



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 6C
PO Box 77876
Washington DC 20013-7787

RE: Advisory Neighborhood Commission 6C Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Wirt, Healey, Adelstein, Eckenwiler, Kelty, and Courtney:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community that was not already captured during previous engagement for this Comprehensive Plan amendment, and reaffirmed policies that were not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 6C, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as “Support. No integration needed”.

During OP’s review, numerous recommendations received from ANC 6C were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as “Acknowledged” in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.

Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as “No” in the public review digest, and more appropriate programs or agencies have been identified.

The Commission's resolution included: continued planning for Reservation 13; providing long-term care and senior services for older adults; coordinate health, housing, and human services for vulnerable populations; and diversify the District's housing stock. The Mayor's Proposal includes updates based on the Commission's recommended. Following submission of the Mayor's Proposal, OP, along with our sister agencies, will continue to work towards these important priorities.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment.

Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District's growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document's scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District's physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15,

2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Trueblood', with a long horizontal flourish extending to the right.

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 6C-1	2.14	1500.3	Capitol Hill	Final sentence of section is cut off.	01-Yes	The text was changed to finish the sentence.
ANC 6C-2	2.14	1500.9	Capitol Hill	Two of these groups—Stanton Park Neighborhood Association and Near Northeast Citizens Against Crime and Drugs—no longer exist to our knowledge.	01-Yes	The text was changed to remove the two groups that no longer exist.
ANC 6C-3	2.14	1503.3 and 1503.4	Capitol Hill	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).	01-Yes	The text was changed to correct the discrepancy.
ANC 6C-4	2.14	1504.2	Capitol Hill	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.	01-Yes	The text was changed to correct the discrepancy.
ANC 6C-5	2.14	1057	Capitol Hill	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.	01-Yes	The Planning and Development Priorities were reinstated in the Area Elements.
ANC 6C-6	2.14	1514.4	Capitol Hill	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, 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 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-7	2.14	1514.8	Capitol Hill	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 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: Policy CH-2.4.3: Reservation 13 Parkland Create new waterfront parklands and green spaces at Reservation 13, including a grand waterfront park designed for resilience to flooding, and that includes recreational trails along the waterfront, smaller neighborhood parks and open spaces within the site, and tree-lined pedestrian streets. See also 1508.13, Policy CH-1.1.12 RFK Stadium.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-8	2.14	1514.12	Capitol Hill	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 following to the proposed text at the end: 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.

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ANC 6C-9	2.14	1514.6	Capitol Hill	<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 an array of housing, retail, office space, health care, civic, educational, institutional and recreational uses 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, recognize this site as an ideal attractive location for an anchor employer or institution. Retention of established Established uses such as the DC Correctional Facility should be reassessed 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>	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-10	2.14	New text before 1615.8	Central Washington	We support this addition, but suggest changing "Maintain" in the heading to "Increase".	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-11	2.14	1618.18 and new text preceding it	Central Washington	<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>	01-Yes	A cross reference was added to the Transportation Element and the reference of an EIS was removed.
ANC 6C-12	2.14	2.1.1	Community Services and Facilities	<p>Policy CSF-2.1.1: Enhance Health Systems and Equity</p> <p>Support the Strategic Framework for Improving Community Health, which seeks to improve public health outcomes while promoting equity across a range of social determinants that include health, race, income, age, and geography.</p>	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-13	2.14	New paragraph after 1106.10	Community Services and Facilities	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. 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).	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-14	2.14	1106.14	Community Services and Facilities	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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-15	2.14	New text after 600.5	Environmental Protection	OP should discuss how the Green Bank functions and also clarify its status, including whether it is presently operating and funding projects.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-16		New	FLUM	ANC 6C recommends that Square 750 be re-designated moderate-density residential only. 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. Square 750, bounded by 2nd, 3rd, K & Eye Sts. NE	01-Yes	The FLUM reflects this change.
ANC 6C-17	2.14	505.5	Housing	An important part of growing inclusively is to develop and maintain, across neighborhoods and throughout the city, a diverse housing stock of all sizes and types that can fit the needs of the 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-18	2.14	Following 516.1	Housing	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 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.

