



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

February 14, 2020

Andrew Trueblood
Director
Office of Planning
1100 4th Street, SW, Suite 650 East
Washington, DC 20024

Re: Draft Amendments to the Comprehensive Plan

Dear Director Trueblood:

We write to provide our comments¹ on the draft amendments to the Comprehensive Plan.

The attached comments are the product of several months of review undertaken by ANC 6C and its standing committees on planning, transportation/public space, and the environment. Without the diligent efforts of the citizen volunteers on those committees, as well as the extensive and insightful comments received from the public, it would not have been possible to assemble these detailed, coordinated recommendations.

As you will see, certain themes permeate ANC 6C's recommendations. We place special emphasis on 1) the need for substantial reforms to address transportation safety and to encourage and protect non-motor-vehicle modes (such as walking and cycling) and 2) the need to better incorporate the needs and interests of older adults into planning across a diverse array of Elements.

We hope our comments prove useful to you and your staff, and are happy to answer any questions or provide additional information as needed.

Thank you for giving great weight to the views of ANC 6C.

Sincerely,

Karen Wirt
Chair, ANC 6C

¹ On February 12, 2020, at a duly noticed and regularly scheduled monthly meeting, with a quorum of six out of six commissioners and the public present, this matter came before ANC 6C. The commissioners voted 6-0 to adopt the comments set out in this letter and its attachments.

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update

Introduction

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pp. 1-2 100.5	<p>As we think about our future, other issues arise. How will people get around the city in 20 years? Where will our children go to school? Will police and fire services be adequate? Will our rivers be clean? Will our air be healthy? How will we resolve the affordable housing crisis and ensure that housing choices are available for all residents? <u>How do we address housing affordability and ensure that current and longtime residents have a place in the future of the city?</u> How can we ensure that District residents have access to the thousands of new jobs we are expecting? <u>How can we ensure the District continues to produce jobs and that District residents have the supports they need to take these jobs and find pathways to success? How will the best parts of</u> will the <u>character of our neighborhoods be conserved</u> <u>preserved</u> and <u>the challenging parts</u> improved? How will federal and local interests be balanced?</p>	<p>As we think about our future, other issues arise. How will people get around the city in 20 years? Where will our children go to school? <u>How will the needs of our growing aging population be met as they move from being active older adults to frail elders?</u> Will police and fire services be adequate? Will our rivers be clean? Will our air be healthy? How will we resolve the affordable housing crisis and ensure that housing choices are available for all residents? <u>How do we address housing affordability and ensure that current and longtime residents have a place in the future of the city?</u> How can we ensure that District residents have access to the thousands of new jobs we are expecting? <u>How can we ensure the District continues to produce jobs and that District residents have the supports they need to take these jobs and find pathways to success? How will the best parts of</u> will the <u>character of our neighborhoods be conserved</u> <u>preserved</u> and <u>the challenging parts</u> improved? How will federal and local interests be balanced?</p>
Pg. 7 103.4	[diagram]	<p>Under “Related Studies and Plans,” add the Council-mandated 10-year Senior Strategic Plan. <i>See</i> L22-0267. Note: Department of Aging and Community Living is the lead agency in developing this city-wide plan.</p>

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update

Land Use Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 35 309.6	<ul style="list-style-type: none"> Housing choices, including homes for renters and for owners, and a range of units that meet the different needs of the community; Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature; Quality public services, including police and fire protection, high-quality, safe and modernized schools, health services, and libraries and recreation centers that can be conveniently accessed (though not necessarily located within the neighborhood itself); 	<ul style="list-style-type: none"> Housing choices, including homes for renters and for owners, and a range of units that meet the different needs of the community including older adults; Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature; Quality public services, including police and fire protection, high-quality, safe and modernized schools, services for older adults, health services, and libraries and recreation centers that can be conveniently accessed (though not necessarily located within the neighborhood itself);
Pg. 43 311.3	<p><i>Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas</i></p> <p>Maintain zoning regulations and development review procedures that prevent the encroachment of inappropriate commercial uses in residential areas; and (b) limit the scale and extent of non-residential uses that are generally compatible with residential uses, but present the potential for conflicts when they are excessively concentrated or out of scale with the neighborhood.</p>	<p>Strengthen the Plan's existing language to emphasize the seriousness of the problem of illegal commercial uses in residential areas and to underscore the need for more vigorous enforcement than exists at present.</p>
Pg. 44 311.10	<p><i>Policy LU-2.3.8: Non-Conforming Commercial and Industrial Uses</i></p> <p>Limit Reduce the number of nonconforming uses in residential areas, particularly those uses that generate noise, truck traffic, odors, air and water pollution, and other adverse effects.</p>	<p>Strengthen the Plan's existing language to emphasize the seriousness of the problem of illegal commercial uses in residential areas and to underscore the need for more vigorous enforcement than exists at present.</p>

	Consistent with the zoning regulations, limit the expansion of such uses and fully enforce regulations regarding their operation to avoid harmful impacts on their surroundings.	
--	--	--

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Urban Design Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 12 <u>New</u> paragraph	<p><i>Policy UD-1.1.6: Public Space Landscape</i></p> <p><u>Continue and enhance the use of “public parking” regulations (See Figure 9.4) to promote a verdant park-like character to DC’s streets with landscaped yards, generous tree canopy, and pedestrian-scaled retaining walls and fences. Maintain building restriction lines, limit below grade building projections that detract from green space, and protect the existing grades along a block or corridor in public space and building restriction areas.</u></p>	ANC 6C strongly supports this addition.
Pp. 13-14 <u>New</u> paragraph	<p><i>Policy UD-1.1.8: Reducing Railroad and Highway Barriers</i></p> <p>Upgrade or rebuild railroad and highway overpasses and underpasses to maintain or restore the continuity of the historic street network and ensure the comfort and safety of pedestrians and bicyclists. In appropriate settings, such as Central Washington, explore longer-term solutions to addressing railroad and highway barriers such as air rights development over tracks, sunken freeways, or conversion into multiway boulevards.</p>	ANC 6C strongly supports this addition.
Pp. 37-38 <u>New</u> paragraph	<p><i><u>Policy UD-2.1.2: Neighborhood Streetscapes</u></i></p> <p><u>Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low-scale buildings, while sidewalks with more trees and vegetation My [sic] be appropriate for large-scale development.</u></p>	<p><i><u>Policy UD-2.1.2: Neighborhood Streetscapes</u></i></p> <p><u>Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low-scale buildings, while sidewalks with more trees and vegetation My [sic] be appropriate for large-scale development. Pedestrian-</u></p>

Deletions = Strikethrough. Additions = black font, bold and underline.

		<p><u>oriented lighting should be designed to enhance walking thoroughfares to public transportation hubs as well as visually reflect the character of neighborhoods.</u></p>
<p>Pg. 39</p> <p><u>New</u> paragraphs after 909.15</p>	<p><u>Action UD-2.1.B: Standards for Street Furniture</u></p> <p><u>Produce standards for street furniture in public space, such as benches, trash cans, and bike racks, that designate spacing, layout, and other characteristics that promote socialization and interaction, as well as public health and wellbeing.</u></p> <p>[...]</p> <p><u>Action UD- 2.1.D: Public Restrooms in Streetscapes</u></p> <p><u>When designing and upgrading streets and sidewalks in commercial areas, investigate opportunities to install attractive, clean, safe standalone public restrooms that are accessible at all hours.</u></p>	<p>ANC 6C strongly supports these insertions.</p>
<p>Pp. 48-49</p>	<p><u>UD-2.3 Play Everywhere</u> <i>The Design Of New Neighborhoods</i></p> <p>The potential redevelopment of a dozen or so “large sites” around the city provides particularly important urban design opportunities (see the Land Use Element for a map of large sites). The large sites provide some of the city’s best opportunities for distinctive architecture as well as the application of green design and low impact development principles. While these sites are largely discussed for their housing and economic development potential, their reuse can achieve parallel urban design objectives. They can and should improve neighborhood connectivity, create new open space, and define a stronger identity for adjacent areas. Large sites represent an unparalleled opportunity to knit the city together, address historic inequities, and position the District at the forefront of comprehensive planning; in short, they represent a</p>	<p>ANC 6C strongly supports this revision.</p>

~~major component of our inclusive city.~~ **Play is a universal experience that brings different people together, helps children learn, and promotes better physical and mental health for all residents. When play is thoughtfully designed into our public realm, it creates enriching, whimsical, and memorable public spaces and facilitates interactions and community-building among residents of diverse backgrounds and ages. Before the advent of the automobile, play largely happened on the neighborhood street, in the public square, and in the formal federal and ceremonial public spaces of our city like the National Mall. Over time, play slowly receded to private yards and public playgrounds. Today, play largely happens in safety-engineered playgrounds or the unique urban park with a splash fountain or playable sculpture.**

Encouraging play in our public spaces requires policies and actions that can address multiple challenges, both physical and regulatory. Structural barriers such as the infrequent placement of public playgrounds make it harder for XXX% of Washington, DC households, and XX% of low-income households to access playgrounds within a ¼ mile of their home. Poor access is reinforced by social behaviors where many kids go to playgrounds only if accompanied by adults. The District has been addressing the structural challenges through the renovation and creation of over 40 playgrounds in the last 10 years and creation of new signature park spaces like Canal Park with interactive playable elements. The District will work further toward building a playable city that brings play even closer to residents through a variety of local and small-scale play spaces that are built into the fabric of our neighborhoods, streets and schools.

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Housing Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 1 500.2	<p>The critical housing issues facing the District of Columbia are addressed in this Element. These include:</p> <ul style="list-style-type: none"> • Ensuring housing affordability <u>across all incomes</u> • <u>Furthering fair housing opportunities especially in high cost areas</u> • Fostering housing production <u>to improve affordability</u> • <u>Preserving existing affordable housing</u> • <u>Promoting more housing proximate to transit and linking new housing to transit</u> • <u>Restoration or demolition of vacant blighted properties</u> • Conserving existing housing stock • <u>Maintaining healthy homes for residents</u> • Promoting home ownership • <u>Ending Homelessness</u> • Providing housing for residents with special needs <u>integrated with supportive services.</u> 	<p>The critical housing issues facing the District of Columbia are addressed in this Element. These include:</p> <ul style="list-style-type: none"> • Ensuring housing affordability <u>across all incomes</u> • <u>Furthering fair housing opportunities especially in high cost areas</u> • Fostering housing production <u>to improve affordability</u> • <u>Preserving existing affordable housing</u> • <u>Promoting more housing proximate to transit and linking new housing to transit</u> • <u>Restoration or demolition of vacant blighted properties</u> • Conserving existing housing stock • <u>Maintaining healthy homes for residents</u> • <u>Promoting appropriate housing alternatives that include social and health services for older adults and other vulnerable populations</u> • Promoting home ownership • <u>Ending Homelessness</u> • Providing housing for residents with special needs <u>integrated with supportive services.</u>
Pg. 21 503.8	<p><i>Policy H-1.1.7: New Neighborhoods <u>Large Sites</u></i></p> <p>Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition <u>to giving priority to market rate and affordable</u> housing, these neighborhoods must <u>should</u> include <u>or have access to</u> well-planned retail, public schools, attractive parks, open space and recreation, <u>enable resilient, innovative neighborhood level</u></p>	<p><i>Policy H-1.1.7: New Neighborhoods <u>Large Sites</u></i></p> <p>Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition <u>to giving priority to market rate and affordable</u> housing, these neighborhoods must <u>should</u> include <u>or have access to</u> well-planned retail, public schools, <u>senior services,</u> attractive parks, open space and recreation, <u>enable resilient, innovative</u></p>

Deletions = Strikethrough. Additions = black font, bold and underline.

