

## **ATTACHMENT A**

### **Other Points on ANC3B Priorities I Select Elements of Draft Amended DC Comprehensive Plan February 13, 2020**

#### **I. ROCK CREEK WEST AREA ELEMENT: Neighborhoods**

The Rock Creek West Area Element highlights the importance of preserving stable, attractive residential neighborhoods. The quality of life in the area is generally perceived as very high, which is related to economic vitality, environmental quality, public safety and security, good public services, parks and recreation, sound housing stock, the supportive and welcoming community, and the energy created by a vibrant, diverse population engaged in the life of the community. Those are characteristics that neighborhoods aspire to, and residents want to sustain, so the ANC area appreciates the emphasis in the Area Element on preserving stable neighborhoods

The major arterial street in Glover Park-Cathedral Heights is Wisconsin Avenue, including the commercial area in Glover Park which has recently been selected for one of the city's newest Main Street programs. One of the challenges for the Glover Park commercial area and the Main Street is sustaining the level of retail and commercial activity by attracting new businesses and keeping the vacancy rate low for storefronts and other commercial properties. Competition with online sales has affected retail businesses around the city and the nation, while restaurants and cafes are in competition with establishments in other neighborhoods. The development of new hubs of retail and restaurants and entertainments destinations in areas such as 14<sup>th</sup> Street NW, H Street NE, NoMa, Union Market, the Wharf and Navy Yard draw customers from District neighborhoods as well as tourists and visitors from around the region. Many local businesses in Glover Park have noted that the combination of on demand delivery to your door and easy access to relatively economical ride-hailing services have made it much easier to take advantage of attractive dining and shopping options other than the establishments a short walk away on Wisconsin Avenue, and that has cut significantly into their business. Nearby neighborhood commercial corridors including those guided by Main Street programs in Woodley Park and Tenleytown, as well as Cathedral Commons, Cleveland Park and Georgetown-Burleith also compete with each other for customers, especially in a market where a declining number of brick and mortar retail establishments are able to sustain themselves.

Other highly popular areas have lost commercial tenants as the number of visitors and the volume of purchases go down, leaving vacant properties and dwindling chances to sustain the businesses that remain. This is a challenge that ANCs and planners around the city will have to take into account. Some properties that have been in use for commercial and retail for decades back, as long as any current residents can remember, are difficult to rent for new restaurants or retail. Are they going to be viable for that use in the future? Mixed use and residential development may help to support local retail businesses, or residences may replace retail and commercial uses in some instances. Close market analysis and careful planning will be needed in neighborhood commercial districts such as Glover Park to maintain the viability of the area and continue to ensure local services are available for residents.

## II. ROCK CREEK WEST AREA ELEMENT and ENVIRONMENTAL PROTECTION: Tree Canopy

The Comp Plan includes a text box about the environmental goals adopted in the Clean Energy DC legislation last year, as well as goals expanding the tree canopy and reducing the effect of “heat islands.” These goals are important for all areas of the city, and should be incorporated in plans for development including construction and renovation and other land use decisions.

The city’s many trees are a distinctive feature which adds to the attractiveness for visitors and residents. At ANC public meetings in the past year where the Comp Plan was discussed, several residents highlighted the importance of preserving the green appearance created by the street trees and other landscaping, which are so noticeable to anyone arriving in the city. That includes arrivals via the ‘gateways’ in Rock Creek West, for example, the circles at Western Avenue and Massachusetts Avenue and at Western Avenue and Connecticut Avenue.

ANC3/4G also has emphasized the importance of maintaining the environmental character of the Connecticut Avenue gateway. The tree canopy and “green” look of the area that visitors see as they enter the city are a particularly valued part of the character of the area. The trees and parks and “public parking” not only contribute to the quality of life but also to the quality of the overall environment and health for the community and the city as a whole, through the reduction of carbon dioxide, a key greenhouse gas, as well as the reduction of temperatures at the street level, the “heat island” effect that creates micro-level and macro-level harms to human health and well-being and human and environmental health in the city. Perhaps those points could be added to the sections on the three Policy Focus Areas, such as in ¶2311.7 *Policy RCW-2.1.1: Connecticut Avenue Corridor*.

Casey Trees, the non-profit that works with households and organizations to plant and care for new trees, recently shared maps and statistics about the extent of impervious surface in the District, which has been increasing over recent decades. The latest estimate is that 43% of District land area is accounted for by impervious surfaces, including paved streets and sidewalks, parking lots, impermeable playgrounds and patios, as well as rooftops. In contrast, the area categorized as “tree canopy cover” is only 38% of the District land area and the aerial maps show a steady reduction in tree canopy from 1984 to recent years. In 2016, the Mayor established new goals for the tree canopy in the District, aiming for 40% tree canopy cover by 2032, which will require preserving existing trees, planting more trees, and replacing damaged or dying trees that have to be removed.

