

## Attachment B

### ANC3B Recommendations for Specific Provisions of Area Element for Rock Creek West February 13, 2020

The land area in the ANC3B area of Glover Park and Cathedral Heights is primarily devoted to residential use, with local commercial development primarily along Wisconsin Avenue in Glover Park.

¶2300.2 notes “Rock Creek West’s most outstanding characteristic is its stable, attractive neighborhoods.” We are pleased to see that paragraph retained, as the stable attractive neighborhoods in our ANC provide a high quality of life for people who live there and visit, shop, or go to the parks and restaurants and other commercial establishments. The character of the neighborhoods is very important in attracting and retaining residents and businesses.

We would also point to the importance of the tree canopy to the environment, which we highlight in the section on the Environment below. This should be referred to as a major part of the character of the neighborhoods in this paragraph and should be emphasized as a major part of ¶2309 Conserving and Enhancing Community Resources, including the Naval Observatory Grounds (see below), ¶2309.4 National Park Service Areas, and ¶2309.6 historic resources.

¶2300.5 adds a paragraph on retail districts along the area’s major corridors, highlighting the competition that commercial corridors in Rock Creek West have experienced for customers and for new restaurants and retailers. This is a very important point and should be reflected in local planning and policies. This paragraph mentions Main Street organizations in the area. We would suggest that the final sentence be amended to say, “Additionally, Main Street organizations in Tenleytown and Van Ness as well as in Glover Park and Woodley Park are working to help attract desired retailers and enliven and improve the commercial areas.”

¶2300.10 adds a new sentence “Main Street organizations have been established for Van Ness and Tenleytown.” We recommend that sentence be amended to add the Main Street organizations in Glover Park and Woodley Park.

¶2308.2 Policy *RCW-1.1.1: Neighborhood Conservation* as amended calls for the city to “Preserve the low density, stable neighborhoods west of Rock Creek Park” and goes on to highlight the “character of these neighborhoods,” which we support. The amendments add a new final sentence acknowledging “**Updates to the Zoning Regulations offer the opportunity to create more accessory dwelling units for this area to help absorb a share of the District’s growth and provide for a more proportional share of the District’s growth and provide a more proportional share of affordable and moderate income housing sensitive to existing neighborhood context.**” Our ANC has strongly supported ADUs and also building and preserving affordable and moderately priced housing, so we support this provision with the amendment.

#### ¶2308.4 Policy *RCW-1.1.2: Conserving Neighborhood Commercial Centers*

This provision calls for the city to “Support and sustain local retail uses and small businesses in the area’s neighborhood commercial centers . . . Compatible new uses such as multi-family housing or neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area’s commercial centers to meet affordable **and moderate income** housing needs, **provide transit-oriented development**, and sustain **existing and** new neighborhood-serving retail and small businesses.” The ANC supports this provision as consistent with the hopes and interests of our area.

#### ¶2308.5 Policy *RCW-1.1.4 Infill Development*

This provision calls for the city to “Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Maps. When such development is proposed,

work with ANC's, residents, and community organizations to encourage **mixed-use** projects that combine housing, **including affordable housing, neighborhood serving retail**, and commercial uses." The amendment, however, would delete an important provision which the ANC would like to see retained: "Heights and densities for such development should be appropriate to the scale and character of adjoining communities." The ANC supports this provision as consistent with the hopes and interests of our commercial area and nearby residential areas.

¶2308.8 Policy RCW -1.1.7: Housing for Seniors and Disabled Residents

This provision calls for the city to "Maintain and increase housing for elderly and disabled residents, especially along the major transportation and commercial corridors of Wisconsin and Connecticut Avenues." The ANC supports the objective and content of this policy but recommends that the title and first sentence be consistent in referring to "Seniors and residents with disabilities."

¶2309 Conserving and Enhancing Community Resources includes several provisions related to National Park Service land such as Glover Archbold Park and Rock Creek Park (¶2309.2e) and three provisions dealing with the U.S. Naval Observatory. We support those provisions. The ANC is bordered on the west by Glover Archbold Park and on the east by a narrow stretch of Rock Creek Park at the southeast corner and north of that by the U.S. Naval Observatory. The Naval Observatory Grounds are located directly behind the commercial establishments on the east side of Wisconsin Avenue for virtually the entire length of the Glover Park commercial area. Both the National Park land and the Naval Observatory provide extensive tree canopy and green areas adjacent to the neighborhood.