	<u>energy systems</u> , as well as needed supportive services. The new neighborhoods should include a variety of housing types, serving a <u>diverse population and a</u> variety of income levels.	<u>neighborhood level energy systems</u> , as well as needed supportive services. The new neighborhoods should include a variety of housing types, serving a <u>diverse population and a</u> variety of income levels.
Pg. 27 504.11	<i>Policy H-1.2.4: Housing Affordability on Publicly Owned Sites</i> Require that a substantial percentage <u>20 to 30 percent</u> of the housing units built on publicly owned sites, including <u>disposed of for housing, or co-located with local public facilities, and</u> sites being transferred from federal to District jurisdiction, are reserved for <u>a range of household incomes including extremely-low and low-income for rental units,</u> and <u>very low and moderate low-income households for ownership units.</u> <u>Prioritize the provision of affordable housing in areas of high housing costs. Take into consideration the need for accessibility for people with disabilities.</u>	The term “disposed of” is unduly vague, and might be read to cover only scenarios in which a property is sold outright. ANC 6C believes this condition should attach to all projects on such publicly owned sites, including ground leases or other scenarios not involving sale of a 100% interest.
Pg. 35-36 New paragraph after 505.4	<u>Given the shortage of available land in areas with some of the highest housing costs promoting Accessory Apartments, also known as accessory dwelling units, is one way to provide housing options for persons at all income levels and support the transition from older to younger households. Large homes may easily accommodate what is commonly called an “in-law suite” on the top floor or lower level, or above a garage, in place of a garage, or in a separate unit out back. An Accessory Apartment can accommodate a low or moderate-income family, a student, or a senior unable to continue to fulfill the full burdens of homeownership. The added rental income can help a younger household qualify to purchase the home.</u>	ANC 6C supports this addition, but notes that the current zoning regulations for the RF-1 rowhouse zone prohibit accessory dwelling units.
Pg. 36	An important part of growing “ inclusively ” <u>inclusively</u> is to <u>develop and</u> maintain, <u>across neighborhoods and throughout the city,</u> a <u>diverse</u> housing stock <u>of all sizes and</u>	An important part of growing “ inclusively ” <u>inclusively</u> is to <u>develop and</u> maintain, <u>across neighborhoods and throughout the city,</u> a <u>diverse</u> housing stock <u>of all sizes and</u>

505.5	<p>types that can fit the needs of the all variety of these households including growing families as well as singles, couples, and aging residents as they transition from independence to skilled nursing care. At its most extreme, market pressures may result in displacement as affordable large rental units are converted to “luxury” upscale condos or upscale apartments. More often, these pressures simply mean that families are having a harder time finding suitable housing in the city. The vacancy rate provides a good barometer of this dilemma. In 2004 2017, the vacancy rate was 8.8 13 percent for studios and one bedroom units, but it was just 4.4 8 percent for units that were two three bedrooms or larger.</p>	<p>types that can fit the needs of the all variety of these households including growing families as well as singles, couples, and aging residents who hope to stay in their homes or choose to as they transition from independence to alternative housing skilled nursing care. At its most extreme, market pressures may result in displacement as affordable large rental units are converted to “luxury” upscale condos or upscale apartments. More often, these pressures simply mean that families are having a harder time finding suitable housing in the city. The vacancy rate provides a good barometer of this dilemma. In 2004 2017, the vacancy rate was 8.8 13 percent for studios and one bedroom units, but it was just 4.4 8 percent for units that were two three bedrooms or larger.</p>
Pg. 36 505.8	<p><i>Policy H-1.3.3: Assisted Living and Skilled Nursing</i></p> <p>Promote the development of neighborhood based assisted living and skilled nursing facilities. Zoning and health regulations should be designed to promote an increase in supply, security, and affordability of housing for the elderly older adults.</p>	<p><i>Policy H-1.3.3: Assisted Living, Adult Day Services, and Skilled Nursing</i></p> <p>Promote the development of neighborhood based assisted living, adult day services with dementia care, and skilled nursing facilities. Zoning and health regulations should be designed to promote an increase in supply, security, and affordability of housing for the elderly older adults.</p>
Pg. 58 510.7	<p><i>Action H-2.2.A: Housing Code Enforcement</i></p> <p>Improve the enforcement of housing codes to prevent deteriorated, unsafe, and unhealthy housing conditions, especially in areas of the city with persistent code enforcement problems. Ensure that information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multifamily buildings, and vote in conversion elections, is provided to tenants.</p>	<p>ANC 6C urges OP to strengthen this language instead of leaving it untouched. DCRA’s failure to perform adequate enforcement of the housing codes is well documented, and substantial (and immediate) improvement in this area is essential for the health and safety of thousands of District residents.</p>
Pg. 74 After relocated	<p>Seniors Older Adults[...]</p>	<p>Please check the forecasted demographics. In studying the obvious error in the number of 85+ year olds projected for 2030, we found the 2030 projection of 60+ year olds is</p>

516.1		different than that given in Chapter 11(1108), Community Services and Facilities (CSF) Element. (The number used by OP here in “after 516.1” appears to be a 2025 projection.) We suggest OP correct the number to be the 2030 projection used in the CSF element, Chapter 11, 141,000. As we do not know OP’s methodology for projecting the number of residents over 85, we suggest a reasonable forecast might be to use the projected number of residents over 85 at the same percentage level experienced in 2017.
Pp. 76-77 Former 516.8	<p><i>Policy H-4.2.2 <u>4.3.2: Housing Choice for Seniors Older Adults</u></i></p> <p>Provide a wide variety of affordable housing choices for the District’s seniors <u>older adults that enable them to age in their neighborhoods either by supporting their ability to remain in their home, or by providing new opportunities within multi-unit buildings that include universal design and intergenerational options.</u>, taking <u>Take into account the income range and health-care needs of this population. Recognize the coming growth in the senior population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority. Acknowledge and support the establishment of Senior Villages throughout the city that allow seniors to remain in their homes and age in-place.</u></p>	<p>Provide a wide variety of affordable housing choices for the District’s seniors <u>older adults that enable them to age in their neighborhoods either by supporting their ability to remain in their home, or by providing new opportunities for one-level living within multi-unit buildings that include universal design elements and intergenerational options.</u>taking <u>Take into account the income range and health-care needs of this population. Recognize the coming forecasted growth in the senior population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority. Acknowledge and support the establishment of Senior Villages throughout the city that allow seniors to remain in their homes and communities age in-place. (A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible.)</u></p>

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Economic Development Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 15 Table 7.2	[table]	<p>ANC 6C is very concerned about the projected shortfall of Home Healthcare Aides (HHA), the workforce that will care for the frail elderly, especially those seeking to age in place. In general, other than a suggested revision in the data presented in Table 7.2, we endorse the several updates to the Comprehensive Plan that would be of particular benefit to this workforce.</p> <p>We recommend revising Table 7.2. To identify programs to develop the needed workforces, use occupation data vs. industry data. For example, comparing the entries “Ambulatory healthcare services” (which in the NAICS classification includes homecare services as well as medical offices, clinics, etc.) to one of its subsets, “Home Healthcare Aide” is misleading. All of the by-specific occupation projections made available to us place Home healthcare workers in the top three (and usually first) of projected needs occupations over the next decade.</p>
Pg. 72 Before 717		<p>Proposed new action:</p> <p><u>Action ED-4.1.H Interjurisdictional Professional Licensing Agreement for Home Healthcare Aides</u></p> <p><u>Department of Health licensing board for Home Healthcare Aides should pursue interjurisdictional agreements that would enable such workers licensed in other jurisdictions to reasonably obtain licensure to work in the District.</u></p>

<p>Pg. 82</p> <p><u>New</u> paragraph after 718.3</p>	<p><u>Transit-accessible housing matching the needs of the workforce is imperative. As Washington, DC continues growing, its housing market is becoming more complex, characterized by increased segmentation of the market rate and affordable housing stock. As a consequence, this increased complexity necessitates closer alignment between economic development planning, housing planning and transportation planning to ensure that growth is equitable and sustainable.</u></p>	<p><u>Transit-accessible housing matching the needs of the workforce is imperative. As Washington, DC continues growing, its housing market is becoming more complex, characterized by increased segmentation of the market rate and affordable housing stock. As a consequence, this increased complexity necessitates closer alignment between economic development planning, housing planning and transportation planning to ensure that growth is equitable and sustainable.</u></p> <p><u>Planners should also recognize that housing needs to be transit-accessible for workers coming to the location, as well as for the residents living there. For example, many homecare workers face transportation and parking challenges in accessing client homes. Older adults confront similar challenges in accessing health services. The creative design of large site developments, that are attentive to access issues for both workers and residents, and that include a mix of housing types and services, will help promote workforce development and quality of life.</u></p>
<p>Pg. 83</p> <p>At end of Element</p>		<p>Proposed new action:</p> <p><u>Action ED-4.3.E: Assess Homecare Worker Commuting Patterns</u></p> <p><u>Determine the number of homecare workers who travel to their work site via public transportation and by private vehicle. In addition, determine their average commute time.</u></p>

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Transportation Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 7 403.7	<p><i>Policy T-1.1.1: Transportation Impact Assessment</i></p> <p>Require full environmental impact statements analysis for major transportation projects, including new roadways, bridges, transit systems, road design changes, and rerouting of traffic from roads classified as principal arterials or higher onto minor arterials or neighborhood streets with lesser volumes.</p>	ANC 6C opposes this amendment, which seriously weakens this provision.
Pg. 8 New paragraph before 403.13	<p><i>Policy T-1.1.8 Minimize Private Parking</i></p> <p><u>An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive vehicle parking on private property should be generally discouraged.</u></p>	<p>Strengthen language to</p> <p><i>Policy T-1.1.8 Minimize Private Parking</i></p> <p><u>An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive vehicle parking on private property should be generally discouraged.</u></p>
Pg 11 New paragraph between 404.8 and 404.9	<p><i>Policy T-1.2.4: Providing Roadway Space for All Modes</i></p> <p><u>Roadway space should be equitably provided for all modes. The use of lanes should be determined by the potential person-carrying capacity of the lane; modes with the ability to move the most people should be prioritized. These changes should be informed by the modal priorities identified in moveDC.</u></p>	<p>Paragraph needs to be more explicit to discourage private automobiles. Preceding paragraph is a policy item for “discouraging auto-oriented uses.” This new paragraph is in conflict with other paragraphs. Suggest the following edits:</p> <p><i>Policy T-1.2.4: Providing Roadway Space for <u>All Modes Transit and Non-Auto Travel</u></i></p> <p><u>Roadway space should be equitably provided prioritized for all modes transit and non-auto travel. The use of lanes should be determined by the potential person-carrying capacity of the lane; modes with the ability to move the most people should be prioritized. These changes should be</u></p>

