

ADVISORY NEIGHBORHOOD COMMISSION 6B PLANNING AND ZONING COMMITTEE Virtual Meeting October 6, 2020, 7:00 p.m.

Commissioners: Samolyk, Sroufe, Ready, Oldenburg, Holman (Chair), Waud, Krepp Resident Members: Friedman, Dierlam, Jarboe, Danks, Ryan, Thomas, Campbell

1. Contract Modification on Eastern Boys and Girls Club [6B09]

Representative: Joel Kelty, Century Associates

The committee heard form Joel Kelty, seeking support for a contract modification to the Eastern Branch Boys and Girls Club. A one-pager is attached to this report. No motion was taken, seeking further clarification from DMPED on why this is considered a modification and doesn't need to be rebid. Notably, the project would need zoning relief and would come to the committee for that as well.

No position taken, will go to full ANC.

 BZA #20300 1309 Potomac Ave SE [6B07] Special Exception for lot occupancy to build an accessory building/garage [40% current, 60% allowed, 70% proposed] Architect: Myron Ward
Owner: Brad Mueller

The application for an accessory building with support from neighbors was well received. The building sits on a largeish alley with multiple adjacent accessory structures, many two stories.

Motion [Waud/Samolyk 2nd] Unanimous consent to place on consent agenda for support

3. BZA #20289 400 Seward Square SE [6B02] Area Variance to add 2 units to existing 15-unit apartment building Representative: Martin Sullivan, Sullivan and Barros

The architect and lawyers presented plans to convert unused storage space in the cellar of this building to two units, and increase the certificate of occupancy from 14 to 17 units, which needs a variance from the 900 square feet of land per unit rule. The building is a purpose-built apartment building that predates zoning restrictions and the committee felt that the application meets the three-prong test for a variance.

Motion [Sroufe/Dierlam 2nd] Unanimous Consent to place support on consent agenda

4. HPA 20-478: 514 Archibald Walk SE [6B03] Add second story to existing one-story alley structure Owner: Peter & Karen Byrne Architect: Justin Donovan



The architect presented plans to add a second story to an existing garage on Archibald walk. The committee did not have thoughts to add on the design and neighbors testified in support of the design and process.

Motion [Ready/Samolyk] 14-1-0 (Sroufe opposed) to support. Sroufe opposed because of lack of written support from neighbors.

(Friedman Recused from Item #5)

5. ANC 6B Rezoning Application of Boathouse Row

Application from ANC 6B to zone Boathouse row, excluding Army Corp of Engineers barge/dock, to MU-11 (Mixed use open space and marina uses) Invited: Historic Anacostia Boathouse Association, Office of Planning, Office of City Administrator, Congressional Aviation

Before discussing the statement of support for the rezoning application, Geoff Rankin of Congressional Aviation presented an update on plans to relocate heliport operations to District-owned land adjacent to Eastern Power Boat Club. While there is no action to take related to this, the committee welcomed this discussion in light of renewd attention on the area because of the 1333 M Street SE PUD. The committee had many questions for Mr. Rankin but continued to be frustrated by the lack of leadership from the Mayor's Office and seeks answers about the continuation of MPD and life flight heliport services.

Related, Commissioner Holman presented a draft statement of support of rezoning that land to MU-11 (open space, parks, and marina use).

Motion [Holman/Waud] Passed Unanimously (Friedman recused) and placed on consent agenda. The statement of support is attached

6. ANC 6B Comments on Comp Plan Amendments Legislation

ANC 6B discussed the Comp Plan sent to the Council for approval. While the ANC continues to have issues with some of the smaller changes not incorporated by the Office of Planning, the committee wants to send a letter asking for the Comp Plan to be passed this year by the Council.

Motion [Holman/Sroufe] Passes unanimously on consent agenda. A draft letter is attached.

Re: Boys & Girls club redevelopment

Joel Kelty <joel.kelty@century-associates.com> Fri 10/2/2020 2:08 PM

To: Holman, Corey (SMD 6B06) <6B06@anc.dc.gov> Cc: Dukes, Erica (DMPED) <erica.dukes@dc.gov>

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Corey,

As discussed I am sending you the following summary of the proposed changes to the redevelopment of the Eastern Branch Boys and Girls Club building in advance of the ANC 6B Planning and Zoning Committee meeting next week.

