**ANC 4A Resolution r4a19-12-03-01 ANC COMMENTS / COMP PLAN**

ANC 4A received a copy of the proposed revision of the Comprehensive Plan in November of 2019. We were told that comments may be submitted from the public until December 20, 2019, and from the ANCs until January 31, 2020.

We share the interest in seeking more time to consider these matters, but there is no guarantee that more time will be given. It is prudent for us to come to a consensus to the extent feasible and then to submit a letter, with ANC 4A’s comments to the Mayor, the Director of the Office of Planning, and the DC Council.

In order not to lose the opportunity to comment, we are offering the attached comments for your consideration and approval at this December 3, 2019 meeting. We will also consider alternative comments.

The Comprehensive Plan encompasses two tiers of city planning: 1) the City-wide Elements, and 2) the Area Elements. In addition, the Future Land Use Map (“FLUM”) and the Generalized Policy Map (“GPM”) express the public policy on future land uses in the District and shows the residential and commercial areas.

In 2017, the Office of Planning (OP) opened the process to amend the 2006 Comprehensive Plan. In response, ANC 4A offered Resolution expressing our views on the plan. We have not received feedback as to whether the ANC’s recommendations were adopted. We know that the Framework Element was amended and approved by the Council on October 8, 2019.

On October 15, 2019, the Office of Planning published the proposed amendments to the 13 Citywide Elements and the 10 Area Elements. The compilation is more than 1,500 pages. Or proposed changes, as well as nearly 200 proposed changes to the FLUM and the GPM maps. The proposed amendments make major changes to the existing elements, striking out large portions of text and replacing the text with new language.

OP has allowed the public a 65-day review period that began on October 5, 2019. The Advisory Neighborhood Commissions were told that we had until January 31, 2020 to submit comments. This review period falls within the Thanksgiving, Christmas, New Year’s and other religious holidays.

We are asking for more time. This should be granted, because we have been advised that it is not likely that the Council will not consider these proposed amendments until after the passage of the District’s Fiscal Year 2021 budget, estimated to be after June 2020.

We incorporate by reference ANC 4A’s previous resolution. Our comments also reference and support the requests submitted through ANC 4A, including from the Shepherd Park Citizens Association.

We now offer comments on the revised draft that was released on October 15, 2019. This matter will be considered at the ANC 4A regular public meeting on Tuesday, December 3, 2019.

Our proposed comments focus primarily on Land Use, Housing, Transportation, the Environment, Historic Preservation, the Rock Creek East Area element, and the Implementation Action Steps and the Future land Use Map. Time did not allow us to address the other elements like Infrastructure, the Education element, the Community Facilities, Urban Design or the Arts, but there is strong interest in those sections as well.

At the ANC 4A meeting, an oral resolution will be offered that the ANC 4A provide comments to the Office of Planning (as approved) and authorize the Chair of ANC 4A to send a letter and the comments as may be agreed to, and adopted at, the December 3, 2019 public ANC 4A meeting to the Mayor, and the Office of Planning.

Therefore, we are providing the attached comments for your consideration. I am also sharing an excerpt from the testimony that I gave at the marathon hearing on this matter on March 20, 2018, along with the draft comments.

Testimony of Gale Black, Before the DC Council Committee of the Whole on the Proposed Framework for the Comprehensive Plan, March 20, 2018

1. We need to protect our limited low density single family housing stock if we want to meet the needs of DC. This plan could lead to the loss of our residential green spaces and churches, because there is an incentive to increase density, through new development, and conversions that build up and out.
2. The plan, as proposed, does not guarantee affordable housing. It does the opposite. It is not even clear what “affordable” means.
3. DC was built and sustained on several historic Master Plans. It is in the public’s interest to retain our historic character, functions, and scale.
4. The concept of “mixed-use” needs to be revisited. It is contrary to the vision for DC and our interest in preserving stable resilient neighborhoods
5. This process has not been transparent. ANC 4A passed a resolution in 2017, in opposition to the proposed Framework Element, because of the wholesale changing of the Comprehensive Plan. OP has not addressed the comments.
6. If “equity” is truly important, there must be one set of laws for everyone, not special privileges for some, over others. Not everyone wants to bike. If fairness is important and diversity is valued, we need to consider DC’s unique needs and have a plan that works for all of us, including older adults, individuals with disabilities, families, those below the poverty line, visitors, and for small businesses.