		<u>informed by the modal priorities identified in moveDC.</u>
Pg. 25 408.2	[discussion of Union Station and the types and volume of transportation services provided]	This provision and new Policy T-2.2.4 (Union Station Expansion, p. 26) allude to the anticipated increases in ridership and passenger activity, but there is no corresponding recommendation of specific measures (or even studies concerning) mitigation of the likely adverse impacts on nearby residential areas.
Pg 27 New paragraph before 408.10	<u>Policy T-2.2.7: Transportation Network Companies (TNCs)</u> <u>Monitor the impacts of TNCs on the District's transportation network and encourage companies to reach underserved areas of the city and incentivize shared rides. TNCs should complement existing mobility services including public transit, bikeshare, and car sharing services.</u>	Need to include action which states how TNC impacts will be monitored. For example, will the District pursue data-sharing agreements with TNCs to understand their impact on congestion, serving underutilized areas, and percentage of shared rides utilized by riders? Language should be more specific about what impacts are being monitored (e.g. impacts on congestion, safety, equitable distribution of transportation options, effects on public transportation utilization).
Pg 27 408.12	<i>Action T-2.2.C: Bicycle and Car-Pool Parking</i> Increase investment in bicycle parking and provide more visible parking for carsharing operations at Metrorail stations, key transit stops, and future streetcar stations.	Need to expand to scooters (docked and dockless), mopeds, and other types of motored and non-motored means of transportation: <i>Action T-2.2.C: Bicycle, <u>Micromobility</u>, and Car-Pool Parking</i> Increase investment in bicycle <u>and micromobility</u> parking <u>(including corrals)</u> and provide more visible parking for carsharing operations at Metrorail stations, key transit stops, and future streetcar stations.
Pp 28, 32, 34, 56 Existing intro paragraphs for	T-2.3. Bicycle Access, Facilities, and Safety T-2.4. Pedestrian Access, Facilities, and Safety	The introduction paragraphs for bicycle, pedestrian, and automobiles should be consistent in writing. The bicycle section includes crash data (paragraph 409.5, pg. 28); however, the pedestrian and automobile sections do not. In 2019, pedestrian fatalities made up 46% of all fatalities, and 47%

<p>each mode (409, 410, 411 & 418)</p>	<p>T-2.5 Roadway System and Auto Movement T-3.5 Tour Bus Motorcoach Operations</p>	<p>were people in cars or motorcycles. OP should revise the introduction paragraphs for T-2.4 and T-2.5 to include crash/fatality information to further emphasize the importance of safety. In addition, the “Roadway System and Auto Movement” introduction also misses the mark. Paragraph 411.7 on page 37 is all about volumes and does not mention the importance of safety and eliminating all fatalities and injuries. Safety should be prioritized over traffic volumes. The “Motorcoach Operations” section starting on page 56 also does not include safety data. In 2018, a tour bus operator was using his phone when he struck and killed two women crossing Pennsylvania Ave NW; and a driver of an intercity bus struck and killed a young man on H Street NE.</p>
<p>Pg 31 409.12</p>	<p><i>Action T-2.3B: Bicycle Master Plan moveDC Bicycle Element</i> Implement the recommendations of the Bicycle Master Plan Bicycle Element of moveDC to: [...]</p>	<p>Ensure consistency with the action item under Action T-2.4.E Pedestrian Master Plan (paragraph 410.13, pg. 34) to mention implementation of the recommendations from the Vision Zero Action Plan: <i>Action T-2.3B: Bicycle Master Plan moveDC Bicycle Element</i> Implement the recommendations of the Bicycle Master Plan Vision Zero DC Action Plan and the Bicycle Element of moveDC to: [...]</p>
<p>Pg. 33 410.6</p>	<p><i>Policy T-2.4.2: Pedestrian Safety</i> Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, <u>HAWK pedestrian signals, Rectangular Rapid Flashing Beacons, accessible pedestrian signal hardware, leading pedestrian interval timing,</u> and pedestrian count-down signals.</p>	<p>ANC 6C supports this and other policies that address pedestrian safety. We recommend including a reference to automated enforcement: <i>Policy T-2.4.2: Pedestrian Safety</i> Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, <u>HAWK pedestrian signals, Rectangular Rapid Flashing Beacons, accessible pedestrian signal hardware,</u></p>

		leading pedestrian interval timing, automated enforcement, and pedestrian count-down signals.
Pg 33 410.8 and 410.9	<p><i>Policy T-2.4.4: Sidewalk Obstructions</i></p> <p>Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage. Maintain sidewalk surfaces and elevations so that disabled or elderly older adult pedestrians can safely use them.</p> <p><i>Action T-2.4.A: Pedestrian Signal Timings</i></p> <p>Review timing on pedestrian signals to ensure that adequate time is provided for crossing, in particular for locations with a large elderly older adult population.</p>	<p>“Older adult” is not inclusive. OP should review and revise all instances of “older adult” to “mobility impaired” or “mobility restricted” where appropriate.</p> <p>In addition, Action T-2.4.A should be revised to establish a clear priority of reducing excessively long pedestrian wait times:</p> <p><i>Policy T-2.4.4: Sidewalk Obstructions</i></p> <p>Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage. Maintain sidewalk surfaces and elevations so that disabled or elderly older adult mobility-impaired pedestrians can safely use them.</p> <p><i>Action T-2.4.A: Pedestrian Signal Timings</i></p> <p>Review timing on pedestrian signals to ensure that adequate time is provided for crossing, in particular for locations with a large elderly older adult mobility-impaired population.</p> <p><u>Prioritize reduction of wait times at pedestrian crossings to 30 seconds or less.</u></p>
Pg. 34 Before 411		<p>ANC 6C proposes a new paragraph:</p> <p><u>Action T-2.4 G Pedestrian oriented street lighting</u></p> <p><u>Develop a program in coordination with the Metropolitan Police to prioritize improving pedestrian-oriented lighting of sidewalks.</u></p>
Pg. 40	<i>Action T-2.5.A: Maintenance Funds</i>	<i>Action T-2.5.A: Maintenance Funds</i>

411.15	Provide sufficient funding sources to maintain, and repair the District’s system of streets and alleys, including its street lights and traffic control systems, bridges, street trees, and other streetscape improvements.	Provide sufficient funding sources to maintain, and repair the District’s system of sidewalks , streets and alleys, including its street lights and traffic control systems, bridges, street trees, and other streetscape improvements.
Pg 40 411.16	<i>Action T-2.5.B: Signal Timing Adjustments</i> Regularly evaluate the need for adjustments to traffic signal timing to minimize unnecessary automobile idling.	This Action misses the mark and does not prioritize safety. For example, right turns on red are allowed because doing so minimizes automobile idling; however, it also increases the potential for crashes. We need to shift to prioritize safety. “Regularly evaluate the need for adjustments to traffic signal timing to minimize unnecessary automobile idling prioritize safety for pedestrian, cyclists, and other vulnerable road users, and reduce pedestrian wait times exceeding 30 seconds. In cases where idling-reduction or motor-vehicle level-of-service goals would conflict with reduction of pedestrian wait times, strike the balance in favor of pedestrians. ”
Pp 48-49 415.8	<i>Action T-3.2.D: Unbundle Parking Cost</i> Find ways to “unbundle” the cost of parking. From For residential units, this means allowing those purchasing or renting property to opt out of buying or renting parking spaces. “Unbundling” should be required for District-owned or subsidized development, and encouraged for other developments. Employers should provide a “parking cash-out” option, allowing employees who are offered subsidized parking the choice of taking the cash equivalent if they use other travel modes. and the amount of parking in such development should not exceed that required by Zoning. Further measures to reduce housing costs associated with off-street parking requirements, including waived or reduced parking requirements in the vicinity of Metrorail stations and along major transit corridors, should be pursued during the revision of the Zoning Regulations. These efforts should be	Paragraph needs to be revised to indicate the true cost of street parking for private automobiles. Further edits from ANC 6C: <i>Action T-3.2.D: Unbundle Parking Cost</i> Find ways to “unbundle” the cost of parking. For residential units, this means allowing those purchasing or renting property to opt out of buying or renting parking spaces and increasing the cost of Residential Parking Permits to reflect the true cost of street parking. “Unbundling” should be required for District-owned or subsidized development, and encouraged for other all developments. [...]

	<p>coupled with programs to better manage residential street parking in neighborhoods of high parking demand, including adjustments to the costs of residential parking permits.</p>	
<p>Pg 52 <u>New</u> text for 416.6</p>	<p><u>Continued support for the freight rail projects within the State Rail Plan needed. The Virginian Avenue Tunnel is a major endeavor for the freight rail network. The project is now in the process of being expanded to include two tracks: this will increase the clearance allowing for double struck intermodal trains that can accommodate high-capacity containers. Construction began in 2015 and is expected to be completed in 2018. Additional opportunities presented by the presence of freight rail in the District could be explored, including the potential for an intermodal or trans load facility.</u></p>	<p>Update fourth sentence with project status. The existing update is already outdated.</p> <p><u>Continued support for the freight rail projects within the State Rail Plan needed. The Virginian Avenue Tunnel is a major endeavor for the freight rail network. The project is now in the process of being expanded to include two tracks: this will increase the clearance allowing for double struck intermodal trains that can accommodate high-capacity containers. Construction began in 2015 and is expected to be completed in 2018[insert completion date]. Additional opportunities presented by the presence of freight rail in the District could be explored, including the potential for an intermodal or trans load facility.</u></p>
<p>Pg 55 <u>New</u> paragraph after 416.13</p>	<p><u>Action T.3.F: Improve Truck Safety</u> <u>Implement a truck safety campaign aimed at pedestrian and cyclists, that focuses on the need to share the road, and identifies potential truck conflict locations with bike lanes, transit stops and streetcars.</u></p>	<p>The campaign should be aimed at truck operators to drive more safely and to understand how to navigate a city with people who walk, roll, bike, or scoot. People die when an operator of a truck strikes a person. A truck operator does not die when a person pushes a stroller strikes a truck, for example.</p> <p><u>Action T.3.F: Improve Truck Safety</u> <u>Implement a truck safety campaign aimed at pedestrian and cyclists, truck operators that focuses on the need to share the road, and identifies potential truck conflict locations with bike lanes, transit stops and streetcars.</u></p> <p>In addition, add language about publicizing and enforcing</p>

		truck routes.
Pg 55 <u>New</u> paragraph after 416.13	<u>Action T.3.G: Address Personal Goods Delivery Devices</u> <u>Develop policies to address small goods delivery by autonomous devices on sidewalks. This will help ensure the continued safety of pedestrians on sidewalks as these services are deployed.</u>	This Action should prioritize pedestrians over delivery robots. <u>Action T.3.G: Address Personal Goods Delivery Devices</u> <u>Develop policies to address small goods delivery by autonomous devices on sidewalks and to prioritize space for pedestrians. This will help ensure the continued safety of pedestrians on sidewalks as these services are deployed.</u>
Pg 58 <u>New</u> paragraph before 418.3	<u>Policy T-3.5.2 Commuter Bus Facilities</u> <u>Develop a commuter bus off-street parking facility plan that identifies solutions to the challenge of limited curbside space and eliminates parking in residential neighborhoods.</u>	Due to limited available drop off space at curbside, and tight schedules, commuter buses often create unsafe conflicts with bicyclists by either stopping in the bicycle lane or stopping adjacent to the bicycle lane and unloading passengers into the bicycle lane. We recommend revising this Policy item as follows: <u>Policy T-3.5.2 Commuter Bus Facilities</u> <u>Develop a commuter bus off-street parking facility plan that identifies solutions that avoid conflicts with other modes and prioritizes the safety for people who bike and walk; addresses the challenge of limited curbside space and eliminates parking in residential neighborhoods; and enforces and implements fines where commuter buses violate traffic laws.</u> Include parallel language in Tour Bus section as well. We suggest adding similar sections to address other types of for-hire vehicles, such as limousines, to deal with idling and double parking.
Pg 58 <u>New</u> paragraph	<u>Action T-3.5E: Consolidate Intercity Buses at Union Station</u> <u>Coordinate with the Federal Transit Administration</u>	Delete this new paragraph. Whether or not to include intercity buses at Union Station needs further study including impacts

