



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown, and Hillandale

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February 14, 2020

Mr. Andrew Trueblood
Director
Office of Planning
1100 4th Street SW, Suite 650 East
Washington, DC 20024
plandc@dc.gov

RE: Proposed Changes to DC's Comprehensive Plan

Dear Director Trueblood,

On February 12, 2020 ANC 2E held its specially scheduled public meeting, which was properly noticed and attended by five commissioners, constituting a quorum. At this meeting the Commission adopted the following resolution by a vote of (5-0-0) with regard to the above-referenced matter:

ANC 2E's detailed comments on the draft amended Comprehensive Plan (CP) are divided into five categories, following the flow of the CP:

1. *Introduction*
2. *Individual Elements*
3. *Area Element: Near Northwest*
4. *Implementation Element*
5. *Other: Language Choices*

To accompany our detailed comments, ANC 2E emphasizes to the Office of Planning (OP) the following themes in our comments and associated recommendations:

- Appropriate Representation: For years to come, Ward 2 – which is a massive revenue generator for DC – will be impacted by this CP. Currently, Ward 2 lacks an elected Councilperson. Typically, ANC 2E would look to this individual to ensure Ward 2 opportunities, needs and considerations are aligned in the CP. The final draft CP will be discussed and agreed upon by 13 members of DC Council and the Mayor's office. Several of the “planning boundaries” used in the draft CP are located in Ward 2. Many neighborhoods in Ward 2 will be greatly impacted by the CP, yet there is no Councilperson representing Ward 2 at this time. The residents of every area of DC are

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specifically represented by an elected Councilperson, except Ward 2. The property, individual income, sales/use, and business income tax from Ward 2 contributes more than 30% of the non-Federal funding used to operate the entire city. Any CP that could impact Ward 2 should be carefully considered by someone with a deep knowledge of and specific interest in Ward 2. ANC 2E calls on the OP to encourage the Mayor and the Council to defer substantive action on the CP until the residents of Ward 2 are represented on the City Council. If the Mayor and OP are not willing to wait until Ward 2 is represented, ANC 2E recommends a process change. The Mayor should identify a person who will be devoted to summarizing - in writing - the comments submitted by entities and residents in Ward 2 as well as comments from other parts of the city could potentially impact Ward 2. This individual and their written summaries should be made available to ANCs and the Council members. The individual can be a seasoned employee from the OP, if appropriate.

- Prioritization: The CP is an ambitious plan for a growing city. That said, the most critical CP goals should be more clearly identified so they are not lost in the massive size of the document. ANC 2E recommends that the OP state which priorities are the top issues. We assume upcoming city budget discussions will be aligned with the CP's most critical goals.
- Balancing Affordability, Preservation and Community Input: One goal that is clearly set out in the CP is a substantial increase in the availability of affordable housing throughout the city. ANC 2E fully supports this goal. This said, various language choices in the CP could be interpreted to mean that the OP believes the only way to achieve the goal is to both compromise the stability of neighborhoods throughout the city and significantly reduce the role of community input. ANC 2E finds this troublesome. As noted in our comments, ANC 2E asks that the OP clarify its intentions for changing existing development/building/zoning processes, especially around reducing the requirement for community input.
- Georgetown and Future Planning Analysis Areas: Georgetown needs a thoughtful Small Area Plan. Georgetown is the oldest part of DC, it is nationally known, and it is an important gateway into our city. With regard to transportation options for Georgetown, the city has decided in the last few months that there will not be investment on K street at this time and the city is proposing to reduce bus lines into and out of Georgetown. These actions are being taken despite the fact Georgetown has never had a metro stop. Georgetown retail is struggling. Vacant commercial buildings are becoming a frequent and concerning sight, so much so that nearly 200 Georgetown residents, business owners and concerned property owners participated in a working group session originated in partnership with the ANC, the Citizens Association of Georgetown, Georgetown BID and Georgetown's Main Streets three months ago to discuss vacancy issues. Telecommunication companies are requesting multiple zoning adjustments, pitting federal and DC policies against each other while leaving local residents no clear path to defend their historic streetscapes. Our public

