

RE: ANC 1C Recommendations on Amendments to the DC Comprehensive Plan

Dear Director Trueblood,

On the evening of February 5, 2020 at a properly noticed meeting with a quorum present and by a vote of 5-0-0, ANC 1C considered and approved the following recommendations regarding the DC Comprehensive Plan. We have compiled the community submissions that we received during the open submission process in an addendum to this document. We expect OP to give these community comments due consideration.

**Mid-City Element: Greater Alignment with the Office of Planning document, [Adams Morgan Vision Framework](#)**

ANC 1C welcomes the Mid-City Area Element's new addition, **Action MC 2.4.7: Implement the recommendations in the Adams Morgan Vision Framework**, and urges OP to align the Adams Morgan section of the Mid-City Area Element more closely with the community and planning goals articulated in the Vision Framework.

Completed by OP in Fall 2016, the Vision Framework is a data-driven community-based strategic planning document. This initiative was an opportunity for residents, local businesses, institutions, and property owners to articulate a vision for the future of Adams Morgan.

Robust community engagement was conducted at every stage in the Vision Framework process including: 1) a neighborhood walking tour; 2) a half- day public workshop held in February 2015; 3) a project website; 4) three community "office hours" events; 5) an online engagement forum; and 6) Latino business outreach through direct canvassing. An Advisory Committee comprised of Advisory Neighborhood Commissioners, business owners, commercial property owners, civic organization members and representatives from the Adams Morgan Partnership Business Improvement District provided detailed feedback and guidance on a regular basis throughout the entire process both as a group and individually. Prior to issuance of the final Vision Framework, a draft of the plan was reviewed by the project's stakeholders at a community open house in fall 2015, and followed by a public comment period which concluded in winter 2016.

The plan identifies opportunities to preserve physical characteristics, enhance retail and amenities, support sustainability and improve the quality of life for the community.

**Creating Great Places.** 1) Enhance existing and create new community gathering spaces, 2) Redefine Unity Park as a place for multicultural events and programming, 3) Improve the transitions between commercial and residential uses.

- The Comp Plan does not adequately address this goal in the Adams Morgan section. ANC 1C urges OP to include language highlighting the importance of recapturing and reviving available public space for community use (e.g. intersection of Columbia Rd & 18<sup>th</sup> Street, Unity Park, alleyways).

**Redefining Retail.** 4) Align retailer goals, 5) Improve connections between Adams Morgan’s retailers and residents, 6) Provide technical assistance for and support to existing Hispanic, Asian, and African owned/operated businesses, 7) Achieve neighborhood goals for cleanliness, safety and a healthy environment.

- ANC 1C supports the inclusion of *Policy MC-2.4.2: Preference for Local-Serving Businesses*, *Action MC-2.4.D: Local Business Assistance*, and new *Actions: Commercial District Management and Enhance the Neighborhood Retail Experience*.
- ANC 1C urges OP to include language related to Goal 7 of the Vision Framework, which emphasizes the need for additional efforts to develop a waste management plan to better dispose of waste and control rodent and pest activity.

**Embracing Sustainability.** 8) Enhance neighborhood sustainability. This goal has several subsections: a) Form an Adams Morgan sustainability task force to incorporate the goals and actions of the Sustainable DC initiative and oversee the sustainability recommendations of this Framework, b) Embed a culture of sustainability into the fabric of all Adams Morgan hospitality and restaurant-based businesses, c) Work with the Urban Forestry Administration to identify opportunities to fill gaps in the street tree canopy, d) Expand the neighborhood’s public recycling program, e) Create a community compost drop off site, f) Conduct a sustainable infrastructure audit to identify interventions to promote neighborhood sustainability efforts, g) Achieve a 25% target for high performing roofs for residential commercial properties, h) Support construction projects to go above and beyond the Green Building Act requirements in situations where community support is integral to a project’s approval.

