

District of Columbia Government Advisory Neighborhood Commission 6A PO Box 15020 Washington, DC 20003



November 11, 2021

Councilmember Elissa Silverman, <u>esilverman@dccouncil.us</u> Councilmember Anita Bonds, <u>abonds@dccouncil.us</u> Councilmember Christina Henderson, <u>chenderson@dccouncil.us</u> <u>redistricting@dccouncil.us</u>

Re: ANC 6A Comments and Recommendations for the Subcommittee on Redistricting

Dear Councilmembers Silverman, Bonds, and Henderson,

At a regularly scheduled and properly noticed meeting¹ on November 10, 2021, our Commission voted 8-0-0 to submit our official comments and recommendations to the Subcommittee on Redistricting.

First and foremost, we are grateful for the difficult and thankless work of the Subcommittee and for the transparency, candor, and honesty with which the process you have undertaken has been approached thus far. We also reiterate our support for all District residents, no matter their ward boundaries, and reject the divisive, classist, and racist language that has characterized some of the redistricting discussions. We recognize that no matter where the lines are ultimately drawn, our neighbors will still be our neighbors — as Councilmember Henderson has expressed: "We are moving lines, not people."

Nevertheless, we oppose any redistricting map amendments that *move the lines* in a manner that impact *the people of Ward 6* — those within this ANC and outside of it — by failing to respect the political and natural geography and neighborhood cohesiveness of Capitol Hill. Any newly drawn lines of Ward 6:

- 1. must include the present geographic area covered by ANC single-member districts 6A07, 6A08, 6B09, and 6B10;
- should reunite the geography of ANC single member district 7D01 (Kingman Park, Kingman Park Historic District) with Ward 6 after its 20 year hiatus following redistricting to Ward 7 following the 2000 Census;
- 3. should contemplate adding a portion or all of Census Tract 89.04 (roughly, ANC Single Member Districts 5D04 and, possibly, 5D05) to Ward 6 to unify the Kingman Park Historic District; and

4. should keep the Southwest Waterfront and Navy Yard communities intact, moving them into Ward 8. To do so, we encourage the Subcommittee to propose a redistricting plan based on **Discussion Map #3 with alterations** — as doing so would promote these rational public policy arguments and would therefore be permitted by DC law.² See Annex for our suggested map.

¹ ANC 6A meetings are advertised electronically on, anc- 6a@googlegroups.com, and newhilleast@groups.io, at www.anc6a.org, on Twitter (@ANC6A) and through print advertisements in the Hill Rag.

² In developing our recommendations, we considered the following key considerations as defined in \$1-1011.01 of the <u>DC</u> <u>Code</u> (*emphasis added*):

Neighborhood Cohesiveness & Natural Geography

Discussion Maps 1 and 2, and to an extent even Discussion Map 3, disregard the real, well-defined natural barrier of the Anacostia River, and by extension, the unpopulated, federal reservation that houses RFK Stadium, and its vast parking lots. These maps also ignore the fabric of the Capitol Hill neighborhood. According to the DC Office of Planning,³ "Capitol Hill is a 'city within the city."⁴ Despite comments to the contrary throughout this redistricting process, the Capitol Hill community has true boundaries that create a cohesive neighborhood.

"Capitol Hill is "bounded on the west by Central Washington and on the south by the Anacostia Waterfront. ... The community has well defined physical boundaries that enhance its sense of identity. Its neighborhoods are united by history, architectural tradition and relatively consistent urban form, including a system of grid and diagonal streets that has remained faithful to the 1791 L'Enfant Plan for Washington. Much of the community has the feel of a small historic town, with block upon block of attractive late 19th century and early 20th century row houses, well-maintained public spaces, historic schoolhouses and corner stores, rear yard alleys, and traditional neighborhood shopping districts. The community's attractive housing stock, living history, low scale, and proximity to the U.S. Capitol make "the Hill" one of the District's most celebrated and attractive communities."⁵

These boundaries are illustrated in a map by the D.C. Office of Planning in 2011. See Attachment A.