Unit Count, Unit Mix, Ownership and Affordability:

The previously proposed project was a 29 unit for-sale condominium project with 5 units reserved for buyers with incomes not exceeding 50% of the Area Median Income (AMI) and 5 units reserved for buyers with incomes not exceeding 80% AMI. The project included 17 market rate units and two guest suites for use by guests of the residents. The project proved not economically feasible due to escalations in construction costs and inherent inefficiencies in the building that made is less than ideal for cohousing.

The pandemic has also played a factor in our decision to pivot from the cohousing model as it relies on a high degree of physical interaction between residents, both before and after completion. That interaction, particularly pre-construction would be difficult to facilitate given current circumstances. We are aware of another local cohousing group that has also put their plans on hold for the same reason.

The new proposal consists of 39 rental units, all of which are reserved for households with incomes not exceeding 60% AMI. The exact ratios are subject to change but the current affordability levels are as follows:

Affordability Percent Total Quantity 0% Units 8% 3 30% Units 18% 7 50% Units 26% 10 60% Units 49% 19

The current unit mix, also subject to revision, currently looks like this:

Bedrooms Quantity Percent of Total Average Size 0 6 15% 525 1 19 49% 658 2 11 28% 839 3 3 8% 1,151

You will note that we have a few larger units in recognition of the fact that there are seniors that are raising children and require larger units.

Community serving function space:

The new proposal retains the community non-profit space in the lower level that was part of the original proposal.

Parking:

We originally proposed approximately 17 parking spaces in a below grade, automated garage. This proved to be infeasible both due to issues with the existing structure and also economically infeasible due to the small number of parking spaces to be provided.

The new proposal includes approximately 9 parking spaces at grade, accessed from the rear alley. The at grade parking displaces units that were originally proposed at this location. In order to compensate and get the unit count high enough to make the project economically feasible, we must add units in an additional story.

Additional Story:

The additional story will be set back with at least a 1:1 ratio from the parapet (which is already about 4 feet high) to minimize visual impact on the building and surrounding context. We have massing models that support this concept, an excerpt of one of which I include below. The perspective is taken from the sidewalk across 17th Street at eye level. You can just see the addition peeking out at the top. Note that this model was developed as part of the prior project, but the massing is substantially the same.

There is good precedent for an additional story from a zoning perspective, but we will need ANC support to achieve this and the other required relief (which remains unchanged). We anticipate coming back to the ANC for discussions about the specific zoning relief necessary at a later date once we have advanced the design for this new proposal.

The purpose of our meeting this week is to solicit ANC input (and hopefully support) for the proposed changes to the overall project term sheet before DMPED submits those modifications to the Council.



Disposition Structure:

The original proposal was a fee simple disposition. The District has a policy that where redevelopment involves rental rather than sale of units, the disposition shall take the form of

a land lease, rather than an outright sale. The new proposal, because it is a rental project, will therefore be be a 99 year ground lease.

I hope your committee finds this summary helpful and I look forward to meeting with you via zoom Oct 7th.

Regards,

Joel Kelty Century Associates

On Sep 29, 2020, at 2:16 PM, Holman, Corey (SMD 6B06) < 6B06@anc.dc.gov > wrote:

If possible can send send either a paragraph describing the previously approved project, the proposed modifications, and the reason for the modification. You'll be first on the agenda right at 7:00 if that works for you

Corey Holman Commissioner, SMD 6B06 Chair, ANC 6B Planning and Zoning Committee Call/Text: 301-664-4132 Twitter: @CoreyHolman Website: _ https://www.coreyholman.com Pronouns: hc/him/his

Summary

This is Advisory Neighborhood Commission ("ANC) 6B's Statement in Support for to amend the zoning map, applying the MU-11 designation to the currently unzoned lots 801, 802, and 803 in square 1080-S (the "Site").

The lots are bounded by Water Street SE to the north, the Sousa Bridge to the east, the Anacostia River to the south, and the 11th Street Bridge to the west. The site is improved with boathouse uses to the northeast and vacant to the southeast. The Site was previously owned by the federal government and transferred to the District in 2008. This application *does not* include lot 804 and 805, two lots still owned by the federal government and used by the Army Corps of Engineers.

The surrounding area is typified by decommissioned industrial uses and vacant land. To the north of Water Street SE, the properties are all zoned PDR-4. There is a large swath of vacant, currently going through a Planned Unit Development in case 20-06. Moving further downstream to the north, there is a large surface parking lot and purpose-built facilities for servicing Washington Gas. At the southwest/downstream edge of the Site is the 11th Street Bridge complex. At the northeast/upstream edge of the Site is the Sousa Bridge.