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ANC 6C-19	2.14	806.6	Parks-Rec-Open Space	Add language to recognize that certain complementary uses may further activate spaces. Policy PROS-1.3.4: Conversion of Parkland/Open Space Protect the basic function of District parks as public open spaces and prevent parkland conversion to other uses. 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-20	2.14	New text after 806.11	Parks-Rec-Open Space	To improve results, practices involving maintenance standards and cost estimates should be uniform across District agencies. Action PROS-1.3.E: Coordination of Maintenance and Programming Responsibilities 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-21	2.14	809.8	Parks-Rec-Open Space	It is important that the District consider whether design and construction will accommodate a diversity of age groups. Proposed edit: Policy PROS-2.1.3: Quality and Compatible Design Require all park improvements to be of high design and construction quality, sensitive to the natural environment, respectful of historic structures and important cultural landscapes, sensitive to accommodating people of all ages and abilities, and compatible with surrounding land uses.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-22	2.14	819.7	Parks-Rec-Open Space	The District should weigh the need to discourage impervious surfaces with the need to address other District priorities, such as affordable housing: Policy PROS-4.3.5: Residential Yards 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 while balancing that value against other district priorities such as creation of affordable housing.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-23	2.14	New paragraph before 403.13	Transportation	Strengthen language to Policy T-1.1.8 Minimize Private Parking 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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-24	2.14	409.12	Transportation	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: Action T-2.3B: moveDC Bicycle Element Implement the recommendations of the Vision Zero DC Action Plan and the Bicycle Element of moveDC to: [...]	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-25	2.14	411.15	Transportation	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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-26	2.14	411.16	Transportation	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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-27	2.14	New text for 416.6	Transportation	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.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-28	2.14	New paragraph after 416.13	Transportation	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. Action T.3.F: Improve Truck Safety 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. Comment: In addition, add language about publicizing and enforcing truck routes.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.

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ANC 6C-29	2.14	Policy UD-2.1.2: Neighborhood Streetscapes	Urban Design	Policy UD-2.1.2: Neighborhood Streetscapes 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-oriented lighting should be designed to enhance walking thoroughfares to public transportation hubs as well as visually reflect the character of neighborhoods.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 6C-30	2.14	New text after 1615.6	Central Washington	We strongly support this addition.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-31	2.14	New paragraph after 505.4	Housing	ANC 6C supports this addition, but notes that the current zoning regulations for the RF-1 rowhouse zone prohibit accessory dwelling units	02-Support. No integration needed.	Thank you for your support.
ANC 6C-32	2.14	New paragraph after 1011.13	Parks-Rec-Open Space	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.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-33	2.14	New paragraph before 420.12	Transportation	ANC 6C supports this insertion.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-34	2.14	Policy UD-1.1.6: Public Space Landscape	Urban Design	ANC 6C strongly supports this addition.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-35	2.14	Policy UD-1.1.8: Reducing Railroad and Highway Barriers	Urban Design	ANC 6C strongly supports this addition.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-36	2.14	Action UD-2.1.B: Standards for Street Furniture	Urban Design	ANC 6C strongly supports these insertions.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-37	2.14	Action UD- 2.1.D: Public Restrooms in Streetscapes	Urban Design	ANC 6C strongly supports these insertions.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-38	2.14	UD-2.3 Play Everywhere	Urban Design	ANC 6C strongly supports this revision.	02-Support. No integration needed.	Thank you for your support.
ANC 6C-39	2.14	1403.4	Arts and Culture	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See related policies and actions in the Arts and Culture Element: AC-1.1.1 Enhancement of Existing Facilities, AC-1.2.6 Support Arts and Cultural Clusters, AC-1.2.7 Mitigate Cultural Displacement, AC-4.1.B Sustain Grant Funding for Arts and Culture, AC-4.1.B New Sources of Cultural Funding.
ANC 6C-40	2.14	New text after 1404.7	Arts and Culture	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The referenced policy is supported by AC-1.1.1 Enhancement of Existing Facilities and AC-4.1.A Sustain Grant Funding for Arts and Culture, AC-4.1.B New Sources of Cultural Funding. Additionally, discussion is included in the DC Cultural Plan, which is incorporated in this Element by reference.

