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D.C. Office of Planning February 11, 2020 (Sent via email to plandc@dc.gov and upload to resolutions.anc.dc.gov)

Re: Comments on the Draft Comprehensive Plan Update

At its duly noticed regular public meeting on February 11, 2020, Advisory Neighborhood Commission 6B (ANC 6B) considered the above-referenced matter. With a quorum of at least six commissioners present, after division of the question and through a series of motions, ANC 6B approved the following comments, with votes noted on each page header.

ANC 6B has prepared comments on several parts of the Comprehensive Plan, which are attached. Where possible, we identified specific provisions of the Plan that should be amended; however, we recognize that such efforts will always be incomplete and encourage the Office of Planning to incorporate the comments as broadly as possible throughout all relevant parts of the Plan. In particular, we encourage the Office of Planning to consider changes to the Future Land Use Map or Generalized Policy Map that are necessary to implement the comments we make.

In addition to the attached comments, the ANC would like to offer a few general observations about issues related to development that will be guided by the Comprehensive Plan. We ask that the Office of Planning respond to the comments below as it does to the remainder of the ANC's comments.

The District faces enormous challenges right now, particularly around affordable housing. Those challenges result largely from the increased number of residents in the District and on Capitol Hill. We welcome our new neighbors. We embrace the opportunities associated with the District becoming a more attractive place to live and work. We understand that our neighborhood is particularly attractive to new residents because of its existing character and charm, proximity to the central business districts, and easy access to public transportation, including four Metro stops. We also understand that the only way to address the current and expected future shortfalls in housing is to add additional housing to the District, including in our neighborhood. Therefore, we support the District's vision to add 3200 housing units to the Capitol Hill Planning Area by 2025, including at least 1400 additional affordable units.

Importantly, we understand that there are costs to doing nothing. The opportunity costs to not acting are significant: the status quo is unacceptable and will only worsen if housing affordability is not addressed.

Increased density presents challenges, however. From the District government, it requires increased investments in housing and related infrastructure, including transit, recreational, service, and commercial opportunities for existing and new residents. From members of the community represented by this ANC, it requires conversations and careful work to add density to our established neighborhoods without destroying those aspects of the neighborhoods that make them attractive to begin with.



From both the District government and the community, it requires a level of trust. The District government must trust that members of our community are committed to addressing the challenges of affordable housing, including adding a significant number of new households to our neighborhoods. In turn, members of the community must trust that the District is attempting to do the right thing and will treat residents— existing and new—fairly and respectfully.

Unfortunately, there are examples of how the District government has failed to uphold that trust, particularly with respect to the Hill East Waterfront, which extends from Barney Circle to Benning Road. For example, the District government has failed to implement the codified Master Plan for Reservation 13 and has often failed to communicate with the surrounding community regarding its plans for this site. Reservation 13 should be developed as an important addition to the Hill East Waterfront, providing new and necessary housing, service, commercial, and recreational opportunities. Instead, some parts of the District government have used Reservation 13 to attract Amazon or the Redskins. Those attempts are clearly contrary to the Master Plan. They have been largely done in secret, without consultation with the surrounding neighbors. Furthermore, significant changes to the approved developments on Reservation 13 have been made without notice to the community and without accounting for the concessions that had been previously granted to the chosen developers. A similar pattern appears to be developing with respect to the RFK Stadium site in the northern portion of the Hill East Waterfront.

The District government's approach to all parts of the Hill East Waterfront has incurred enormous opportunity costs to preserve the chance that an NFL team or a major corporation will choose to move to the Hill East Waterfront. Incurring such costs could be an attractive option for cities without enormous affordable housing challenges. Or it could be a necessary option for cities without economic opportunities. But it is neither an attractive nor necessary option for the District. Instead, by failing to act promptly to redevelop the entire Hill East Waterfront, the District has missed opportunities to expand housing, commercial, and recreational opportunities for, and provide important services to, neighbors and residents from across the District.

Finally, a general note regarding the Plan itself and recent submissions by the Capitol Hill Village. First, we recommend that the Office of Planning reduce the amount commentary about the "great progress" that the District has made and instead focus on ensuring that the Comprehensive Plan identifies, to the greatest extent possible, specific goals and accountability for reaching the goals. ANC 6B incorporates their submitted comments into ours, with one change to the Capitol Hill Area Element regarding land use at RFK. The ANC commends the Capitol Hill Village's comments to the Office of Planning and urges OP to amend the Comprehensive Plan to better account for the important role played by older members of our community, and the needs that will need to be met so that they may continue to play that role in the future.

Sincerely,

Brian Ready Chair, ANC 6B

CC: Tyler Williams, Ward 6 MOCR Andrea Limauro, Ward 6 Senior Community Planner, Office of Planning Charles Allen, Ward 6 DC Councilmember.



ANC 6B Comment:

ANC 6B fully supports the goals for housing creation laid out in the Mayor's May 10, 2019 Order *Housing Framework for Equity and* Growth and subsequent October 15, 2019 *Housing Equity Report: Creating Goals for Areas of Our City.* As one prong to bridge the 1,120-unit gap on Affordable Housing in the Capitol Hill Area Element, ANC 6B fully supports the proposed revisions to the Capitol Hill Area Element regarding Southeast Boulevard. There are few areas in close-in neighborhoods to create more city blocks. Southeast Boulevard presents a unique opportunity to help meet the market-rate and committed affordable housing needs of the city and Capitol Hill Planning Area. Further, the project improves access to the Anacostia Waterfront, increases employment opportunities, and creates recreational and community service opportunities.