The site is designated Parks, Recreation, and Open Space in the Comprehensive Plan Future Land Use Map ("FLUM") and Parks, Federal- and District-Owned in the Generalized Policy Map ("GPM"). The 2008 Boathouse Row Planning Study identified the Site for various potential uses, including boathouse/marina use, park space, or recreational retail. This application is not inconsistent with the map or text elements of the Comprehensive Plan and is consistent with the overall purpose and intent of the Zoning Regulations and other planning efforts.

This petition to amend the zoning map is not inconsistent with the Comprehensive Plan and will not adversely impact the properties or surrounding properties. The proposed map amendment is consistent with the Future Land Use Map ("FLUM") designation as Parks, Recreation, and Open Space. The amendment is consistent with the Generalized Policy Map ("GPM") designation as Parks, Federal- and District-Owned. This application is also not inconsistent with the text elements of the Comprehensive Plan

Consistency with Zoning Regulations

This application is being filed as a Rulemaking Case pursuant to Subtitle Z, Chapter 5 of the Zoning Regulations. As a map amendment, pursuant to Subtitle X-500.3, the Zoning Commission must find this application "not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site"

Further, the Commission in the past has zoned former federal lands transferred to the District, including the Southeast Federal Center (Case 03-06) and Reservation 13/New Hill East District (Case 04-05). The application is consistent with these past approvals.

Comprehensive Plan Map Elements

The Site is designated as "Parks, Recreation, and Open Space" in the FLUM. **Parks, Recreation, and Open Space**: This designation includes the federal and District park systems, including the National Parks, such as the National Mall; the circles and squares of the L'Enfant city and District neighborhoods; settings for significant commemorative works, certain federal buildings such as the White House and the U.S. Capitol grounds, and museums; and District-operated parks and associated recreation centers. It also includes permanent open space uses such as cemeteries, open space associated with utilities such as the Dalecarlia and McMillan Reservoirs, and open space along highways such as Suitland Parkway. This category includes a mix of passive open space (for resource conservation and habitat protection) and active open space (for recreation). While included in this category, parks smaller than one acre including many of the triangles along the city's avenues — may not appear on the map due to scale. Zoning designations for these areas vary. The federal parklands are generally unzoned, and District parklands tend to be zoned the same as surrounding land uses

Further, the site is designated as Parks, Federal- and District-Owned in the GPM. The language

in the Comprehensive Plan related to this designation is limited to a portion of 10A-225.22

'The Generalized Policy Map also identifies **parks and open space**, land owned by or under the jurisdiction of the District or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses. The fact that these areas are not designated as Conservation, Enhancement, or Land Use Change Areas does not mean they are exempt from the Comprehensive Plan or that their land uses will remain static. Public parks and public open space will be conserved and carefully managed in the future. Federal lands are called out to acknowledge the District's limited jurisdiction over them but are still discussed in the text of the District Elements.

Applying the MU-11 zoning to the Site is not inconsistent with maps. While the Comprehensive

Plan does not explicitly mention the MU-11 zone at all, as stated in G-500.2, the zone is intended

to "(a) Permit open space, park, and low-density and low-height waterfront-oriented retail and

arts uses; and (b) Be applied in undeveloped waterfront areas."

Related to the FLUM, while District parklands tend to be zoned the same as surrounding land uses, the surrounding high-density industrial use (PDR-4) to the north of the Site is inconsistent with the land uses (commercial mid-rise office buildings and proposed residential developments) and FLUM designation (Medium-Density Commercial/Industrial). In the FLUM, park uses are envisioned to include passive open space *and* active open space for recreation. As shown recently in Zoning Case 18-04, amendments in the case of text amendment or map amendments are necessary for the construction of active recreation facilities. Existing uses are also generally consistent with the MU-11 zoning. The large open space surrounding the Army Corps of Engineers site clearly meets the standards of *undeveloped waterfront areas*. The existing Eastern Power Boat Club and Washington Yacht Club seem to be broadly consistent with the development standards of the MU-11 zone. The use permissions as related to boathouses would require a special exception, however, ANC 6B is eager to engage in discussions with the Historic Anacostia Boathouse Association and Office of Planning on a text amendment to modify the MU-11 Use Permissions to make existing uses matter-of-right.