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ANC 6C-41	2.14	1502.3 and chart	Capitol Hill	<p>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.</p> <p>Also, section numbering on page 8 needs correction.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Section numbering and citation numbering has been updated. For additional information on rights-of-way in the Planning Area, see moveDC.
ANC 6C-42	2.14	1508.13	Capitol Hill	<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 landscapes.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Planning for RFK and Reservation 13 is ongoing. The area is identified on the Generalized Policy Map (GPM) as a future planning analysis area for further study. Neighborhood planning initiatives, including small area plans and other place-based tools, will be considered following submission of the Comp Plan to DC Council.
ANC 6C-43	2.14	1508.14	Capitol Hill	<p>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.</p> <p>In addition, we recommend that Constitution Avenue be added to the list of streets in the first sentence needing traffic management strategies.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on Union Station and the expansion project can be found in the Transportation Element. See Policy T-2.2.4: Union Station Expansion for guidance on how Union Station uses can be integrated into surrounding neighborhoods.
ANC 6C-44	2.14	1508.19	Capitol Hill	<p>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.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on Union Station and the expansion project can be found in the Transportation Element. See Policy T-2.2.4: Union Station Expansion for guidance on how Union Station uses can be integrated into surrounding neighborhoods.
ANC 6C-45	2.14	1511.6	Capitol Hill	<p>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.</p> <p>In 1511.6(b), we recommend replacing "Parking is to be enhanced by removing on street parking restrictions and identifying opportunities for structured off-street parking" with "Identify opportunities for structured off-street parking."</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on Union Station and the expansion project can be found in the Transportation Element. See Policy T-2.2.4: Union Station Expansion for guidance on how Union Station uses can be integrated into surrounding neighborhoods.

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ANC 6C-46	2.14	1511.12	Capitol Hill	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on viewsheds and development height can be found in the Urban Design Element: UD-1.1 Building on Washington, DC's Historic Plan 903
ANC 6C-47	2.14	1513.5	Capitol Hill	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on Union Station and the expansion project can be found in the Transportation Element. See Policy T-2.2.4: Union Station Expansion and Section T-2.2 Making Multi-Modal Connections for guidance on how Union Station uses can be integrated into surrounding neighborhoods.
ANC 6C-48	2.14		Capitol Hill	We suggest adding a short TOC/roadmap to this and other Elements, e.g., 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)	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Opportunities to revisit the order, format, and the sections included in Area Elements will be explored during the visioning for a Comp Plan rewrite.
ANC 6C-49	2.14	New text in 1503.2	Capitol Hill	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: 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; All data and analysis was provided by the State Data Center.
ANC 6C-50	2.14	1508.1	Capitol Hill	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. 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: The Lower Anacostia Waterfront/Near Southwest Element should be consulted for policies relating to the future of the adjoining Southeast Waterfront Area.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Feedback received from ANCs, community groups, and other stakeholders were used to help inform and shape policies and actions.
ANC 6C-51	2.14	1508.13, 1509.11	Capitol Hill	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; As an action, 1509.11 covers multiple stakeholder groups for long-range planning initiatives.

