



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



February 14, 2020

Andrew Trueblood, Director
Office of Planning
1100 4th Street, SW, Suite 650 East,
Washington, DC 20024

Re: ANC 6A Comments on the Draft Comprehensive Plan Update

Dear Mr. Trueblood,

At a regularly scheduled and properly noticed meeting¹ on February 13, 2020, our Commission voted 7-0-0 (with 5 Commissioners required for a quorum) to submit the attached comments for consideration by the Office of Planning in its updates to the Draft Comprehensive Plan.

Thank you for giving great weight to the recommendation of ANC 6A. Should you wish to discuss this letter or the attached comments with the Commission, please feel free to reach out to me at AmberANC6A@gmail.com.

On behalf of the Commission,

Amber Gove
Chair, Advisory Neighborhood Commission 6A

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

Comprehensive Plan Introduction Element ANC6A Comments

1. 100.5 *Planning for an Inclusive City needs to recognize the special needs of the growing number of older adults, especially as they become frail. To this end, ANC6A recommends the following addition to 100.5:*

100.5 As we think about our future, other issues arise. How will people get around the city in 20 years? Where will our children go to school? **How will the needs of our growing aging population be met as they move from being active older adults to becoming less capable to take care of themselves?** Will police and fire services be adequate? Will our rivers be clean? Will our air be healthy? ~~How will we resolve the affordable housing crisis and ensure that housing choices are available for all residents?~~ **How do we address housing affordability and ensure that current and longtime residents have a place in the future of the city? How can we ensure that residents have access to the thousands of new jobs we are expecting? How can we ensure the District continues to produce jobs and that District residents have the supports they need to take these jobs and find pathways to success? How will the best parts of will the character of our neighborhoods be conserved preserved and the challenging parts improved? How will federal and local interests be balanced?** 100.5

2. 103.4 *Figure 1.1 1.2: The Family of Plans* 103.4
ANC6A notes that several important plans are not included in this figure.

(1) **Add DC City Council mandated “10-year Senior Strategic Plan.** *The Department of Aging and Community Living is the lead agency in developing this comprehensive city-wide plan.*

(2) **Add “Reservation 13 Master Plan” to this figure.** *We suggest it might fit under “Area Elements - Related Studies and Plans.”*

Land Use Element ANC6A Comments

309.6 309.6 *ANC 6A supports these aspects of the discussion of what makes a good neighborhood and proposes changes as they appear in blue font. ANC6A suggests several revisions to the discussion of what makes a good neighborhood and proposes recognition of a broader range of diversity. Current 2006 Comprehensive Plan is shown in black; OP’s new proposed text is in underlined bold; OP’s strikethroughs are in red.*

309.6 What Makes a Great Neighborhood?

A successful neighborhood should create a sense of belonging, civic pride, and a collective sense of stewardship and responsibility for the community’s present and future among all residents. Indeed, a neighborhood’s success must be measured by more than the income of its residents or the size of its homes. Building upon the In 2004, “A Vision for Growing an Inclusive City” identified essential physical qualities that all neighborhoods should share. These included:

- Transportation options for those without a car, including convenient bus service, car sharing, bicycle facilities, and safe access for pedestrians;

- Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down restaurants;
- Housing choices, including homes for renters and for owners, and a range of units that meet different needs of the community;
- Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature;
- Quality public services, including police and fire protection, high-quality, safe and modernized schools, health services, and libraries and recreation centers that can be conveniently accessed (~~though not necessarily located within the neighborhood itself~~);
- Distinctive character and a "sense of place", defined by neighborhood architecture, visual landmarks and vistas, streets, public spaces, and historic places;
 - Evidence of visible public maintenance and investment—proof that the city "cares" about the neighborhood and is responsive to its needs; and
- A healthy natural environment, with street trees and greenery, and easy access to the city's open space system.

The understanding of what makes a great neighborhood has evolved, particularly in terms of addressing social equity, advancing sustainability, and building community resilience to everyday challenges as well as environmental and manmade disasters. Where a resident lives - their neighborhood - remains one of the greatest predictors of individual health and economic outcomes. To achieve inclusive growth, neighborhood success must not only include achieving the desired physical characteristics but also ensuring that every community plays a part in supporting investment and development that advances neighborhood vitality, growth, and economic mobility, and increases access, equity, and where appropriate, jobs. A neighborhood's success must be measured by more than the income of its residents or the size of its homes. A successful neighborhood should create a sense of belonging and civic pride, and a collective sense of stewardship and responsibility for the community's future among all residents.

Today, we recognize that great neighborhoods include racially, socially, and physically diverse residents and offer access to support services for those who have special needs, such as seniors who are becoming frail and others with disabilities. The positive elements that create the identity and character of each neighborhood should be preserved and **enhanced**. ~~enhanced in the future.~~ 309.6

Transportation Element ANC6A Comments

1. *Nomenclature. Capitol Hill Village, a neighborhood-based "senior village" with over 500 older adult members, endorses the substitution of "older adult" for "elderly" throughout the Element.*
2. **403.5.** ANC6A believes that planning and policy new transportation technology should also include addressing the increasing availability and use of micromobility options such as scooters. The District must address how these micromobility systems interact with traffic and pedestrians, what are the rules of behavior, and how they use public space.

3. 410.6 Policy T-2.4.2: Pedestrian Safety. ANC6A supports the policy that addresses pedestrian safety and endorses the proposed additions of additional types of pedestrian safety devices and approaches to 410.6 Policy T-2.4.2.

4. 410.8 Policy T-2.4.4: Sidewalk Obstructions. ANC6A endorses this policy with the proposed change in nomenclature.

5. 411.15. Action T-2.5.A: Maintenance Funds. ANC6A urges the city to improve sidewalk lighting in neighborhoods and to maintain sidewalks to reduce tripping hazards. This would make walking safer both from helping prevent injuries and increasing personal security. Specifically, we recommend revision of 411.15 as follows:

411.15. Action T-2.5.A: Maintenance Funds.

Provide sufficient funding sources to maintain, and repair the District's system of sidewalks, streets and alleys, including its street lights and traffic control systems, bridges, street trees and their roots, and other streetscape improvements. 411.15

6. After 410.14, ANC6A proposes a new action item as follows:

NEW. Action T-2.4 G Pedestrian oriented street lighting.

Develop a program in coordination with the Metropolitan Police to prioritize improving pedestrian oriented lighting of sidewalks, while reducing light pollution. This would increase ease of communication for the Deaf and Hard of Hearing

7. After 420.11, NEW. Policy T-4.1.4: Accommodating Evacuation Needs. ANC6A very much endorses the addition of this new policy to ensure consideration of residents who have access and functional needs in emergency evacuation planning.