Impervious surfaces absorb heat, creating higher ambient temperatures around the city (the “heat island” effect) and exacerbating breathing problems, stress, and other health challenges. Impervious surfaces also create increased run-off into our storm sewers, often containing oils and other chemicals, waste products and sediments flowing into storm sewers and on to rivers and streams. Trees and plants can have an opposite effect, increasing shade, reducing heat, absorbing carbon dioxide. Recent research indicates that low-income neighborhoods often have more impervious surface areas than other areas of the city and a smaller proportion of tree canopy. The result is higher temperatures in the summer which are also related to worse health outcomes for residents. This is another example of environmental injustice, and it is good to see the concerns reflected in the Comp Plan ¶E-1-1.2 Urban Heat Island Mitigation,

which includes tree canopy. These considerations should be part of land use policies, development plans and decisions throughout the District.

### III. HOUSING ELEMENT

Housing is vital to residents' well-being and the important goals and values of being a welcoming and inclusive city, which the Comp Plan is intended to meet. ANC3B appreciates the emphasis on creating additional opportunities to live in the District, including affordable housing throughout the District. Creating and preserving affordable housing has been a goal that our ANC has been strongly supporting, for all levels of affordability—from severe low income to 30%, 60% and 80% of Area Median Income, including workforce housing, dedicated housing for military veterans with limited resources, long-term supported housing for formerly homeless individuals and households, as well as short-term emergency shelters for homeless families such as The Brooks on Idaho Avenue, assisted living and nursing care for seniors and others who need it. Housing will be needed for new residents, young professionals moving into the workforce, growing families, households looking to downsize, and families and individuals seeking rapid rehousing after experiencing financial crises or homelessness. (In January, the Interagency Council on Homelessness shared its draft update of the District's *Homeward DC* plan for preventing and eliminating homelessness, which estimates that the city needs 1,500 more "slots" for individuals looking for rapid rehousing, which is a repeating demand as more individuals fall into difficulties and need their own longer-term housing.)

The Comp Plan needs to provide for constructing and preserving housing in the city that will meet each of those needs, including affordable housing. The Mayor's goals of 36,000 new housing units across all wards by 2025, including 12,000 "affordable" units, while admirable, seems far short of the needs, particularly for low-cost housing. Plans need to accommodate the number of residents who are on a District waiting list for public housing and housing vouchers, are paying far more than the target 30% of monthly income on housing, need replacements for deteriorating housing where they are now living, cannot find economical housing to which they can move to fit the changing number of household members, or are currently homeless.

High cost or "luxury housing" seems to be in ample supply, with new units being added through new construction and conversion of older units. What is in short supply is housing that can accommodate low and moderate income households. The city needs to create incentive programs to encourage more affordable units, preserve existing affordable units, identify prospective properties where affordable and mixed income projects can be encouraged, and make it a priority to encourage low and moderate cost housing along transit corridors with available services so the available sites are not being exclusively devoted to high-cost housing. ANC3B has a new project coming online for affordable workforce housing on Wisconsin Avenue in the Glover Park commercial district, which the ANC encourages and welcomes. It is important for additional projects to be developed on or near the Wisconsin Avenue corridor that provide affordable housing, and the ANC hopes to assist in meeting that goal. The provisions H-1.3.4 for co-housing and H-1.3.6 for Single Room Occupancy units can be very useful, along with ¶1309.12 discouraging tear-downs of existing moderate cost housing.

The District must also specifically plan for housing that provides services to individuals requiring ongoing assistance for social services or medical or mental health treatment, whether they have been experiencing homelessness or facing other challenges. If District agencies have assessed individuals as needing support services and assigned case workers or other service providers to assist them, it is essential that they not be cut off from the services when they are able to move to a new unit such as dedicated affordable housing, whether under a voucher program or other public housing program. That has been happening too often and it is not right or fair or effective in protecting the health and quality of life of residents. Our ANC has maintained close touch with DHS, DBH, DCHD, the Council, senior services agencies and providers of services for individuals experiencing homelessness, and this is always a major issue in the discussion. Residents who have been receiving social services and medical or mental health services and have been identified as needing continuing assistance deserve better from the city. The Comp Plan and other plans for housing and other services must not ignore these vital social and health needs, and just focus on the availability of physical units to house them. The city must provide for those needs or we will not be meeting stated goals for housing equity.

