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VIA EMAIL

Director Trueblood D.C. Office of Planning 1100 4th Street, SW, Suite 650 East, Washington, DC 20024 plandc@dc.gov

Director Trueblood:

The Eckington Civic Association (ECA) appreciates the opportunity to comment on the Office of Planning's recommendations to the D.C. Council regarding proposed amendments to the Comprehensive Plan. The ECA is writing to request that the Office of Planning reverse its preliminary decision not to recommend adoption of several map amendments that ECA proposed (tracking numbers 2416.1, 2416.2, 2416.3, 2419.1, 2419.2, and 2419.3) as well as a related text amendment (tracking number 1702). We believe that the Office of Planning erred in concluding that these requested changes were inconsistent with completed plans or policy documents or "inappropriate," and are requesting that the Office of Planning reconsider.

Contrary to the Office of Planning's preliminary conclusions, the ECA map and text amendments are consistent with the Office of Planning's own citywide and Mid City targets for new housing units. Indeed, the ECA's support for the amendments is based on a desire for our neighborhood to grow sustainably while creating a thriving, vibrant community with accessible amenities nearby. The map and text amendments identified above, the most important of which include the upzoning underused and underutilized industrial space are consistent Mayor Muriel Bowser's goal of creating 36,000 new housing units in the District of Columbia by 2025. They are also consistent with the Office of Planning's October 2019 report detailing a specific need for 4,210 net new market rate and affordable housing units in Mid City (which includes Eckington) by 2025.

Mayor Bowser has recently spoken of the potential need to "<u>shame</u>" neighborhoods into being more receptive to building additional housing. In Eckington, no shaming is necessary. We

continue to embrace zoning changes in our neighborhood that would make possible a significant increase in the amount of affordable and market-rate housing stock in part of the city that is centrally located and proximate to public transportation. The comprehensive plan amendments the ECA continues to pursue would help, not hinder, the Mayor and the Office of Planning's housing goals. For that reason, we believe the Office of Planning erred in concluding that they were "inconsistent with completed plans or policy documents."

The Office of Planning has not articulated the basis for its determination in certain instances that ECA's proposed amendments were also "inappropriate." We believe that this too was in error and would like the Office of Planning to reverse this decision or articulate what aspect of the ECA's proposed amendments it considers to be "inappropriate" so that the ECA has sufficient information to respond. The ECA submitted its 2017 amendments after a lengthy period of community engagement. We do not believe that the civic work that went into proposing these amendments should be brushed aside by the Office of Planning without a valid, clearly articulated reason.

Critically, none of the amendments the ECA has proposed would eliminate existing uses; rather, they allow for additional residential or commercial uses of areas that are already designated for moderate density residential or production, distribution, and repair. Rather than go through years of zoning commission process to rezone each of these parcels on a one-by-one basis, the community has and continues support the comprehensive plan amendments it submitted in 2017. To be clear, all of these amendments were included in the ECA's original set of 2017 amendments and previously received the unanimous support of ANC 5E. The ECA also voted unanimously at its December 2019 meeting to request that that the Office of Planning reconsider its rejection of these map and text amendments.

For those reasons, the ECA respectfully requests that the Office of Planning include in its recommended changes to the Comprehensive Plan the following map amendments:

- 1. In the General Policy Map, add a Main Street Corridor on 5th Street Northeast from the intersection with the Metropolitan Branch Trail to Rhode Island Avenue Northeast. This will allow more investment into local businesses within Eckington's boundaries.
- 2. In the General Policy Map, add a Land Use Change area along the length of the Metropolitan Branch Trail. We believe this makes the map element consistent with amendments recommended in the plan's text component.
- 3. In the Future Land Use Map, change the southeast corner of Florida Avenue Northeast and North Capitol to mixed-use "Moderate Density Commercial" and "Moderate Density Residential." This will make the map consistent with existing plans to build two residential structures on that land in the coming years, while continuing to encourage commercial development as well.
- 4. In the Future Land Use Map, change the corridor along the Metropolitan Branch Trail to mixed use "Production, Distribution and Repair," "Moderate Density Commercial," and

- "Medium Density Residential." Again, this makes this corridor's map element consistent with amendments recommended in the plan's text component.
- 5. In the Future Land Use Map, change 5th Street Northeast to mixed use "Moderate Density Residential" and "Low Density Commercial."

The ECA also respectfully request that the Office of Planning include in its recommended changes to the Comprehensive plan the following text amendments:

Policy MC-2.8.2: Higher-Density Residential Near Transit

Focus higher-density residential in Eckington close to the two Metro stations near Eckington (NoMa/Gallaudet and Rhode Island Avenue). Specifically, between the Metropolitan Branch Trail and 4th St. NE, east of Eckington Place, south Eckington from New York Avenue to North Capitol to O St NE, along Florida Avenue east of North Capitol to the Metropolitan Branch Trail, and from 4th Street to the Metropolitan Branch Trail on Rhode Island Avenue are ideal locations for additional high-density housing. 2018.4

Best regards,

/s/ Conor Shaw

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