

GOVERNMENT OF THE DISTRICT OF COLUMBIA
ADVISORY NEIGHBORHOOD COMMISSION 3B
GLOVER PARK AND CATHEDRAL HEIGHTS



February 13, 2020

Mr. Andrew Trueblood
Director, Office of Planning
1100 4th Street SW, Suite E650
Washington, DC. 20024

Dear Mr. Trueblood:

Thank you for the opportunity for ANCs to comment on the draft amended DC Comprehensive Plan (“Comp Plan.” The Comp Plan is very important as a framework and guidebook for all planning in the District, including for housing, transportation, schools, parks and other public facilities, as well as development and zoning decisions in the District. We appreciate the addition of provisions on resilience and climate change. Many of the other elements can also have major effects on our area and the city.

As our ANC expressed in our December 12, 2019, letter to OP, we would have liked to see OP undertake extensive and comprehensive outreach to residents and other stakeholders as part of the Comp Plan amendment process, including full presentation of the proposed amendments to the Comp Plan, what they are intended to do, and how they address strengths and weaknesses that have been identified in the 2006 Comp Plan as part of a formal evaluation process. In the absence of that kind of effort, and with a very constrained time schedule, our Commission has reviewed the content of the draft amended Area Element for Rock Creek West, which is the part of the District that includes ANC3B, and tried to assess whether the amendments reflect what we know about our own community and what our constituents are seeking as we look to the future.

We would also like to share some more general points about priorities for the area and the city including:

- supporting and preserving stable neighborhoods so they can provide a high quality of life for new and existing residents;
- emphasizing the importance of preserving and enhancing the tree canopy and avoiding or reducing “heat islands” in all plans for land use and other economic development;
- carrying out environmental goals adopted in the Clean Energy DC legislation last year, including energy conservation, reduced use of fossil fuels, and increased use of renewable energy, which should be built into plans for economic development, construction and renovation, and other land use plans and design decisions
- creating and preserving affordable housing and moderate cost housing in the area, to ensure that housing options are available in our area for residents at all income levels rather than just high cost or luxury housing, whether in new or existing buildings;
- supporting mixed use including retail and other commercial as well as residential use in neighborhood commercial districts along major transit corridors;

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MELISSA LANE

3B04
CATHEDRAL HEIGHTS
MARY C. YOUNG

3B05
S. GLOVER PARK
BRIAN TURMAIL

- planning for additional school capacity along with plans for additional housing for families in the area;
- ensuring that plans for other development are coordinated with plans for transportation and other infrastructure to ensure that adequate services are available for new and existing residents;
- providing housing options such as permanent supported housing in the Rock Creek West area for individuals assessed with ongoing needs for medical and mental health care and other social services, to ensure that their current services continue when they move and they are not left without required assistance in units that do not sustain their quality of life;
- providing for public participation in reviewing and commenting on future changes to the Comp Plan as well as plans for developments that use city funding or require zoning approval.

These types of points about priorities would usually be included in a section of the Comp Plan entitled "Priorities." OP, however, did not conduct a comprehensive outreach process to identify the people's vision and priorities for the city, the functional areas covered in the plan, or various part of the city, that means there is no section of the draft plan presenting a new vision or priorities for our area, Rock Creek West. That section of the 2006 plan is simply omitted from the Area Element and placed in an appendix. For that reason, we have tried to represent priorities that have been raised to our ANC and will offer them on several key topic areas in the draft, with the hope they will be useful as guidance for this and future drafts of the Comp Plan.

As many residents, planners, business people, and local officials have observed, the District has changed a great deal since 2006, in ways that are visible and tangible in how the city and its neighborhoods look and operate and in other ways that are unseen but felt. Some challenges remain the same, others have evolved, and many new challenges have emerged. Our expectation and recommendation is that when OP next takes up the Comp Plan for amendments or rewrites, the process should begin with wide-ranging outreach that reaches a large share of residents and other stakeholders around the District, with the intention of understanding the people's vision and priorities. It should also consider what has worked well and what has not worked as well in the Comp Plan in the intervening years. That combination of listening and learning and evaluating, against a backdrop of standards and principles that reflects a range of views and interests of the public, can create a foundation for considering what portions of the Comp Plan should be amended or rewritten and what changes are needed to satisfy the overarching vision of the people for their city.