Housing Element ANC6A Comments

ANC6A endorses the Age Friendly DC Initiative's contribution to the Comprehensive Plan. We are pleased to see that the changing older adult housing needs are recognized.

1. 500.2. ANC6A proposes that Section 500.2 recognize the special housing challenges facing our older adult population faces as they become frail as follows:

500.2. The critical housing issues facing the District of Columbia are addressed in this section. These include:

- Ensuring housing affordability **across all incomes**
- **Furthering fair housing opportunities especially in high cost areas**
- Fostering housing production **to improve affordability**
- **Preserving existing affordable housing**
- **Promoting more housing proximate to transit and linking new housing to transit**
- **Restoration or demolition of vacant blighted properties**
 - Conserving existing housing stock
- **Maintaining healthy homes for residents**

• Promoting appropriate housing alternatives for older adults and other vulnerable populations, that include social and health services

- Promoting home ownership
- **Ending Homelessness**
- Providing housing integrated with supportive services for residents with special needs, ~~integrated with supportive services~~. 500.2

2. 503.8 Policy H-1.1.7: Large Sites. The omission of senior services is a serious omission and can be rectified by the following revision:

503.8 Policy H-1.1.7: ~~New Neighborhoods~~ **Large Sites**.

Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition to giving priority to market rate and affordable housing, these neighborhoods ~~must~~ **should** include or have access to well-planned retail, public schools, attractive parks, open space and recreation, ~~enable resilient, innovative neighborhood level energy systems~~, as well as needed supportive services for seniors and other residents with special needs. The new neighborhoods should include a variety of housing types, serving a **diverse population and a** variety of income levels. 503.8

3. 505.5 *ANC6A recommends important changes to this paragraph about the need for diverse housing stock:*

505.5 An important part of growing ~~"inclusively"~~ **inclusively** is to **develop and** maintain, **across neighborhoods and throughout the city**, a **diverse** housing stock **of all sizes and types** that can fit the needs of **the all variety** of ~~these~~ households **including growing families as well as singles, couples, and aging residents who hope to stay in their homes or choose to as they transition from independence to skilled nursing-care alternative housing**. At its most extreme, market pressures may result in displacement as affordable large rental units are converted to ~~"luxury"~~ upscale condos or ~~upscale~~ apartments. More often, these pressures ~~simply~~ mean that families are having a harder time finding suitable housing in the city. The vacancy rate provides a good barometer of this dilemma. In ~~2004~~ **2017**, the vacancy rate was ~~8.8~~ **13** percent for studios and one bedroom units, but it was just ~~4.4~~ **8** percent for units that were ~~two~~ three bedrooms or larger.

4. 505.8 Policy H-1.3.3: Assisted Living and Skilled Nursing. *ANC6A fully supports the Policy H-1.3.3 with the addition of adult day service to facilities. Such facilities, which would also provide services to families caring for family members with dementia, are greatly needed in the Capitol Hill Planning Area. ANC6A recommends the following revision to this policy:*

505.8 Policy H-1.3.3: Assisted Living, **Adult Day Services**, and Skilled Nursing.

Promote the development of neighborhood based assisted living, **adult day services with dementia care**, and skilled nursing facilities. Zoning and health regulations should be designed to promote an increase in supply, security, and affordability of housing for the elderly older adults. 505.8

5. 506.12 Policy H-1.4.6: Whole Neighborhood Approach. The omission of senior services is serious and can be rectified by the following revision:

506.12 Policy H-1.4.6: Whole Neighborhood Approach. Ensure that the planning for, and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, child care, [senior services](#), food access, parks, community gardens and open spaces, health care facilities, police and fire facilities, transportation, and emergency response capacity.

6. NEW H-4.3 Meeting the needs of Specific Groups. (page. 73)

ANC6A recommends that the Office of Planning check the forecasted demographics provided under “Older Adults” on page 74. In studying the obvious error in the number of 85+ year olds projected for 2030, ANC6A found the 2030 projection of 60+ year olds is different than that given in the Community Services and Facilities (CSF) Element (1108).

We suggest that OP correct the number by using the 2030 projection used in the CSF element, Chapter 11, which is 141,000. As we do not know OP’s methodology for projecting the number of residents over 85, we suggest a reasonable forecast might be to use the projected number of residents over 85 at the same percentage level experienced in 2017. Using analysis completed by Capitol Hill Village members, ANC6A proposes the following update:

Pasted ~~Seniors~~ Older Adults

In ~~2000-2017~~, there were ~~70,000~~ **118,275** District residents **age 60 and over-65**, including ~~8,500~~ **12,133** residents-~~over~~ **85 and over**. As the baby boom generation matures and as average lifespan increases, the population of ~~seniors~~ residents age **60 and over** in the District is expected to increase dramatically. ~~At the national level, the Census projects the number of senior citizens will increase by 104 percent between 2000 and 2030 almost four times the rate of the population at large. By 2030, there will be 133,000~~**141,000** residents **60 and over, of which 12,000**14,500** **will be 85 and older**. There will be a need for a broad range of senior living environments, serving residents across the income spectrum.**

7. Policy H-4.2.2 4.3.2: Housing Choice for ~~Seniors~~ Older Adults . (page 76)

ANC6A is pleased the Comprehensive Plan recognizes the role of “senior village” organizations, of which there are now over a dozen in the District of Columbia alone. We recommend the concept be defined for the readers of the Comprehensive Plan as set out below.

Pasted Policy H-4.2.2 4.3.2: Housing Choice for ~~Seniors~~ Older Adults

Provide a wide variety of affordable housing choices for the District’s ~~seniors~~ **older adults that enable them to age in their neighborhoods either by supporting their ability to remain in their home, or by providing new opportunities for one-level living within multi-unit buildings that include universal design elements and intergenerational options.** ~~taking~~ Take into account the income range and health-care needs of this population. Recognize the ~~coming~~ **forecasted** growth in the ~~senior~~ **older adult** population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority. Acknowledge and support the establishment of Senior Villages* throughout the city that **help** seniors to remain in their homes and **communities.** ~~age in-place.~~ 516.8

* [A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. More information about this nationwide movement is available at the Village to Village Network website: https://www.vtvnetwork.org/](https://www.vtvnetwork.org/)

**Economic Development Element
ANC6A Comments**

ANC6A is **very** concerned about the projected shortfall of Home Healthcare Aides (HHA), the workforce that will care for the frail elderly, especially those seeking to age in place. ANC6A has conducted extensive research in this area that we can share with Office of Planning and other governmental agencies. In general, other than a suggested revision in the data presented in Table 7.2, we endorse the several updates to the Comprehensive Plan that would be of particular benefit to this workforce. We look forward to seeing what action the city might take to effect these aspirations.