Presently, Ward 6 encompasses this neighborhood in a geographically compact and contiguous area (with the exception of the geographically compact Kingman Park area that was redistricted in the 2000 Census into Ward 7 and as raised here should be returned to Ward 6).⁶ As observed by our Commission in 2011, Ward 6 "is widely

⁶ ANC 6A proposes that the populated areas of the Kingman Park Historic District in Ward 7 and Ward 5 be similarly unified with any errant parts of Kingman Park presently in Ward 6 and be included within Ward 6. In the case of the Ward 7 portion of Kingman Park, community sentiment and litigation has often reflected a desire to "return" to Ward 6. In June 11, 2011 testimony to the Redistricting Subcommittee, 7D01 Commissioner Lisa White said "*We still think in Kingman Park we should be redistricted back to Ward 6… it is in the best interest that Kingman Park be redistricted back to Ward 6.*" In the

[&]quot;(f) No redistricting plan or proposed amendment to a redistricting plan shall result in district populations with a deviation range more than 10% or a relative deviation greater than plus-or-minus 5%, unless the deviation results from the limitations of census geography or from the promotion of a rational public policy, including but not limited to respect for the political geography of the District, the natural geography of the District, neighborhood cohesiveness, or the development of compact and contiguous districts.

⁽g) No redistricting plan or proposed amendment to a redistricting plan shall be considered if the plan or amendment *has the purpose and effect of diluting the voting strength of minority citizens.*"

³ It is interesting to note that the Office of Planning is the office that, among other things, performs planning for neighborhoods, corridors, districts, historic preservation, public facilities, parks and open spaces, and individual sites, and houses the DC State Data Center which provides data to support this redistricting process. ⁴ District Elements Volume II Chapter 15 April 8 2011.pdf (dc.gov)

⁵ ibid. This same document says that Capitol Hill "is comprised of several distinct neighborhoods," and explains that "[t]he original Capitol Hill neighborhood was developed on the high ground just east of the U.S. Capitol building during the 1800s and is still the historic heart of the community." It is our observation that over time, established neighborhoods tend to expand, as illustrated by development east of the Capitol to the river in the nineteenth and early twentieth century that created Hill East, Northeast Capitol Hill, Kingman Park and Rosedale. Some areas have their "own sense of identity" as observed by the Office of Planning, but are nonetheless strongly anchored in Capitol Hill. We observe a similar cohesion pattern of other DC neighborhoods, like Southwest. The original community, dramatically impacted by mid twentieth-century "urban renewal" also incorporates various but separately developed component parts of Buzzard Point, Fort McNair, which evolved over time. Kingman Park in particular has a vibrant history as a part of the Capitol Hill, developed as a community available to African-American residents during the height of segregation. It is presently recognized by the DC Office of Planning in its own historic district that was established in 2018 and expanded in 2020. The Kingman Park Historic district actually extends across Benning Road into Ward 5 and includes Langston Golf Course.

separated from Ward 7 by the broad basin of the Anacostia River, RFK Stadium's extensive parking lots, Interstate 295, and the Anacostia parks. Moreover, the eastward-oriented pattern of streets and residential locations on the east side of the River move us an even greater distance from Ward 7." An arbitrary north-south dividing line along 15th Street is proposed in <u>Discussion Maps 1 and 2</u>, which in effect severs this unified, continuous residential area that is tightly knit, indistinguishable on scale or quality on either side, and geographically divided from Ward 7 by the river. A proposal that ignores the neighborhood's cohesive nature and natural geography violates the principles of redistricting outlined by the Subcommittee.⁷

