



January 10, 2020

DC Office of Planning
Comprehensive Plan Amendments

Please find the comment supported by the Kalorama Citizens Association below:

Land Use Element

Policy LU-2.1.1: Variety of Neighborhood Types

Maintain a variety of ~~residential~~ neighborhood ~~types in the District~~, ranging from low-density, ~~single-family~~ neighborhoods to high-density, ~~multi-family mixed-use~~ neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced ~~in the future~~. while encouraging the identification of appropriate sites for new development, and/or adaptive reuse to help accommodate population growth and advance affordability and opportunity. 309.5

Proposed change: None.

Rationale: This is a fundamentally important land use policy. It should be maintained.

Policy LU-2.1.3 Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply including affordable units and expand neighborhood commerce with parallel goals to ~~protect~~ **respect** neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on ~~conservation~~ conserving units and character in some neighborhoods and revitalization in others although all neighborhoods have a role in helping to meet District-wide needs such as affordable housing and public facilities. 309.8

Proposed change: None.

Rationale: This remains a fundamentally important land use policy. It should be maintained.

Policy LU-2.1.7. ~~Conservation of Row House Neighborhoods~~ Character

~~Protect~~ **Respect** the character of row house neighborhoods by requiring the height and scale of structures to be consistent with the existing pattern, ~~considering additional row house neighborhoods for “historic district” designation, and regulating the subdivision of row houses into multiple dwellings~~. Upward and outward extension of row houses which compromise their design and scale should be discouraged. 309.14

Proposed change: Restore the deleted portion of the above text beginning with “considering” and ending with “dwellings”.

Rationale: The need for this policy, particularly to guide the Zoning Commission, the Board of Zoning Adjustment and the Historic Preservation Review Board, remains undiminished. It should be

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maintained. OP's apparent position that it is not permissible even to "consider" additional historic designation for rowhouse neighborhoods in accordance with the body of District law it is charged with implementing is unacceptable.

Policy LU-2.1.8. Zoning of Low and Moderate Density Neighborhoods:

Unless a small area plan, District agency directive or study indicates otherwise, Discourage the zoning of areas currently developed with single family homes, duplexes and rowhouses (e.g., R-1 through ~~RFR-4~~) for multi-family apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhoods.]

Proposed change: Delete "Unless" through "otherwise". Replace "and" before "its replacement" with "or".

Rationale: Giving OP – or any executive agency-- the ability to nullify a Comprehensive Plan Policy at will, as OP now proposes, would be outrageous. The need for this policy remains undiminished and it should be maintained undiminished..

LU-2 CREATING AND MAINTAINING SUCCESSFUL INCLUSIVE NEIGHBORHOODS 308

308.1 This section of the Land Use Element focuses on land use issues within the District's neighborhoods. It begins with a set of broad policies which state the city's commitment to sustaining neighborhood diversity and ~~protecting~~ **enhancing** the defining characteristics of each community. This is followed by a discussion of neighborhood appearance, particularly the treatment of abandoned and blighted properties. This section then turns to a discussion of residential land use compatibility issues, followed by a discussion of neighborhood centers and commercial land use compatibility issues. 308.1

Proposed change: Restore "SUCCESSFUL" and insert "and" before "INCLUSIVE"; restore "protecting" and insert "and" before "enhancing".

Rationale: Having neighborhoods that can be considered broadly successful is an obviously valid goal. And it is also obvious that the defining characteristics of a community cannot be "enhanced" if they do not continue to exist – hence they need to maintain and protect them.

Policy LU-2.1.9: ~~Addition of Floors and Roof Structures to Row Houses and Apartments~~ Alterations to Rowhouses and Apartments

Generally discourage alterations to buildings that result in a loss of familysized units ~~increases in residential density~~ resulting from new floors and roof structures (with additional dwelling units) being added to the tops of existing row houses and apartment buildings, ~~if particularly where~~ such additions would be architecturally undistinguished and out of character with the other structures on the block. Roof structures should only be permitted if they ~~would not harm the~~ aim to respect the architectural character of the building on which they would be added. or other buildings nearby.