1. NEW Figure 7.2 Cross-Cutting Industry Clusters Identified by the 2016 DC’s Economic Strategy (certified as the Comprehensive Economic Development Strategy or CEDS by the U.S. Economic Development Administration in August 2017).

The Office of Planning should clarify implications of Table 7.2 for occupational as well as sector projections or supplement the table with occupation-specific projections. Table 7-2 reports growth projections by industry sector; some of the reported sector categories are very broad (Professional, Scientific and Technical), others more narrowly focused (Home Health Care Services), making assessments of training programs and other growth-supporting initiatives difficult. In addition, categories overlap – in NAICS classifications, Ambulatory Healthcare Services, for example, includes home health services, yet in the D.C. data, Home Health Care Services are separately listed. While perhaps useful as an illustration of core sectors in the D.C. economy, data by occupation would be more useful for planning purposes.

Capitol Hill Village representatives have conducted extensive research into the projected shortfall in Home Healthcare Aides and Personal Care Aides (who help with basic activities of daily living for persons unable to live independently without support) which require the attention of the D.C. government. All of the by-occupation projections we have found place Home Healthcare workers in the top three (and usually the first) both nationally and in D.C. of projected needs occupations over the next decade. Capitol Hill Village analysts are very willing to share these data with the Office of Planning and other entities.

For example, District of Columbia projected job openings for Home Healthcare Aides and Personal Care Aides are as follows (DOES OLMRI data):

	2016	2026 (projected)	# change	%change
Home Health Care Aides	4,996	7,627	2631	52%
Personal Care Aides	6,012	8,563	2551	42%
TOTAL	11,008	16,190	5182	47%

2. 716.8 ANC6A Endorses the retention of this policy with one OP proposed revision:

716.8 Existing Policy ED-4.1.3 Certification and Associate Programs

Support the continued contributions of colleges and universities in providing career-building opportunities for District ~~adults~~ **residents**, including literacy and job training programs as well as

professional certificate and two-year degree programs. The District will strongly support the University of the District of Columbia (UDC) as a public institution of higher learning, a place of continuing education, and a ladder to career advancement for District residents. 716.8

3. *716.9. ANC6A endorses the proposed revision to the policy on adult education as set forth below:*
716.9 Policy ED-4.1.4: Adult Education

Support adult education and workforce development, career and technical training for unskilled adult workers of all ages. Continue to innovate with programs that blend adult education and basic skills remediation with occupational skills and work ~~.-Increase and more effectively target resources for adult education and workforce development, vocational training, and technical training for unskilled adult workers.~~716.9

4. *ANC6A endorses the following proposed new policy.*

NEW Policy ED-4.1.7 Interjurisdictional Professional Licensing Agreements Encourage and support professional licensing boards/commissions to adopt interjurisdictional agreements that enable workers licensed in domestic jurisdictions other than the District of Columbia to reasonably obtain licensure to work in the District.

5. *ANC6A proposes a new Action Item as follows:*

Action ED-4.1.H Interjurisdictional Professional Licensing Agreement for Home Healthcare Aides.

The Department of Health licensing board for Home Healthcare Aides should pursue interjurisdictional agreements that would enable such workers licensed in other jurisdictions to reasonably obtain licensure to work in the District.

6. *717.16 ANC6A endorses the proposed revision of the policy on Limited English Proficiency and Literacy.*

717.16 Policy ED-4.2.8: Limited English Proficiency and Literacy Promote collaboration between the District's education, human services, juvenile justice, and workforce development agencies to better serve the city's English Language Learners (ELL) and Limited English Proficiency (LEP) populations, reduce barriers to employment, and connect residents with education and training opportunities, that lead to successful employment. Encourage English-as-a-Second-Language (ESL) programs and literacy training for residents in need of such services in order to overcome barriers to employment. ~~English-as-a-Second-Language (ESL) programs and literacy training for residents in need of such services in order to overcome barriers to employment.~~717.16

8. *ANC6A endorses the proposed new paragraph after 718.3 with the clarification that it is transit- accessible affordable housing that is imperative.*

NEW Transit-accessible affordable housing matching the needs of the workforce is imperative.

As Washington, DC continues growing, its housing market is becoming more complex, characterized by increased segmentation of the market rate and affordable housing stock. As a consequence, this increased complexity necessitates closer alignment

between economic development planning, housing planning and transportation planning to ensure that growth is equitable and sustainable.) Planners should also recognize that housing needs to be transit-accessible for workers coming to the work location, as well as for the residents living there. For example, many homecare workers face transportation and parking challenges in accessing client homes. Older adults confront similar challenges in accessing health services. The creative design of large site developments, that are attentive to access issues for both workers and residents, and that include a mix of housing types and services, will help promote workforce development and quality of life.

8. *Information derived from the following ANC6A proposed new action will help those who plan programs for developing the home healthcare aide workforce and providing these services.*

Action ED-4.3.E : Determine the number of homecare workers who travel to their work site via public transportation and by private vehicle. In addition, determine their average commute time.

9. *Homecare Cooperatives offer a potentially viable business model for the Home Healthcare Aide workforce, one that has been shown to reduce turnover, improve wages and benefits, provide enhanced training and on-the-job supports, and develop leadership and career advancement opportunities. In this context, several of the proposed policies would facilitate the development of homecare cooperatives. ANC6A endorses the following:*

- ***New Policy ED-3.2.8: Employee Owned and Controlled Businesses***
Support the creation and advancement of employee owned and controlled businesses. Consider techniques such as public funding to support the formation of cooperatives; prioritizing worker cooperatives in contracting and procurement opportunities; aligning preferences for cooperatives with workforce and economic development initiatives; training partnerships with workforce development programs; and providing technical assistance including financial and legal services.

- ***New Policy ED 1.1.4: Promote Local Entrepreneurship***
Support District residents seeking entrepreneurship opportunities through layered programs including technical assistance, promotion of District products and services, and market development.

- ***703.16 Action ED-1.1.C Business Support Structures.***
Streamline processes and create a more centralized system that assists ~~to assist~~ businesses in meeting ~~to meet~~ regulatory requirements quickly and efficiently, with a particular focus on serving small businesses, **businesses that show the promise to create many jobs, and businesses that help the District meet goals such as its commitments to reduce greenhouse gases.** Continue ~~Centralize~~ centralizing information and assistance to small and local businesses on starting a new business, the business permitting processes, zoning, fees and regulations, incentives, financing, unique programs, and opportunities. Create **and** maintain **a** fast-track permits and approvals system for businesses interested in opening or expanding in priority, under-served neighborhoods. 703.16

- ***Endorse: Action ED-1.1.D Improve Access to Capital and Financing Opportunities***

Support collaboration between District agencies and private organizations that facilitate increased access to capital for District entrepreneurs. This includes strategic grantmaking, facilitating small business access to capital, and facilitating new forms of investment, such as social impact investing and Opportunity Funds.