Like Capitol Hill, the areas that make up the Southwest Waterfront and Navy Yard share neighborhood cohesiveness and natural geography that should also be respected. The Southwest Waterfront and Navy Yard areas are geographically defined as "the Lower Anacostia waterfront/Near Southwest Area" by the D.C. Office of Planning. This area "encompasses 3.0 square miles of land located along both sides of the Anacostia River in the southwest and southeast quadrants of the District of Columbia."⁸ These boundaries are illustrated in a map drawn by the D.C. Office of Planning in 2011. See Attachment B. For this area, the Anacostia Freeway/295 is a clear natural (man-made) boundary to the north and the Anacostia River is a clear natural boundary to the south and east of Capitol Hill. As noted by the Office of Planning, the Anacostia River must be a "unifier and a source of economic opportunity for the neighborhoods on its shores"⁹ — shores which are presently divided into two separate wards, but whose connection will be further facilitated by the new Frederick Douglass Memorial Bridge and the <u>11th Street Bridge Park</u>.

Discussion Maps 1 and 2 arbitrarily either keep the Southwest Waterfront with Ward 6 at the expense of both the Navy Yard and part of Capitol Hill or keep the Navy Yard with Ward 6 at the expense of both the Southwest Waterfront and part of Capitol Hill. These maps each divide a unified, continuous area: severing the Lower Anacostia waterfront/Near Southwest Area from its neighbors across the River, and severing Navy Yard and the Southwest Waterfront, united by the common divide of both the Freeway and the River, from each other. Again, a proposal that ignores the neighborhood's cohesive nature and natural geography violates the principles of redistricting.

The Subcommittee's Ward 6 and District-wide hearings on redistricting during the week of November 1, 2021, garnered participation from Southwest Waterfront leaders and residents. Testimonials from these community members focused on the unique singular cohesiveness of that riparian-focused community, and strongly expressed desires to "keep Southwest together"¹⁰ as a unit and avoid any plan that would split off geographic neighborhoods, blocks, and Census tracts to multiple wards. It was additionally observed in testimony that "Southwest's future looks bright wherever we end up."¹¹

case of the Ward 5 portion of Kingman Park, this would include the Langston Terrace Dwellings, developed by the federal government beginning in 1935 to provide modern low-cost housing for African-Americans. The Kingman Park Historic District was accepted in 2018 by the DC Office of Planning and expanded in 2020. <u>KingmanPark HD Guidelines.pdf</u> (dc.gov).

⁸ District Elements Volume II Chapter 19 April 8 2011.pdf (dc.gov).

⁹ ibid.

¹⁰ Testimony of Gail Fast to the Subcommittee on Redistricting Ward 6 hearing, November 3, 2021.

¹¹ ibid.

Given the growth of Ward 6, we recognize, as the Subcommittee has clearly communicated, that some current portion(s) of this ward will need to be realigned. But in doing so, the Subcommittee should recognize the importance of neighborhood cohesiveness and natural geography and reject any proposal that divides Capitol Hill along the one-way corridor that is 15th Street NE & SE, in favor of moving *entire* cohesive neighborhoods, like Navy Yard and Southwest Waterfront, together into a new ward.

Respect for Political Geography In Furtherance of Administrative Efficiency

Navigating DC municipal services is administratively complex and the city organizes many functions — traffic management, school oversight, repair and administration, garbage collection, and other municipal activities along ward boundaries. This organizational structure also includes the ward-focused oversight accountability for these services. When city services don't work well, the intervention of a ward Councilmember to help a community compel action with related issues can both be critical and decisive. And as a practical matter, whether calling attention to traffic safety, zoning, or unlawful construction, residents lean on the expertise of their volunteer Advisory Neighborhood Commissioners and aforementioned elected Councilmembers for assistance. Residents deserve to have their views represented and acted upon at both the ANC and Council level for decisions that affect their quality of life; splitting apart the Capitol Hill community of interest and moving the eastern portion of Capitol Hill to Ward 7 would add unnecessary complexity to the process and channels for engagement that residents must use and monitor in order to have those issues addressed.

