



District of Columbia Government
Advisory Neighborhood Commission 6A
Box 75115 Washington, DC 20013



March 9, 2018

The Honorable Phil Mendelson
Chairman
Council of the District of Columbia
1350 Pennsylvania Avenue, NW, Suite 402
Washington, D.C. 20004

Re: Proposed Revisions to the D.C. Comprehensive Plan

Dear Chairman Mendelson:

At a regularly scheduled and properly noticed meeting on March 8, 2018¹, our Commission voted 7-0 (with 5 Commissioners required for a quorum) to oppose the current draft of the revised Framework Element of the D.C. Comprehensive Plan. The opposition of ANC6A to the proposed plan is based on the lack of proper process in developing and reviewing the revised comprehensive plan, and our fear that the language currently in use will weaken D.C.'s zoning regulations and lead to potential chaos in development activities.

The D.C. Office of Planning failed to provide ANCs a thirty (30)-day comment period on the Comprehensive Plan Framework Element as required by law. While there were public meetings and the opportunity for the public to submit amendments to the Comprehensive Plan - and a commitment to provide the required review of the Plan in its entirety - the Framework Element, alone, has been submitted directly to the Council with almost no public review of the proposed changes. The result of this lack of proper process is that there has not been adequate time for ANCs to consider and respond to specific changes to the Comprehensive Plan that will affect them prior to its consideration for adoption.

Compounding the lack of transparent and open process is the proposed language being proposed in the comprehensive plan. The current draft states that zones for each land use category are "broad guidelines" and are "not intended to be strictly followed." This language, combined with other similar changes, will likely result in a softening of zoning guidance, allowing developers or other parties to argue that different zoning standards may be used for development projects, based on potentially arbitrary or idiosyncratic criteria. These changes are likely to place a substantial burden on the Zoning Commission and Board of Zoning Administration, which will lack clarity in the Comprehensive Plan. The net result is likely to be zoning decisions that will be more arbitrary and capricious and provide less predictability and support from local communities.

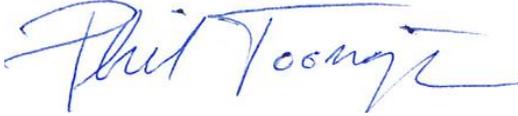
While our Commission believes that the current zoning appeal process is problematic and should be addressed, the proposed approach of softening the Comprehensive Plan language to make appeals more difficult is likely to result in more problems than it will resolve. Therefore, the Commission requests the Council return the Comprehensive Plan to the Office of Planning for lawfully required comment from

¹ ANC 6A meetings are advertised electronically on the anc6a-announce@yahoogroups.com, anc-6a@yahoogroups.com, and newhilleast@yahoogroups.com, at www.anc6a.org, and through print advertisements in the Hill Rag.

affected ANCs and the public.

Please be advised that Brad Greenfield and I are authorized to act on behalf of ANC6A for the purposes of this case. I can be contacted at philanc6a@gmail.com and Mr. Greenfield can be contacted at brad.greenfield@gmail.com.

On Behalf of the Commission,

A handwritten signature in blue ink, appearing to read "Phil Toomajian". The signature is fluid and cursive, with a long horizontal stroke at the end.

Phil Toomajian
Chair, Advisory Neighborhood Commission 6A

cc: Members of the D.C. Council, Eric Shaw, Director of the Office of Planning, Brian Kenner,
Deputy Mayor for Planning and Economic Development