Related to the GPM, this Site is not exempt from the other components of the Comp Plan. This application requests designation to the MU-11 zone and that designation is not inconsistent with the Generalized Policy Map.

Applying MU-11 zoning to the Site is not inconsistent with the FLUM and GPM designation.

Comp Plan Text Elements

Framework Element (Chapter 1)

31. Connections to and between the city's celebrated open spaces, such as Rock Creek Park and the National Mall, should be improved. At the same time, creation of new parks along the Anacostia River and enhancement of the federal Fort Circle Parks, should be supported to connect communities and enhance "green infrastructure" in the city. 222.4

Mapping this land to MU-11 allows for the creation of new parks by-right in the undeveloped

areas without seeking text amendments to allow building on unzoned land. Further, these new

parks would be along the Anacostia River and serve as another step in reconnecting the

communities torn apart by the Southeast Freeway and 11th Street Bridge Complex

Land Use Element (Chapter 2)

Policy LU-1.2.8: Large Sites and the Waterfront Use the redevelopment of large sites to achieve related urban design, open space, environmental, and economic development objectives along the Anacostia Waterfront. Large waterfront sites should be used for

water-focused recreation, housing, commercial, and cultural development, with activities that are accessible to both sides of the river. Large sites should further be used to enhance the physical and environmental quality of the river. 305.13

Mapping the Site to MU-11 encourages the redevelopment of a large formerly federal land to

enhance the physical and environmental quality of the Anacostia River. MU-11 zoning would

also allow water-focused recreation, commercial, and cultural development by-right.

Environmental (Chapter 6)

Policy E-1.2.1: River Conservation Improve environmental conditions along the Anacostia River and other water bodies, including shorelines, wetlands, islands, tributaries, and the rivers themselves. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitat, creating new wetlands, and reducing litter. 604.3

Policy E-1.2.3: Retention of Environmentally Sensitive Areas as Open Space Retain environmentally fragile areas such as wetlands and riparian areas along the Anacostia and Potomac Rivers as open space or parkland. In areas under federal jurisdiction such as Rock Creek Park, work with the National Park Service to conserve and carefully manage such areas, and to implement an effective "no net loss" policy. 604.5

MU-11 zoning is not inconsistent with these elements as development and use standards would

require these policies to be followed, as laid out in G-500 and U-505, U-506, and U-509. The

standards here lay out strict guidelines requiring projects to not be inconsistent with these

elements

Parks, Recreation, and Open Space (Chapter 8)

Policy PROS-1.1.3: Park Diversity: Provide a diverse range of recreational experiences in parks within the District of Columbia, including a balance between passive and active recreational uses, and a mix of local-serving, region-serving, and national recreational uses.

Policy PROS-3.2.1: Protecting Waterfront Open Space Recognize the importance of the city's waterfronts for recreation, public access, ecological protection, and scenic beauty. 813.3

Policy PROS-3.2.3: Linkages Between the Waterfront and Nearby Neighborhoods Establish stronger linkages between the waterfront and adjacent upland neighborhoods including Deanwood, Mayfair, Kenilworth-Parkside, River Terrace, Fairlawn, Twining, Kenilworth, Historic Anacostia, CarverLangston, Kingman Park, Hill East, Capitol Hill, Barney Circle, and Southwest. Maximize public access to the waterfront from these areas through the development of a riverwalk and shoreline trail, improved public transportation, redesigned bridges and freeways, and the extension of neighborhood streets and avenues to the water's edge. 813.6

Policy PROS-3.2.4: Waterfront Visibility and Accessibility Improve access to the shoreline parks from across the city, and reduce barriers to waterfront access created by railroads, freeways, and non-water dependent industrial uses. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan that has been approved by the District government. 813.7

Policy PROS-3.2.5: Water-Oriented Recreation Provide for a variety of water-oriented activities, including fishing and boating, on the District's rivers. Recognize both the Anacostia and Potomac Rivers as vital aquatic resources that can accommodate kayaking, canoeing, sculling, fishing, and other forms of water-oriented recreation. 813.8

Policy PROS-3.2.7: Waterfront Park Design Require the design and planning of waterfront parks to maximize the scenic and recreational value of the rivers. Activities such as parking lots and park maintenance facilities should be located away from the water's edge, and environmentally sensitive resources should be protected. 813.10

MU-11 designation will allow the site to maximize on it's potential by allowing for by-right use

of water-oriented recreation and design that maximizes the scenic and recreational value of the

river, while also allowing for projects on the Site to increase drawing power of surrounding

neighborhoods to the Anacostia River.