schools have overcrowding after fifth grade and projections show overcrowding will only increase in the coming years. Our infrastructure, like many of the older areas of DC, needs updating, including basic utilities that are needed to serve a growing population. The Generalized Policy Map (GPM) (<http://bit.ly/34T2eYl>) does not designate Georgetown as a Future Planning Analysis Area. Instead, part of Georgetown is designated as one of the few Regional Centers in DC; however, the intent of the definitional changes made to the Regional Centers is unclear. ANC 2E asks OP to work with our ANC to create a Small Area Plan for Georgetown and to make Georgetown part of the Future Planning Analysis efforts.

- Alternative Transportation: The modes of transportation in DC are quickly changing to meet new demand, reduce pollution, and improve traffic flow. ANC 2E supports the overall concepts in MoveDC and the concept of embracing non-auto options. ANC 2E also supports efforts to improve city infrastructure for bikes, multi-modal forms of transportation and pedestrians and Vision Zero. However, in just a few years over 10,000 alternative vehicles¹ have been authorized by DDOT to operate on city streets, and thousands more are expected. These numbers do not account for the increase in the home package delivery vehicles. How the city aims to integrate these new modes into DC neighborhoods is very unclear. Our neighborhood has repeatedly shared concerns and ideas about safety and enforcement issues, and yet we are not being heard or responded to by DDOT. The alternative transportation efforts appear to be operating without any accountability to the residents of Washington or the unique challenges (e.g. sidewalk widths, paving materials, etc.) they face. More in-depth planning is needed on how these alternative modes will integrate with and impact our city – and DDOT must develop a way to seek consideration and respond to regular input from ANCs on these evolving issues given safety and enforcement concerns.
- Monitoring, Evaluating and Amending the Comprehensive Plan: ANC 2E urges the OP to ensure it seeks robust input from the ANCs on status of CP implementation. Currently the OP currently is only required to “publicize” its progress reports.

1. Introduction – Chapter 1

- In the introduction to the 2006 Comprehensive Plan the authors noted that D.C. Code §1-301.62(i)f (since recodified as §1-306-01(b)(6)) provides that the purposes of the Comprehensive Plan are to “assist in the conservation, stabilization and improvement of each neighborhood and community in the District” (emphasis supplied). Nevertheless, and without amending the introduction, in the amended statement of the Land Use Goals (§302.1), the existing goal of protecting the “. . . stability . . . of neighborhoods in all parts of the city” is replaced with a goal of protecting the “affordability and equity” of neighborhoods. ANC 2E agrees that enhancing the

¹ Non-single owner vehicles such as Uber and Lyft people delivery cars, motorized scooters, dockless bikes, mopeds, temporary rental cars, etc.

affordability and equity of housing in neighborhoods in all parts of the city are critically important goals, but we view the suggestion that affordability and equity can only be achieved by sacrificing the stability of neighborhoods throughout the city both concerning and false.

2. Individual Elements

LAND USE – Chapter 3

- In §304.2 (under LU-1.1 “Strengthening The Core”), the current Plan mandates that “growth must be accommodated in a way that protects the . . . historic texture” of areas in which growth is occurring. In the CP the word “protects” is replaced by “respects.” This substitution of “respects” for “protects” or “preserves” in reference to neighborhoods and neighborhood character recurs throughout the CP. ANC 2E is concerned that deleting the requirement that neighborhoods be protected, and replacing it with a mere suggestion that neighborhoods need only be honored, could lead to the loss of neighborhood stability, the protection of which was a principal goal of the 2006 Comprehensive Plan.
- ANC 2E notes the language changes in *Policy LU-2.4.5: Heights and Densities in Regional Centers*, §312.8, which would result in the active encouragement of increased heights and densities in the commercial corridor in Georgetown. ANC 2E believes the original language, which calls for maintenance of existing heights and densities should be retained, along with the requirement that new development “step down” to “adjacent residential areas.”
- Revised language in *Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations*, §315.8, would permit expansion of institutional uses that adversely affect neighborhoods if “commensurate benefits” are provided. ANC 2E believes that he proposed changes to §315.8 should not be adopted unless a precise definition of “commensurate benefits” is included.