10. *Note: For the sake of completeness, we include below our comments on Workforce Development that ANC6A is submitting to the Educational Facilities Element. The **text in bold underlined blue** represents ANC6A's proposed additions.*

NEW Policy EDU-3.2.3 Workforce Development

Strengthen connections among educational programs, skills training, and workforce development initiatives to support development of career pathways and prosperity for all. Current Home Healthcare Aide (HHA) training opportunities for HHA certification are limited and often expensive in D.C. There is significant growth potential in the public school/community college sector for certification programs that train HHAs and facilitate bridging Certified Nursing Assistance (CNA) and HHA certifications.

Parks, Recreation and Open Spaces Element ANC6A Comments

ANC6A is pleased that the Draft Comprehensive Plan recognizes the value and need for city parks and recreational programs for older citizens. Such programs are important for seniors who without recreation and leisure activities can become socially isolated which is detrimental to their overall health.

1. 805.4 NEW. Need for improved data collection. *ANC6A endorses this new section on data driven programming as recommended by OP.*

2. 809.12 **NEW Action PROS 2.1.C: Parks Restroom Inventory.** ANC6A strongly endorses this proposed new inventory.

3. **809.12 NEW. Action PROS-2.1F: Action PROS-2.2L.** *ANC6A believes that despite good steps forward, the Parks and Recreation Element should be strengthened with regard to addressing the recreational and leisure needs of DC's older residents. Accordingly, ANC6A recommends the following two new action items that we believe are appropriate to the Comprehensive Plan and necessary to meet the needs of aging residents.*

a. **809.12 NEW Action PROS-2.1F: Integrating Needs of Seniors into Plans. The Parks Master Plan and Master Plans for Individual Parks, as appropriate, should include the following for older adults**

- **Recreation Center programming for older adults during the summer months.**
- **Indoor facilities to include walking tracks so older adults can continue their walking programs in rainy and cold weather.**
- **Benches be placed along side pedestrian paths every 1/8 of a mile.**

b. **809.12 NEW Action PROS-2.2L Enhancing effectiveness of programming for Older Adults. Work with Senior Villages and other non-governmental organizations to determine how community-based organizations can enhance the effectiveness of older adult recreational programs.**

4. 810. 7 Policy PROS-2.2.3: Program Diversity. ANC6A endorses the policy **on program diversity and the recognition of Senior Villages**. As we have in our review of other elements, we recommend a footnote that explains what senior villages are and where to get more information. We also believe this section would be strengthened by referring to “community based organizations” of which Senior Villages are one.

810. 7 Policy PROS-2.2.3: Program Diversity . Provide diverse recreation activities **to promote healthy living** for persons of all ages and cultural backgrounds, distributed equitably in all parts of the city. Coordinate **activities and offerings** with other service providers, including DC Public Schools, and **community-based organizations, such as “Senior Villages*,”** to maximize the effectiveness of service delivery and minimize redundancy. 810.7

*** A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. More information about this nationwide movement can be found at the Village to Village Network website: <https://www.vtvnetwork.org/>.**

5. 810.8. Policy PROS-2.2.4 Data-Driven Programming. ANC6A endorses this new proposal.

6. **810.9 Policy PROS-2.2.56 Special Needs.** ANC6A endorses the following which includes significant and welcome new policy, but we urge recognition of the special needs of older residents, many of whom remain active and do not have disabilities:

810.9. Policy PROS-2.2.56: Special Needs

Increase efforts to meet the needs of special **underserved** population groups, particularly **older residents and** persons with disabilities. Provide “barrier free” access by modifying existing facilities to accommodate the needs of the disabled **and modifying existing indoor and outdoor facilities and parks to accommodate the needs of people with disabilities.** **Explore the use of alternative participation styles and formats in the program curriculum so that activities can be easily adjusted to allow people with disabilities and other special needs to participate.** 810.9

**Urban Design Element
ANC6A Comments**

More than perhaps other segments of society, older adults need to have safe sidewalks and walking trails with places to sit and rest. They also need access to safe and clean public restrooms. The effects of the Urban Design Element not only address the needs of DC’s older citizens but also the needs and comfort of the hundreds of thousands of older tourists who come here each year.

1. ANC6A endorses without change the following new proposed Actions:

- **NEW Action UD-2.1.B: Standards for Street Furniture**

Produce standards for street furniture in public space, such as benches, trash cans, and bike racks, that designate spacing, layout, and other characteristics that promote socialization and interaction, as well as public health and wellbeing. These should be equitably distributed throughout the City.

- **New Action UD-2.1D Public Restrooms in Streetscapes**

When designing and upgrading streets and sidewalks in commercial areas, investigate opportunities to install attractive, clean, safe standalone public restrooms that are accessible at all hours.

2. *ANC6A endorses, with a proposed addition, the following new policy on neighborhood streetscapes:*

NEW Policy at UD-2.1.2: on Neighborhood Streetscapes Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low-scale buildings, while sidewalks with more trees and vegetation may be appropriate for large-scale developments. Pedestrian oriented lighting should be designed to enhance walking thoroughfares to public transportation hubs and promote communication for the Deaf and Hard of Hearing as well as visually reflect the character of neighborhood. Light sources should be shielded to eliminate or reduce light pollution.

Community Services and Facilities Element ANC6A Comments

1. *ANC6A supports the following new policy and revised action if amended to include the addition of senior services and to recognize the needs of our growing older adult population.*

NEW Policy CSF-1.1.10: Agency Coordination for Co-Location Strategies

Ensure that the Civic Facilities Plan includes inter-agency coordination for co-location of public uses early in planning and project initiation processes to ensure that critical input is captured and incorporated. Joint planning of District-operated facilities with other community facilities such as schools, senior services, health clinics, community kitchens, healthy food growing or retail spaces, and non-profit service centers should also be supported through ongoing communication and collaboration among relevant District agencies and outside agencies and partners.