309.14

Proposed change: Strike "that result in a loss of family-sized units" and insert "particularly where they result in the loss of family-sized units" between "apartment buildings" and "if". Correct spelling of



“undistinguished”. Strike “roof structures” before “should”, and insert “Such alterations” in its place.. Restore “would not harm the” and strike “aim to respect the”.

Rationale: (1) There is no reason to limit this policy to alterations that result in loss of family-sized units, although in practice commercial conversions of rowhouses and renovations of multifamily buildings typically involve an increase the number, and a reduction in the size, of dwelling units,

(2) Substitute “penthouses” for “roof structures”, to be consistent with the current nomenclature of the Zoning Regulations.

(3) The second sentence should be consistent with the first, which is not limited to roof structures.

(4) The meaning of “aim to respect” in this context is obscure. The Policy should be expressed in plain language.

Policy LU-2.1.10. Multi-Family Neighborhoods

Maintain the multi-family residential character of the District’s Medium- and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, unless those uses would likely provide jobs for nearby residents, and make these areas more attractive, pedestrian-friendly, and transit accessible. 309.15

Proposed change: Strike “unless those uses would likely provide jobs for nearby residents,” and insert in its place “while encouraging commercial uses that would likely provide jobs for nearby residents”.

Rationale: No one should want to *invite* incompatible commercial uses into these or any other residential neighborhood, as the proposed policy seems to do. Preserving neighborhood character and welcoming job-providing commercial uses are not incompatible objectives.

Action LU-2.1-A : Rowhouse Zoning District

~~Develop a new rowhouse zoning district or divide the existing R-4 district into R-4-A and R-4-B to better recognize the *their* unique nature of rowhouse neighborhoods and conserve their architectural form (including height, mass, setbacks, and design).~~ **Completed – see implementation table.** 309.19

Proposed change: Modify the original text as follows:

Encourage and facilitate rezoning of RA-zoned rowhouse neighborhoods to the recently created RF-4 and RF-5 rowhouse districts ~~Develop a new rowhouse zoning district or divide the existing R-4 district into R-4-A and R-4-B to better recognize the *their* unique nature of rowhouse neighborhoods and conserve their architectural form (including height, mass, setbacks, and design).~~ 309.19

Rationale: All that has happened by way of “implementation” is that the new zones were created in the zoning re-write. It is now important to move forward proactively to implement the steps taken in ZR16 to promote bringing zoning into line with the built environment in the row-house areas which these zones were intended.



Action LU-2.1-B. ~~Amendment of Exterior Wall Definition~~ Penthouse setback on detached dwellings, semi-detached dwellings, row houses and flats

Amend ~~the city's~~ procedures for roof structure review so that the division-on-line wall or party wall of a row house or semi-detached house is treated as an exterior wall for the purposes of applying zoning regulations and height requirements. **Completed – See implementation table.**^{309.20}

Proposed change: Change title to read: “Penthouse setback on detached dwellings, semi-detached dwellings, row houses and flats”. Strike “roof structure” and replace it with “penthouse”. Insert, at the end, “Continue the requirement that penthouses be set back from all walls of detached dwellings, semi-detached dwellings, row houses and flats and buildings in R-1 though RF zones. Strike “Completed – See implementation table”.

Rationale: (1) Language should be consistent with the current nomenclature of the Zoning Regulations.

(2) These important protections against visually intrusive penthouses should be maintained as a matter of policy.

Action LU-2.1-C: Residential Rezoning

Provide a better match between zoning and existing land uses in ~~the city's~~ residential areas, with a particular focus on:

(a) Blocks of well-established single family and semi-detached homes that are zoned ~~R-5-A~~ RA-1 or higher

(b) Blocks that consist primarily of row houses that are zoned ~~R-5-B~~ RA-2 or higher

(c) Historic districts where the zoning does not match the predominant contributing properties on the block face.

In all these instances, ~~pursue~~ **consider** rezoning to appropriate densities to ~~protect~~ **respect** the predominant architectural character and scale of the neighborhood. ^{309.21}

Proposed change: Restore “pursue”, and insert, at the end of the foregoing text, “**utilizing the two recently created row house zones RF-4 and RF-5 where applicable.**”

Rationale: Except for the recently reformed RF-1 zone, the need for this action remains widely unmet throughout the city. It should be pursued, and in the process changes in ZR16 designed to facilitate this action should be utilized.

Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas

Maintain zoning regulations and development review procedures that prevent the encroachment of inappropriate commercial uses in residential areas; and (b) limit the scale and extent of non-residential uses that are generally compatible with residential uses, but present the potential for conflicts when they are excessively concentrated or out of scale with the neighborhood. ^{311.3}

Proposed change: Insert “(a)” between “that” and “prevent” in first line. Add a new sentence at the end: “Avoid converting residential use to non-residential use.”



Rationale: The need for this action remains undiminished after the enactment of ZR16. It should be maintained and strengthened. The problem of conversion of residential use to non-residential (e.g.unauthorized transient accommodation) should be explicitly noted.

Policy LU-2.3.2: Mitigation of Commercial Development Impacts

Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts on surrounding residential areas. Before commercial development is approved, establish **appropriate** requirements for ~~traffic~~ **transportation demand management** and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid ~~such possible~~ **adverse effects of the benefits of commercial development in enlivening neighborhoods, generating taxes and creating jobs.** 311.4

Proposed change: None.

Rationale: The need for this policy, particularly to guide the Zoning Commission and the executive branch, remains undiminished. It should be maintained.

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, **livability**, and future of **Washington, DC and its residents**. ~~the District of Columbia. Ensure that W~~when such uses are permitted in residential neighborhoods, ~~their y~~are designed and operation ~~ed in a manner that is~~**should be** sensitive to neighborhood issues and neighbors' ~~that maintains~~ quality of life. Encourage institutions and neighborhoods to work proactively to address issues such as ~~traffic~~ **transportation** and parking, hours of operation, outside use of facilities, and facility expansion. 311.7

Proposed change: Restore the original second sentence (beginning with "Ensure that").

Rationale: There is really no reason why the language of this important policy should be watered down from the imperative "ensure" to the merely hortatory "should". .

Policy LU-2.3.7: Non-Conforming Institutional Uses

Carefully control and monitor institutional uses that do not conform to the underlying zoning to **promote** ~~ensure their~~ long-term compatibility. In the event such **institutions** ~~uses~~ are sold or cease to operate ~~as institutions~~, encourage conformance with existing zoning and continued compatibility with the neighborhood. 311.9

Proposed change: Strike "promote" and restore "ensure their ". Insert, after "compatibility", "discouraging special exceptions or variances that allow them to operate at a different scale from the underlying zoning".

Rationale: The need for this policy, remains undiminished. It should be strengthened and maintained.



Policy LU-2.3.8: Non-Conforming Commercial and Industrial Uses

Limit ~~Reduce the number of~~ nonconforming uses in residential areas, ~~particularly those uses~~ that generate noise, truck traffic, odors, air and water pollution, and other adverse effects. Consistent with the zoning regulations, limit the expansion of such uses and fully enforce regulations regarding their operation to avoid harmful impacts on their surroundings. 311.10

Proposed change: Strike “and” before “other adverse effect”, and insert “or” in its place..

Rationale: As written this policy would “limit” only those harmful nonconforming uses that have *all* the adverse effects enumerated in the first sentence. That should be corrected.

Policy LU-2.3.9: Transient Accommodations in Residential Zones

Continue to distinguish between transient uses—such as hotels, bed and breakfasts, and inns—and permanent residential uses such as homes and apartments in the District’s Zoning Regulations. The development of new hotels on residentially-zoned land should continue to be prohibited, ~~incentives for hotels (such as the existing Hotel Overlay Zone) should continue to be provided on commercially-zoned land~~, and owner-occupancy should continue to be required for transient accommodations in residential zones, **consistent with applicable laws. Short Term housing for persons receiving social services is outside the scope of this policy’s prohibitions.** 311.11

Proposed change: None.

Rationale: The need for this policy remains undiminished. It should be maintained.