TRANSPORTATION – Chapter 4

- ANC 2E notes that *Policy T-1.1.1: Transportation Impact Assessment*, found in §403.7 of the Transportation Element of the CP would delete the requirement that “full environmental impact statements” be prepared for major transportation projects. ANC 2E opposes this change.
- *Actions T-1.1.A: Transportation Measures of Effectiveness and Action T-1.1.B: Transportation Improvements* (§§403.13 and 403.14) speak to transportation measures of effectiveness and coordination. Currently, DDOT is only accountable for issuing measures, considering improvements and meeting with neighborhood jurisdictions. It is unclear if OP or DDOT view feedback from ANCs on non-auto

transportation as a key piece of feedback or if it will be accorded great weight. ANC 2E believes OP should make it clear what the CP requires of MoveDC or other similar programs (and the role of ANC's in this process) given that so much of the CP is dependent upon the successful roll-out of MoveDC.

- §407.15 (under “Multi-Modal Transportation Choices”) states that plans “for extending the DC Streetcar west to Georgetown are underway.” This is no longer true. ANC 2E recommends that the CP be amended to address the lack of convenient and efficient transit access to and from Georgetown.
- In sections 409 “T-2.3 Bicycle Access, Facilities, and Safety” and 410 “T-2.4 Pedestrian Access, Facilities and Safety,” ANC 2E recommends stronger language that calls for monitoring and enforcing the private vendor/providers dockless programs’ Agreements (B23-359 – The Electric Mobility Devices Amendment Act of 2019). Currently, DDOT does not effectively monitor or enforce the Dockless Bike and Scooter Share Terms and Conditions. The dockless programs need to be administered with the interests of all DC residents in mind, not only the interests of users of such means of transportation. Since the dockless vehicle program began, multiple neighbors in various Wards have observed that DDOT has not been effective in implementing awareness, education, safety and enforcement. Moreover, all available data on the program is extremely high-level, thus little analysis can be done by neighborhoods using DDOT-developed data. More data should be made available to ANC’s and OP should revise §409.10 to specifically call out the need to address the safety, monitoring and enforcement of this alternative modes.
- ANC 2E believes §410.3 should be amended to include reference to the importance of improving accessibility of sidewalks and paths for disabled pedestrians.
- In section 411 “Roadway System and Auto Movement,” §411.1 notes that 22% of the District’s intersections are signalized. The CP should include a goal providing signalization appropriate for blind residents at these intersections.
- ANC 2E believes that *Policy T-2.6.2 Transit Needs* (§412.3) should include “persons with disabilities” in the list of transit-dependent groups requiring assistance.
- In new *Policy T-5.1.4: Equitable Access*, ANC 2E believes it should be made clear that vehicle fleets will be required to be made accessible to people with disabilities.

HOUSING – Chapter 5

- The CP is replete with references to the city’s goal of promoting the development of affordable housing throughout all neighborhoods. Not surprisingly, the Housing Element contains many proposed amendments intended to support this goal. In particular, ANC 2E notes the proposed amendments to *Policy H-1.1.4: Mixed Use*

Development (§503.5) that would call for the promotion of “moderate to high density” mixed use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors and high capacity surface transit corridors. ANC 2E asks OP to clarify whether this policy is intended to apply to commercial corridors in the Old Georgetown historic district.

- New *Action H-1.1.D: Research New Ways to Expand Housing* (§503.10) suggests the Height Act of 1910 could be “updated” to promote housing production. ANC 2E would oppose changes to the Height Act of 1910 that could permit the construction of tall buildings in the Old Georgetown historic district.
- The requirement of a “State of DC Housing Report” included in the §503.10 (*Action H-1.1.B: Annual Housing Report and Monitoring Efforts*) should mandate the inclusion of data on housing accessibility for people with disabilities and proposals to increase the number of these units.
- ANC 2E notes that several residents, and other ANC’s, have observed that no hard data has been issued to define what OP means by “affordability,” and no data on whether “affordability” goals are being met. ANC 2E requests that OP provide such data so progress toward goals can be tracked.