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ANC 6C-52	2.14	1618.7	Central Washington	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on Union Station and the expansion project can be found in the Transportation Element. See Policy T-2.2.4: Union Station Expansion and Section T-2.2 Making Multi-Modal Connections for guidance on how Union Station uses can be integrated into surrounding neighborhoods.
ANC 6C-53	2.14	Table 11.3	Community Services and Facilities	To provide meaningful data or 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional data on Health Services and Facilities in the District can be accessed through DC Health.
ANC 6C-54	2.14	1106.18	Community Services and Facilities	Policy CSF-2.13.7: Hospices and Long-Term Care Facilities 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information and recommendations for Hospice and Long-Term Care facilities are developed and implemented by DC Health.
ANC 6C-55	2.14	Policy CSF-2.3.8 Increasing Supply of Facilities That Support Assisted Living	Community Services and Facilities	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. Policy CSF-2.3.8 Increasing Supply of Facilities That Support Assisted Living, Adult Day Services and Dementia Care 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a general guide. There are many other District reports and initiatives which describe the issues facing our older adults in more detail, including Age Friendly DC, Healthy People 2020, and the DC Health Equity Report. In particular, the DC Health Equity Report describes the differential opportunities for health across the District by age, income, geography and race.
ANC 6C-56	2.14	Policy CSF-2.3.9: Improving Access to Long-Term Supports and Services for Vulnerable Populations	Community Services and Facilities	Policy CSF-2.3.9: Improving Access to Long-Term Supports and Services for Vulnerable Populations 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.)	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a general guide. There are many other District reports and initiatives which describe the issues facing our older adults in more detail, including Age Friendly DC, Healthy People 2020, and the DC Health Equity Report. In particular, the DC Health Equity Report describes the differential opportunities for health across the District by age, income, geography and race.

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ANC 6C-57	2.14	New paragraph after 1106.21	Community Services and Facilities	<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 disabled loved one and must transport them to such a service.</p> <p>--</p> <p>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</p> <p>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.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a general guide. There are many other District reports and initiatives which describe the issues facing our older adults in more detail, including Age Friendly DC, Healthy People 2020, and the DC Health Equity Report. In particular, the DC Health Equity Report describes the differential opportunities for health across the District by age, income, geography and race.
ANC 6C-58	2.14	1108.1	Community Services and Facilities	<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>The population of older adults or seniors (persons 60 years of age and older) is expected to continue to grow at a steady rate and to be the fastest growing segment of the District's population during the next 15 to 20 years. Although the District's Department of Aging and Community Living (DACL) 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 older adults 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 141,381 141,000 by 2030. As of 2017 about 36 percent of the city's older adults 65 years and older live alone. Some percent of older adult households have no personal vehicle and 36.5 percent have some type of a 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 are in Rock Creek West and Rock Creek East. Many are homeowners, caring for their properties on a fixed income Others are primary caregivers for their grandchildren, facing the challenge of raising a family in their advancing years.</p> <p>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.</p> <p>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, 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.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a general guide. There are many other District reports and initiatives which describe the issues facing our older adults in more detail, including Age Friendly DC, Healthy People 2020, and the DC Health Equity Report. In particular, the DC Health Equity Report describes the differential opportunities for health across the District by age, income, geography and race.
ANC 6C-59	2.14	insert after 1108.1	Community Services and Facilities	<p>Action CSF-2.3.A Develop Demographic of Residents over 65 who have disabilities to compare with available facilities that can support them.</p> <p>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.</p> <p>Action CSF-2.3.B Older Adults with "middle income" 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.)</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Facilities planning analyzes the needs to various demographic groups. Requested studies would fall under the proposed Civic Facilities Plan.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 6C-60	2.14	New paragraph after 1103.14	Community Services and Facilities	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current list does not prohibit or limit senior services from receiving joint planning. Additional information on senior services can be found in the Community Services and Facilities Element.
ANC 6C-61	2.14	New paragraph before 1214	Education Facilities	Policy EDU-3.2.6: University Offerings for Older Persons 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Entrance and access fees are operational and budgetary issues, making the proposed language beyond the scope of the Comp Plan.
ANC 6C-62	2.14	1103.15	Education Facilities	As part of this work the appropriate 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current list does not prohibit or limit the ability to collect data on senior services. Additional information on senior services can be found in the Community Services and Facilities Element.
ANC 6C-63	2.14	603.8	Environmental Protection	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional information on tree boxes and tree planting can be found in Sustainable DC 2.0.
ANC 6C-64	2.14	611.9	Environmental Protection	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Associated programmatic goals and measures fall outside of the Comp Plan. Additional resilient strategies can be found in Sustainable DC 2.0.
ANC 6C-65	2.14	New text after 623.10	Environmental Protection	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Additional sustainable policy recommendations can be found in Sustainable DC 2.0 and by partner agencies such as DOEE.
ANC 6C-66	2.14	New text after 623.10	Environmental Protection	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Associated programmatic goals and metrics fall outside of the Comp Plan. Additional resilient strategies can be found in Sustainable DC 2.0
ANC 6C-67	2.14	504.11	Housing	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The policy outlines other conditions of publicly owned sites.

