

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 1C
P.O. Box 21009
Kalorama Station
Washington DC 20009

RE: Advisory Neighborhood Commission 1C Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Irani, Guthrie, Zottoli, Dendy, Wright, Bowles, and Jackson:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update. ANC 1C consistently presented thoughtful and thorough feedback. We commend you for your leadership and are particularly grateful for your accessibility to fellow ANCs across the District to share your approach during this endeavor.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community and reaffirmed policies not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 1C, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as “Support. No integration needed”.

During OP’s review, numerous recommendations received from ANC 1C were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as “Acknowledged” in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did



not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.

Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as “No” in the public review digest, and more appropriate programs or agencies have been identified.

The Commission's resolution included: improving support for the LGBTQ+ community and restoring the Planning and Development Priorities section in the Mid-City Area Element. The Mayor's Proposal includes the Commission's recommended changes to the Mid-City Area Element as well as updated language for vulnerable communities and protected classes.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment. Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District's growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document's scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District's physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in

response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15, 2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Trueblood', with a long horizontal flourish extending to the right.

Andrew Trueblood

Resolution Number	Date Received	Citation Tracking Number	Element	Comment	Integrated into Comp Plan	Response
ANC 1C-12	2.14	H-4.3	Housing	<p>Strengthen support for LGBTQ+ Community</p> <p>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</p> <ul style="list-style-type: none"> ➤ 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. <p>Community Services and Facilities Element—</p> <ul style="list-style-type: none"> ➤ 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 	Yes	The text was updated to reflect the proposed language.
ANC 1C-18	2.14	Policy LU-2	Land Use	<p>Policy LU-2.1.8. Zoning of Low and Moderate Density Neighborhoods: <u>Unless a small area plan, District agency directive or study indicates otherwise.</u> 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.]</p> <p>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..</p>	Yes	The text was updated to reflect proposed language.

ANC 1C-33	2.14	311.14	Land Use	<p>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.</p> <p>Completed – See Implementation Table.311.14</p> <p>Proposed change: Restore deleted text and strike “Completed – See Implementation Table”.</p> <p>Rationale: Significant portions of this Action’s extensive mandate remain unfulfilled post ZR16..</p>	Yes	The text was updated to reflect proposed language.
ANC 1C-42	2.14	Planning a	Mid City	<p>Planning and Development Priorities</p> <p>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.</p> <p>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.</p>	Yes	The text was updated to reflect proposed language.
ANC 1C-39	2.14	HP-1.6.5	Historic Preservation	<p>Policy HP-1.6.5: Commercial Signage</p> <p>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.</p> <p>Recommended change: None.</p> <p>Rationale: This new policy is timely and highly important.</p>	Support - No integration needed.	Thank you for your support.

ANC 1C-40	2.14	HP-2.4.1	Historic Preservation	<p>Policy HP-2.4.6HP-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.</p> <p>Proposed change: None. Rationale: The importance of this policy continues to increase. It should be maintained.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-15	2.14	309.5	Land Use	<p>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</p> <p>Proposed change: None. Rationale: This is a fundamentally important land use policy. It should be maintained.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-16	2.14	309.8	Land Use	<p>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</p> <p>Proposed change: None. Rationale: This remains a fundamentally important land use policy. It should be maintained.</p>	Support - No integration needed.	Thank you for your support.

ANC 1C-26	2.14	311.4	Land Use	<p>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</p> <p>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.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-30	2.14	311.11	Land Use	<p>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</p> <p>Proposed change: None. Rationale: The need for this policy remains undiminished. It should be maintained.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-31	2.14	311.12	Land Use	<p>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</p> <p>Please refer to Policy 2.4.11 of this Element for additional guidance on hotel uses and the need to address their impacts.</p> <p>Proposed change: None. Rationale: The need for this policy remains undiminished and it should be maintained.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-32	2.14	311.13	Land Use	<p>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</p> <p>Proposed change: None. Rationale: The need for this policy remains undiminished. It should be maintained.</p>	Support - No integration needed.	Thank you for your support.

ANC 1C-34	2.14	LU-2.3-B	Land Use	<p>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.</p> <p>Proposed change: None. Rationale: The stated objectives of this action remain valid; it should be retained</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-36	2.14	312.13	Land Use	<p>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</p> <p>Proposed change: None. Rationale: The need for this policy is undiminished.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-37	2.14	312.15	Land Use	<p>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.</p> <p>Proposed change: None. Rationale: The problems that this policy seeks to address remain and have not abated.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-43	2.14	MC-1.1.5	Mid City	<p>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.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-44	2.14	MC-2.7.2	Mid City	<p>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.</p>	Support - No integration needed.	Thank you for your support.

ANC 1C-45	2.14	MC-1.1.1	Mid City	<p>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. <u>The Planning Areas squares, alleyways, and historic alley buildings offer opportunities for preservation and creative development.</u> The area’s rich architectural heritage and cultural history should be protected and enhanced.</p> <p>Proposed change: None. Rationale: The need for and importance of this policy remain undiminished, and it should be retained.</p>	Support - No integration needed.	Thank you for your support.
ANC 1C-13	2.14		General Comp Plan Comments	<p>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.</p>	Acknowledged	The community public review process was extended for both the community and ANCs resulting in 88 days for the public and 123 days for ANCs. ANC input is being reviewed as great weight and forwarded to DC Council for great weight.