- ANC 1C supports *Policy MC 1.1.11: Stormwater Management for Interior Flooding*, *Policy MC-1.2.5: Neighborhood Greening*, and *Policy MC-1.1.12: Green Development Practices*, which encourages capital improvement or development projects in Mid-City to eliminate surface water runoff from sites through green roofs, rain gardens, cisterns, pervious pavement, bioretention cells, and other reuse or filtration methods.
- The Comp Plan does not adequately address this goal in the Adams Morgan section. ANC 1C urges OP to include language that communicates the importance of achieving sustainability goals in each neighborhood. In addition to the goals outlined in the Vision Framework, the Comp Plan should promote walkability, transit access and biking infrastructure to encourage non-carbon intensive forms of transportation.

**Strengthening Identity Through Arts, History, and Culture.** 9) Recognize and reinforce the importance of maintaining neighborhood architectural character and urban form in residential and commercial buildings and key open spaces, 10) Reinforce Adams Morgan as a place for arts, culture, and entertainment, 11) Establish neighborhood gateways, 12) Celebrate and connect neighborhood assets, 13) Increase the percentage of units that are subsidized affordable housing

- ANC 1C supports the inclusion of additional background information on the identity of Adams Morgan in *Section 2014.3*; however, it recommends that language about the “plans for a new grocery store in the former Citadel skating rink” be updated.
- We support *Policy MC-1.2.4A: Public Art*, exploring opportunities with local arts organizations, artists, and residents for public art throughout Mid-City.
- We support *Policy MC-2.4.1: Preserving the Character of Adams Morgan* and new *Action: Design Guidelines*.

**Bolstering Community.** 14) Expand neighborhood amenities, 15) Improve the quality and accessibility of existing playgrounds, parks and green spaces, 16) Improve bike and pedestrian access and safety and establish a more connected bicycle lane network, 17) Improve public safety and communications with MPD.

- ANC 1C urges OP to strengthen *Policy MC-2.4.4: Transportation Improvements* in the Adams Morgan section of the Mid-City Element to better reflect the importance of creating new measures to improve pedestrian and cyclist safety. We strongly support *Action MC 1.1.C Multi-Modal Improvements* and the outcomes of the Crosstown Multimodal Transportation Study, as reflected in new *Policy MC-2.1.5: Crosstown Connectivity*.
- We support *Policy MC-1.2.3: Rock Creek Park*, which would establish clear, direct pedestrian and bicycle connections between Adams Morgan, surrounding neighborhoods, and the Smithsonian National Zoo.
- We recommend that OP modify *Action MC-2.4-A: 18<sup>th</sup> Street/Adams Morgan Transportation and Parking Study*. This plan should be readdressed due to increased conflict between motor vehicles and pedestrians/cyclists/scooter users, and should take ANC 1C’s suggestions for the 18<sup>th</sup> St, Florida Ave, and U Street intersection into consideration.
- We support *Policy MC-2.4.6: Adams Morgan Public and Institutional Facilities*, and urges OP to include language underlining the importance of providing additional library services in Adams Morgan.

**Strengthen Commitment to Providing Affordable Housing Throughout the District and in Area Elements**

ANC 1C urges OP to identify extremely low-income households and very low-income households as the households who suffer the most under DC’s housing crisis and to focus programs on these income groups in order to provide safe, secure housing affordable to them to mitigate homelessness and the risk of homelessness. The Comprehensive Plan must reflect a commitment to creating more affordable housing.

U.S. Department of Housing and Urban Development 2019 statistics show that a family of four in an extremely low-income household has an annual income at 30% of the Median Family

Income (MFI) at the poverty level or \$36,400. The 2019 National Low Income Housing Coalition (NLIHC) DC report shows that: 1) extremely low income households can afford monthly rents of little more than \$900; 2) DC has only 40 housing units available to every 100 extremely low income households seeking housing; and 3) 80% of these households pay more than 50% of their income on housing. According to 2019 HUD reports, a very low-income household of four is at 50% of MFI and has an annual income limit of \$60,650. There are only 65 homes available to every 100 very low-income households seeking housing. NLIHC's 2019 report shows that 68% of very low-income households spend more than 30% of their income on housing and 25% spend more than 50% of their income on housing.

First, ANC 1C urges OP to include in the Housing Element a renewed commitment to preserving, upgrading, and building more public housing.