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ANC 6C-68	2.14	100.5	Introduction	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? How will the needs of our growing aging population be met as they move from being active older adults to frail elders?	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately addresses the needs of aging adults. See the Housing, Transportation and Community Services and Facilities Elements.
ANC 6C-69	2.14	103.4	Introduction	Under "Related Studies and Plans," add the Council-mandated 10-year Senior Strategic Plan. See L22-0267. Note: Department of Aging and Community Living is the lead agency in developing this city-wide plan.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The language provided includes examples and is not meant to be an exhaustive list.
ANC 6C-70	2.14	311.3	Land Use	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language reflects the role of the Comp Plan as a high-level guiding document, recommending enforcement is a regulatory recommendation.
ANC 6C-71	2.14	311.1	Land Use	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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language reflects the role of the Comp Plan as a high-level guiding document, recommending enforcement is a regulatory recommendation.
ANC 6C-72	2.14	803	Parks-Rec-Open Space	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: Specific outcomes of the Parks Master Plan include: • New service standards for parks, recreational programs, and facilities	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; New service standards were not part of the 2014 Parks Master Plan; however, they may be part of the upcoming Parks Master Plan.
ANC 6C-73	2.14	809.11	Parks-Rec-Open Space	We should encourage creative and thoughtful designs that will instill community pride. Suggested new provision: Policy PROS-2.1.10 - Diversity in Design 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Parks, Recreation and Open Space Element provides guidance on design.
ANC 6C-74	2.14	New text after 817.3	Parks-Rec-Open Space	State unequivocally that the District government bears primary responsibility for developing and maintaining a world class park system: 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See The Parks, Recreation and Open Space Element for information on responsibility of the park system.
ANC 6C-75	2.14	819.5	Parks-Rec-Open Space	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. Policy PROS-4.3.3: Common Open Space in New Development Work with Mandate that developers for new and rehabilitated buildings to include "green roofs", rain gardens, landscaped open areas, and/or other common open space areas that provide visual relief and aesthetic balance.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Environmental Protection Element Citation 600.11c for information on Green Area Ratio (GAR).