Policy LU-2.3.10: Conversion of Housing to Guest Houses and Other Transient Uses

Control the conversion of **entire** residences to guest houses, bed and breakfast establishments, clinics, and other non-residential or transient uses. Zoning regulations should continue to allow larger bed and breakfasts and small inns within residential zones *as home occupations* through the Special Exception process, with care taken to avoid the proliferation of such uses in any one neighborhood. 311.12

Please refer to Policy 2.4.11 of this Element for additional guidance on hotel uses and the need to address their impacts.

Proposed change: None.

Rationale: The need for this policy remains undiminished and it should be maintained.

Policy LU-2.3.11: Home Occupations

Maintain appropriate regulations (including licensing requirements) to address the ~~growing~~ trend toward home occupations, accommodating such uses but ensuring that they do not ~~negatively impact~~ **hurt** residential neighborhoods. 311.13



Proposed change: None.

Rationale: The need for this policy remains undiminished. It should be maintained.

~~Action LU-2.3.A: Zoning Changes to Reduce Land Use Conflicts in Residential Zones~~

~~As part of the comprehensive rewrite of the zoning regulations, Develop text amendments which: a. Expand buffering, screening, and landscaping requirements along the edges between residential and commercial and/or industrial zones; b. More effectively manage the non-residential uses that are permitted as a matter of right within commercial and residential zones in order to protect neighborhoods from new uses which generate external impacts; c. Ensure that the height, density, and bulk requirements for commercial districts balance business needs with the need to protect the scale and character of adjacent residential neighborhoods; d. Provide for ground-level retail where appropriate while retaining the residential zoning along major corridors; and, e. Ensure that there will not be a proliferation of transient accommodations in any one neighborhood.~~

~~**Completed – See Implementation Table.**~~^{311.14}

Proposed change: Restore deleted text and strike “Completed – See Implementation Table”.

Rationale: Significant portions of this Action’s extensive mandate remain unfulfilled post ZR16..

Action LU-2.3-B: Analysis of Non-Conforming Uses

Complete an analysis of non-conforming commercial, industrial, and institutional uses in ~~the District’s~~ residential areas. Use the findings to identify the need for appropriate actions, such as zoning text or map amendments and relocation assistance for problem uses.

Proposed change: None.

Rationale: The stated objectives of this action remain valid; it should be retained.

Policy LU-2.4.7: Location of Night Clubs and Bars

Provide zoning and alcoholic beverage control laws that ~~discourage the excessive concentration and~~**encourage a mix of ground floor uses in commercial areas creating stronger retail environments** and minimizing potential negative effects of liquor licensed establishments (e.g., night clubs and bars) in neighborhood commercial districts ~~and adjacent residential areas.~~ New uses that generate late night activity and large crowds should be ~~located away from low and moderate density residential areas and should instead be concentrated~~**prioritized** Downtown, in designated arts or entertainment districts, and in areas where there is a limited residential population nearby.

Proposed change: Restore “discourage the excessive concentration and”. Change “minimizing” to “minimize”. Insert “, and” after “residential areas”, to be followed by “encourage a mix of ground floor



uses in commercial areas creating stronger retail environments” relocated to that position in the text. Strike “prioritized”. The revised text would then read as follows:

Provide zoning and alcoholic beverage control laws that discourage the excessive concentration and minimize potential negative effects of liquor licensed establishments (e.g., night clubs and bars) in neighborhood commercial districts and adjacent residential areas, and encourage a mix of ground floor uses in commercial areas creating stronger retail environments. New uses that generate late night activity and large crowds should be located away from low and moderate density residential areas and should instead be concentrated Downtown, in designated arts or entertainment districts, and in areas where there is a limited residential population nearby.

Rationale: The revisions proposed by OP obscure what should be the main objective of this policy, namely, to forestall excessive concentration of ABC establishments near residential areas.

312.13 Policy LU-2.4.9: High-Impact Commercial Uses

Ensure that the District’s zoning regulations limit the location and proliferation of fast food restaurants, sexually-oriented businesses, late night alcoholic beverage establishments, 24-hour mini-marts and convenience stores, and similar high-impact commercial establishments that generate excessive late night activity, noise, or otherwise affect the quality of life in nearby residential neighborhoods. 312.13

Proposed change: None.