1103.15 Action CSF-1.1.A: Civic Master-Public Facilities Plan

Continue to ~~d~~**Develop** and **refine the District's multi-layered approach** to a ~~Master-Public Facilities master p~~**Planning (MPFP)** to ensure adequate community facilities and ~~infrastructure~~**are provided for existing residents and can be provided for new neighborhoods in Washington, DC, and to including by** providing guidance for the long-term ~~(six-year)~~**(six-year)** Capital Improvements Program **(CIP)** and the ~~6-year~~**annual capital budget**. The ~~approach~~**MPFP** should include an assessment of all District-owned or maintained community facilities and property and should identify what improvements are needed to correct deficiencies and address planned growth and change in the District. The facilities plan should be continuously maintained

and updated regularly with new priorities and timelines. As needed, the Comprehensive Plan should be amended to incorporate the **MPFP master facilities planning** findings ~~and to add newly developed benchmarks and standards, acreage and locational requirements for various public uses, and identification of sites for new or refurbished facilities.~~ As part of ~~this work the MPFP and for each planning cluster,~~ the appropriate ~~planning~~ agency shall **continue to** annually collect and publish data on public school capacity and enrollments, **senior services,** recreational facilities, libraries, emergency medical service response time, sewers, green space, public transit capacity including bus routes and ridership statistics for Metrorail stations and lines as well as parking availability, and traffic volumes on roads and at key intersections. This ~~ese~~ data should be used **as appropriate** when evaluating the need for facility and infrastructure improvements, and for ~~evaluating appropriate densities for development in various neighborhoods both in the rezoning process and for planned unit developments.~~ 1103.15

2. *ANC6A agrees with the proposed NEW Policy CSF-2.1.1: Enhance Health Systems and Equity if it is amended to include age as follows:*

NEW Policy CSF-2.1.1: Enhance Health Systems and Equity.

Support the Strategic Framework for Improving Community Health, which seeks to improve public health outcomes while promoting equity across a range of social determinants that include health, race, income, age, and geography.

3. *ANC6A recommends **that the Plan include** the number of residents that Assisted Living Residences (ALRs) can serve, and their locations by quadrant in the District. We also recommend identifying those ALRs that accept subsidized fees. This is critical for identifying big gaps in the distribution of assisted living units across the city and especially for **identifying gaps in assisted living units available to lower income older people.***

a. **NEW** Follows 1106.10. ANC6A notes that a new citation is needed for these new paragraphs.

In addition to hospitals, the District counts on a broad array for facilities that provide a wide range of healthcare and health services. Many of these facilities provide services that enable Washington, DC residents to age in their communities. As of 2017, the District has twelve Assisted Living Residences (ALRs) which provide long-term care in the form of housing, health and personalized assistance. ~~Some Washington, DC residents who are not eligible to receive Medicaid benefits find it challenging to pay for ALR care.— Out of a total of 731 ALR living units as of summer 2018, there are none in Wards 5, 6, 7, and 8. Of two currently operating ALR facilities providing any subsidies, there are less than 100 subsidized units. Two ALR buildings in Wards 7 and 8 are planned for 300 units to open in 2021 and 2022 for those with Medicaid waivers. The eight facilities with full-priced ALR units charge basic fees that range from \$45,000 to \$100,000 per year, fees that are beyond the household budgets of DC residents with incomes between 30% and 100% of Median Family Income (MFI). Many of the smaller, private-pay ALR providers closed their doors in recent years due to inability to meet regulatory requirements or attain financial support.~~

b. **NEW Table 11.3. Health Services Facilities in the District (p.35)**

To provide meaningful data on the amount of service provided by facilities, ANC6A recommends:

- Insertion of a new column, called “Number of living units/or beds,” after the column “Number in the District”.
- Enter the Summer 2019 number of assisted living units in DC, “731”, into the data element cell for ALRs and the new column.
- Add similar data for the service numbers (or “beds”) available for Hospices and other facilities listed.
- Add to the Notes in the last column that no ALRs were located in Wards 5, 6, 7, or 8.

4. 1106.14 (p. 36) *ANC6A recommends that “housing” be added to Policy 1106.14 as follows:*

Policy CSF 2.3.3 Coordination of to better Serve Special Needs Residents.

Design and coordinate health, housing, and human services to ensure the maximum degree of independence for senior citizens, the disabled, and mentally handicapped. Locate health services within multi-unit senior housing to ensure best and least expensive management of chronic illnesses in these vulnerable groups. These services are particularly important for households with incomes between 30% and 100% of MFI, and the senior citizens who are not eligible for Medicaid and who cannot pay the fees for private ALRs.

5. 1106.18 (p. 37) *ANC6A believes hospice facilities are very important for families who cannot manage the needs of dying family members in their homes. Note: A doctor’s order stating the patient is in their last 6 months of life is necessary for qualifying for hospice care. The need is great in the eastern sections of the District. ANC6A recommends the following revisions:*

Policy CSF-2.3.7 Hospices and Long-Term Care Facilities.

Support the development of hospices and other long-term care facilities for persons with advanced HIV/AIDS, cancer and other disabling illnesses such as dementias, including alzheimers.—in all neighborhoods for those who qualify and are unable to receive hospice services in their homes

6. Increasing Supply of Facilities that Support Assisted Living. (NEW Policy CSF-2.3.8)

ANC6A encourages increasing the supply of Assisted Living Residential Facilities but also urges that Adult Day Services with dementia care be added to this policy as the needs are great, especially in the eastern half of the city. The new IONA adult day services scheduled to open in Ward 8 in 2020 and the newly approved Medicare and Medicaid-funded PACE (Program of All-encompassing Care of the Elderly) to be located in Ward 7 are a start to meeting the growing demand for adult day programs. The two large affordable ALR projects in development in Wards 7 and 8 are the only ones designed for large numbers of residents with Medicaid waivers.

NEW Policy CSF-2.3.8: Increasing Supply of Facilities that Support Assisted Living, Adult Day Services and Dementia Care.

Promote expansion of the supply of neighborhood-based facilities that provide assisted living services in Washington, DC. These include Assisted Living Residential facilities (ALRs) and Community Residential Facilities (CRFs) as well as adult daycare facilities.

7. *New Policy CSF-2.3.9: Improving Access to Long-term Supports and Services for Vulnerable Populations.*

Continue to improve access to Long-term Supports and Services (LTSS) for vulnerable populations, including people with disabilities and older adults and their families. Enhance the network of government and non-profit organizations that provide LTSS to these individuals and seek to improve their experience. Encourage the development and expanding roles of aging-in-place “senior villages* who enlist and train volunteers to provide services to other village members, especially those that are more vulnerable.

***A Senior Village is a neighborhood-based organization that relies largely on volunteers to design and conduct social, wellness, and educational programs and to provide volunteer services such as transportation, errand running, and light household maintenance with the purpose of helping older adults remain in their own homes as long as possible. Learn more about this nationwide movement at the Village to Village Network website: <https://www.vtvnetwork.org/>**

8. ANC6A endorses the following new Action. The idea of smaller ALR/CRG facilities available in more neighborhoods may provide residents the ability to more easily retain friendships and ties to family. Neighborhood based adult day services can be a boon to family members who care for their disabled loved one and who must transport them to such a service.