We are attaching recommendations for specific provisions of the draft amended Comp Plan in the Area Element for Rock Creek West which covers our ANC area, and corresponding mark-ups with specific suggestions and questions. Our recommendations focus on maintaining stable, attractive neighborhoods, supporting the vitality of the local business district, protecting and expanding the tree canopy, conserving National Park land and the U.S. Naval Observatory, considering school capacity and overcrowding in plans for housing and other development, completing sewer improvements including in Glover Archbold Park, supporting housing for seniors and people with disabilities, and providing senior wellness activities through decentralized programming at facilities around the Rock Creek West area. Also attached are some additional general priorities for other Elements of the amended draft Comp Plan on Housing, Environment, and Land Use.

As ANC3B has highlighted in our previous comments to OP about other phases of this Comp Plan cycle, public participation is essential to effective city planning at each stage, from development of the vision and priorities all the District's plans to the specific language of the Comp Plan to Small Area Plans, plans for other agencies and parts of the infrastructure, and zoning regulations, to the review of particular projects such as PUDs or applications that go through the Board of Zoning Adjustment.

Though public participation was not as full as the city should have provided and as we would have liked to see through the current amendment cycle, from 2017 to 2019, we hope that OP will fully consider all comments from ANCs and members of the public in this comment period, before finalizing the draft amended Comp Plan and moving it forward to the Council for review.

We hope that in coming years, OP will concentrate on designing an effective process for reaching out to the people throughout the District to hear their priorities and assess their vision for the future, consider what worked well or not as well all under the 2006 Comp Plan and the 2019 rewrite, and assess the changes recommended to correct or improve the Comp Plan, as the foundation for the actual update of the Comp Plan that is due to be completed in 2026.

We also would like to share a few recommendations for future updates of the Comp Plan. Though the calendar established by the Council currently in effect required a set of amendments to the 2006 Comp Plan in 2011, 2016, and 2021 leading to a complete update/rewrite in 2026 after 20 years, it is now 2020 and it may take an entire year or more for the Council to approve the amendments in the current cycle, so it is in no way practical to imagine that we could undertake another amendment cycle that would conclude in 2021. Our strong recommendation would be to skip the 2021 amendment cycle—or consider the current cycle to satisfy that requirement—and move directly to working toward having an effective, inclusive updated Comprehensive Plan in place by 2026, with all the public outreach, public input, and public review that would be required in a full public planning process that there was not time to do in this amendment process.

If the Council finds it necessary or desirable to adopt new legislation to guide the Comp Plan update process for 2026, we suggest that there should be:

- requirements for formal evaluation of experiences with what works and what does not work as well in the Comp Plan in effect, with public outreach, public comments, and public sharing of the evaluation results before initiating a call for amendments or input for an update or rewrite of the Comp Plan
- detail on what should be considered in the range of “amendments” in an amendment cycle
- directions on how to elicit suggested amendments from a broad range of stakeholders, identify the reasons for the proposed amendments and the intended effects
- provisions for stakeholders to submit suggestions of provisions in the Comp Plan that they would like to keep, rather than change
- specifics on the timetable and notification process and potentially public hearings that OP should follow to provide for public review of proposed amendments, including adequate information and time for residents and ANCs to make an assessment and submit comments
- consideration of a shorter time between full updates of the Comprehensive Plan, perhaps 15 years with two amendment cycles rather than 20 years with three amendment cycles.

Thank you for your consideration.

Sincerely,



Brian Turmail
Chairman

This letter was approved by a vote of 5-0 at a duly noticed public meeting of the Commission on February 13, 2020, at which a quorum was present. (Three of the five Commissioners make a quorum.) By that vote, the Commission also designated the Chairman or the Commissioner for 3Bolt to represent the Commission on this matter.

Attachments:

Other Points on ANC3B Priorities in Select Elements

Detailed Recommendations for Area Element Rock Creek West

Mark-up of Area Element Rock Creek West

Zoning Description for Mixed Use (MU) Zone MU-27 Naval Observatory

Residents' Comments on Draft Amended Comp Plan