Rationale: The need for this policy is undiminished.

312.15 Policy LU-2.4.11: Hotel Impacts

Manage the impacts of hotels on surrounding areas, particularly in the Near Northwest neighborhoods where large hotels adjoin residential neighborhoods. Provisions to manage truck movement and deliveries, overflow parking, tour bus parking, and other impacts associated with hotel activities should be developed and enforced. 312.15

Please refer to Policies 2.3.9 and 2.3.10 of this Element for additional guidance on hotel uses within residential neighborhoods.

Proposed change: None.

Rationale: The problems that this policy seeks to address remain and have not abated.



Action LU-2.4-B: Zoning Changes to Reduce Land Use Conflicts in Commercial Zones

As part of the comprehensive rewrite of the zoning regulations, consider text amendments that:
(a) more effectively control the uses which are permitted as a matter-of-right in commercial zones;
(b) avoid the excessive concentration of particular uses with the potential for adverse effects, such as convenience stores, fast food establishments, and liquor-licensed establishments; and
(c) consider performance standards to reduce potential conflicts between certain incompatible uses, if they do not require frequent and extensive monitoring. **Completed -- See Implementation Table.**

Recommended change: Strike "Completed – See Implementation Table."

Rationale: At least some of the problems that this Action seeks to address – e.g excessive concentration of liquor-licensed establishments -- remain unabated and were not effectively addressed if at all by ZR16.

Historic Preservation Element

Policy HP-1.6.5: Commercial Signage

Control commercial signage to avoid the visual blight of billboards and intrusion upon the city's monumental grandeur and residential neighborhoods. Support the city's economic vitality and quality of life through carefully considered policies and regulations for commercial signage in designated entertainment areas.

Recommended change: None.

Rationale: This new policy is timely and highly important.

Policy ~~HP-2.4.6~~HP-2.4.1: Preservations Standards for Zoning Review Ensure consistency between zoning regulations and design standards for historic properties. Zoning for each historic district shall be consistent with the predominant height and density of contributing buildings in the district. **Monitor the effectiveness of zoning controls intended to protect characteristic features of older neighborhoods not protected by historic designation.** Where needed, specialized standards or regulations should be developed to help preserve the characteristic building patterns of historic districts and minimize design conflicts between preservation and zoning controls.

Proposed change: None.

Rationale: The importance of this policy continues to increase. It should be maintained.



Mid-City Element

Mid-City Area Element -- Overview, 2000.9.

. . . Revitalization has increased the need to manage traffic and parking and assist small businesses. brought traffic and parking pressures, caused construction-related street disruptions, and has burdened small businesses trying to keep up with rising costs. There are also visible threats to the historic integrity of many of the area's residential structures, particularly in ~~areas like Adams Morgan Lanier Heights, Reed Cooke, Park View,~~ Columbia Heights, Bloomingdale, and Eckington, which are outside of designated historic districts. In some instances, ~~row houses are being converted to multi-family flats, demolitions~~ and poorly designed alterations are diminishing an important part of Washington's architectural heritage. Revitalization must be recognized to be offset by the perception and fact of longstanding residents being priced out of their historic homes even as some persons benefit from the tremendous rise in property values. 2000.9

Proposed change: Restore the terms "Adams Morgan" and "demolitions" in the foregoing text.

Rationale: Deletion of these terms significantly diminishes the factual accuracy of the text..

Mid-City Area Element -- ~~Planning and Development Priorities—2007~~ See Appendices for historical record of 2005-2006 engagement results.