Second, ANC 1C recommends that the Land Use Element link the increased housing capacity in the FLUM to greater set asides of affordability that exceed the baseline requirement set by Inclusionary Zoning.

Third, ANC 1C urges OP to include more language throughout the Comp Plan committing the District to Affirmatively Furthering Fair Housing principles. As DHCD develops its forthcoming Analysis of Impediments to Fair Housing report, integration of AFFH principles into the Comp Plan is critical. While there are numerous references to fair housing in the Housing Element, we encourage inserting more specific references to AFFH in particular, as well as more references in introductory portions of the land use element and individual area elements. The District has functionally agreed to carrying out AFFH principles even as the federal government has walked back its commitment to enforcing them. But there are only references to AFFH on pages 196 and 222 of the amended Comp Plan.

Fourth, ANC 1C supports the amendments to the Housing Element that emphasize making affordable housing available throughout the city and promote furthering fair housing opportunities, especially in high-cost areas. We urge OP to require a commitment to a strengthened rent control law to preserve and upgrade existing rent-controlled buildings and bring new buildings under rent control.

### **Strengthen support for LGBTQ+ Community**

The ANC 1C represents Adams Morgan, which is a proud cultural hub to D.C.'s LGBTQ+ community. We are proud of our LGBTQ+ community and the fact that D.C. is one of the most welcoming jurisdictions in the country. Members of the LGBTQ+ community can have needs different than non-LGBTQ+ members and the Comprehensive Plan should plan for these needs moving forward. Specifically:

Housing Element

- *H-4.3 Meeting the Needs of Specific Groups*— Persons in the LGBTQ Community should be identified as one of the populations which have specific requirements that benefit from specific supportive services as profiled in this section.
- *Policy H-4.3.x*— Housing for LGBTQ Older Adults should be considered as an addition to this section. D.C. has the highest percentage of LGBTQ adults in the country but critically insufficient LGBTQ-affirming older adult housing compared to other comparable cities.

#### Community Services and Facilities Element—

- In this element, and as appropriate in the Housing Element, indicate better support for youth experiencing homelessness who self-identify as LGBTQ, which constitutes nearly half of D.C.’s youth experiencing homelessness. Include health care and services for LGBTQ patients, a group that faces disparities similarly to other populations identified as at-risk or disadvantaged.
- *Action CSF-2.3.D: Improving Coordination and Service Delivery Among District Agencies*— Include the LGBTQ community in this language, as there are specific health care and services the LGBTQ community either requires or can benefit from.

#### **ANC 1C Concerns with OP’s Process**

ANC 1C feels that the timeframe allotted for ANC comments on OP’s Amendments to the Comp Plan (even including the extension granted) is not enough time to digest the 1,500 total pages of redlines to the 2006 Comp Plan, conduct meaningful community engagement, and write thorough recommendations, pursuant to the Implementation Element or Chapter 25 of the Plan itself, especially 10A DCMR §§ 2505, 2507, 2515, 2516, and more generally DC Code § 1–306, et. seq.

Moreover, these “amendments” to the Comprehensive Plan constitute a rewrite (a major revision and not an amendment as described in Implementation Element Section 2513.2) making major changes and rewrites to policies without the public engagement required.

ANC 1C is concerned that the Comp Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions. OP should provide a full explanation of their proposed changes to each Element, and must be able to provide understandable data and clear impact analysis to support amendments and assertions that certain actions have been completed pursuant to 10A DCMR §§ 2511, 2512, and especially DC Code § 1–306.04. Preserving and ensuring community input regarding the DC Comprehensive Plan.

While ANC 1C appreciates OP's efforts to include ANCs in the process, the trainings OP provided were only helpful in relaying information on the structure of the Comp Plan, amendment process, and timeline. OP provided little support to those of us who understand our communities and are interested in collecting input, but do not have planning/housing backgrounds. We would have benefited from meaningful efforts on the part of OP to engage with us and our communities at a grassroots level, using our conversations to shape the Comp Plan rather than the other way around. ANC 1C also believes that OP's Comprehensive Plan "Amendment" process has left out residents who do not speak English as a first language, contrary to the Language Access Act, an especially important issue for the diversity of Ward 1 families and residents who will be affected.