<u>Urban Design (Chapter 8)</u>

Policy UD-1.3.1: DC as a Waterfront City Strengthen Washington's civic identity as a waterfront city by promoting investment along the Anacostia River, creating new water-related parks, improving public access to and along the shoreline, and improving the physical and visual connections between the waterfront and adjacent neighborhoods. 905.5

Policy UD-1.3.2: Waterfront Public Space and Access Develop public gathering spaces along the waterfronts, including promenades, viewpoints, boating and swimming facilities, and parks. Such space should be designed to promote continuous public access along the rivers, and to take full advantage of site topography and waterfront views. Design treatments should vary from "hardscape" plazas in urban settings to softer, more passive open spaces that are more natural in character. 905

Policy UD-1.3.3: Excellence in Waterfront Design Require a high standard of design for all waterfront projects, with an emphasis on shoreline access, integration of historic features and structures, an orientation toward the water, and the creation of new water-oriented public amenities. 905.7

Policy UD-1.3.4: Design Character of Waterfront Sites Ensure that the design of each waterfront site responds to its unique natural qualities. A range of building forms should be created, responding to the range of physical conditions present. New buildings should be carefully designed to consider their appearance from multiple vantage points, both in the site vicinity and at various points on the horizon. 905.8

Policy UD-1.3.5: River Views Protect and enhance river views in the design of buildings, bridges, and pedestrian walkways on or near waterfront sites. The scale, density and building form along the city's waterfronts should define the character of these areas as human-scale, pedestrian-oriented neighborhoods and should protect views from important sites. Figure 9.5 (at left) illustrates preservation of river views on waterfront development sites. 905.10

Policy UD-1.3.6: "Activating" Waterfront Spaces Encourage design approaches, densities, and mixes of land uses that enliven waterfront sites. Architectural and public space design should be conducive to pedestrian activity, provide a sense of safety, create visual interest, and draw people to the water. 905.11

Policy UD-1.3.7: Neighborhood Connectivity Improve the physical connections between neighborhoods and nearby waterfronts. Where feasible, extend the existing city grid into large waterfront sites to better connect nearby developed areas to the shoreline (see Figure 9.6). 905.12

MU-11 zoning allows for by-right development and park and low-impact retail use that can serve

to activate the waterfront, specifically along the long-neglected Anacostia.

Lower Anacostia Waterfront and Near Southwest Area Element

Policy AW-1.1.5: River Basins as a Planning Guide Recognize and be responsive to the distinct settings and environments created by varying conditions along the shoreline. Consistent with the Anacostia Framework Plan, the river should be viewed as a series of "basins," each defined by their unique physical and visual characteristics. In general, there should be a progression from a more urban environment on the lower basins (Washington Channel and the river gateway) to a more natural environment on the upper basins (Kingman and Heritage Islands, Arboretum, etc.) 1908

Policy AW-1.1.6: Pedestrian Orientation of Waterfront Uses Provide a high level of pedestrian amenities along the shoreline, including informational and interpretive signs, benches and street furniture, and public art. 1908

Policy AW-1.1.8: Barriers to Shoreline Access Minimize the visual and accessibility impacts of railroad and highway infrastructure, surface parking, and industrial uses along the Anacostia River shoreline. In particular, the impacts of freeways on waterfront access should be mitigated by supporting the redesign of these facilities as tunnels or landscaped boulevards. 1908.9

Policy AW-1.2.1: Historic and Cultural Waterfront Assets Capitalize on the historic and cultural assets located near the Lower Waterfront, such as the Washington Navy Yard and Fort McNair. Public education about these assets should be expanded, the physical connections between them should be enhanced, and greater recognition of their value and importance should be achieved. 1909.1

Policy AW-1.2.4: Anacostia River Parks Create a connected network of waterfront parks from Hains Point to the Sousa Bridge, and continuing through adjacent upriver Planning Areas to the Maryland border. These parks should be easily accessible to surrounding neighborhoods and accommodate the need for more local and regional serving recreational activities in the city. New parks should be an integral part of any new waterfront neighborhood, and should showcase the remarkably diverse landscape along the Anacostia River. A variety of active and passive recreational settings should be provided. 1909.4

Policy AW-2.3.2: Near Southeast Shoreline Access Improve shoreline access and movement to and through the Near Southeast by eliminating real and perceived barriers, improving public space and street corridors, reducing the amount of land occupied by surface parking and industrial uses, and encouraging new land uses that maximize public activity near the waterfront.