~~2007.1 Three Comprehensive Plan workshops took place in Mid-City during 2005 and 2006. These meetings provided an opportunity for residents to discuss both citywide and neighborhood planning issues. The Advisory Neighborhood Commissions provided an important voice in this discussion, particularly on the Future Land Use Map. There have also been many meetings in the community not directly connected to the Comprehensive Plan, but relating to other planning topics. These meetings have covered topics such as public realm and transportation improvements in Columbia Heights, revitalization of Georgia Avenue, redevelopment of McMillan Reservoir, parking and traffic issues in Adams Morgan, and the arts districts along U Street and in the greater Shaw area. 2007.1~~

~~2007.2 The community delivered several key messages during these meetings, summarized below:-~~

~~2007.2 a. The distinct and eclectic character that defines Mid-City neighborhoods should be protected as infill development takes place. The communities of the Mid-City welcome community reinvestment, but are worried that the rapid pace of redevelopment may be changing the fabric of the community too quickly. The loss of neighborhood diversity was the greatest concern expressed at almost every Comp Plan meeting in the Mid-City area, and was raised in many different contexts—from the need for affordable housing to concerns about the influx of chain stores and decline of neighborhood businesses.~~



- ~~b. Housing opportunities should be increased for people at all income levels so that Mid-City can remain a diverse neighborhood. The citywide run-up in housing prices has particularly impacted Mid-City, as costs have soared beyond what many local residents can afford. Working families and lower income residents are being priced out of the area, and there are concerns that the community is becoming affordable only to upper income professionals. Preserving the existing stock of affordable units is important, either through rehabilitation or replacement of subsidized housing projects with new affordable units. The type of new housing being built in the area should be more varied. In particular, more three- and four-bedroom units are needed to attract and retain families.~~
- ~~c. New condos, apartments and commercial development should be directed to the areas that are best able to handle increased density, namely areas immediately adjacent to Metrorail stations or along high volume transit corridors. These areas are generally located around 14th and Park, along the 14th Street corridor, along~~
- ~~d. U Street—especially around the Metro station, along 7th Street and Georgia Avenue—especially west of Howard University, and in the southeastern corner of the Planning Area near the New York Avenue Metro station. Mixed use development, with multi-story housing above retail shops and services, is desirable in these locations and would reinforce the Mid-City's character as a vital, pedestrian-oriented neighborhood.~~
- ~~e. The row house fabric that defines neighborhoods like Adams Morgan, Columbia Heights, Pleasant Plains, Eckington, and Bloomingdale should be conserved. Although Mid-City includes six historic districts (Greater U Street, LeDroit Park, Mount Pleasant, Strivers' Section, Washington Heights and Kalorama Triangle), most of the row houses in Mid-City are not protected by historic district designations. Some are even zoned for high density apartments.~~
- ~~f. A variety of problems have resulted, including demolition and replacement with much larger buildings, the subdivision of row houses into multi-unit flats, and top story additions that disrupt architectural balance. Intact blocks of well-kept row houses should be zoned for row houses, and not for tall apartment buildings, and additional historic districts and/or conservation districts should be considered to protect architectural character.~~
- ~~g. The community is in dire need of additional parkland. Mid-City is the densest part of the city, but the ratio of park acreage per resident is among the lowest in the city. Rock Creek Park is a great resource, but is a long way from the eastern part of the Planning Area and is primarily a passive open space. The Area has a shortage of active play fields and recreational facilities, especially east of 16th Street. In many cases, schools are the only open spaces in the neighborhood, but access to school grounds may be restricted, and the school facilities themselves are suboptimal. Sites like the McMillan Reservoir Sand Filtration site offer the promise for additional neighborhood open space. New development there and elsewhere should set aside land for parks, while development along the area's commercial streets and around Metro stations should include pocket parks and plazas. Throughout the community, innovative approaches such as land trusts and easements should be considered to improve open space access.~~
- ~~h. Language barriers should be broken so that more foreign-born residents can get a proper~~



~~education, find suitable housing, find a decent job, and participate in community life and civic affairs. With a growing population of immigrants and non-English speaking residents, the Planning Area needs alternative education options and better access to literacy and language programs. If residents are to fill the good quality jobs to be created in the new economy, better vocational training and bilingual services are needed. Local public schools, charter schools, universities, and non-profits should be integral partners in these efforts~~

~~i. The arts should be recognized as an essential part of community life. While this is true in all parts of Washington, it is especially true in the multicultural neighborhoods of the Mid-City. The Planning Area has been the home of many ethnic and racial groups for more than 100 years, and has long been a center of creative expression and cultural diversity. The area should celebrate its past through heritage trails and historic exhibits, and celebrate its present through indoor and outdoor performance, art, and music. New cultural facilities must also be part of the area's future.~~