An example of this administrative complexity has played itself out for many years with respect to the re-development of Reservation 13 and the RFK Stadium complex, which is presently in Ward 7, but immediately abuts a longtime Ward 6 residential neighborhood. These redevelopment plans have and will continue to impact neighbors from the river to Lincoln Park and further westward, regardless of their Ward designation. Due to natural geography, these plans clearly will have a larger impact on those residents who live closest to the complex, in terms of additional traffic, people, and disruptions, and less impact on neighbors east of the river. The Commission has already noted how challenging it can be for residents to get the engagement of a Councilmember outside of their political geography to focus on issues that directly affects citizens that neighbor their ward. For example, this community has already voiced its opposition to a new NFL stadium on the current RFK Stadium site, and yet, the present Ward 7 Councilmember supports that proposition despite the views of those most directly impacted — constituents of the neighboring ward. Thus, as these plans advance and largely remain under the direct purview of Ward 7 leaders, we fear that keeping this area in Ward 7 and expanding that Ward further into Capitol Hill, as proposed by Maps 1 and 2, will only drown out even more voices of those most directly impacted, just like we've heard has been a real challenge experienced over the past 20 years by residents of the Kingman Park portion of ANC 7D, as the only part of ANC 7 located west of the Anacostia River. On the contrary, a map that expands Ward 6 to include all of Kingman Park (like we propose herein) would bolster the political influence of those redistricted residents who are most impacted by these redevelopment plans, thereby reducing administrative complexity.

Furthermore, keeping DC public schools that are within the same feeder pattern within the same Ward reduces administrative complexity. As examples, such an arrangement is helpful in advocacy and accountability for school modernization projects and ongoing maintenance needs. During the 2016-2020 school modernization process for Eliot-Hine Middle School, the success of the project required the support of multiple elementary school feeder families, as well as the Ward Councilmember serving that political geography. The Councilmember's personal involvement was required to ensure the school would receive adequate funding for its modernization and expected

enrollment growth. We believe the Councilmember's motivation in this effort was cemented by his motivation to serve his Ward's constituents with an issue that he could influence (a school's needs located in *his Ward*).¹² Maps 1 and 2 propose to redistrict Miner Elementary School, Eliot-Hine Middle School and Eastern High School from Ward 6 to Ward 7. All of these schools are in a geographic feeder pattern overwhelmingly designed to serve the Capitol Hill community, a community of students whose families are Ward 6 voters.¹³ This process was challenging even when performed within one ward; based on other cross-ward experiences, we can only fear how much more challenging it could have been if it straddled two political geographies.¹⁴

Elementary School	Middle School	High School			
Maury ES (PK3-5)					
Miner ES (PK3-5)					
Payne ES (PK3-5)	Eliot-Hine MS (6-8)				
School-Within-School (PK3-5) (citywide school with no boundary)					
Amidon-Bowen ES (PK3-5)		1			
Brent ES (PK3-5)	Jefferson MS Academy (6-8)	Eastern HS (9-12)			
Tyler ES (PK3-5)	Jefferson MS Academy (6-8)				
Van Ness ES (PK3-5)					
J.O. Wilson ES (PK3-5)]			
Ludlow-Taylor ES (PK3-5)	Stuart-Hobson MS (6-8)				
Peabody (PK3-K)/Watkins ES (1-5)					
Capitol Hill Montessori @ Logan (PK3-8) (citywide school with no boundary)					
Browne EC (PK3-8)					

Neighborhood input on highly localized matters before the ANC such as alcoholic beverage establishment licensing and zoning further lend support to the need to maintain a continuous political geography of Capitol Hill including Kingman Park, Rosedale and Hill East. The "city within a city" of Capitol Hill, as earlier described, has unique considerations (such as predominant RF-1 zoning), preferences and patterns as they extend to zoning and liquor licensing that regularly need to be adjudicated in front of city commissions by the many unpaid, volunteer ANC Commissioners and attendant community members. The specialized knowledge, historical precedent, and methods used by ANCs in furtherance of community wishes is better modeled and preserved with political boundaries that encompasss all of Capitol Hill. As just one example, discussion for a new restaurant at the northeast corner of 15th and East Capitol brought together neighbors several blocks both east and west of 15th Street to discuss hours of operation and terms for the settlement agreement. Liquor stores and other establishments are scattered throughout our neighborhood, and nearby commercial hubs, including H Street, Eastern Market, Barrack's Row, and the developments at 14th/Kentucky SE and Potomac and Pennsylvania Avenue SE mean that