before 419	<u>(FTA), Federal Railway Administration (FRA), Amtrak and the Union Station Redevelopment Corporation to ensure that plans for redevelopment of Union Station include Intercity Buses in the transportation hub expansion plan.</u>	on safety and the environment. Additionally, intercity buses travel through ANC 6C at unsafe speeds. One was involved with the death of a bicyclist at 3rd and H Streets NE, and several companies were recently sued by Attorney General Racine for air pollution violations at Union Station.
Pg. 61 <u>New</u> paragraph before 420.12	<u>Policy T-4.1.4: Accommodating Evacuation Needs</u> <u>Ensure that residents with access and functional needs, including older adults and people with disabilities, are considered in emergency evacuation planning.</u>	ANC 6C supports this insertion.
Pp. 63 & 67 <u>New</u> paragraphs	<i>T-4.4 Climate Resiliency</i> <i>T-5.2 Electric Vehicles</i>	New sections on climate resiliency mention preparing for climate change impacts but do not acknowledge that our transportation choices are a major contributor to climate change and ignore the need to end reliance on single-occupancy vehicles. OP should revise these sections to explicitly note the connection between our transportation choices and climate change. Include same revision in T-5.2 Electric Vehicles on page 67.
Pg 67 <u>New</u> text	<i>T-5.2 Electric Vehicles</i>	The Electric Vehicle section should include much of the language included in T-5.1 Autonomous Vehicles, such as the following: <u>The degree to which electric vehicles are personally owned or are operated as fleet vehicles will have major ramifications for the transportation system. Sharing electric vehicles for trips has the potential to increase the efficiency of the transportation network, while a system that allows increases in vehicle trips that serve only one—</u>

		<p><u>or zero—passengers could greatly exacerbate congestion.</u></p> <p><u>As the proliferation of electric vehicles increases, it will be critical that the District does not simply substitute gasoline vehicles with electric vehicles, and not take advantage of the opportunity to increase car-sharing, ride-sharing, or decrease vehicle ownership altogether.</u></p> <p><u>Implementation of these additional Electric Vehicle policies should not result in negative externalities that would be felt by District residents, such as; increased congestion, additional vehicle miles travelled, increased local or external carbon emissions.</u></p>
--	--	--

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Educational Facilities Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 38 New paragraph before 1214	<p><u><i>Policy EDU-3.2.6: University Offerings for Older Persons</i></u></p> <p><u>Encourage universities to expand low-cost access to course and other university offerings to older persons who reside in Washington, DC beyond zip codes that directly surround the university.</u></p>	<p><u><i>Policy EDU-3.2.6: University Offerings for Older Persons</i></u></p> <p><u>Encourage universities to expand free and low-cost access to course and other university offerings to older persons who reside in Washington, DC beyond zip codes that directly surround the university.</u></p>
Pg. 38		<p>Proposed new action:</p> <p><u>Action: EDU-3.2A: Addressing Home Healthcare Aide Workforce Development needs</u></p> <p><u>Current Home Healthcare Aide (HHA) training opportunities for HHA certification are limited and often expensive in District. There is significant growth potential in the public school/community college sector for certification programs that train HHAs and facilitate bridging Certified Nursing Assistance (CNA) and HHA certifications. The HHA workforce draws significantly from immigrant populations with corresponding need for cultural competency and language training.</u></p> <p><u>Using workforce projections, forecast the size of new or additional public school or community college training programs for Home Healthcare Aides.</u></p>

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Community Services and Facilities Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 10 <u>New</u> paragraph after 1103.14	<p><u><i>Policy CSF-1.1.10: Agency Coordination for Co-Location Strategies</i></u></p> <p><u>Ensure that the Civic Facilities Plan includes inter-agency coordination for co-location of public uses early in planning and project initiation processes to ensure that critical input is captured and incorporated. Joint planning of District-operated facilities with other community facilities such as schools, health clinics, community kitchens, healthy food growing or retail spaces, and non-profit service centers should also be supported through ongoing communication and collaboration among relevant District agencies and outside agencies and partners.</u></p>	<p><u><i>Policy CSF-1.1.10: Agency Coordination for Co-Location Strategies</i></u></p> <p><u>Ensure that the Civic Facilities Plan includes inter-agency coordination for co-location of public uses early in planning and project initiation processes to ensure that critical input is captured and incorporated. Joint planning of District-operated facilities with other community facilities such as schools, senior services, health clinics, community kitchens, healthy food growing or retail spaces, and non-profit service centers should also be supported through ongoing communication and collaboration among relevant District agencies and outside agencies and partners.</u></p>
Pg. 11 1103.15	<p>As part of <u>this work</u> the MPFP and for each planning cluster, the appropriate planning agency shall continue to annually collect and publish data on public school capacity and enrollments, recreational facilities, libraries, emergency medical service response time, sewers, green space, public transit capacity including bus routes and ridership statistics for Metrorail stations and lines as well as parking availability, and traffic volumes on roads and at key intersections.</p>	<p>As part of <u>this work</u> the MPFP and for each planning cluster, the appropriate planning agency shall continue to annually collect and publish data on public school capacity and enrollments, senior services, recreational facilities, libraries, emergency medical service response time, sewers, green space, public transit capacity including bus routes and ridership statistics for Metrorail stations and lines as well as parking availability, and traffic volumes on roads and at key intersections.</p>
Pg. 27 <u>New</u> paragraph	<p><u><i>Policy CSF-2.1.1: Enhance Health Systems and Equity</i></u></p> <p><u>Support the Strategic Framework for Improving Community Health, which seeks to improve public health outcomes while promoting equity across a range of social</u></p>	<p><u><i>Policy CSF-2.1.1: Enhance Health Systems and Equity</i></u></p> <p><u>Support the Strategic Framework for Improving Community Health, which seeks to improve public health outcomes while promoting equity across a range of social</u></p>

Deletions = Strikethrough. Additions = black font, bold and underline.

	<u>determinants that include health, race, income and geography.</u>	<u>determinants that include health, race, income, age, and geography.</u>
Pg. 33 New paragraph after 1106.10	<u>In addition to hospitals, the District counts on a broad array of facilities that provide a wide range of healthcare and health services. Many of these facilities provide services that enable Washington, DC residents to age in their communities. As of 2017, the District has twelve Assisted Living Residences (ALRs), which provide long-term care in the form of housing, health and personalized assistance. Some Washington, DC residents who are not eligible to receive Medicaid benefits find it challenging to pay for ALR care. Many of the smaller, private-pay ALR providers closed their doors in recent years due to inability to meet regulatory requirements or attain financial support.</u>	<u>In addition to hospitals, the District counts on a broad array of facilities that provide a wide range of healthcare and health services. Many of these facilities provide services that enable Washington, DC residents to age in their communities. As of 2017, the District has twelve Assisted Living Residences (ALRs), which provide long-term care in the form of housing, health and personalized assistance. Some Washington, DC residents who are not eligible to receive Medicaid benefits find it challenging to pay for ALR care. Out of a total of 731 ALR living units as of summer 2018, there are none in Wards 5, 6, 7 and 8. Of two currently operating ALR facilities providing any subsidies there are less than 100 subsidized units. Two ALR buildings in Wards 7 and 8 are planned for 300 units to open in 2021 and 2022 for those with Medicaid waivers. The eight facilities with full-priced ALR units charge basic fees that range from \$45,000 to \$100,000 per year, fees that are beyond the household budgets of DC residents with incomes between 30% and 100% of Median Family Income (MFI). Many of the smaller, private-pay ALR providers closed their doors in recent years due to inability to meet regulatory requirements or attain financial support.</u>
Pg. 35 Table 11.3	[table]	To provide meaningful data on the amount of service provided by facilities, insert a new column, called “Number of living units/or beds,” after the column “Number in the District”. In the data element for ALRs and the new column, enter 731, the Summer 2019 number of assisted living units in the District. Similar data on the service numbers (or “beds”) available in Hospices should be added to the facilities listed. Also add to the Notes in the last column that no ALRs were located in Wards 5, 6, 7, or 8.

<p>Pg. 36</p>	<p><i>Policy CSF-2.43.3: Coordination to Better Serve Special Needs Residents</i></p> <p>Design and coordinate health and human services to ensure the maximum degree of independence for senior citizens, the disabled, and the physically and mentally handicapped.</p>	<p><i>Policy CSF-2.43.3: Coordination to Better Serve Special Needs Residents</i></p> <p>Design and coordinate health, housing, and human services to ensure the maximum degree of independence for senior citizens, the disabled, and the physically and mentally handicapped. Locate health services within multi-unit senior housing to ensure best and least expensive management of chronic illnesses in these vulnerable groups. These services are particularly important for households with incomes between 30% and 100% of MFI, and the senior citizens are not eligible for Medicaid, who cannot pay the fees for private ALRs.</p>
<p>Pg. 37</p>	<p><i>Policy CSF-2.43.7: Hospices and Long-Term Care Facilities</i></p> <p>Support the development of hospices and other long-term care facilities for persons with advanced HIV/AIDS, cancer, and other disabling illnesses, such as dementias, including alzheimers.</p>	<p><i>Policy CSF-2.43.7: Hospices and Long Term Care Facilities</i></p> <p>Support the development of hospices and other long-term care facilities for persons with advanced HIV/AIDS, cancer, and other disabling illnesses, such as dementias, including alzheimers. in all neighborhoods for those who qualify and are unable to receive hospice services in their homes. A doctor's order stating the patient is in their last 6 months of life is necessary for qualifying for hospice care.</p>
<p>Pg. 37</p> <p><u>New</u> paragraph after 1106.18</p>	<p><u>Policy CSF-2.3.8 Increasing Supply of Facilities That Support Assisted Living</u></p> <p><u>Promote expansion of the supply of facilities that provide assisted living services in Washington, DC. These include Assisted Living Residential facilities (ALRs) and Community Residential Facilities (CRFs), as well as adult daycare facilities.</u></p>	<p>ANC 6C encourages increasing the supply of Assisted Living Residential Facilities but suggest Adult Day Services with dementia care be added to this policy as the needs are great, especially in the eastern half of the city. The new IONA adult day services scheduled to open in Ward 8 in 2020 and the newly approved Medicare and Medicaid-funded PACE (Program of All-encompassing Care of the Elderly) to be located in Ward 7 are a start to meeting the growing demand for adult day programs. The two large affordable ALR projects in development in Wards 7 and 8 are the only ones designed for large numbers of residents with Medicaid waivers.</p>