ECONOMIC DEVELOPMENT – Chapter 7

- The critical economic development issues facing the city are set out in §700.2 in the “Overview” section of the Economic Development Element. Inexplicably, the CP calls for deletion of the bullet point that sets a goal of “enhancing and revitalizing the city’s shopping districts.” The decline in the number of retail establishments along Georgetown’s commercial corridors is one of the critical issues faced by ANC 2E, and by ANCs in other areas of the city. ANC 2E asks that this bullet point be restored, and focus be placed on how existing shopping areas in the city can be promoted by the CP goals.
- ANC 2E believes that the Retail Agenda referred to in *Action ED – 2.2.A: Update Retail Action Agenda* (§708.12) should include, “developing incentives/plans for addressing retail vacancies.”
- Rising operating expenses in areas of rapidly rising rents are already having a severe impact on small and local businesses. Therefore, ANC 2E recommends that the second sentence of *Policy ED-3.2.6: Commercial Displacement* (§714.11) should be revised to read, “Develop and implement programs to offset...”

PARKS, RECREATION and OPEN SPACE – Chapter 8

- Chapter 8 of the CP is critical to residents young and old. DPR is going through significant transformation and now manages over 700 parks. DPR lacks an electronic maintenance tracking tool for its parks. Without such a tool, users, including ANCs, cannot work with DPR to track the status of basic maintenance/safety requests, as well as beautification opportunities. Although new language under old §808.4 “DC Speaks Out on Parks” notes that deferred DPR maintenance is an issue and §810.16 (*Action PROS-2.2.B: Maintenance Standards*) notes the need for a maintenance standard for sustainability, Chapter 800 should also include a goal for DPR to electronically track and report on maintenance needs so that accountability on deferred maintenance is possible. To address the long-standing issue of deferred DPR maintenance, ANC 2E asks that a goal be set for DPR to implement a maintenance tracking technology that is visible to interested parties, such as Friends Groups and ANCs who are investing time, money and energy into our parks. The timeframe for this should be short-term so that budgeting will not be a barrier to successful execution.
- §812.4 (“Rock Creek Park”) speaks to the value of Rock Creek. Reinvestment is needed in key parks along Rock Creek, especially those (like Rose Park in Georgetown) that help connect different neighborhoods by providing foot traffic and potential bike paths. Reinvestment should address the ongoing need for safe walkways, level paved areas, and beautification efforts that take into account need for family friendly safety initiatives. ANC 2E is not persuaded that given all the other priorities within the CP that existing city assets such Rock Creek will receive needed reinvestment. How will the CP prioritize reinvestment?
- ANC 2E urges OP to amend the second bullet in §800.5 (“Overview”) to include a requirement that parks and recreational fields will not be changed without robust community outreach and input.
- In §8.7 (“PROS-4.1 Maximizing Access Through Partnership”), ANC 2E believes §8.17 should be revised to state that public private partnerships can be a positive way to help our parks function, provided that such partnerships do not impede equitable access to the public resource.

URBAN DESIGN – Chapter 9

- ANC 2E is disturbed by the fact that, taken as a whole, the proposed amendments to the Urban Design Element would (1) reduce the level of design oversight from the Commission of Fine Arts, and other federal agencies, (2) advocate for a virtual evisceration of the Height Act of 1910, (3) restrict the ability of ANCs to participate in design and zoning matters, (4) weaken and generalize historic preservation concepts wherever possible, (5) weaken zoning map classifications and overlays to promote growth regardless of proximity to commercial uses; and (6) encourage penthouses and roof decks. ANC 2E views these changes as disturbing and

recommends that such changes not be implemented without robust community and ANC input.