The Naval Observatory is an important and long-time part of the community and we work coordinate when there are plans for projects within or adjacent to the Observatory Grounds. The mission of the Observatory also requires special considerations of lighting as well as building height in the Glover Park commercial district.

¶2309.2(d) highlights the policy to conserve the scenic resource of the U.S. Naval Observatory Grounds, which we are happy to see retained in the amended draft Comp Plan.

¶2309.5 Policy RCW-1.2.4: Cultural and Tourist Attractions mentions a policy to "encourage broader recognition of other attractions in the area, such as the Naval Observatory . . ." Our neighborhood is fortunate to have the large green area and significant and attractive tree canopy provided by the Nava Observatory, which is lovely to see from a distance, outside the fences. We would note that with present security provisions and extremely limited areas or opportunities for tourists to observe the grounds and structures, the potential for additional recognition of the Naval Observatory as an attraction seems minimal.

¶2309.7 Policy RCW-1.2.6: Naval Observatory calls for ensuring that planning decisions in the vicinity of the Naval Observatory consider the possible impacts of light pollution and take appropriate steps to avoid adverse impacts.

There is also a policy in the Environmental Protection Element that states that regulations for outdoor lighting should be maintained that reduce light pollution and conserve energy, with particular attention to glare and nighttime light trespass in the vicinity of the U.S. Naval Observatory.

Those provisions are consistent with the zoning code and policies, which guide the policy recommendations of the ANC as well. All the commercial properties in ANC3B along Wisconsin Avenue on both sides of the street, from Calvert Street south to Whitehaven Parkway on the west side and Whitehaven Street on the east side (also including 3300 Whitehaven Street and 2001 Wisconsin) are in the MU-27 zone, identified as the Naval Observatory Mixed Use Zone.

The zoning code for MU-27 (§11-G800) states the purposes of the zone “promote the public health, safety, and general welfare on land adjacent to or in close proximity to the highly sensitive and historically important United States Naval Observatory, in keeping with the goals and policies of the Comprehensive Plan” and the master plan for the U.S. Naval Observatory. The MU-27 zone is also intended to “reduce or eliminate any possible harm or restrictions on the mission of the Federal establishment within the zone” and “to provide additional controls on private land to protect recognized federal interests including the critical scientific mission performed at the Naval Observatory and the security needs of the Vice President’s residence located on the grounds.” DC Code 11-G803 also specifies a 40-foot height limit in MU-27, to meet the purposes of the Naval Observatory Zone. See attached.

The ANC supports the purposes of the MU-27 zone, and will continue to work to ensure that the zoning requirements are met, as reinforced by the Comp Plan, and the Naval Observatory grounds and mission can be maintained. Many of the structures on nearby properties in the Glover Park commercial area are not currently built to the floor area or 40-foot maximum allowable height limits. Some new development is being added that will include additional stories for residential or in some cases commercial use above first floor retail space. All proposals in the commercial area that go through zoning review must meet the specific requirements and purposes of the MU-27 zone.

¶2309.9 *Policy RCW-1.2.8: Schools and Libraries* calls for expansion, renovation and improvement of area schools, which is an important priority for our ANC, as our local public elementary school is among the most crowded in the city. One of the proposed amendments removes a clause that alluded to the importance of considering schools “operating at or above capacity . . . in the approval of any residential development that could exacerbate school overcrowding.” With such severe overcrowding in area schools already, and which is getting worse year to year we also would also call for any development of additional housing to accommodate families to be planned in coordination with plans for adding capacity at DC public schools.

¶2309.12 *Action RCW-1.2.A: Combined Sewer Separation* calls for the city to “continue efforts to separate storm sewers and sanitary sewers within the area’s stream valleys, with a priority on **rehabilitating** the combined sewer in Glover Archbold Park.”