		<p>--</p> <p><u>Policy CSF-2.3.8 Increasing Supply of Facilities That Support Assisted Living, Adult Day Services and Dementia Care</u></p> <p><u>Promote expansion of the supply of facilities that provide assisted living services in Washington, DC. These include Assisted Living Residential facilities (ALRs) and Community Residential Facilities (CRFs), as well as adult daycare facilities.</u></p>
<p>Pp. 37-38</p> <p><u>New</u> paragraph after 1106.18</p>	<p><u>Policy CSF-2.3.9: Improving Access to Long-Term Supports and Services for Vulnerable Populations</u></p> <p><u>Continue to improve access to Long-Term Supports and Services (LTSS) for vulnerable populations, including people with disabilities and older adults and their families. Enhance the network of government and non-profit organizations that provide LTSS to these individuals and seek to improve their experience.</u></p>	<p><u>Policy CSF-2.3.9: Improving Access to Long-Term Supports and Services for Vulnerable Populations</u></p> <p><u>Continue to improve access to Long-Term Supports and Services (LTSS) for vulnerable populations, including people with disabilities and older adults and their families. Enhance the network of government and non-profit organizations that provide LTSS to these individuals and seek to improve their experience. Encourage the development and expanding roles of aging-in-place senior villages who enlist and train volunteers to provide services to other village members, especially those that are more vulnerable. (A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible.)</u></p>
<p>Pg. 38</p> <p><u>New</u> paragraph after 1106.21</p>	<p><u>Action CSF-2.3.B: Increase in Supply of Assisted Living Residential Facilities (ALRs) and of Community Residential Facilities (CRFs)</u></p> <p><u>Explore a variety of approaches for increasing the number</u></p>	<p>ANC 6C endorses the following Action. The idea of smaller ALR/CRG facilities available in more neighborhoods may provide its residents the ability to more easily retain friendships and ties to family. Neighborhood based adult day services can be a boon to family members who care for their</p>

	<p><u>of CRFs as well as small and mid-size ALR facilities in underrepresented areas and areas of high need in the District. These approaches can include financial strategies and partnerships as well as regulatory reform. Work to increase community awareness of these needs.</u></p>	<p>disabled loved one and must transport them to such a service.</p> <p>--</p> <p><u>Action CSF-2.3.B: Increase in Supply of Assisted Living Residential Facilities (ALRs), and of Community Residential Facilities (CRFs), and Adult Day Care Facilities</u></p> <p><u>Explore a variety of approaches for increasing the number of CRFs as well as small and mid-size ALR facilities in underrepresented areas such as all of Wards 5, 6, 7, and 8 and areas of high need in the District. Promote the construction of affordable ALRs for the elderly and disabled eligible for Medicaid waivers. Promote the construction and launching of ALRs and adult day care that are designed for those older and disabled people with dementias, including Alzheimer's. These approaches can include financial strategies and partnerships as well as regulatory reform. Work to increase community awareness of these needs so that neighborhoods will be ready for the increase in the population of older and disabled people.</u></p>
<p>Pg. 40 1108.1</p>	<p><u>The population of older adults or seniors (persons 60 years of age and older) is expected to continue to grow at a steady rate</u> are expected <u>and</u> to be the fastest growing segment of the District's population during the next <u>15 to 20</u> years. Although the District's Office on Aging <u>Department of Aging and Community Living (DACL)</u> and several affiliated non-profit organizations already provide a comprehensive system of health care, education, employment, and social services for Washington, DC's the District's elderly population, these entities may be hard pressed to keep up with demand as the number of <u>older adults</u> seniors in the city rises. <u>The 2017 older adult population of 118,275 (17 percent of the total population) is forecasted to rise to 132,648 in 2025 and to 141,381 by 2030. As of 2017,</u> Currently, about 45 <u>36</u> percent of the city's <u>older adults</u> seniors <u>65 years and older</u></p>	<p>ANC 6C suggests the use of rounded numbers when presenting projections or forecasted data to avoid misleading precision. We have included the results of our analysis of American Community Survey data which provides insight into the realities of many aging District residents.</p> <p>--</p> <p><u>The population of older adults or seniors (persons 60 years of age and older) is expected to continue to grow at a steady rate</u> are expected <u>and</u> to be the fastest growing segment of the District's population during the next <u>15 to 20</u> years. Although the District's Office on Aging <u>Department of Aging and Community Living (DACL)</u> and several affiliated non-profit organizations already provide a comprehensive system of health care, education, employment, and social</p>

live alone. Some ~~43~~ **37.4** percent **of older adult households** have no personal vehicle and ~~42~~ **36.5** percent have **some type of a physical disability**. The largest percentages of **older adults seniors** are in Upper Northwest **Rock Creek West** and Far Northeast **Rock Creek East**. Many are homeowners, caring for their properties with ~~diminished~~ **on a fixed** incomes and ~~physical mobility~~. Others are primary caregivers for their grandchildren, facing the challenge of raising a family in their advancing years.

services for Washington, DC's the District's elderly population, these entities may be hard pressed to keep up with demand as the number of **older adults seniors** in the city rises. **The 2017 older adult population of 118,275 (17 percent of the total population) is forecasted to rise to 132,648 133,000 in 2025 and to 141,381,000 by 2030. As of 2017, Currently,** about ~~45~~ **36** percent of the city's **older adults seniors 65 years and older** live alone. Some ~~43~~ **37.4** percent **of older adult households** have no personal vehicle and ~~42~~ **36.5** percent have **some type of a physical disability**. **One group of older adults is especially vulnerable. In an analysis of a 2017 sample from the U.S. census, of 76,000 District adults 65 or older living in households, 13,000 had a difficulty (or disability) living independently. Of these 13,000 older adults, 6,200 also had a difficulty with self-care (such as bathing or dressing) and 5,500 had a cognitive difficulty. These are the older people that need long-term care. There needs to be long-term support and facilities for these people.** The largest percentages of **older adults seniors** are in Upper Northwest **Rock Creek West** and Far Northeast **Rock Creek East**. Many are homeowners, caring for their properties with ~~diminished~~ **on a fixed** incomes and ~~physical mobility~~. Others are primary caregivers for their grandchildren, facing the challenge of raising a family in their advancing years.

However, a large majority of these households with adults 65 and over, would have extreme difficulty paying for any long-term care. Of 59,000 households with an adult 65 and over, 11,500 have someone who has difficulty living independently. Of these 11,500 households, 4,500 have incomes that are 30% or less of the Median Family Income (MFI), and 5,500 have incomes that are 31% to 100% of MFI.

Those households below 30% of MFI that have Medicaid would qualify for home health aides and a few other services through the Medicaid waiver program. Until 2021,

		<p><u>there is no assisted living in wards 5, 6, 7, and 8 that will take Medicaid waivers and very few in Wards 1-4. Those households between 31% and 100% of MFI, sometimes called “the forgotten middle” could not begin to pay for market rate assisted living that ranges from \$45,360 to \$126,000 a year. At the low end of the middle, they could not pay for unsubsidized home aides at \$20 per hour. At the high end they could afford only limited hours of home health aides (for example, home aides at \$20 an hour for 4 hours a day for 5 days a week, would cost \$20,800.) With no paid long-term care, many of these households struggle to manage the disabled older member. 13% percent of these middle income households have only one member, who manages self-care with difficulty. 21% percent of these households are married couple households where a spouse carries the burden of care for the older adult who cannot live independently.</u></p>
<p>Pg. 40 After 1108.1</p>		<p>Insert the following new language:</p> <p><u>Action CSF-2.3.A Develop Demographic of Residents over 65 who have disabilities to compare with available facilities that can support them.</u></p> <p><u>Demographics of DC residents 65 and over with disabilities should be presented by broad location and compared to the availability of the facilities and services for older adults with chronic illnesses, or with certain disabilities. The facilities should include assisted living residences, community residential facilities, and adult day care. The categories of older adult disabilities to be examined should include those with: cognitive difficulty, self-help difficulty and difficulty living independently.</u></p> <p><u>Action CSF-2.3.B Older Adults with “middle income”</u></p>

		<p><u>Conduct a study of those households with older residents over 60 with incomes in the “forgotten middle” range, those with incomes between 30% of Median Family Income and 100% of Median Family Income. (Note: These residents of these households are not eligible for Medicaid or for public housing but cannot afford much service funded privately. Innovations, such as providing minimum health care in buildings with large numbers of older adults, can postpone the need for expensive long term care or bankruptcy by these households.)</u></p>
--	--	---

**ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Environmental Protection Element**

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 4 New text after 600.5	[...] <u>In 2018, the District government established the DC Green Bank as a key mechanism to accelerate the deployment of affordable private and public capital for clean energy projects.</u>	OP should discuss how the Green Bank functions and also clarify its status, including whether it is presently operating and funding projects.
Pg. 15 603.8	<i>Action E-21.1.A: Tree Replacement Program</i>	OP should add language to this provision, or add a new provision, to indicate that the District will prioritize tree boxes by adding new boxes as well as improving/expanding existing tree boxes.
Pp. 44-45 611.9	<i>Action E-32.3.E: E-Cycling</i> Establish Continue to operate drop-off E-cycling programs and other measures to promote the recycling of computers and other electronic products in an environmentally sound manner.	The present action item does not explain any of the programs or measures. The District should be expanding its efforts and make it easier for residents to recycle these items. The “Continue to operate” language reflects a lack of ambition.
Pg. 45 New text after 611.10	<u>Action E-3.3.G: Zero Waste plan</u> <u>Develop a comprehensive Zero Waste plan, as required by the Sustainable Solid Waste Management Amendment Act of 2014, with the objective of decreasing all citywide waste streams and achieving source reduction goals. The development of such a plan would tie together existing activities and inform the development and evaluation (including carbon impacts) of further policies so that the District can strategically achieve zero waste citywide, defined as 80 percent diversion of all solid waste from</u>	Council passed the legislation in 2014, so it is unacceptable that the Zero Waste plan is not fully developed today. As a result, we recommend that this provision of the Comp Plan specify that the District is committed to completing the plan in 2020.

	<u>landfill and waste-to energy.</u>	
Pg. 77 <u>New</u> text after 623.10	<u>Action E-5.6.F: Single-Use Bottles</u> <u>Discourage purchase of single-use bottles, which often end up in parks and streams, by encouraging persons to carry refillable water bottles, and by encouraging institutions to have working water fountains and bottle-filling stations. Consider mandating manufacturer take-back programs for beverage containers and other packaging.</u>	OP should amend the language to indicate that the District will strongly consider a container-deposit law (a.k.a., a “bottle bill”) to encourage recycling by consumers.
Pg. 77 <u>New</u> text after 623.10	<u>Action E-5.6.G: Vacant and Blighted Properties</u> <u>Continue investigating and classifying vacant and blighted properties; continue pursuing enforcement of violations on these properties to protect the health, safety and welfare of the general public.</u>	The present action item should express stronger commitment to the task, provide some basic goals/metrics, and identify specific efforts aimed at improving the regime. The District should commit itself to improving this program. The present “Continue” language suggests (wrongly) that past efforts have been adequate and that no new efforts are planned to improve the program.