MU-11 zoning recognizes the unique nature of the Site, while giving certainty of development

and use standards to the existing Historic Anacostia Boathouse Association, which includes the

landmarked Washington Yacht Club. Further, MU-11 zoning allows for development of parks

and low-intensity retail and commercial uses that could be pedestrian-oriented and allow access

to the shoreline. Also, the Site would be the last in a line of public parks from Hains Point to the

Sousa Bridge.

Anacostia Waterfront Initiative Framework Plan

The Site sits at the edge of the Anacostia Waterfront Initiative Framework Plan. Adopted in

2003, this document lays out the rouge guidelines for the recent development focused on the

Anacostia River. While much of the guidance has since been incorporated into the

Comprehensive Plan, there are elements showing the further consistency of MU-11 zoning and

this plan.

On the west side of the river, the existing boat clubs and marinas will be enhanced to create a Boathouse Row (Page 29)

By contrast, the lower reaches of the river will host more active boating, particularly sculling. Currently there are seven marina and boating clubs with slips for 600 boats, all on the Washington Channel and the west side of the river. A new Boathouse Row will enhance the existing boat clubs on the west side of the river and add rowing centers. (Page 67)



Without MU-11 zoning, these elements, especially the proposed map, simply isn't possible. MU-

11 zoning of the Site is consistent with the Anacostia Waterfront Initiative Framework Element

Boathouse Row Planning Study

While not an official Small Area Plan adopted by the Council, this study issued in 2009, further

serves as a guiding principle for this map amendments, specifically the zoning portion

Because the land comprising Boathouse Row was previously owned by the United States and maintained by the National Park Service, it was not zoned by the District of Columbia. It is designated in the 2006 DC Comprehensive Plan's Future Land Use map as Parks, Recreation and Open Space. Future zoning changes for this area will occur through the Zoning Commission process to include community notification and input. At this time, a schedule has not been determined for when that process will occur. Any zoning implemented on this site would be consistent with a low-density waterfront designation as recommended in the Comprehensive Plan. .

Community and Property Owner Outreach

(I'll need to host a community meeting at some point and I've continued trying to get in contact with HABA along with Scott from the Bridge Park with no luck. I'll have to expand this before filing)

References

(Zoning Regulations, Comp Plan Boathouse Row Planning Study, Anacostia Waterfront Initiative)

Exhibits

Application Form Waiver of Survey Vicinity Map Notice of Intent Lost of Property Owners Re: Bill B23-0736, The Comprehensive Plan Amendment Act of 2020

Members of the DC Council,

ANC 6B is writing to you as members of the Committee of the Whole, in support of Bill 23-736, The Comprehensive Plan Amendment Act of 2020 and we urge swift approval of this bill in this Council period.

Over the last four years, individual commissioners and ANC 6B's Planning and Zoning Committee have worked collaboratively with the Office of Planning on proposed amendments to citywide elements and the Capitol Hill and Lowest Anacostia and Near Southwest area elements. We proposed 42 amendments in 2017 and a further 24 amendments in 2020. OP provided relatively prompt responses and explanations in both cases. OP by no means accepted all of our proposals and we believe some amendments that we proposed in 2017 and 2020 should have been incorporated, but we understand the process has many competing parties. The process has resulted in an unambiguously better Comprehensive Plan. We look forward to participating in the holistic rewrite of the Comprehensive Plan starting in 2021.

While we offer no proposed amendments to the pending bill, we wanted to highlight our support for the changes made to the Future Land Use Map (Changes 2418, 5006.2, 5008, 5034, 9901, 9902, 9903, and 9925) and Generalized Policy Map (5035) in ANC 6B as well as language encouraging development of Reservation 13, RFK Stadium land, and Southeast Boulevard. These sections and map changes should remain unamended in the final bill.

In our second set of proposed amendments we urged OP to act quickly. Despite the onset of COVID-19, OP was able to get a final bill to the COW by April. It's time now for the Council to act and pass this bill before the end of the Council period.