ANC 1C-14	2.14		General Comp Plan Comments	<p>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.</p>	Acknowledged	<p>This update did not involve the visioning and document restructuring of a rewrite, but it did involve more substantial updating and outreach than the 2011 update. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite. Please see the Office of Planning's Staff Report (see plandc.dc.gov) for more information.</p>
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ANC 1C-7	2.14		Housing	<p>Strengthen Commitment to Providing Affordable Housing Throughout the District and in Area Elements</p> <p>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.</p>	Acknowledged	<p>The Housing Element promotes housing affordability across all incomes and household sizes. Policies support affordable housing for extremely-, very-, and low-income households. For policies and actions directed towards extremely low-income households, please see Section H-2.1 Preservation of Affordable Housing and Section H-1.2 Ensuring Housing Affordability.</p>
ANC 1C-8	2.14		Housing	<p>First, ANC 1C urges OP to include in the Housing Element a renewed commitment to preserving, upgrading, and building more public housing.</p>	Acknowledged	<p>See the Housing Element section H-1.4 for more information on Public Housing. Policies and actions related to public housing that fall outside the scope of the Comp Plan are being addressed through the Framework for Housing Equity and Growth.</p>

ANC 1C-11	2.14		Housing	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.	Acknowledged	See Policy H-2.1.6 which supports rent control but expansion of rent control is beyond the scope of the Plan.
ANC 1C-9	2.14		Land Use	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.	Acknowledged	The Land Use Element includes policies for increasing densities to support an increase in affordable housing production such as citation number 304.3, Policy LU-1.4.3: Housing Around Metrorail Stations, and Action LU-1.4.C: Metro Station and Inclusionary Zoning
ANC 1C-17	2.14	309.14	Land Use	<p>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</p> <p>Proposed change: Restore the deleted portion of the above text beginning with “considering” and ending with “dwellings”.</p> <p>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 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.</p>	Acknowledged	See HP-1.5.5: Historic District Designation and Text Box: Designation Criteria for Historic Landmarks and Districts for additional information and criteria on Historic District designation.

ANC 1C-20	2.14	309.14	Land Use	<p>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 family sized 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</p> <p>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”.</p> <p>Rationale: (1) There is no reason to limit this policy to alterations that result in loss of familysized 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.</p>	Acknowledged	See the Housing Element, Section H-1.3 Diversity of Housing Types for more information on family-sized units.
ANC 1C-21	2.14	309.15	Land Use	<p>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</p> <p>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”.</p> <p>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.</p>	Acknowledged	See Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas and Policy LU-2.4.6: Scale and Design of New Commercial Uses for additional guidance on the relationship between residential and commercial uses.

ANC 1C-25	2.14	311.3	Land Use	<p>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</p> <p>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 nonresidential (e.g.unauthorized transient accommodation) should be explicitly noted.</p>	Acknowledged	See the Housing Element, Section H-2.1 Preservation of Affordable Housing and Policy H-2.2.1: Housing Conversion for more information on non-residential conversions
ANC 1C-27	2.14	311.7	Land Use	<p>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, <u>livability</u>, and future of <u>Washington, DC and its residents the District of Columbia. Ensure that</u> When such uses are permitted in residential neighborhoods, the ir <u>y are</u> designed and operation ed in a manner that is <u>should be</u> sensitive to neighborhood issues and neighbors' <u>that maintains</u> quality of life. Encourage institutions and neighborhoods to work proactively to address issues such as <u>traffic transportation</u> and parking, hours of operation, outside use of facilities, and facility expansion. 311.7</p> <p>Proposed change: Restore the original second sentence (beginning with "Ensure that"). Rationale: There is really no reason why the language of t his important policy should be watered down from the imperative "ensure" to the merely hortatory "should".</p>	Acknowledged	The Comp Plan is a guiding document. Mandatory language such as "ensure", "must", and "require" were removed to better reflect current policy.
ANC 1C-28	2.14	311.9	Land Use	<p>Policy LU-2.3.7: Non-Conforming Institutional Uses Carefully control and monitor institutional uses that do not conform to the underlying zoning to <u>promote ensure their</u> long-term compatibility. In the event such <u>institutions uses</u> are sold or cease to operate <u>as institutions</u> , encourage conformance with existing zoning and continued compatibility with the neighborhood. 311.9</p> <p>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.</p>	Acknowledged	The Comp Plan is a guiding document. Mandatory language such as "ensure", "must", and "require" were removed to better reflect current policy.
ANC 1C-29	2.14	311.10	Land Use	<p>Policy LU-2.3.8: Non-Conforming Commercial and Industrial Uses <u>Limit Reduce</u> the number of nonconforming uses in residential areas , <u>particularly those uses</u> 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</p> <p>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.</p>	Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies

ANC 1C-1	2.14	MC-2.4.7	Mid City	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.	Acknowledged	While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.
ANC 1C-2	2.14		Mid City	<p>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.</p> <p>> The Comp Plan does not adequately address this goal in the Adams Morgan section.</p> <p>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 & 18th Street, Unity Park, alleyways).</p>	Acknowledged	While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.