**The Land Use Element is very important.** More than any other part of the Comprehensive Plan, the Land Use Element lays out the policies through which the city will accommodate growth and change, while conserving and enhancing its neighborhoods 3-1. We don’t need to CREATE new neighborhoods. We need to **maintain the successful neighborhoods.** Guiding Principles 2-24.

We hope to keep strong protections for existing residential communities. For stable neighborhoods, the 2006 plan emphasized neighborhood conservation and appropriate infill. Land use policies in those areas focused on retaining neighborhood character. This new plan focuses on **increasing density** and **Creating New** Neighborhoods, but in ways that are not equitable or affordable for the majority. It seeks to replace our street network.

The District has benefitted from a legacy of far-sighted master plans that recognize the importance of parks and open spaces to the future of the city. The city is built on the historic L’Enfant and McMillan Plans which are the foundations of modern Washington, according the National Capital Planning Commission Federal Elements. The L’Enfant Plan’s streets and place - - and their extension by the 1983 Permanent System of Highways - - as well as the 1901 McMillan Plan and the 1910 Height of Buildings Act, have directed the character and orderly development of the city, according to the NCPC, federal elements at page 157. There was a place for everything and everyone. The horses did not share the path with the pedestrians. That worked. Now, everything is “mixed-use” and not nearly as safe. Now, we have scooters, sharing the public roads and sidewalks.

Washington has no fewer than 130 distinct and identifiable neighborhoods. “They range from high-density urban mixed use communities,” like the West End and Mount Vernon Square to quiet low density neighborhoods like Crestwood, Colonial Village, Hillcrest and Spring Valley, providing a wide range of choices for the District’s many different types of households. Page 3-23. The 1999 Comprehensive Plan identified the then staple neighborhoods in Ward 4. The list included Rock Creek East, Carter Barron East, and Lamond-Riggs. Those names don’t appear on any maps today. Long ago, the city recognized that Colonial Village, North Portal Estates and Crestwood should be “clustered” together for planning purposes. Section 1503.3(b) stated that “Crestwood, Colonial Village and North Portal Estates are affluent neighborhoods bordering Rock Creek Park, They are developed with single-family detached homes on relatively large lots. These quiet neighborhoods are characterized by curving non-through streets and cul-de-sacs. Because the park is a natural barrier, access to these neighborhoods is limited, traffic is restricted, and open space is abundant.” It recognized that there were many well-known neighborhoods, such as Crestwood, Shepherd Park, Colonial Village, North Portal Estates and 16th Street Heights. “Each neighborhood is unique in demographic, social, economic and housing characteristics. They contain a diverse mix of housing types that will accommodate a variety of income ranges.” We need to preserve that mix of options. We need to protect all of our neighborhoods, and not overlook protecting Brightwood. **There are 85 development projects planned for the Rock Creek East Area.** Where are they? Will they be affordable?

**We need to remember that there is only so much land, time, or money.**

**DC is small. It is only 69 square miles; and DC is already dense**. In 2016, the District had over 11,000 people per square mile. Population density is even higher if the federal lands are subtracted out. Federal lands comprise almost 40% of the land in the District. Currently, only 23% of the land is permanent, open green space, like Rock Creek Park and the National Mall.

Only 28.1% of our land is residential. Only 13% is single family, low density, non-commercial.

**Let’s recognize that DC is unique; and its city plan should be responsive to DC’s unique needs.**

It’s the Nation’s Capital.

DC is an international city.

DC is historic.

DC is unique because of the federal presence that accounts for 40% of our land.

The city also attracts 19 million visitors annually.

We have 169 or more foreign diplomatic missions.

We have 23 international organizations.

We have many large employers, which include the federal government, universities, hospitals and 130 unique neighborhoods.

20% of the population is below the poverty level.

Approximately 8,000 residents are homeless (and many of these are the working poor).

**DC has many challenges**.

For one thing, Seventeen jurisdictions feed into DC. Most of the people who work here commute here from outside of DC. The road network is already overcapacity. We need to consider a viable rail option. This plan does not do that. Sixteenth Street, NW is one of the few evacuation routes in our quadrant. At no point does the city explain how it is to operate to move people or goods efficiently or effectively along this corridor.

We are also struggling now with our infrastructure needs, as reflected by black-outs, road cave-ins, sink holes, water main breaks, and delays in restoration of use of our existing public roads and public rights-of-way.

**BIG CHALLENGE**

**TRANSPORTATION SAFETY AND EFFICIENCY FOR ALL OF US**

By contrast, in just 6 years, the bike share program has grown to almost 450 stations and 3700 bikes across DC. We now also have dock less bikes, competing for our public transportation rights of way.