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ANC 6C-76	2.14		Parks-Rec-Open Space	New Text. 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: 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Parks, Recreation and Open Space Element for information on park size.
ANC 6C-77	2.14	New paragraph before 408.10	Transportation	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).	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; DDOT and DFHV have established programs that monitor TNCs.
ANC 6C-78	2.14	408.12	Transportation	Need to expand to scooters (docked and dockless), mopeds, and other types of motorized and non-motorized means of transportation: Action T-2.2.C: Bicycle, Micromobility, and Carpool Parking Increase investment in bicycle and micromobility parking (including corrals) and provide more visible parking for carsharing operations at Metrorail stations, key transit stops, and future streetcar stations.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; DDOT is actively installing corrals in the District.
ANC 6C-79	2.14	T-2.3, T-2.4, T-2.5, and T-3.5	Transportation	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% 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Vision Zero is referenced as a guiding principle, and fatalities are discussed in Section 4.2.
ANC 6C-80	2.14	410.8 and 410.9	Transportation	"Older adult" is not inclusive. OP should review and revise all instances of "older adult" to "mobility impaired" or "mobility restricted" where appropriate. In addition, Action T-2.4.A should be revised to establish a clear priority of reducing excessively long pedestrian wait times: Policy T-2.4.4: Sidewalk Obstructions 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 older adult mobility-impaired pedestrians can safely use them. Action T-2.4.A: Pedestrian Signal Timings Review timing on pedestrian signals to ensure that adequate time is provided for crossing, in particular for locations with a large older adult mobility-impaired population. Prioritize reduction of wait times at pedestrian crossings to 30 seconds or less.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Older adult is the consistent language used in the Comp Plan. There is narrative in this element speaking to the importance of pedestrian prioritization; however specific crossing times are too detailed for the Comp Plan.
ANC 6C-81	2.14	New paragraph after 416.13	Transportation	This Action should prioritize pedestrians over delivery robots. Action T.3.G: Address Personal Goods Delivery Devices 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; This element already emphasizes the prioritization of pedestrians on the sidewalk.
ANC 6C-82	2.14	New paragraph before 418.3	Transportation	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: Policy T-3.5.2 Commuter Bus Facilities 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 to the challenge of limited curbside space and eliminates parking in residential neighborhoods; and enforces and implements fines where commuter buses violate traffic laws. 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.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; DDOT actively monitors commuter buses and coordinates with providers for pick-up-drop-off locations.

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ANC 6C-83	2.14	T-5.2 Electric Vehicles	Transportation	<p>The Electric Vehicle section should include much of the language included in T-5.1 Autonomous Vehicles, such as the following:</p> <p>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—or zero—passengers could greatly exacerbate congestion.</p> <p>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.</p> <p>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.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Autonomous Vehicles will have significantly different impacts on mobility than Electric Vehicles.
ANC 6C-84	2.14	new text after 1404.5	Arts and Culture	Text should make clear that community-oriented cultural programming includes work being done by existing cultural organizations to engage new audiences	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Policies and actions that fall outside of the scope of the Comp Plan are being addressed through the DC Cultural Plan.
ANC 6C-85	2.14	403.7	Transportation	ANC 6C opposes this amendment, which seriously weakens this provision.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; There are existing legal requirements for environmental impact statements.
ANC 6C-86	2.14	New paragraph between 404.8 and 404.9	Transportation	<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>Policy T-1.2.4: Providing Roadway Space for All Modes Transit and Non-Auto Travel</p> <p>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 informed by the modal priorities identified in moveDC.</p>	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The Comp Plan recognizes the importance of providing space for non-auto travel. This policy supports the allocation of space for modes that exist in the District.
ANC 6C-87	2.14	New paragraph before 419	Transportation	Delete this new paragraph. Whether or not to include intercity buses at Union Station needs further study including impacts 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.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Current guidance is consistent with existing District policy on the inclusion of intercity bus at Union Station.