NEW Action CSF-2.3.B. Increase ~~in~~ Supply of Assisted Living Residential Facilities (ALRs), ~~and of~~ Community Residential Facilities (CRFs), and Adult Day Care Facilities. Explore a variety of approaches for increasing the number of CRGFs as well as small and mid-size ALR facilities in underrepresented areas, such as all of Wards 5, 6, 7, and 8, and areas of high need in the District. Promote the construction of affordable ALRs for the elderly and disabled eligible for Medicaid waivers. Promote the construction and launching of ALRs and adult day care that are designed for those older and disabled people with dementias, including Alzheimer’s. These approaches can include financial strategies and partnerships as well as regulatory reform. Work to increase community awareness of these needs so that neighborhoods will be ready for the increase in the population of older and disabled residents.

9. 1108 Senior/Older Adult Care (p. 40) Capitol Hill Village analysts suggest the use of rounded numbers when presenting projections or forecasted data to avoid misleading precision. We recommend that OP add the results of our analysis of American Community Survey data which provides insight into the realities of many aging District residents as follows:

1108.1 The population of older adults or ~~S~~seniors (persons 60 years of age and older) is expected to continue to grow at a steady rate ~~are expected~~ and to be the fastest growing segment of the District’s population during the next 15 to 20 years. Although the District’s ~~Office on Aging~~ Department of Aging and Community Living (DACL) and several affiliated non-profit organizations already provide a comprehensive system of health care, education, employment, and social services for Washington, DC’s ~~the District’s~~ elderly population, these

entities may be hard pressed to keep up with demand as the number of **older adults seniors** in the city rises. **The 2017 older adult population of 118,275 (17 percent of the total population) is forecasted to rise to 132,648 133,000 in 2025 and to 141,381 141,000 by 2030.** **As of 2017,** Currently, about **45 36** percent of the city's **older adults seniors 65 years and older** live alone. Some **43 37.4** percent of **older adult households** have no personal vehicle and **42 36.5** percent have some type of a **physical** disability. One group of older adults is especially vulnerable. In an analysis of a 2017 sample from the U.S. census, of 76,000 District adults 65 or older living in households, 13,000 had a difficulty (or disability) living independently. Of these 13,000 older adults, 6,200 also had a difficulty with self-care (such as bathing or dressing) and 5,500 had a cognitive difficulty. These are the older people that already need long-term care and long-term support and facilities for these people are already insufficient.

The largest percentages of older adults **seniors** are in **Upper-Northwest Rock Creek West** and **Far-Northeast Rock Creek East**. Many are homeowners, caring for their properties **with diminished on fixed incomes and physical mobility**. Others are primary caregivers for their grandchildren, facing the challenge of raising a family in their advancing years. 1108-1

However, a large majority of these households with adults 65 and over, would have extreme difficulty paying for any long-term care. Of 59,000 households with an adult 65 and over, 11,500 have someone who has difficulty living independently. Of these 11,500 households, 4,500 have incomes that are 30% or less of the Median Family Income (MFI), and 5,500 have incomes that are 31% to 100% of MFI.

Those households below 30% of MFI that have Medicaid would qualify for home health aides and a few other services through the Medicaid waiver program. Until 2021, there is no assisted living in wards 5, 6, 7, and 8 that will take Medicaid waivers and very few in Wards 1-4. Those households between 31% and 100% of MFI, sometimes called “the forgotten middle” could not begin to pay for market rate assisted living that ranges from \$45,360 to \$126,000 a year. At the low end of the middle, they could not pay for unsubsidized home aides at \$20 per hour. At the high end they could afford only limited hours of home health aides (for example, home aides at \$20 an hour for 4 hours a day for 5 days a week, would cost \$20,800.) With no paid long-term care, many of these households struggle to manage the disabled older member. 13% percent of these middle income households have only one member, who manages self-care with difficulty. 21% percent of these households are married couple households where a spouse carries the burden of care for the older adult who cannot live independently. (1808.1)

10. ANC6A recommends adding the following action:

Action CSF-2.3.A Develop the Demographics of Residents over 65 who have disabilities to compare with available facilities that can support them.

Demographics of DC residents 65 and over with disabilities should be presented by broad location and compared to the availability of the facilities and services for older adults with chronic illnesses, or with certain disabilities. The facilities should include assisted living residences, community residential facilities, and adult day care. The categories of older adult disabilities to be examined should include those with: cognitive

difficulty, self-help difficulty and other conditions that create difficulty with living independently.

11. *ANC6A recommends the following action item be included to address a looming issue among DC middle income seniors:*

CSF-2.3.B “Middle Income” Older Adults—“The Missing Middle”

Conduct a study of those households with older residents over 60 with incomes in the “forgotten middle” range, those with incomes between 30% of Median Family Income and 100% of Median Family Income. (Note: These residents of these households are not eligible for Medicaid nor eligible for public housing but cannot afford much service funded privately. Innovations, such as providing minimum health care in buildings with large numbers of older adults, can postpone the need for expensive long term care or bankruptcy by these households.)

Overview 1300 Element
ANC6A Comment

1317.1 One of the basic purposes of the Comprehensive Plan is to improve the linkage and coordination between the city’s development and capital improvement decisions. When well-coordinated, a state of good repair for existing infrastructure can be maintained and infrastructure sufficiency for Washington, DC’s growth can be ensured. The District anticipates potential development and/or redevelopment of various large sites in the city, including at Buzzard Point, Hill East, the Florida Avenue Market, Walter Reed, the Armed Forces Retirement Home, St. Elizabeths, Poplar Point, McMillan, Union Station/Burnham Place, Brentwood, and Bladensburg Road at New York Avenue, NE, around the National Arboretum, and possibly at RFK Stadium. The goal for these efforts is to create vibrant new communities that are effectively integrated with surrounding neighborhoods, and that offer a high-quality experience for residents, workers and visitors. Ensuring infrastructure sufficiency with growth will be critical in coming years, given that existing infrastructure systems may require modernization or expansion to meet the needs of these new areas. However, as this Element highlights, any of the infrastructure improvements required to serve development are funded by entities other than the District of Columbia.

Educational Facilities Element
ANC6A Comments

ANC6A supports three of the new policies proposed by the Office of Planning and proposes a new “Action” needed for addressing critical workforce shortfalls.