HISTORIC PRESERVATION – Chapter 10

- In the Historic Preservation Element (Chapter 10), the CP deletes the Plan’s statement that historic preservation is “an important local government responsibility” and suggests that historic preservation is merely “a valuable planning tool.” ANC 2E believes that the history of Washington is at the very core of the city’s appeal. While we must guard against overemphasis on preservation, ANC 2E believes the CP’s suggestion that historic preservation is not an important local government responsibility is simply wrong.
- Changes proposed for §1000.12 (“Overview”), which lays out the basic assumptions on which preservation policies are premised are alarming to ANC 2E. In one bullet, language that stated that the “basic assumption” of the plan is that the “protection” of historic properties is essential to public welfare is deleted. In another bullet, new language is inserted that says, “[p]reservation standards should be reasonable, and flexible enough in their application to accommodate different circumstances and community needs.” ANC 2E is concerned that, taken together, these changes in language appear to be designed to weaken existing protections for historic properties.
- In §1003 (“HP-1.4 Evaluating Historical Significance”), the revised language no longer calls for protection of all properties that meet the basic test of significance. Instead, those properties would be “...considered for protection...according to preservation planning priorities.” ANC 2E is concerned that this is but one of many examples in the CP of planning mandates being changed to create opportunities for the Office of Planning to exercise discretion to the detriment of historic preservation goals.
- ANC 2E believes that one of the goals of the Historic Preservation Element should be increasing efforts to make historic properties accessible for all members of the community, including people with disabilities. Finding accessible solutions to design elements should be a principal goal of this Element.

COMMUNITY SERVICES AND FACILITIES – Chapter 11

- This chapter of the CP should include a goal of reducing the number of Long-Term Care Facilities in the District and replacing them with more robust Community Based Services for people with disabilities and the elderly.
- ANC 2E is concerned that taken as a whole the Community Service and Facilities Element fails to address many issues important to residents with disabilities.

- In *Policy CSF-1.1.6 Barrier-Free Design*, ANC 2E believe that planning to “consider Universal Design Solution when opportunities present themselves and as funding allows” is setting the bar extremely low for inclusion and respect of residents with disabilities. ANC 2E asks OP to revisit this issue and to require Universal Design Solution.

EDUCATIONAL FACILITIES – Chapter 12

- The CP appears to mention overcrowding as a minor issue, yet this issue is frequently brought up at ANC 2E public meetings and other local events. Current efforts to combat overcrowding will be exacerbated given that the CP calls for the building of an additional 35,000 housing units. ANC 2E asks OP to confirm in the CP that the housing, educational plans and parks and recreation plans are well aligned with regard to population growth.

ARTS AND CULTURE – Chapter 14

- This chapter places no importance on enhancing/improving the culinary arts in DC. Culinary arts can help transform areas of the city, produce revenue, and provide professional training to residents who might otherwise not receive such opportunities. Moreover, the culinary arts place importance on sustainability, climate change, food waste and equality. ANC 2E asks that culinary arts be included in Chapter 14.
- Although ANC 2E agrees with the emphasis on providing theatre for those who live east of the Anacostia river, it should be noted that no major stand-alone theatre exists west of Rock Creek, which also houses a large portion of DC’s population. At a minimum, OP should aim to encourage children’s theatre in all part of the city given the city’s educational goals.
- ANC 2E asks why “Creating a civic culture that attracts the creative class.” was deleted from §1400.2 (“Overview”)? Is this no longer a goal of DC? DC is a very expensive city in which to live. Some incentive for the creative class to base themselves here will help the city meet the CP goals. Having a creative class in all parts of the city means viewing the creative class as a population that requires infrastructure support, including creative housing options. The deleted language should be reinstated.
- ANC 2E ask why the theme in §1404.3(under AC-1.2 “Art and Culture in Every Community) – the successful and recent creation of Art Districts in DC – is not being encouraged by the CP in new areas of DC? Beyond the deletions in §1404.3, §1404.6 deletes “and encourage the development of additional arts districts throughout the city”. ANC 2E believes Art Districts – big and small – are critical to a first-class city. The deleted language should be reinstated.