¹² We expect the continued sponsorship and boosterism of a Ward Councilmember will be important to families and students as they move through the Capitol Hill feeder pattern.

¹³ Nearly all of feeder schools leading to Eastern High School are located in Ward 6: 12 of 13 elementary and 3 of 4 middle schools, which facilitates coordination across schools and assistance in galvanizing support and resources from a single councilmember.

¹⁴ Much of the recent growth of Elliot-Hine and Eastern High School (and more to come) is thanks to the engaged parents of elementary aged children who live in the feeder pattern for these schools. Eastern High School serves in a variety of roles in the Capitol Hill community, in addition to a school with growing enrollment of Ward 6 families, it has served as the site of a community COVID vaccine clinic and the location of both a 5th grade graduation and talent show performance for Maury Elementary School — events which were facilitated by this ANC and let to engagement by these families to fix problems with non-functioning audio visual equipment that ultimately benefited the school. Again, these opportunities may not have been possible if the area is divided into two political geographies as proposed by Maps 1 and 2.

¹⁵A footnote to the SY21-22 School Feeder Pattern table notes that graduates of Kelly Miller Middle School, located in Ward 7, have the option to enroll at Eastern for ninth grade in addition to their geographic/primary feeder school--Woodson High School.<u>https://dcps.dc.gov/sites/default/files/dc/sites/dcps/publication/attachments/SY2122-School-Feeder-Patterns_Feb-202</u>1.pdf.

neighbors east of 15th largely shop and dine west of their homes. We've heard from many neighbors that they would like to continue to have representation and voice in the types of businesses and hours of those businesses through our Commission and others in Ward 6. Moving them to Ward 7 would impede that ability.

Proposed Map

Based on these principles, we encourage the Subcommittee to propose a redistricting map based on the proposal discussed herein and attached below as an Annex. This map begins with Discussion Map 3 and incorporates the Southwest quadrant and Navy Yard into Ward 8, shifting the Ward 6 border to the Anacostia River.

Ward 1: Absorb a portion of U Street by extending the southern Ward 1 border south to S Street NW and west to 15th Street NW; accept a portion of Shaw from Ward 6

Ward 2: Transfer the Ward 6 portion of Shaw into Ward 2; transfer a portion of U Street to Ward 1; move East Potomac Park to Ward 8

Ward 3: No change

Ward 4: Absorb the neighborhood between Kennedy Street NE and Galloway NE from Ward 5 **Ward 5:** Absorb the block bordered by N Street NW, Kirby Street NW, New York Ave NW, and New Jersey Ave NW, previously in Ward 6; transfer the neighborhood between Kennedy Street NE and Galloway NE to Ward 4; NEW, transfer Langston to Ward 6.

Ward 6: Transfer the Shaw portion into Wards 1, 2, and 5; expand out to 7th Street NW south of Massachusetts; transfer Southwest to Ward 8; NEW transfer Kingman Park and the current portions of Ward 7 that are west of the Anacostia River back to Ward 6

Ward 7: Transfer a small portion bordered by Pennsylvania Ave SE, Minnesota Ave SE, Nicholson Street SE, and Fairlawn Ave SE from Ward 7 to Ward 8; extend the eastern border of Ward 7 south to Suitland Parkway SE; NEW extend Ward 7 south to Good Hope Road in keeping with resident requests to have both sides of Pennsylvania Ave in the same Ward.