ANC 1C-3	2.14	MC-2.4.2	Mid City	<p>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.</p> <p>➤ 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.</p> <p>➤ 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</p>	Acknowledged	<p>While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.</p>
ANC 1C-4	2.14		Mid City	<p>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.</p> <p>➤ 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.</p> <p>➤ 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.</p>	Acknowledged	<p>While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.</p>

ANC 1C-5	2.14	2014.3	Mid City	<p>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</p> <ul style="list-style-type: none"> ➤ 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. 	Acknowledged	<p>While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.</p>
ANC 1C-6	2.14	MC-2.4.4	Mid City	<p>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.</p> <ul style="list-style-type: none"> ➤ 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: 18th 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 18th 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. 	Acknowledged	<p>While Mid City does not cite all recommendations from the Adams Morgan Vision Framework, the Element recognizes and recommends the implementation of that Vision Framework. See Mid City citation 2008.1. Citation 2014.8 and Action Action MC-2.4.A: AMVF.</p>

ANC 1C-10	2.14		<p>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.</p>	Acknowledged	<p>The Comp Plan is intended as a high-level guiding document. HUD's Affirmatively Furthering Fair Housing Act AFFH is a legal requirement that federal agencies and federal grantees have to follow. Enforcement of comp plan policies is part of implementation and involves multiple District agencies.</p>
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ANC 1C-47	2.14	102.1	Introduction	<p>The DC Code vests the Mayor with the authority to initiate, develop and submit a Comp Plan to DC Council, as well as the power to propose amendments following the plan's adoption. In the course of adoption, DC Council may alter adopts the Comp Plan, subject to the approval of the Mayor and review by 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 Comp 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, The DC Council may alter adopts the Comp Plan, subject to the approval of the Mayor and review by the NCPC and Congress.The amended text will then read as follows:The DC Code requires the Mayor to submit the District elements of the Comp 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 NCPC and Congress.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 NCPC with respect to the adoption and amendment of the Comp 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 Council shall submit such elements and amendments thereto to NCPC 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</p>	No	<p>The Comprehensive Plan is a high-level guide that sets a positive, long-term vision for the physical development of the District. The Comprehensive Plan establishes a context and sets broad goals to inform public decisionmaking. Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies.</p>
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ANC 1C-19	2.14	308.1	Land Use	<p>LU-2 CREATING AND MAINTAINING SUCCESSFUL INCLUSIVE NEIGHBORHOODS 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</p> <p>Proposed change: Restore “SUCCESSFUL” and insert “and” before “INCLUSIVE”; restore “protecting” and insert “and” before “enhancing”.</p> <p>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.</p>	No	Language was updated to be more inclusive of neighborhood characteristics and the varying components that make a neighborhood prosperous.
ANC 1C-22	2.14	309.19	Land Use	<p>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</p> <p>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</p> <p>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.</p>	No	The Comp Plan is not zoning. All Zoning changes and processes related to zoning applications are issues for the OZ, ZC, and BZA.

ANC 1C-23	2.14	309.2	Land Use	<p>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</p> <p>Proposed change: Change title to read: “Penthouse setback on detached dwellings, semidetached 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”.</p> <p>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.</p>	No	The Comp Plan is not zoning. All Zoning changes and processes related to zoning applications are issues for the OZ, ZC, and BZA.
ANC 1C-24	2.14	309.21	Land Use	<p>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:</p> <ul style="list-style-type: none"> (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. <p>In all these instances, pursue consider rezoning to appropriate densities to protect respect the predominant architectural character and scale of the neighborhood. 309.21</p> <p>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.”</p> <p>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.</p>	No	The Comp Plan is not zoning. All Zoning changes and processes related to zoning applications are issues for the OZ, ZC, and BZA.

ANC 1C-35	2.14	LU-2.4.7	Land Use	<p>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.</p> <p>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.</p> <p>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.</p>	No	Liquor licenses are regulatory and not covered in the Comp Plan. Policies relating to the over-concentration of liquor licenses have been all elements.
ANC 1C-38	2.14	LU-2.4-B	Land Use	<p>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:</p> <p>(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.</p> <p>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.</p>	No	The Comp Plan is not zoning. All Zoning changes and processes related to zoning applications are issues for the OZ, ZC, and BZA. All issues related to liquor licenses fall outside the Comp Plan and are better suited for ABRA.

ANC 1C-41	2.14	2000.9	Mid City	<p>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</p> <p>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...</p>	No	Updated text is intended to list the neighborhoods which are outside of the designated historic districts.
ANC 1C-46	2.14	2008.12	Mid City	<p>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</p> <p>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.</p>	No	The Comp Plan is not zoning. All Zoning changes and processes related to zoning applications are issues for the OZ, ZC, and BZA.