~~j. Better economic balance should be achieved in the neighborhood. The neighborhood centers on the west side of the Mid-City Planning Area are generally successful, with strong demand for commercial space. Neighborhood business districts on the east side, particularly along Georgia Avenue and North Capitol Street, are still struggling. There are numerous vacant and boarded up properties, along with concerns about fire safety, blight, and crime. Commercial gentrification is also an issue. Small corner stores and other businesses that are unique to the neighborhood are having a harder time getting by. The area's restaurants, ethnic establishments, and iconic neighborhood businesses are an important part of what defines this community. They should be strongly supported in the future.~~

~~k. Pedestrian safety, improved traffic operations, and parking management are all high priorities. Increased density within this already dense Planning Area creates busier streets—both for cars and for people. Despite its proximity to Metro, Columbia Heights will become more congested as 700 new housing units and 500,000 square feet of new retail space come on line. Parking demand will continue to exceed supply in Adams Morgan and Mount Pleasant. Commuter traffic along North Capitol Street and Florida Avenue will continue to burden side streets in Eckington and Bloomingdale. New solutions and strategies to traffic management are needed. Increasing transit service and improving pedestrian safety are important parts of the equation, but they must not be the only parts.~~

~~l. Public facilities in Mid-City need improvement. Many of the area's schools, libraries, and recreation centers are outdated and do not meet the needs of the community. At the same time, residents are concerned about proposals to use private development to leverage public facility replacement. A key concern is that public facilities are not rebuilt at the expense of neighborhood open space, which is already in very short supply. While MidCity has several outstanding new facilities, including the Girard Street Playground, the Columbia Heights Community Center, and Bell-Lincoln Multicultural Middle/ High School, there are still unmet needs. m. Mid-City needs "greening." This Planning Area has a very high percentage of impervious surface coverage and lost much of its tree cover during the 1970s, 80s, and 90s. Tree planting is needed to reduce urban runoff, create shade, remove air pollutants, and create beauty in the neighborhoods. Future development should incorporate green roofs and~~



~~other methods to reduce resource consumption, conserve energy and water, and be more environmentally-friendly.~~

Proposed change: Restore the foregoing approximately three pages of text, pending a careful professional analysis to determine in what respects it remains valid, in what respects it should be updated, and why. Redraft the text accordingly.

Rationale: Mr. Trueblood has called for giving priority in commenting on OP's current draft to "big picture" problems. This section illustrates such a problem, which unfortunately is found in a number of instances throughout OP's proposed update of the Comp Plan.. In this case, OP has proposed simply to delete in its entirety some three pages of text on planning and development priorities in the current plan that resulted from extensive consultation with the community. Any observant resident of Mid-City neighborhoods will see that much of that material remains highly relevant today. OP has provided no reason to conclude otherwise, or offered any comparably thoroughgoing alternative analysis, but seems to assume the prerogative to discard these insights from the community wholesale simply because they've been around too long. This is both intellectually unsupportable and, incidentally, inconsistent with the nature of the current exercise as an update of the current Plan and not the drafting of new one, that OP has emphasized.

Policy MC-1.1.5: Conservation of Row House Neighborhoods:

Recognize the value and importance of Mid-City's row house neighborhoods as an essential part of the fabric of the local community. Ensure that the Comprehensive Plan and zoning designations for these neighborhoods reflect the desire to retain the row house pattern. Land use controls should discourage the subdivision of single family row houses into multi-unit apartment buildings but should encourage the use of English basements as separate dwelling units, in order to retain and increase the rental housing supply.

Proposed change: None.

Rationale: The need for and importance of this policy remain undiminished, and it should be retained.

Policy MC-2.7.2: ~~Eckington/Bloomindale~~ Neighborhood Character

~~Protect~~ **Preserve and retain** the architectural integrity **and cultural resources** of the ~~Eckington/Bloomindale~~ neighborhoods, and encourage ~~the continued restoration~~ **compatible rehabilitation** and improvement of the area's row houses.

Proposed change: None.

Rationale: The need for and importance of this policy remain undiminished, and it should be retained.