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Parks and Open Space Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pp. 4-5 801.1	<p><i>The overarching goal for parks, recreation and open space is: Preserve and enhance parks and open spaces within <u>Washington, DC</u> the District of Columbia to meet active and passive recreational needs <u>through universal access, promote health and wellness</u>, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of <u>Washington, DC</u> the national capital.</i></p>	<p>Strengthening of community bonds should be an explicit overarching goal for our parks, recreation and open spaces. We therefore propose the following edit:</p> <p><i>The overarching goal for parks, recreation and open space is: Preserve and enhance parks and open spaces within <u>Washington, DC</u> the District of Columbia to meet active and passive recreational needs <u>through universal access, promote health and wellness</u>, improve environmental quality, enhance the identity and character of District neighborhoods, <u>strengthen community bonds</u>, and provide visual beauty in all parts of <u>Washington, DC</u> the national capital.</i></p>
Pg. 6 803	<p><u>Specific outcomes of the Parks Master Plan include:</u></p> <ul style="list-style-type: none"> New service standards for parks, recreational programs, and facilities <p>[...]</p>	<p>It is prudent to have service standards for parks, recreational programs, and facilities and for those standards to be identified as one “specific outcome” of the Parks Master Plan. We therefore recommend retention of the language proposed for deletion:</p> <p><u>Specific outcomes of the Parks Master Plan include:</u></p> <ul style="list-style-type: none"> <u>New service standards for parks, recreational programs, and facilities</u> <p>[...]</p>
Pg. 17 806.6	<p><i>Policy PROS-1.3.4: Conversion of Parkland/Open Space</i></p> <p>Protect the basic function of District parks as public open spaces and prevent parkland conversion to other uses. <u>On select park sites with active uses, complementary uses such</u></p>	<p>Add language to recognize that certain complementary uses may further activate spaces.</p> <p><i>Policy PROS-1.3.4: Conversion of Parkland/Open Space</i></p>

	<p><u>as concessions or co-location may be considered as a way to generate the revenue needed to sustain and modernize recreation facilities.</u></p>	<p>Protect the basic function of District parks as public open spaces and prevent parkland conversion to other uses. <u>On select park sites with active uses, complementary uses such as concessions or co-location may be considered as a way to generate the revenue needed to sustain and modernize recreation facilities and further activate such spaces.</u></p>
<p>Pp. 18-19 New text after 806.11</p>	<p><u>Action PROS-1.3.E: Coordination of Maintenance and Programming Responsibilities</u></p> <p><u>Improve the coordination, scheduling, and management of park and open space maintenance and programming responsibilities among relevant government agencies, including the DPR, DGS, NPS, DCPS, DDOT, the Department of Public Works (DPW), and the Department of the Environment (DOEE). Consider the establishment of Districtwide maintenance standards and cost estimates.</u></p>	<p>To improve results, practices involving maintenance standards and cost estimates should be uniform across District agencies.</p> <p><u>Action PROS-1.3.E: Coordination of Maintenance and Programming Responsibilities</u></p> <p><u>Improve the coordination, scheduling, and management of park and open space maintenance and programming responsibilities among relevant government agencies, including the DPR, DGS, NPS, DCPS, DDOT, the Department of Public Works (DPW), and the Department of the Environment (DOEE). Consider the establishment of Establish Districtwide maintenance standards and cost estimates.</u></p>
<p>Pg. 29 809.8</p>	<p><i>Policy PROS-2.1.3: Quality and Compatible Design</i></p> <p>Require all park improvements to be of high design and construction quality, sensitive to the natural environment, <u>respectful of historic structures and important cultural landscapes, sensitive to accommodating people of all abilities,</u> and compatible with surrounding land uses.</p>	<p>It is important that the District consider whether design and construction will accommodate a diversity of age groups.</p> <p>Proposed edit:</p> <p><i>Policy PROS-2.1.3: Quality and Compatible Design</i></p> <p>Require all park improvements to be of high design and construction quality, sensitive to the natural environment, <u>respectful of historic structures and important cultural landscapes, sensitive to accommodating people of all ages and abilities,</u> and compatible with surrounding land uses.</p>
<p>Pg. 29</p>	<p><i>Policy PROS-2.1.4: Responding to Local Preferences</i></p>	<p>As noted on the District’s website, “The ANCs' main job is to be their neighborhood's official voice in advising the District</p>

809.9	Provide amenities and facilities in District parks that are responsive to the preferences and needs of the neighborhoods around the parks. Park planning should recognize that there are different leisure time interests in different parts of the city. To better understand these differences, the community must be involved in key planning and design decisions.	<p>government (and Federal agencies) on things that affect their neighborhoods.” As a result, it is important that ANC’s be involved in park planning and that District agencies are reminded of their obligation to give the ANC recommendations “great weight.”</p> <p><i>Policy PROS-2.1.4: Responding to Local Preferences</i></p> <p>Provide amenities and facilities in District parks that are responsive to the preferences and needs of the neighborhoods around the parks. Park planning should recognize that there are different leisure time interests in different parts of the city. To better understand these differences, the community must be involved in key planning and design decisions. <u>In particular, relevant Advisory Neighborhood Commissions must be involved in key planning and design decisions and their recommendations afforded “great weight.”</u></p>
Pg. 30 Before 809.11		<p>We should encourage creative and thoughtful designs that will instill community pride. Suggested new provision:</p> <p><u>Policy PROS-2.1.10 - Diversity in Design</u></p> <p><u>New and updated facilities should strive to emphasize the unique nature of each facility, whether in terms of design, function, geographic location or neighborhood. Rather than creating interchangeable sites, the District should use unique features and design elements to create places that emphasize the particularity of each facility. Different playgrounds, especially those near each other, should include different styles of design and different play elements; art installed at each facility should take into account local neighborhood history and identity; aquatic facilities should include different arrangement of pools and children’s play facilities.</u></p>

<p>Pg. 54 <u>New</u> text after 817.3</p>	<p><u>Building a world class park system is not a governmental responsibility alone. It is a collective effort that requires the contribution of private businesses, institutions, non-profits, DC residents and community organizations.</u></p>	<p>State unequivocally that the District government bears primary responsibility for developing and maintaining a world class park system:</p> <p><u>Building a world class park system is not a governmental responsibility alone. Although the District government bears primary responsibility for building and maintaining a world class park system, it is a collective effort that requires the contribution of private businesses, institutions, non-profits, DC residents and community organizations.</u></p>
<p>Pg. 58 819.5</p>	<p><i>Policy PROS-4.3.3: Common Open Space in New Development</i></p> <p>Provide incentives <u>Work with developers</u> for new and rehabilitated buildings to include “green roofs”, rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance.</p>	<p>The proposed “work with developers” language is weak, open to interpretation, and ultimately meaningless. Instead the District should signal a commitment to these initiatives by imposing enforceable standards.</p> <p><i>Policy PROS-4.3.3: Common Open Space in New Development</i></p> <p>Provide incentives <u>Work with Mandate that developers</u> for new and rehabilitated buildings to include “green roofs”, rain gardens, landscaped open areas, and <u>or</u> other common open space areas that provide visual relief and aesthetic balance.</p>
<p>Pg. 58 819.7</p>	<p><i>Policy PROS-4.3.5: Residential Yards</i></p> <p>Recognize the value of residential yards as a component of the city’s open space system and discourage increased coverage of such areas by buildings and impervious surfaces.</p>	<p>The District should weigh the need to discourage impervious surfaces with the need to address other District priorities, such as affordable housing:</p> <p><i>Policy PROS-4.3.5: Residential Yards</i></p> <p>Recognize the value of residential yards as a component of the city’s open space system and discourage increased coverage of such areas by buildings and impervious surfaces <u>while balancing that value against other district priorities such as creation of affordable housing.</u></p>

<p><u>New</u> text</p>		<p>Establishment of large parks should be prioritized for areas that lack access to one. We propose that the language below be inserted at a suitable location in this Element:</p> <p><u>While recognizing the importance of small parks, the District shall prioritize the establishment of a large park (greater than 1/3 acre) in each neighborhood that lacks access to one. This policy statement reflects the view that a series of two or more small parks likely does not offer the same community value as a single large park.</u></p>
------------------------	--	--

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
 Historic Preservation Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 47 New paragraph after 1011.13	<p><i><u>Action HP-2.5.D: Accessibility Guidelines for Aging in Place</u></i></p> <p><u>Analyze common barriers to accessibility in older homes and develop guidelines on how aging residents can modify such homes in ways compatible with their historic character, while making them visitable and safer to live in.</u></p>	ANC 6C agrees with the proposed language, and recommends that these guidelines on changes to accommodate aging in place should, where feasible, favor reversible changes.

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Arts & Culture Element

Page # & section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 6 1403.4	<p><i>Policy AC-1.1.43: Distribution of Facilities</i></p> <p>Promote improved access to geographic distribution of arts and cultural facilities access to geographic distribution of arts and cultural facilities that offer arts and cultural resources, including development of arts facilities and venues east of the Anacostia River and in other parts of the city where they are in short supply today.</p>	<p>In addition to creating new facilities where few exist, text should include focus on preserving access to existing facilities, including studios and rehearsal spaces, which are at risk of being priced out by rising property costs.</p>
Pg. 7 <u>New</u> text after 1403.9	<p><i><u>Policy AC-1.1.12: Include Cultural Facilities when Large Sites are Redeveloped</u></i></p> <p><u>When large sites are planned and developed, cultural facilities should be incorporated where feasible. Planning for these facilities should consider both their neighborhood-serving role as well as how they relate to the network of cultural facilities citywide.</u></p>	<p>Text should be amended to clarify that “large sites” includes neighborhoods experiencing rapid growth, including NoMa and Union Market District.</p>
Pp. 10-11 <u>New</u> text after 1404.5	<p><i><u>Policy AC-1.2.3: Expand Community-Oriented Cultural Programming</u></i></p> <p><u>Continue expanding community-oriented cultural programming through grants and programming partnerships.</u></p>	<p>Text should make clear that community-oriented cultural programming includes work being done by existing cultural organizations to engage new audiences.</p>
Pg. 11 <u>New</u> text after 1404.7	<p><i>Policy AC-1.2.7: Mitigate Cultural Displacement</i></p> <p><u>Reinforce and elevate existing cultural anchors, practices and traditions in communities undergoing significant demographic change. Such efforts should reflect the history and culture of established communities in these neighborhoods and also embrace new residents. Additionally, support cross-cultural programming that fosters a shared understanding of</u></p>	<p>Text should be amended to clarify that cultural displacement includes the loss of studios, rehearsal spaces, and other venues that risk being priced out by rising property costs.</p>

	<u>Washington, DC's history and culture among all residents.</u>	
--	--	--

ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
 Capitol Hill Area Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pg. 2		<p>We suggest adding a short TOC/roadmap to this and other Elements, <i>e.g.</i>,</p> <ul style="list-style-type: none"> 1500 Overview 1501 History 1502 Land Use Composition 1503 Demographics 1504 Housing Characteristics 1508 Guiding Growth and Neighborhood Conservation 1509 Conserving and Enhancing Community Resources 1510 Policy Focus Areas 1511 H Street/Benning Road 1512 Pennsylvania Avenue SE Corridor 1513 U.S. Capitol Perimeter 1514 Reservation 13/RFK Stadium (Hill East Waterfront)
Pg. 3 1500.3		Final sentence of section is cut off.
Pg. 5 1500.9	Other neighborhood groups, like the Stanton Park Neighborhood Association, North Lincoln Park Neighborhood Association, Near Northeast Citizens Against Crime and Drugs, the Barney Circle Neighborhood Association, [...]	Two of these groups—Stanton Park Neighborhood Association and Near Northeast Citizens Against Crime and Drugs—no longer exist to our knowledge.
Pg. 8 1502	[chart and 1502.3]	Consider splitting data on streets and right of ways, or note that a significant portion of the right-of-way figure represents land (“public parking”) between sidewalks and housing units.

