

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



December 12, 2019

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

Dear Mr. Trueblood:

Thank you and the staff of the Office of Planning (OP) for the work you have done to prepare the 1,500-page redline draft “amended” version (“draft”) of the 2006 District Comprehensive Plan (“Comp Plan”), released in mid-October for public review. We also appreciate your participation in our November 14 ANC3B public meeting to make an initial presentation on the draft, and OP’s continuing attention to ANCs in the process, with workshops, copies of the draft and maps, offers of further assistance in reviewing and preparing resolutions on the proposed language, and agreement to give “great weight” to ANC comments. We are looking forward to more chances to discuss proposed change to the Comp Plan, and additional opportunities for the Commission and our constituents to participate in the process and share our perspectives.

We have already been hearing from constituents who have concerns about the contents of the draft and the timetable for public comments, which OP has requested by the end of the day on Friday, December 20. That is why we are writing to you today, before the due date, to share our requests, before that deadline arrives.

Based on what we have learned and heard from constituents, we do not believe the amount of time OP is providing for comments would be in any way sufficient for individuals, ANCs and other organizations to develop informed statements about how the draft would meet the interests of area residents and communities who will be affected by the revised plan. We want to make three main points:

First, our ANC has been asked by several constituents and civic associations to support an extension to the time for public comment to at least April 1 and possibly April 30. We support any extension in time for public comment and for ANC comments.

Second, we are concerned that extending the due date to April 2020 would not remedy the lack of detailed information available to the public about the proposed changes to the Comp Plan, and specifically what the changes are intended to do and what impact they would have for residents and communities. We hope OP can do more to assist ANCs and others to greatly expand the awareness and understanding of the changes proposed in the draft..

Third, the ANC has heard multiple concerns from residents who have participated in the Comp Plan amendment process about the substance of the draft. Some neighbors have expressed fears that grounds for residents to question proposed developments have been largely removed from the draft. Others have asked

why none of the Comp Plan amendments submitted by individuals were accepted. We have not heard explanations of why some suggested changes while others were not.

Those are serious concerns and we would like to see OP address them.

We strongly urge that OP provide a far more extensive public information effort on the contents of the draft, far more robust public engagement process as well as significantly more time for public review and comments.

As a Commission, we also need more time for our review of our constituents' comments and our own analysis. We are pleased that OP intends to give "great weight" to ANC comments on the draft and has given ANCs several more weeks, until January 31, to submit comments. At this time, we want to submit an initial statement, before the due date for comments from the general public, because we have several basic concerns about the process:

1. The revised draft is too long for a member of the general public to read, comprehend, and prepare informed comments in the time allowed.
2. The revised draft is truly not an amended Comp Plan, it is a rewrite. There are significant changes in virtually every paragraph, The fact that the redline version is nearly twice as long as the original Comp Plan makes that point. And the changes are far from "technical." They reach to the essential substance of the content.
3. OP briefings on the plan have been conducted have been at a "high level," but for a document this complex, a "high level" assessment of the draft is not sufficient to get at the meaning and impacts of the proposed changes.
4. Each section or "element" of the Comp Plan relates to other elements and to the maps. To understand the meaning and potential effects of changes in one element, a reader needs to consider the effect of related changes in other elements.
5. There has been no true "public engagement" in the current cycle. OP made an Open Call for amendments in 2017, but that is far different from engaging the residents around the city to hear their interests and priorities, and assess what is working and what needs to be adjusted in the Comp Plan, which was the foundation of the 2006 Comp Plan and should be a starting point for a rewrite.
6. The ANCs are not constituted or mandated to be planning bodies, and it is beyond our capacity to educate our constituents about the proposed changes and synthesizing all residents' possible comments on the details of this lengthy document. That is OP's job. We will listen to each comment offered to us and represent the Commission area in our own statement, but many of the issues are outside our areas of technical expertise.

We appreciate OP's attention to ANCs and its decision to give "great weight" to ANC comments on the draft plan. We hope to submit a statement of our comments at a later time. We could also attach to our comments any individual comments we receive from constituents, and take them into account as possible in our own comments. But we are not a good substitute for the OP staff in sorting through and synthesizing

Rather than rushing this process and shortchanging the opportunities for full public participating, we would note several options for responding to the important and serious concerns about the process for concluding this "amendment cycle" in coming months:

- A) OP could acknowledge that the required 2016 amendment cycle has been missed and work toward a combined 2016/2021 amendment cycle, with the goal to get an amended Comp Plan adopted in 2021.
- B) OP could focus in this cycle on making "technical amendments" to the 2006 Comp Plan, necessitated by changes in law or regulations, corrections to actual errors, as well as edits to reflect Small Area Plans and other plans made since the 2011 amendment cycle, but not
- C) The Council could change the Comp Plan timetable so a rewrite/update of the Comp Plan would be required after only 15 years instead of 20 years, providing for a complete rewrite of the Comp Plan in 2021 or 2022, so OP could also undertake the intensive public engagement and participation that were part of the original 2006 Comp Plan process.

In summary, the Commission recommends strongly that OP:

- **Extend the deadline for comments from the public and ANCs at least to April 2020**, and potentially through the end of spring.
- **Conduct much more extensive effort to share information on the detailed changes in language** the draft proposes and how it will change the meaning and impact of the Comp Plan on District priorities, plans and process for public participation in physical development programs and projects.
- **Provide staff and leadership to conduct public outreach and analyze their comments**, not rely on ANCs to compile and evaluate input from residents about the proposed changes to the Comp Plan.

OP has indicated it would like to have about two months to review comments and make any additional changes, with the goal of sending the revised draft to the Council around April 2020. That will be the time of the Council's review and hearings on the Mayor's proposed FY2021 budget, when the Council has virtually no chance to take the Comp Plan, until the budget is approved in the summer. For that reason as well, it seems reasonable for OP to extend its public outreach and public review and comment period, to allow fuller understanding and more complete comments before concluding the drafting and sending a revised "amended" Comp Plan to the Council.

OP has stated that it would like to restore respect for planning and the Office of Planning. We support that goal and want to see the Comp Plan be respected and valued along with the work of OP going forward.

Thank you again for your work and your interest in including ANCs and residents in this important process. We hope to continue working productively with OP on the planning efforts through this process and beyond.

Sincerely,



Brian Turmail
Chairman

The Commission approved this letter by a vote of 4-0 at a duly noticed public meeting at which a quorum was present. (Three of the five members constitute a quorum.) The Commission designates the Chairman or his designee to represent the Commission on this matter.