1. *ANC6A endorses the new policy on University Offerings for Older persons but strongly recommends that the policy be amended to include “free” as well as “low cost access. We also suggest revising the “zip code” reference.*

NEW Policy EDU-3.2.6: University Offerings for Older Persons

Encourage universities to expand free and low-cost access to course and other university offerings to older persons who reside in Washington, DC, beyond zip codes that directly surround the university.

2. *ANC6A endorses without further revision OP's proposed:*

NEW Policy EDU-3.3.11: Access to Recreational, Educational, and Cultural Opportunities Support continued access by local neighborhoods to university offerings, such as concerts and lectures, campus green space, continuing education, and low-cost programming for older persons.

3. *ANC6A endorses without further revision OP's proposed:*

NEW Policy EDU-3.2.3: Workforce Development Strengthen connections among educational programs, skills training, and workforce development initiatives to support development of career pathways and prosperity for all.

4. *ANC6A proposes the addition of a new action that is critically needed to ensure adequately trained home healthcare aids in DC.*

NEW Action: EDU-3.2.3A: Addressing Home Healthcare Aide Workforce Development needs. Current Home Healthcare Aide (HHA) training opportunities for HHA certification are limited and often expensive in District. There is significant growth potential in the public school/community college sector for certification programs that train HHAs and facilitate bridging Certified Nursing Assistance (CNA) and HHA certifications. The HHA workforce draws significantly from immigrant populations with the corresponding need for cultural competency and language training.

Using DC Office of Labor Market Research and Information (DC OLMRI) workforce projections, forecast the size of new or additional public school or community college training programs for Home Healthcare Aides.

CAPITOL HILL PLANNING AREA ELEMENT ANC6A Comments

1. **1503.2 Demographics.** *Based on the numbers in the new Table 15.1, OP's characterization of the growth in the number of seniors in the Planning Area is not correct. ANC6A proposes revision as follows:*

1503.2 Since 2000, a majority of the population within the Capitol Hill Planning Area (73%) is between the ages of 18 and 65. This is slightly higher than the citywide total of 70 percent. While the number of seniors is higher now than in 2010, the percentage of seniors within the Planning Area is slightly lower.

2. **NEW Table 15.1.** *The proposed title should be corrected to read 15.1 Capitol Hill Planning Area at a Glance.*

3. **1507. See Introduction for Summary of Community Engagement.** *ANC6A has not been able to find this summary. Queries to OP on this have not been answered. As a result, ANC6A is uncertain of how our 2017 recommendations were treated in this Draft Amendment..*

4. **1508.11. Policy CH-1.1.10: Public Housing.**

(a) Please note that the redline draft incorrectly identifies this section as 1509.11, rather than 1508.11.

(b) Some community members have reported a high level of anxiety and doubt among residents of public housing in the Planning Area that rehabilitation of public housing projects will be replaced in kind by new public housing units within the community. (2006 Comprehensive Plan 1508.11, see page 19 of Draft Amendments Chapter 15) These residents fear that, to the contrary, this policy will actually result in displacement of residents.

Existing public housing units provide much needed housing for low income older adults, including grandparents who care for their grandchildren. In fact, we understand that many residents in the Potomac Gardens complex are seniors—either living alone or with extended family. Many of these older residents have called Potomac Gardens Public Housing their home for decades. Some residents do not want to be relocated to new units elsewhere in the community; to relocate means changes in children’s and grandchildren’s schools, loss of well-known neighbors, and, potentially, less convenient access to public transportation. ANC6A urges OP to consider how the Comprehensive Plan’s public housing policy can address and mitigate the impacts on older residents associated with rehabilitation of public housing units.

5. **1508.13 Policy CH-1.1.12 RFK Stadium Area.** *The lands and resources around RFK stadium and the Reservation 13 site provide an unprecedented opportunity to build an innovative, multi-generational neighborhood that serves families and older adults with a full range of incomes, including those needing long-term care services. Reservation 13 is a large site that de facto will become a major new neighborhood. It will need coordinated public services, housing, retail, and space for recreation. The Comprehensive Plan should recommend a creative mixture of housing for a range of income levels, and long-term care facilities for a range of income levels and intergenerational interaction. Implementing the Reservation 13 Master Plan offers the District an unparalleled opportunity to innovate and to become a model for the integration of older persons and long-term care into a thriving multi-generational and multi-income neighborhood.*

ANC6A also believes that development of the RFK and Reservation 13 sites offers excellent opportunities for coordinated planning for recreation, parkland, and mitigation of negative effects of heavy traffic in the area. While we support environmentally appropriate development of the waterfront and adjacent open space in a manner that provides access to the neighbors, we also believe that the shoreline and parklands should be equally available to DC residents of all ages and physical condition and from all city neighborhoods. We also recommend that OP add an additional sentence to 1508.13 which would give preference to maintaining more natural landscapes along the River, over highly developed landscapes. We recommend that OP and the DC government ensure that no professional football stadium is allowed in the RFK Stadium

Area, as it would negatively affect the traffic and parking in the area, and detract from the lifestyle of Capitol Hill.

Our proposed revisions to this section follow:

1508.13 Policy CH-1.1.12 RFK Stadium Area. RFK Stadium and the surrounding area are currently leased by the DC Government from the National Park Service, with the restriction that development be limited to sports, recreation and entertainment. The lease expires in 2026, but the District has initiated a process to transfer the land from the Park Service to the District. Restricting the use of the land to sports and recreation, if not entertainment uses, is consistent with preferences of adjacent neighbors and residents of the wider Planning Area. Provide improved buffering and **landscaping landscape** screening along 19th Street and elsewhere in the vicinity of RFK Stadium in order to reduce the effects of noise, dust, vibration, and air pollution on the adjacent Hill East community. Work collaboratively with the

National Park Service, **District agencies, Events DC**, and National Capital Planning Commission on long-range plans for the stadium and adjacent parkland and parking lots. The highly successful project, the Fields at RFK Campus, offers a model for how Events DC can collaborate with the neighborhood and other stakeholders. Waterfront open space in this area should be retained and improved for the benefit of all DC residents as well as adjacent Hill East, Kingman Park, and Rosedale residents. Improvements should include the creation, and maintenance, of a pedestrian and cyclist shoreline access path, and well-designed public spaces. Recreational and green spaces should include features for people with disabilities or for aging adults. Reduce the amount of land occupied by surface parking and maximize activity along the waterfront. Facilities for indoor and outdoor swimming should be included.