While recognizing the incredible opportunities presented by Southeast Boulevard, the Comprehensive Plan must also recognize the potential impacts on the existing residents including shifting traffic patterns. Given the geographical and financial realities of the project, ANC 6B encourages OP to include language wherever possible that details necessary mitigation of any use of the land under a new at-grade Southeast Boulevard. These mitigations should at a minimum: *Prohibit the storage, repair, or idling of pollutant-emitting automobiles, particularly non-electric buses.

*Ensure automotive connections to underground space are available only from 11th Street or Barney Circle

*Promote any new employment opportunities to the surrounding residential area

*Ensure the design of the facility can support uses other than transportation uses currently envisioned.

The land created by Southeast Boulevard serves as the perfect buffer between the existing moderate density rowhouse neighborhoods to the north and the proposed high-density uses to the south. Given the uncertainties of future ward redistricting and legislative action, ANC 6B recommends the land for Southeast Boulevard be changed in the Future Land Use Map to Medium Density Residential and Low Density Commercial rather than maintaining the existing Production & Technical Employment designation. Further, we recommend this change extend all the way to M Street SE incorporating a small but impactful triangle (Square 1024, Lot 0808) owned by CSX, whose industrial uses are incompatible with the surrounding FLUM designations. We finally recommend extending the land-use change area in the Generalized Policy Map all the way to Barney Circle.

ANC 6B is excited to be an equitable partner in housing production and help lead the creation of new community spaces. We encourage OP to work expeditiously with its partner agencies to move plans forward for Southeast Boulevard.

Potential Amendments to Draft Comprehensive Plan (Redlines from October 2019)

CH 1508.15 Policy CH-1.1.14: Southeast Boulevard

Recognize the transportation and land use opportunities and impacts associated with the creation of Southeast Boulevard as an at-grade boulevard, serving to better connect Capitol Hill residents to the Anacostia Waterfront via non-motorized crossing of the CSX tracks and by restoring the historic street grid to the north. Add new residential development and public spaces where possible along a newly designed boulevard. Ensure that new pathways will safely serve both pedestrians and cyclists. Future



planning efforts should reflect the importance of affordable housing potential, connecting neighborhoods to the river, and creation of community space.

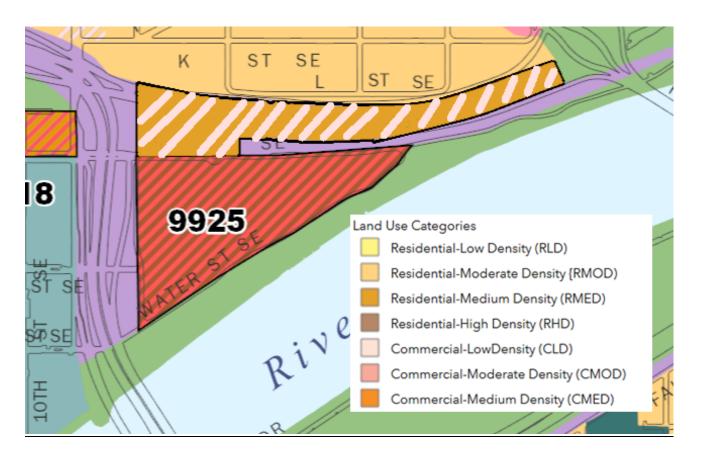
- NEW <u>Policy CH-2.5.1: Southeast Boulevard Land Uses</u> Ensure that the Southeast Boulevard and the land uses around it enhance and strengthen the neighborhood fabric and promote safer and greater connectivity between the Capitol Hill neighborhoods and the Anacostia Waterfront. Implement future land uses that reflect community desires for mixed-use development that reflects its position as a transition area between rowhouse zones to the north and highdensity uses to the south. Explore opportunities for neighborhood-serving retail.
- NEW <u>Action CH 2.5.B Additional Land Use Planning for Southeast Boulevard</u> In conjunction with environmental and feasibility studies, complete a Small Area Plan to further refine the preferred options for the creation of Southeast Boulevard. Identify opportunity for community spaces and other public amenities.



ANC 6B Comments on Draft Comprehensive Plan, February 11, 2020 Tracking 5 of 24 Subject: Southeast Boulevard Policy Focus Area Element: Capitol Hill ANC Vote: 5-2-3 (5 in support, 2 opposed, 3 abstentions)

Proposed Changes to Future Land Use Map

Area bounded by bold – Change from Production & Technical Employment to Medium Density Residential and Low Density Commercial. Generally bounded by M Street SE to the South, theoretical 12th Street St SE to the west, the temporary Southeast Boulevard retaining wall to the north, and Barney Circle to the east, excluding the above-ground CSX tracks





ANC 6B Comments on Draft Comprehensive Plan, February 11, 2020 Tracking 5 of 24 Subject: Southeast Boulevard Policy Focus Area Element: Capitol Hill ANC Vote: 5-2-3 (5 in support, 2 opposed, 3 abstentions)

Proposed Changes to Generalized Policy Map

Area bounded by bold – Change from Neighborhood Conservation Area to Land Use Change Area. Generally bounded by M Street SE to the South, the existing land use change near theoretical 15th Street SE to the west, the temporary Southeast Boulevard retaining wall to the north, and Barney Circle to the east.