- New section 1405 (AC-2 “Making Culture More Visible”) highlights that DPW trucks display art work created by local artists. ANC 2E encourages OP to expand this program to other vehicles, thus encouraging our local talent by showing them they are valued by our city.
- ANC 2E does not understand why the language in §1408.2 promoting support for creative professionals was deleted. Georgetown, for example, would benefit from this type of work force focus. ANC 2E encourages the OP to consider places in DC where the creative work force can be encouraged to grow and thrive.
- Section 1411.2 regarding the importance of arts education is also proposed for deletion. ANC 2E does not understand why such a deletion would be made. The deleted language should be reinstated.

3. *Area Element Near Northwest* - Chapter 21

- §2107 addressed Planning and Development Priorities for Near Northwest, but this section has been completely stricken. Many items in this section are still relevant, e.g. in 2107.2 “... zoning changes need to be consistently applied ...” OP should re-review this provisions to ensure all relevant parts are not stricken.
- §2108.6 of the CP includes Georgetown in its discussion of areas with an excessive concentration of liquor licenses. This is outdated. ANC 2E ask OP to delete this reference to Georgetown. Unlike in the past, Georgetown is now combating commercial vacancies, and the number of restaurants in our community has declined since the 2006 Plan was written, so this language is no longer appropriate to Georgetown.
- §§2108.15, 2108.18 and 2114.4 (NEW) speak to transit and refer to Georgetown or a street in Georgetown. Yet, none of these sections offer real specifics or state that there will be a robust planning process. Georgetown needs transportation – it is one of the city’s major connecting areas, yet the city has not done a thorough analysis in many years of Georgetown’s transportation options. Moreover, DDOT has not responded to local input on the implementation of alternative modes of transportation. ANC 2E requests that the CP place a priority on transportation options for Georgetown. Any transit on K street should be pedestrian friendly and encourage foot traffic to other areas of Georgetown. The current plan for K street is outdated. Moreover, further consideration should be given to the feasibility of a metro stop in Georgetown. Finally, DDOT should seek local feedback on the implementation of alternative modes of transport. ANC 2E asks that the CP state the need for pedestrian-friendly transportation to and from Georgetown and state that the creation of transportation plan for Georgetown should be an immediate goal.

- §2108.16 calls for a market studies in two areas of Near Northwest. Georgetown also needs a market study. ANC 2E requests that such a study be prepared.
- Section 2114 speaks only to Lower Georgetown. ANC 2E asks the OP why not all of Georgetown was considered for planning purposes? Georgetown as a whole has a range of issues that it needs to address. Goals must be set and met for an integrated future Georgetown (note the above request for a Small Area Plan for Georgetown)

4. **Implementation** – Chapter 25

- ANC 2E recommends that section 2500 be revised. Currently, the OP has established that it will be primarily accountable for reporting status of the CP by issuing status reports via various electronic communication tools such as social media. ANC 2E asks that the OP place greater emphasis on the OP proactively seeking, addressing and incorporating feedback from local bodies, especially the ANCs. Specifically, §2512 should be amended to require that the OP seek formal input from the ANCs. The CP will only be successful if the CP is well executed. The local communities will be on the front line of execution. We ask this addition would also apply to related plans such as MoveDC.

5. **Other: Language Choices**

- The CP tells us that, “[A]pproximately 94,400 District residents – or 13 percent of the total population – live with a physical or mental disability.” Despite this fact, much of the CP uses language to describe people with disabilities that is outdated and offensive. Similarly, its use of the word “accessible” is repeatedly unclear in meaning, especially as to whether it means disability access or something else. ANC 2E believes that this language should be revisited and changed accordingly.

Commissioner Rick Murphy (2E03@anc.dc.gov) is the Commission’s representative in this matter.

Respectfully submitted,



Rick Murphy
Chair, ANC 2E