Give preference to retaining the natural character of the landscape along the shoreline while allowing access to enjoy the river and its shoreline. See also 1514.8 Reservation 13 Parkland and ~~See the Urban Design Element for additional policies related to parks and open space.~~ 1508.13

6. *1509.6 Policy CH-1.2.6: Improved Park and Recreation Services. ANC6A is very pleased that OP has endorsed a proposal for triangle park improvements throughout the Capitol Hill Planning Area, as these little parks are very popular with older residents.*

1509.11 Action CH-1.2.C: RFK Stadium Area. Actively participate in **the current** efforts by the National **Capital Capitol** Planning Commission, the National Park Service, **the Anacostia Waterfront Corporation District agencies, Events DC**, local Advisory Neighborhood Commissioners, residents, and neighborhood groups to develop a long-range plan for the RFK Stadium complex, extending from the DC Armory north to Benning Road. The plan should include provisions for a substantial amount of waterfront open space, as well as measures to enhance and restore the natural environment in this area. **Improve shoreline access where possible, reduce land occupied by surface parking, and encourage new land uses that maximize access and activity to the waterfront. Ensure that recreational spaces and pedestrian and cycling paths accommodate a wide range of users and abilities. Ensure that the RFK Stadium Area does not include a professional football stadium.**

6. 1514.13 and 1514.4 Narrative. *The Draft Amendments refer to the Master Plan for Reservation 13 in inconsistent ways—as (1)the Hill East/Reservation 13 master plan,(2) the Hill East Development Plan or (3) the Hill East/Reservation 13. ANC6A recommends that OP choose one title for consistency.*

Also, the narrative description of the Master Plan (hereafter Reservation 13 Master Plan) needs to be updated to reflect the Mayor’s recent decision to convert one of the first phase buildings to provide housing for homeless individuals. To this end, we offer the following proposed addition:

1514.4 The adopted Reservation 13 Master Plan retains **the historic Anne Archbold Hall**, DC Jail, and other institutional uses and identifies approximately 40 acres for redevelopment. New facilities for health care and recreation are envisioned, along with new housing, offices, retail, and institutional uses. Key urban design features include extension of the Capitol Hill street grid into the site, new parks, and new access to the waterfront, including a great meadow overlooking the shoreline. Other notable elements of the plan include extension of Massachusetts Avenue to the Anacostia River and a village square at the Stadium-Armory Metrorail station. The preliminary development program identifies the potential for 800 new housing units and over 3 million square feet of non-residential space, roughly doubling the total square footage of buildings on the site. **In May 2016, Phase 1 of the Hill East development received Design Review Approval, and the District selected a development partner. The buildings are under construction and near completion. Originally, this first phase will was to include over 350 residential units, with 30 percent designated for affordable housing, and additional retail and green spaces. In fall 2019, the Mayor announced that one of the residential buildings will be converted to Permanent Supportive Housing for individuals who are now homeless and require supportive services. Residents will have access to social workers and other support services.**

7. 1514.6 Policy CH-2.4.1 Redevelopment of Public Reservation 13. *OP’s proposed new text to “recognize this site as an ideal location for an anchor employer or institution” raises concerns about whether this Mayor or future Mayors might continue to use Reservation 13 to entice big anchors such as the recent identification of Reservation 13 as available to Amazon Corporation for locating its East Coast headquarters. We believe the Plan should address the importance of moving ahead with implementation of the Master Plan which was approved in 2006. ANC6A proposes the following revision:*

1514.6 Policy CH-2.4.1: Redevelopment of Public Reservation 13.

Redevelop Reservation 13 as a mixed-use neighborhood that combines **an array of** housing, **retail**, office space, health care, civic, **education,educational, institutional**, and recreational uses **and amenities. There is sufficient space for Reservation 13 to meet affordable housing and other goals, particularly services and amenities that meet the special needs of aging residents. To the extent consistent with the Master Plan, recognize this site as an ideal attractive location for an anchor employer or institution.** Retention of Established uses, such as the DC Correctional Facility, should be **re-assessed retained**. Health care and institutional uses on the site should be reorganized to accommodate infill uses, improve the site’s vitality and efficiency, and create an environment more conducive to pedestrian travel.

1514.6

8. *1514.8 Reservation 13 Parkland. ANC6A is concerned that this section calls for a “grand” waterfront park, albeit one designed for resilience to flooding, etc. Such a goal connotes a highly built out park which is inconsistent with the desires of neighbors and other residents of the Planning Area to maintain a more natural approach to accessing and enjoying the waterfront. ANC6A recommends this the word “grand” be removed and a cross reference to 1508.13 be added as follows:*

1514.8 Reservation 13 Parkland. Create new waterfront parklands and green spaces at Reservation 13, including a ~~grand~~ waterfront park that is designed both for recreation and **designed for resilience to flooding, and that includes** recreational trails along the waterfront, smaller neighborhood parks and open spaces within the site, and tree-lined pedestrian streets. See also 1508.13. Policy CH-1.1.12 RFK Stadium. 1514.8

9. **NEW** *1514.12 Action CH-2.4.A: The Reservation 13 development will create a major new neighborhood. Accordingly, the city must devise a community-based land-use plan to determine the public services, facilities, and infrastructure needed to serve this new neighborhood. ANC6A believes this can be done within the context of implementing the Master Plan; however, if the Comprehensive Plan fails to specifically require consideration of land uses and services, facilities, and infrastructure, we want to ensure that this level of community engagement is not overlooked in the process. Accordingly, ANC6A proposes that OP revise this action item by adding the following to the proposed text as follows:*

1514.12, Action CH-2.4A: Hill East/ Reservation 13 Master Plan. Implement the Hill East/Reservation 13 Master Plan, including the Massachusetts Avenue extension and the creation of new waterfront parks. ~~Upon transfer of the land from federal to District control, the site should be rezoned to achieve the Master Plan objectives-~~ Explore the need for building a recreation/senior center/library in Reservation 13. Explore creating recreation spaces that include indoor walking/indoor track opportunities. Coordinate this study with Events DC to determine if any of these recreational needs can be met through development of the RFK Stadium site. Specifically consider developing an adult day care facility on Reservation 13 that can serve at least 50 people per day (approximately 9000 square feet) Study the feasibility of repurposing the historically significant Anne Archbold Hall for senior-oriented health services to include hospice, rehabilitation, adult day care, and memory care services . 1514.2

Comprehensive Plan Upper Northeast Area Element ANC6A Comments

2408 UNE-1.1 GUIDING GROWTH AND NEIGHBORHOOD CONSERVATION

NEW: Encourage the development and revitalization of the area around the National Arboretum. The National Arboretum is a natural anchor to development, and to date has been underutilized for development. The District should encourage the development and revitalization of this area as a mechanism for driving economic development on the Eastern portion of the Area Element. Additionally, development of the Arboretum would prove to be a catalyst for further development along the Benning and New York corridors, and help move development

towards Anacostia. The District should create a development plan for this area, including transportation and infrastructure improvements.