Policy MC-1.1.1: Neighborhood Conservation

Retain and reinforce the historic character of Mid-City neighborhoods, particularly its row houses,



older apartment houses, historic districts, and walkable neighborhood shopping districts. The Planning Areas squares, alleyways, and historic alley buildings offer opportunities for preservation and creative development. The area's rich architectural heritage and cultural history should be ~~protected~~ and enhanced.

Proposed change: None.

Rationale: The need for and importance of this policy remain undiminished, and it should be retained.

Action MC-1.1.A: Rezoning Of Row House Blocks

Selectively rezone well-established residential areas where the current zoning allows densities that are well beyond the existing development pattern. The emphasis should be on row house neighborhoods that are presently zoned R-5-B RA-2 or higher, which include the areas between 14th and 16th Streets NW, parts of Adams Morgan, areas between S and U Streets NW, and sections of Florida Avenue, Calvert Street, and 16th Street. Completed – See implementation table. 2008.12

Proposed change: Delete “Completed – See implementation table”.

Rationale: The need for this action remains widely unmet, including in some of the areas cited in the text. It calls for a sustained and systematic effort.

Introduction

102.1 The DC Code vests the Mayor with the authority to initiate, develop and submit a Comprehensive Plan to the DC Council, as well as the power to propose amendments following the plan's adoption. ~~In the course of adoption, t~~The DC Council ~~may alter~~ **adopts** the Comprehensive Plan, subject to the approval of the Mayor and review by the National Capital Planning Commission (NCPC) and Congress. 102.1

Proposed change: Modify the foregoing text as indicated below:

§102.1 The DC Code ~~requires~~ vests the Mayor with the authority to initiate, develop and ~~to~~ submit ~~the District elements of the~~ a Comprehensive Plan ~~and amendments thereto~~ to the DC Council ~~for revision or modification, and adoption by act, following public hearings, as well as the power to propose amendments following the plan's adoption.~~ ~~In the course of adoption, t~~The DC Council ~~may alter~~ **adopts** the Comprehensive Plan, subject to the approval of the Mayor and review by the National Capital Planning Commission (NCPC) and Congress. 102.1

The amended text will then read as follows:



§102.1 The DC Code requires the Mayor to submit the District elements of the Comprehensive Plan and amendments thereto to the DC Council for revision or modification, and adoption by act, following public hearings, subject to the approval of the Mayor and review by the National Capital Planning Commission (NCPC) and Congress. 102.1

Rationale: The current version of this section in the Comp Plan is an accurate if abbreviated statement of the respective legal authorities of the Mayor, the Council and the National Capital Planning Commission with respect to the adoption and amendment of the Comprehensive Plan. Its legal basis is found in the following language that is repeated in essentially identical form twice in the Home Rule Act, as well as the provision in the DC Code requiring submission of acts of the Council to the Mayor for approval.

“(a)The Mayor shall be the central planning agency for the District. He [sic] shall be responsible for the coordination of planning activities of the municipal government and the preparation and implementation of the District's elements of the comprehensive plan for the National Capital. . . .”

“(b) The Mayor shall submit the District's elements and amendments thereto to the Council *for revision or modification, and adoption by act, following public hearings.* Following adoption and prior to implementation, the Council shall submit such elements and amendments thereto to the National Capital Planning Commission for review and comment with regard to the impact of such elements or amendments on the interests and functions of the federal establishment, as determined by the Commission.” DC Code §1-204.23. See also DC Code §§2-1002.

OP now proposes to strike the reference to the Council’s explicit authority to revise the Mayor’s proposals. Why? The only discernible reason is to suggest to the public that the Council’s “adoption” is to be a merely ministerial act automatically performed once the Mayor’s proposals are in hand – a needless little piece of misrepresentation apparently designed to enhance the Mayor’s role.

This is consistent with Director Trueblood’s misguided assertion, during the Council’s recent deliberation on the Framework Element, to the effect that the Council lacked authority under the Home Rule Act to tell the Zoning Commission how to act. The Chairman properly called him out on that point, but then, sadly, promptly relinquished a big piece of that authority to the Commission in §227.2 of the Framework element.