A. Definition of Affordable Housing: One concern raised in ANC3B and other ANCs is the suggestion in the amended Comp Plan, as well as in the Housing Equity Report of October 15, 2019, to define affordable housing goals only in terms of “dedicated affordable housing” that will be “limited to” individuals meeting certain income standards. That approach would only count those forms of “dedicated” housing as distinguished from “naturally occurring” affordable housing available on the market, such as rent-controlled apartments and other housing priced at levels affordable to people with low or moderate income. See the new paragraph after ¶P500.3 of the Housing Element (p. 3 of 79)

Publicly supported housing, such as public housing and housing provided under public programs such as Housing Choice Vouchers may be easier to count and map than the fuller range of affordable housing, but that does not mean that for policy purposes the city should not pay very close attention to the wide range of other affordable housing in its planning and analysis. If city agencies and plans accept the suggested definition in setting and carrying out goals for creating and preserving affordable housing in the coming years, the District will be missing a major part of the housing that meets the needs of low and moderate income residents today. The greatest loss of affordable housing in the District in recent decades has been in the “naturally occurring” category where the housing is provided and paid for in the private market. That does not make the losses any less damaging for the residents or the city. It is very important that the city does not lose increasing numbers of housing units that are now available at affordable prices on the market, including rent-controlled apartments and private homes, which are already highly vulnerable to being razed and replaced or converted to higher-priced housing as development pressures continue.

B. Preserving Affordable Housing on the Market: Our ANC area is known as one of the few places where young professionals and others can find affordable housing in an attractive neighborhood within relatively short distance from downtown, jobs, schools, and essential services. For the health and vibrancy of the community and the continued diversity of income and backgrounds of residents, it is vitally important to preserve this type of affordable housing

in our neighborhood, whether in rent-controlled buildings, accessory dwelling units, co-housing or other economically priced housing that currently exist in Glover Park-Cathedral Heights, even as the city also increases the number of new affordable units being created. The same applies across the city. The city should have clear goals for building and preserving these types of affordable housing in the market, though they may not meet the definition of “dedicated affordable housing” limited to residents at certain income levels, under publicly subsidized programs. Policies to provide financial incentives should also be considered.

C. Linking Housing Plans to Infrastructure Plans: The Mayor’s housing goals call for significant additional housing around the city, including in transit-oriented developments along Metrorail routes. In Rock Creek West, the Comp Plan highlights Friendship Heights as well as portions of Connecticut Avenue for additional housing density. The additional residents associated with the new housing units will necessarily require additional infrastructure, whether it is utility services, transportation, or public facilities. The capacity of the infrastructure and plans for expanding it must be considered at the same time the housing is planned, or the area will not be able to continue to function effectively for any residents.

D. Planning for School Capacity: The city’s estimates are that all the elementary schools in Ward 3 will be at more than 110% of capacity in the coming decade. Many of those schools are already operating at more than that level and are likely only to face greater shortages in capacity compared to the number of students who would like to enroll. In recent years, our local elementary school, Stoddert School has ranked as the most overcrowded school in the city, with enrollment at 135% of capacity—the most overcrowded school in the city. Even after a recent renovation, the school is using closets, administrative space and “demountable” classrooms to accommodate all the students. Other elementary schools in the area, along with the middle schools and high school, are also operating over their estimated capacity. The educational quality at local schools remains high, but the overcrowding creates serious strain on the facilities and limitations on the educational experience the schools can offer. It is a major concern for the community that future additions to the housing stock, particularly for families, will add further to the problems of overcapacity. The city is already struggling to identify remedies for the overcrowding situation, even as forecasts of future enrollment in the Rock Creek West area continue to rise.

The 2018 *Public Education Master Facilities Plan* predicted that 2,500 more students would be enrolling in Wilson feeder schools by 2027-2028. Many of the local elementary schools have been beautifully renovated and expanded over the past decade, and are already overcapacity again. The sites are built out to the point that the required capacity is going to require construction of additional schools. Over the past two years, the Wilson High School Feeder Pattern Community Working Group developed an assessment of expected capacity needs and estimated that 2025 “high-end” forecast scenarios, the average projected utilization across the feeder pattern would reach 128% in their “high end” forecast. In its February 8, 2019, report, the Ward 3-Wilson Feeder Educational Network called for construction of two new elementary schools, a middle school, and a high school. Sites would have to be identified for any of these new schools.

The city's next Master Facilities Plan should address this serious challenge, and deal with the question of how and where land can be found for needed new schools, how development can be distributed to encourage residents to make use of schools that are operating at less than capacity, and how housing projects can be located to ease strain on already overcapacity schools. Planning for housing development in areas with overcrowded schools must take into account potential effects on public school enrollment, and planning for school capacity must accompany plans for additional housing for families in the area.

#### IV. LAND USE ELEMENT: SUCCESSFUL NEIGHBORHOODS

The ANC appreciates the emphasis in the Rock Creek West Area Element on maintaining and preserving stable neighborhoods. But the Land Use Element that deals with overall planning for neighborhoods does not use the word "stable." The amendments dealing with "Successful Neighborhoods" and policies to ensure a high quality of life in the District's residential neighborhoods would remove the word "successful" from critical provisions and instead use the word "inclusive" echoing the title of the 2006 Comp Plan, "Building an Inclusive City." [See ¶1308 and following sections of the Land Use Element].