		Also, section numbering on page 8 needs correction.
Pg. 10 <u>New</u> text in 1503.2	<u>Since 2000, there are slightly fewer children and seniors living in the Area, with a majority of the population (73%) between the age of 18-65. This is slightly higher than the citywide total of 70 percent.</u>	Based on the numbers in the new Table 15.1, OP's characterization of the growth in the number of seniors in the Planning Area is not correct. ANC 6C proposes revision as follows: <u>Since 2000, a majority of the population within the Capitol Hill Planning Area (73%) is between the ages of 18 and 65. This is slightly higher than the citywide total of 70 percent. While the number of older adults is higher now than in 2010, the percentage of older adults within the Planning Area is slightly lower.</u>
Pp. 10-11 1503.3 <i>et seq.</i>		The 2017 figures in Table 15.1 for white and foreign-born residents do not line up with the figures used in text (1503.4).
Pg. 12 1504.2		The comparison of "less than eleven percent" with 10.8% in the next sentence is unilluminating. Also, the deletion of "reduction" leaves a gap in the meaning of the sentence.
Pp. 13-17 1507	[strikes 1507 in its entirety]	ANC 6C understands that section 1507 on its face describes a series of Comp Plan meetings held in 2005-2006. Although the meetings themselves are no longer relevant, many of the concerns conveyed then remain applicable today. For example, section 1507.2(a) describes the adverse effects on historic Capitol Hill from development pressures in its northern, southern, and eastern portions. Those pressures and potential impacts remain of concern today, even as we welcome and celebrate the renewed growth and vigor of H St. and other revitalized commercial corridors. Similarly, 1507.2(k) identifies the problems associated with heavy commuter traffic that burdens Capitol Hill with noise, air pollution, and safety hazards. That threat to the health and

		well-being of Hill residents continues to be a matter of serious concern.
Pg. 17 1508.1	The following general policies and actions should guide growth and neighborhood conservation decisions on Capitol Hill. These policies and actions should be considered in tandem with those in the citywide elements of the Comprehensive Plan. The Lower Anacostia Waterfront/Near Southwest Element should be consulted for policies relating to the future of the adjoining Southeast Waterfront Area.	The following general policies and actions should guide growth and neighborhood conservation decisions on Capitol Hill. These policies and actions should be considered in tandem with those in the citywide elements of the Comprehensive Plan. <u>They should also be developed in coordination with the affected Advisory Neighborhood Commissions, residents, and community groups. Moreover, all development should ensure roads, infrastructure, and services can absorb additional growth before work proceeds. Note:</u> The Lower Anacostia Waterfront/Near Southwest Element should be consulted for policies relating to the future of the adjoining Southeast Waterfront Area.
Pg. 19 After 1508.10	<i>Policy CH-1.1.10: Public Housing</i>	Please note that the redline draft incorrectly identifies this section as 1509.11, rather than 1508.11. Some community members have reported a high level of anxiety and doubt among residents of public housing in the Planning Area that rehabilitation of public housing projects will be replaced in kind by new public housing units within the community. (2006 Comprehensive Plan 1508.11, see page 19 of Draft Amendments Chapter 15) These residents fear that, to the contrary, this policy will actually result in displacement of residents. Existing public housing units provide much needed housing for low income older adults, including grandparents who care for their grandchildren. In fact, we understand that many residents in the Potomac Gardens complex are seniors—either living alone or with extended family. Many of these older residents have called Potomac Gardens Public Housing their home for decades. Some residents do not want to be relocated

		<p>to new units elsewhere in the community; to relocate means changes in children’s and grandchildren’s schools, loss of well-known neighbors, and, potentially, less convenient access to public transportation. ANC 6C urges OP to consider how the Comprehensive Plan’s public housing policy can address and mitigate the impacts on older residents associated with rehabilitation of public housing units.</p>
<p>Pg. 19 1508.13</p>	<p><i>Policy CH-1.1.12: RFK Stadium Area</i></p>	<p>The lands and resources around RFK stadium and the Reservation 13 site provide an unprecedented opportunity to build an innovative, multi-generational neighborhood that serves families and older adults with a full range of incomes, including those needing long-term care services. Reservation 13 is a large site that de facto will become a major new neighborhood. It will need coordinated public services, housing, retail, and space for recreation. The Comprehensive Plan should recommend a creative mixture of housing for a range of income levels, and long-term care facilities for a range of income levels and intergenerational inter-action. Implementing the Reservation 13 Master Plan offers the District an unparalleled opportunity to innovate and to become a model for the integration of older persons and long-term care into a thriving multi-generational and multi-income neighborhood.</p> <p>ANC 6C also believes that development of the RFK and Reservation 13 sites offers excellent opportunities for coordinated planning for recreation, parkland, and mitigation of negative effects of heavy traffic in the area. While we support environmentally appropriate development of the waterfront and adjacent open space in a manner that provides access to the neighbors, we also believe that the shoreline and parklands should be equally available to DC residents of all ages and physical condition and from all city neighborhoods. We also recommend that OP add an additional sentence to 1508.13 which would give preference to maintaining more natural landscapes along the River, over highly developed</p>

		landscapes.
Pg. 20 1508.14	<i>Policy CH-1.1.13: Traffic Management Strategies</i> Establish traffic management strategies to reduce commuter traffic on East Capitol Street, Independence Avenue, C Street NE, 17th Street SE, and other predominantly residential streets that also function as through-streets. These strategies should include limiting additional one-way streets on Capitol Hill (and possibly restoring existing one-way streets to two-way traffic), improving signal timing on Benning Road and Pennsylvania Avenue, and improving pedestrian and bicycle safety. Measures should also be implemented to route through-traffic around residential neighborhoods, and to restrict trucks and heavy vehicles on local streets.	ANC 6C feels that a strong additional statement needs to be made here regarding traffic to and from Union Station. District planners should a) require traffic management measures to discourage Union Station traffic from flowing through the adjacent residential neighborhoods and b) examine Union Station circulation patterns, especially on Second Street, NE in the vicinity of Union Station. In addition, we recommend that Constitution Avenue be added to the list of streets in the first sentence needing traffic management strategies.
Pp. 19, 23 1508.13, 1509.11	<i>Policy CH-1.1.12: RFK Stadium Area</i> <i>Action CH-1.2.C: RFK Stadium Area</i>	The text of these two sections should be harmonized. For example, 1508.13 should be revised to include “local Advisory Neighborhood Commissioners, residents, and neighborhood groups” as used in 1509.11.
Pp. 20-21 1508.19	<i>Action CH-1.1.C: Transportation Studies</i>	The referenced Capitol Hill Transportation Study does not, so far as we are aware, address the proposed Union Station expansion. The Comp Plan should call for a traffic circulation and management plan for an expanded Union Station.
Pg. 28 1511.6	<i>Policy CH-2.1.1: H Street Revitalization</i>	This section mentions the air-rights project (Burnham Place) over the rail yard, but excludes any mention of the proposed expansion of Union Station. FRA anticipates a more-than-doubling of passenger volumes by 2040, which will undoubtedly have multiple impacts on H St. and surrounding areas. In 1511.6(b), we recommend replacing “Parking is to be enhanced by removing onstreet parking restrictions and

		identifying opportunities for structured off-street parking” with “Identify opportunities for structured off-street parking.”
Pg. 29 1511.10	<i>Policy CH-2.1.5: Parking</i> Retain existing on-street parking along H Street. As recommended by the H Street Small Area Plan adopted by Council, [...]	<i>Policy CH-2.1.5: Parking</i> Retain existing on-street parking along H Street. As recommended by the H Street Small Area Plan adopted by Council, [...]
Pg. 30 1511.12	<i>Policy CH-2.1.7: H Street Bridge Overpass</i> [...] The allowable height of any building constructed in the air rights should be measured from the bridge existing grade of 1st Street or 2nd Street NE, rather than from the overpass.	We believe it is important to state that the height of the air rights development should not detract from historic Union Station or the essentially horizontal cityscape of Washington DC.
Pg. 35 1513.5	<i>Policy CH-2.3.3: Surface Transportation Improvements</i> Improve surface transportation in and around the Capitol Complex in a manner that reduces impacts on Capitol Hill neighborhoods and facilitates access within the area. This could include the use of shuttles between key destinations such as Union Station, the new Capitol Visitors Center, and the Capitol South Metro station.	This policy should address surface transportation around Union Station more generally, and not just with a passing reference to possible Capitol-Union Station shuttle buses.
Pg. 35 1514		Consider adding a map or graphic showing Reservation 13 and RFK Stadium in relation to each other.
Pg. 36 1514.4	<u>In May 2016, Phase 1 of the Hill East development received Design Review Approval, and the District selected a development partner. This first phase will include over 350 residential units, with 30 percent designated for affordable housing, and additional retail and green spaces.</u>	<u>In May 2016, Phase 1 of the Hill East development received Design Review Approval, and the District selected a development partner. The buildings are under construction and near completion. Originally, the this first phase will was to include over 350 residential units, with 30 percent designated for affordable housing, and additional retail and green spaces. In fall 2019, the Mayor announced</u>

		<p><u>that one of the residential buildings will be converted to Permanent Supportive Housing for individuals who are now homeless and require supportive services. Residents will have access to social workers and other support services.</u></p>
<p>Pg. 37 1514.6</p>	<p><i>Policy CH-2.4.1: Redevelopment of Public Reservation 13</i></p> <p>Redevelop Reservation 13 as a mixed-use neighborhood that combines housing, <u>retail</u>, office space, health care, civic, education, <u>institutional</u> and recreational uses. <u>Recognize this site as an ideal location for an anchor employer or institution.</u> Established uses such as the DC Correctional Facility should be retained. Health care and institutional uses on the site should be reorganized to accommodate infill uses, improve the site’s vitality and efficiency, and create an environment more conducive to pedestrian travel.</p>	<p>OP’s proposed new text to “recognize this site as an ideal location for an anchor employer or institution” raises concerns about whether this Mayor or future Mayors might continue to use Reservation 13 to entice big anchors such as the recent identification of Reservation 13 as available to Amazon Corporation for locating its East Coast headquarters. We believe the Plan should address the importance of moving ahead with implementation of the Master Plan which was approved in 2006.</p> <p>Suggested edit:</p> <p>Redevelop Reservation 13 as a mixed-use neighborhood that combines <u>an array of</u> housing, <u>retail</u>, office space, health care, civic, educational, <u>institutional</u> and recreational uses <u>and amenities. There is sufficient space for Reservation 13 to meet affordable housing and other goals, particularly services and amenities that meet the special needs of aging residents. To the extent consistent with the Master Plan, Rrecognize this site as an ideal attractive location for an anchor employer or institution. Retention of established</u> Established uses such as the DC Correctional Facility should be <u>re-assessed retained</u>. Health care and institutional uses on the site should be reorganized to accommodate infill uses, improve the site’s vitality and efficiency, and create an environment more conducive to pedestrian travel.</p>
<p>Pg. 37 1514.8</p>	<p><i>Policy CH-2.4.3: Reservation 13 Parkland</i></p> <p>Create new waterfront parklands and green spaces at Reservation 13, including a grand waterfront park <u>designed</u></p>	<p>ANC 6C is concerned that this section calls for a “grand” waterfront park, albeit one designed for resilience to flooding, etc. Such a goal connotes a highly built out park which is</p>