The ANC is pleased to see the mention of rehabilitating the sewer in Glover Archbold Park, which the community has been discussing with DC Water since 2013 and we are anticipating that in the next few years DC Water and the National Park Service will release a draft environmental assessment and circulate it for public review and comment. We believe, however, that the action statement as written may be misleading and partly incorrect. First, to the best of our knowledge, the rehabilitation of the sewer pipe in the stream valley in Glover Archbold Park does not involve separating storm sewers and sanitary sewers, and should not be included in a sentence about that effort. Second, we understand that the city is not pursuing separation of combined sanitary and stormwater systems right now except in two limited locations where combined sewers spill into the Potomac River in Georgetown south of the C&O Canal (CSO 25 and CSO 26). See: <https://www.dewater.com/whats-going-on/news/dc-water-begins-sewer-investigations-georgetown-sewer-separation> In 2005, DC Water entered a Consent Decree with the federal government to reduce Combined Sewer Outflows in the District, and there were some small sewer separations including in ANC3B at that time, which have been completed. There are no plans to pursue additional separation of combined sewer systems.

Under the Consent Decree, DC Water is installing “green infrastructure” in the part of western Glover Park to reduce stormwater run-off. This is the first year and the results will be evaluated by DC Water and U.S. Environmental Protection Agency, at which time DC Water will determine whether to pursue additional green infrastructure or build a tunnel to hold overflow from the Combined Sewer Systems after heavy storms to keep sewage out of the rivers. DC Water is now in the middle of the \$2.6 billion Clean Rivers Project initiated under the 2005 Consent Decree to build a series of other large tunnels under the

shorelines of the Anacostia and Potomac Rivers to hold the outflow from combined storm and sanitary sewers in the District, before the material goes to treatment at the Blue Plains wastewater treatment plant. The cost of the Impervious Area Charges to cover the costs of the Clean Rivers Project currently makes up more than 50% of most DC Water customers' monthly bills, and the bills are expected to continue reflecting these costs through the scheduled completion of the project in 2030 or beyond. The tunnels are planned to last for many more decades. In 2015, DC water requested and was granted a modification to the Consent Decree to allow use of green infrastructure in Glover Park and Georgetown to reduce stormwater run-off, instead of building an additional tunnel along the waterfront in Georgetown. But again, DC Water has not raised the prospect of a wide-scale project to replace combined sewers in our area. OP should contact DC Water if additional clarification is needed. We recommend the following:

*PROPOSED NEW WORDING:* ¶2309.12 *Action RCW-1.2.A: Improvements to Combined Sewer Systems* Complete current efforts to separate storm sewers and sanitary sewers. Place a priority on **rehabilitating** the combined sewer in Glover Archbold Park.

¶2309.15 *Action RCW-1.2.D: Senior Wellness Center Development* calls for the city to “develop a wellness center in the Rock Creek West Planning Area, partnering with existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults.” Our ANC pays close attention to interests and issues of seniors in the area, and for several years we have participated in discussions with seniors and providers of senior services about proposals for improving wellness services for area seniors. Wards 2 and 3 do not have a fixed facility designated as a Senior Wellness Center and the city has asked about establishing a single wellness center for the area, but many of our constituents do not support having a single fixed base senior for that purpose. Because the area west of Rock Creek is so large and senior adults reside in every neighborhood from Palisades and Georgetown to Chevy Chase, the distance from any one location in Rock Creek West to a fixed senior wellness center in another part of the area could be as much as 6 miles. That is a considerable distance for seniors to have to go for a daily or weekly activity. To be most effective at drawing seniors and meeting their needs, activities much closer to their home would be much more convenient and practicable. For that reason, our ANC strongly supports the current pilot program sponsored by the city to develop “satellite” wellness centers at multiple locations around the Rock Creek West area.

We appreciate the addition of a new clause in this action item about using “existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults,” With that amendment, however, the paragraph seems ambiguous about whether it is recommending: a senior center at some fixed location in the Rock Creek West area or more of a “virtual” center offering services at many different locations in Rock Creek West coordinated across the area but not an actual fixed senior wellness “center.”

This has been a subject of dialogue and coordination among residents, ANCs and Councilmember Mary Cheh, as well as Iona Senior Services as the designated provider for senior services in Ward 3, and the DC Office on Aging (now the Department of Aging and Community Living). The Council has provided funding for the pilot efforts to create a satellite wellness center for Wards 2 and 3. We would recommend that the provision be amended to reflect those facts:

*PROPOSED NEW WORDING:* ¶2309.15 *Action RCW-1.2.D: Senior Wellness Services* Develop and support **a strong senior wellness program** in the Rock Creek West Planning Area using existing facilities in the community to provide decentralized programming, activities, and services to the area’s large population of older adults.