The ANC agrees with the goals of an inclusive city that welcomes all residents in all neighborhoods and communities. That is an important value for the city, as the Comp Plan highlights. But to capture the full meaning and goals of successful neighborhoods still included in various other provisions of the Land Use Element, it would be more in keeping with the rest of the language and provisions if the title of this section and other provisions dealing with the character of neighborhoods NOT substitute the word "inclusive" for the word "successful" in the title and other operative sentences, but use "inclusive" as part of the title and description of successful neighborhoods. It would be far more meaningful and helpful for residents, communities, and planners trying to sustain and foster well-functioning, healthy, safe and inclusive neighborhoods if the headings and opening sentences of those sections of the plan refer to the range of characteristics that make for a "successful neighborhood" and a "great neighborhood," as other paragraphs in those sections still call for, including ¶1309.6 "What Makes a Great Neighborhood?" As important as being inclusive is and will continue to be, achieving a vibrant, thriving, and welcoming neighborhood requires other features if it is going to be viable and sustainable for the longer term, including economic strength, access to housing and transportation, the quality of public facilities and amenities, schools, parks and physical environment, recreational and social opportunities, and less tangible aspects of the "social capital" of a community. The key paragraphs about planning for high quality of life in District neighborhoods should continue to reflect more of those factors, even as they underline the importance that the neighborhoods be inclusive.

#### V. AREA ELEMENT ANACOSTIA RIVERFRONT

Another important "gateway" to the city is the Southeast entrance alongside the Potomac River, via the Anacostia waterfront. The Comprehensive Plan considers the Anacostia waterfront as its own Area Element, separate from the rest of Anacostia. The waterfront has no permanent residents which makes it a bit awkward to speak about who the people are that the Area Element is aimed at. However, the green areas and park facilities on the Anacostia waterfront have for decades served the people who live in Anacostia, for recreation, relief from

heat in the summer, relaxation in the beauty of the shoreline, the wider horizons the vistas provide, and connection to each other and to the larger city and region around them. At one ANC roundtable about the Comp Plan amendment cycle, an ANC member from Ward 8 asked the OP staff, “Why did you take the waterfront away from us?” noting that the maps in the draft Comp Plan have created a new boundary, a line between the people of Anacostia and their waterfront, and instead of talking about what the community wants to see along the waterfront, is proposing a new mixed use center for upscale market from outside Anacostia, similar to The Wharf recently opened in Southwest Washington.

The Anacostia Waterfront is a large and uniquely special area with huge potential and major attractions to meet many different interests. Should the Anacostia Waterfront be heavily developed for commercial use? Should the Anacostia Waterfront be planned for people other than the residents living nearby who need and want to have parkland and recreational facilities there to enjoy with their families and friends? Is commercial development the highest and best use for that special riverside environment, particularly when the city is looking for ways to keep green space, preserve natural habitat, and reduce impervious surface area in the city? Is there a need for a regional-scale commercial center along the Anacostia waterfront or would it be more appropriate to plan local-scale attractions for the local community that would better serve their needs? Can all these interests be accommodated in that area? The residents closest to the Anacostia Waterfront should be at the heart of planning efforts for that land and the major environmental and recreational amenity it represents for the community.

There are also questions of whether there a risk that a large regional commercial development along the Anacostia Waterfront would draw patrons from existing developments and make it more difficult for the restaurants and other business establishments in those areas to survive and thrive. The District has the Georgetown Waterfront, Navy Yard, and the Southwest Waterfront/“The Wharf” which are developed with restaurants and bars and promenades that are crowded in evenings and weekends with tourists as well as residents from around the region. The city also has seen mixed use development with restaurants, shops, other commercial and residential projects in NoMa, H Street, 14th Street, Union Market, Shaw and other emerging centers for cafes and theaters and bars and related destination commercial establishments. They are competing with each other and with the older commercial centers around the city including Georgetown and neighborhood commercial centers along Wisconsin Avenue and Connecticut Avenue in Rock Creek West. The new areas offer vibrant, eye-catching contemporary developments that draw people from miles away to experience the food and entertainment available there. Is the market sufficient that they can attract sufficient customers without taking away from the business that the other areas need to sustain themselves? If not, it is important to consider those potential effects before developing new plans for commercial development along the waterfront land in the District and committing to more large-scale development along the same lines those other areas have followed. And the process of developing a vision for that area of the waterfront on the south side of the Anacostia River should start by including the people living closest to that waterfront land, the people of Anacostia.