	<p><u>for resilience to flooding</u>, recreational trails along the waterfront, smaller neighborhood parks and open spaces within the site, and tree-lined pedestrian streets.</p>	<p>inconsistent with the desires of neighbors and other residents of the Planning Area to maintain a more natural approach to accessing and enjoying the waterfront. ANC 6C recommends this the word “grand” be removed and a cross reference to 1508.13 be added as follows:</p> <p><i>Policy CH-2.4.3: Reservation 13 Parkland</i></p> <p>Create new waterfront parklands and green spaces at Reservation 13, including a grand waterfront park <u>designed for resilience to flooding, and that includes</u> recreational trails along the waterfront, smaller neighborhood parks and open spaces within the site, and tree-lined pedestrian streets. <u>See also 1508.13, Policy CH-1.1.12 RFK Stadium.</u></p>
<p>Pg. 38 1514.11</p>	<p><i>Policy CH-2.4.6: RFK Stadium Area</i></p> <p>Encourage <u>active and</u> better use of the National Park Service lands around RFK Stadium, including park and trail improvements that connect Hill East to the Langston Golf Course and National Arboretum areas to the north. <u>Explore the potential of transferring NPS land to the District where appropriate.</u></p>	<p><i>Policy CH-2.4.6: RFK Stadium Area</i></p> <p>Encourage <u>active and</u> better use of the National Park Service lands around RFK Stadium, including park and trail improvements that connect Hill East to the Langston Golf Course and National Arboretum areas to the north. <u>Explore the potential of transferring NPS land to the District where appropriate. Ensure that future development does not lead to increased automobile traffic flowing through Capitol Hill.</u></p>
<p>Pg. 38 1514.12</p>	<p><i>Action CH-2.4.A: Hill East/Reservation 13 Master Plan</i></p>	<p>The Reservation 13 development will create a major new neighborhood. Accordingly, the city must devise a community-based land use plan to determine the public services, facilities, and infrastructure needed to serve this new neighborhood. ANC 6C believes this can be done within the context of implementing the Master Plan; however, if the Comprehensive Plan fails to specifically require consideration of land uses and services, facilities, and infrastructure, the ANC wants to ensure that this level of community engagement is not overlooked in the process. Accordingly, ANC 6C proposes that OP revise this action item by adding the</p>

		<p>following to the proposed text at the end:</p> <p><u>Explore the need for building a recreation/senior center/library in Reservation 13. Explore creating senior recreation spaces that include indoor walking opportunities. Determine if any of these recreational needs can be met through development of the RFK Stadium site. Specifically consider developing an adult day care facility on Reservation 13 that can serve at least 50 people per day (approximately 9000 square feet) Study the feasibility of repurposing the historically significant Anne Archbold Hall for senior-oriented health services to include hospice, rehabilitation, adult day care, and memory care services.</u></p>
--	--	--

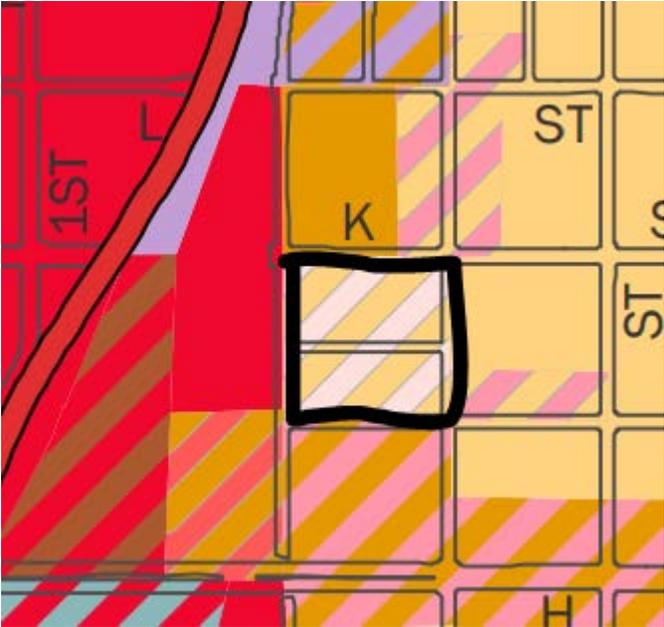
ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
 Central Washington Area Element

Page # and section	OP's proposed language	ANC 6C comment or proposed language edit
Pp. 30-31 1610.3-4	[map and table]	This table and map should include Capitol Hill, an area that is clearly adjacent to the Central Area.
Pg. 45 <u>New</u> text before 1615.4	<u>Up to 10% of residents in Downtown East live in some form of group quarters, including seniors in assisted living housing, student dormitories, and shelters. This is in contrast to the only 6% of DC residents who share a similar type of housing. The Federal City Shelter, also known as the Community for Creative Nonviolence (CCNV), in Downtown East is the biggest temporary home for many of the city's homeless persons and links them with nearby supportive services and non-profits such as DC Central Kitchen. The shelter houses up to 150 long-term guests and provides an additional 1000 beds each evening. There is an active proposal to redevelop the site to smaller-scale supportive housing of approximately 300 beds within a larger mixed-use redevelopment project.</u>	This section should go into more detail about the “active proposal” described at the end. Is the proposal adequate? Who is proposing it? How does (or should) District government attempt to advance or improve that proposal?
Pg. 46 <u>New</u> text after 1615.6	<u>Policy CW-2.5.x: Establish Louisiana Avenue as the Primary Route between Union Station and the National Mall</u> <u>Louisiana Avenue NW provides the most direct and visible route between Union Station and the National Mall and its design should be encouraged to reflect its importance to tourists and other users. Improved sidewalks, pedestrian street crossings, bicycle facilities, and wayfinding should be installed so as to enhance this corridor. Alternative locations for vehicle parking for Congressional staff should</u>	We strongly support this addition.

	<p><u>be explored so as to eliminate the need for angled parking on Louisiana Avenue.</u></p>	
<p>Pg. 46 <u>New</u> text before 1615.8</p>	<p><u>Policy CW: Maintain affordability and services for people experiencing homelessness in Downtown East</u></p> <p><u>The District should prioritize additional affordable housing and homeless services throughout the Downtown East area. Emergency shelters for homeless persons should be accessible 24-hours a day, year-round, and contain high quality homeless-oriented services co-located on site. New shelters should also include short term housing designed for the needs of youth under age 24 and permanent supportive housing.</u></p>	<p>We support this addition, but suggest changing “Maintain” in the heading to “Increase”.</p>
<p>Pp. 55-56 1618.7</p>	<p>[...]</p> <p>The strategy also envisions air rights development over the CSX tracks (adjacent to the H Street overpass) <u>north of Union Station</u>, helping bridge the railroad barrier and support the revival of the H Street commercial district to the east. <u>The Union Station Expansion and Air Rights Development projects present a significant opportunity not only to underscore the role of the Station as one of the most important regional transportation hubs in the Northeast and as one of the District’s most distinctive historic landmarks, but to reinforce the many additional roles it plays in the District: a critical center of multimodal transportation; a vital community asset to District residents; a place of civic, cultural, and commercial activity; and as a national gateway to Downtown, Capitol Hill, and NoMa neighborhoods, which include mixed uses, job centers, hotel, cultural and entertainment uses that attract millions of visitors and workers each year.</u></p>	<p>This new language falls far short of providing any guidance. The height of the Air Rights project and increased traffic demands by the combined Station Expansion and Air Rights projects should be addressed.</p>

<p>Pp. 58-59</p> <p>1618.18 and <u>new</u> text preceding it</p>	<p><u>Policy CW: Union Station Expansion and Railyard Air Rights Development Projects</u></p> <p><u>Prioritize Washington Union Station’s vital role now and into the future as an intermodal transportation hub while recognizing the importance of its preservation as a key historic landmark and function as a community asset. Ensure that future expansion and air rights development projects appropriately respond to surrounding land use and design programs and plans, including those for Downtown East, Capitol Hill and NoMa neighborhoods.</u></p> <p><u>Action CW: Union Station Expansion Project and Railyard Air Rights Development</u></p> <p><u>Continue participating in the Union Station Expansion Project Environmental Impact Statement (EIS) process and in coordinating with related projects, including the H Street Bridge reconstruction and future air rights development projects.</u></p> <p><i>Action CW-2.8.E: Public Participation in Union Station Air Rights Development</i></p> <p>Because of the Union Station air rights’ uniquely diverse surroundings – including rowhouses, historic landmarks, and dense office development – and its potential to spur other investment in the neighborhood, implement a process that requires public participation in the review of any development application for that site.</p>	<p>The final three paragraphs of the Central Washington Area Element are misleading. The second-to-last paragraph (Action CW) implies that the Station Expansion project EIS encompasses the Air Rights project. Nothing could be further from the truth.</p> <p>As to Action CW-2.8.E, the creation of the Union Station North zone in the zoning regulations has largely eliminated any meaningful opportunity for public participation in the air rights development. This project should have been envisioned as a PUD instead of a “matter of right” development.</p>
--	--	--

**ANC 6C Comments or proposed edits for the DC Draft Comprehensive Plan Update
Future Land Use Map**

Location	Existing designation	ANC 6C proposed change
<p>Square 750, bounded by 2nd, 3rd, K & Eye Sts. NE</p>	<p>Mixed-use: moderate-density residential/low-density commercial</p> 	<p>ANC 6C recommends that Square 750 be re-designated moderate-density residential only.</p> <p>The north half of the square (north of Parker) retains its row-dwelling form, with only one commercial entity (a restaurant at 3rd & K). The southern half is more mixed, with a blend of small flat-front row dwellings along the south side of Parker; several larger rowhouses along 3rd; a more dense multi-unit apartment building on 2nd; and a combination of office and residential uses along Eye.</p> <p>This square—especially its north half—is closer in form and use to the residential neighborhood immediately to the east than it is to those to the south and north. (It has no significant connection to the area to the west owing to physical separation from the railroad tracks and embankment on the west side of 2nd.)</p> <p>Moreover, vehicular access to the square is highly constrained, with few opportunities to improve existing traffic flow, let alone accommodate additional commercial activity and the associated motor-vehicle traffic. Both 2nd & 3rd are narrow streets with one lane in either direction; Parker St. (bisecting the square) is a narrow one-way street with a single travel lane; the alley serving the north half is narrow and no longer extends through to 2nd at the west end; and DDOT and ANC 6C have worked diligently to reduce motor-vehicle traffic volumes and speeds along this hazardous stretch of K St.</p> <p>Amending the FLUM, or any subsequent amendment of the zoning map <i>per se</i>, would not impair the ability of existing businesses on the square to continue operations.</p>