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ANC 6C-88	2.14	New text after 1403.9	Arts and Culture	Text should be amended to clarify that "large sites" includes neighborhoods experiencing rapid growth, including NoMa and Union Market District.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Large sites are an important feature of the Comprehensive Plan and they are defined in section 1.2 of the Land Use Element. Neighborhood guidance including for those experiencing rapid growth such as NoMa and the Florida Avenue Market, is found in the Land Use Element and more specifically for these neighborhoods in the Upper Northeast Area Element.
ANC 6C-89	2.14	After 1508.10	Capitol Hill	Update: 1514.12, Action CH-2.4 A :Hill East/ Reservation 13 Master Plan. Implement the Hill East/Reservation 13 Master Plan, including the Massachusetts Avenue extension and the creation of new waterfront parks. Upon transfer of the land from federal to District control, the site should be rezoned to achieve the Master Plan objectives Explore the need for building a recreation/senior center/library in Reservation 13. Explore creating recreation spaces that include indoor walking/indoor track opportunities. Coordinate this study with Events DC to determine if any of these recreational needs can be met through development of the RFK Stadium site.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; For additional information on creating new recreation facilities see the Parks, Recreation and Open Space Element, including citation 803.3 and section PROS-2.1 Assessing Recreational Facilities 809.
ANC 6C-90	2.14	1514	Capitol Hill	Consider adding a map or graphic showing Reservation 13 and RFK Stadium in relation to each other.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Maps for each Planning Area are standardized to view the entire neighborhood. See Map 15.1 for the Capitol Hill Planning Area. Additional information can be found on the Generalized Policy Map and Future Land Use Map.
ANC 6C-91	2.14	1610.3-4	Central Washington	This table and map should include Capitol Hill, an area that is clearly adjacent to the Central Area.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; To best organize the Comp Plan, each Area Element is split apart. Capitol Hill has its own Element and should not be integrated into the larger Central Washington Element.
ANC 6C-92	2.14	New paragraph after 718.3	Economic Development	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. 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.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; This type of access is covered by the Transportation Element, which addresses citywide accessibility and mobility.
ANC 6C-93	2.14	500.2	Housing	Add the following bullet: Promoting appropriate housing alternatives that include social and health services for older adults and other vulnerable populations	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Housing Element Section 4.3 - Meeting the Needs of Specific Groups.

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ANC 6C-94	2.14	503.8	Housing	In addition to giving priority to market rate and affordable housing, these neighborhoods should include or have access to well-planned retail, public schools, senior services, attractive parks, open space and recreation, enable resilient, innovative...	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The current list does not prohibit or limit the ability for priority to be given to senior services. Additional information on senior services can be found in the Community Services and Facilities Element.
ANC 6C-95	2.14	505.8	Housing	Policy H-1.3.3: Assisted Living, Adult Day Services, and Skilled Nursing Promote the development of neighborhood based assisted living, adult day services with dementia care, and skilled nursing facilities.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Adult day services do not represent a housing related policy and are sufficiently covered in Policy CSF-2.4.1.
ANC 6C-96	2.14	Former 516.8 (H-4.3.2)	Housing	Provide a wide variety of affordable housing choices for the District's 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. 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.)	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Community Services and Facilities Element for definition of senior villages.
ANC 6C-97	2.14	309.6	Land Use	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);	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Guidance on the needs of older adults are included in the Community Services and Facilities Element.
ANC 6C-98	2.14	801.1	Parks-Rec-Open Space	Strengthening of community bonds should be an explicit overarching goal for our parks, recreation and open spaces. We therefore propose the following edit: The overarching goal for parks, recreation and open space is: Preserve and enhance parks and open spaces within Washington, DC to meet active and passive recreational needs through universal access, promote health and wellness, improve environmental quality, enhance the identity and character of District neighborhoods, strengthen community bonds, and provide visual beauty in all parts of Washington, DC.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Parks, Recreation and Open Space Element already speaks to the importance of parks in the community.
ANC 6C-99	2.14	809.9	Parks-Rec-Open Space	As noted on the District's website, "The ANCs' main job is to be their neighborhood's official voice in advising the District government (and Federal agencies) on things that affect their neighborhoods." As a result, it is important that ANCs be involved in park planning and that District agencies are reminded of their obligation to give the ANC recommendations "great weight." Policy PROS-2.1.4: Responding to Local Preferences 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. In particular, relevant Advisory Neighborhood Commissions must be involved in key planning and design decisions and their recommendations afforded "great weight."	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Parks, Recreation and Open Space Element includes information on park planning. See ANC statutory language in DC Code regarding participation in planning processes and "great weight".

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ANC 6C-100	2.14	408.2	Transportation	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.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Policy CW: Union Station Expansion and Railyard Air Rights Development Projects 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.
ANC 6C-101	2.14	T-4.4 Climate Resiliency T-5.2 Electric Vehicles	Transportation	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.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Environmental Protection Element speaks to the importance of reducing vehicle emissions: Citation 610.2 speaks to this: The use of fossil fuels such as coal and natural gas to generate electricity, natural gas used for heating and hot water, and gasoline and diesel in vehicles, is the prime contributor in the District to increasing concentrations of GHG emissions in the atmosphere, which cause climate change.
ANC 6C-102	2.14	1511.1	Capitol Hill	Retain existing on-street parking along H Street. As recommended by the H Street Small Area Plan adopted by Council, [...]	04-No	Current language is sufficient and does not preclude regulatory action; Policy is consistent with H Street Small Area Plan and ongoing work is coordinated with DDOT.
ANC 6C-103			001 - General Comp Plan Comments	Request for more time	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Yes. Public review phase was extended to allow more time.
ANC 6C-104	2.14	New text before 1615.4	Central Washington	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?	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is used as a high-level guide and is not intended to be prescriptive. Additionally, this specific project is in the planning phase, making the addition of specific information premature.

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ANC 6C-105	2.14		Economic Development	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. 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.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan notes the home health aide occupation is expected to grow rapidly in the coming years. However, the most responsive workforce development policy is captured in the shorter-term WIOA plan, which is updated every 5 years.
ANC 6C-106	2.14		Economic Development	Proposed new action: Action ED-4.1.H Interjurisdictional Professional Licensing Agreement for Home Healthcare Aides 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.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan recognizes the importance of Home Health Aides. Specific proposed Action is outside the purview of the Comp Plan and is more accurately covered by DC Health.
ANC 6C-107	2.14		Economic Development	Proposed new action. Add at the end of the element Action ED-4.3.E: Assess Homecare Worker Commuting Patterns 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.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; This comment is outside the purview of the Comp Plan. It may be beneficial for highly targeted workforce development planning as part of the next WIOA Plan.
ANC 6C-108	2.14		Education Facilities	Proposed new action: Action: EDU-3.2A: Addressing Home Healthcare Aide Workforce Development needs 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. Using workforce projections, forecast the size of new or additional public school or community college training programs for Home Healthcare Aides.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Occupation specific workforce development strategy is outside the purview of the Comprehensive Plan.
ANC 6C-109	2.14	New text after 611.10	Environmental Protection	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.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Zero Waste plan is a legislative act within its own accord and does not need a relationship with Comp Plan to be completed or implemented.
ANC 6C-110	2.14	510.7	Housing	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.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. Enforcement is outside the purview of the Comp Plan.
ANC 6C-111	2.14	410.6	Transportation	Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, HAWK pedestrian signals, Rectangular Rapid Flashing Beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, automated enforcement, and pedestrian count-down signals.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Narrative focuses on improvements to the pedestrian experience and public realm. Automated enforcement is not appropriate to include.

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ANC 6C-112	2.14	Before 411	Transportation	ANC 6C proposes a new paragraph: Action T-2.4 G Pedestrian oriented street lighting Develop a program in coordination with the Metropolitan Police to prioritize improving pedestrian-oriented lighting of sidewalks.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Street lighting projects and programs fall under the purview of DDOT.
ANC 6C-113	2.14	415.8	Transportation	Paragraph needs to be revised to indicate the true cost of street parking for private automobiles. Further edits from ANC 6C: Action T-3.2.D: Unbundle Parking Cost 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. [...]	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Recommending modifications to RPP is outside the purview of the Comprehensive Plan, DDOT can make modifications to the RPP program as necessary and needed.