Ward 8: Absorb the small tract of Ward 7 along Pennsylvania Ave SE; transfer Skyland, Garfield Heights, and Buena Vista to Ward 7; accept Southwest from Ward 6 along with East Potomac Park from Ward 2; NEW Transfers Navy Yard and areas south of the Southwest Freeway to Ward 8.

This proposal promotes neighborhood cohesiveness, respects natural and political geography, and has neither the purpose nor effect of diluting the voting strength of minority citizens. In fact, based on the census information, this proposal, in comparison to discussion Maps 1, 2, and 3, provides the least decrease to the black population in Ward 6 — keeping the minority population in Ward 6 at almost 45%. Community leaders have appealed to protect important minority voices and communities in Ward. As ANC 6A07 Commissioner Sondra Philips-Gilbert reflected in her November 3, 2021 testimony to the Subcommittee, "What I hope to see in the redistricting process is that the Councilmembers will ensure that fragile, under-served black communities in Ward 6, such as Rosedale, remain an integral part of the Ward 6 community and not be placed in other Wards where other black communities are already underserved and struggling." While this proposal does provide a large increase to the white population in Ward 8, the strength of the minority citizen population for that Ward would still be at about 80%.

Need for Deviation

The proposal discussed herein meets the public policy considerations and deviation principles of redistricting. Nevertheless, should the Subcommittee wish to deviate from this proposal, we recommend that they consider the possibility of deviating slightly from the plus or minus 5% restriction with the goal of respecting the above principles - by keeping Capitol Hill, Navy Yard, and the Southwest Waterfront intact. We have outlined the public

policy concerns that permit the Subcommittee and the Council to do so: neighborhood cohesiveness and respect for geographical and political boundaries. We acknowledge that it is the purview of the Subcommittee to gauge public comment and concerns and we ourselves have not taken on the task of, for example, consulting Langston residents if it makes sense to be included in Ward 6. Should Langston residents reject this, we would propose that the Subcommittee consider a Ward 6 map below the 5% range for deviation, especially given the expected growth in new Hill East in the coming years.

Conclusion

The Subcommittee's decision to publicly endorse three community-sourced Ward boundary map proposals compels this Commission to strongly express its views, not least for the fact that two of the three proposals will, if adopted by the Council, directly and immediately impact 25% of the residents of ANC 6A by redistricting them to a different ward. We note the Subcommittee has decided, "*to factor in ward continuity and stability, given the incredible instability brought on by the COVID-19 pandemic*" as an additional public policy goal. This public policy factor is altogether unique to this redistricting cycle and not required nor contemplated in law. In this context, the Subcommittee may effectively be avoiding what would be customary *and broader* equity adjustments that would be made in a redistricting in the other Wards in this redistricting because of this factor. Therefore, it is equally appropriate to expect the Subcommittee and the Council to exercise its legal flexibility from defined population ranges to mitigate the *ward instability* and *ward discontinuity* it is creating for Ward 6 residents in this redistricting process.

Therefore, we encourage the Subcommittee to propose a redistricting plan based on Discussion Map #3 honors the principles of neighborhood cohesiveness and respect for natural and political boundaries by keeping Capitol Hill intact. Accordingly, we recommend extending the eastern portion of the Ward 6 boundary to the Anacostia River, reuniting Kingman Park, the RFK Campus, and the new Hill East development (both currently in Ward 7) to their adjacent neighbors.

Furthermore, these same principles should also direct the Subcommittee to recommend keeping the Southwest and Navy Yard Communities intact, moving them into Ward 8. It is not that these neighborhoods are "any less Ward 6 than is Capitol Hill" but that we do not see a mapping solution that both maintains neighborhood cohesiveness (for Southwest, Navy Yard and Capitol Hill) AND keeps them all in Ward 6.

Thank you for giving great weight to the recommendations of ANC6A. Should you wish to discuss this letter with the Commission, please feel free to reach out to me at 6A04@anc.dc.gov.

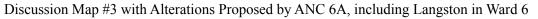
On Behalf of the Commission,

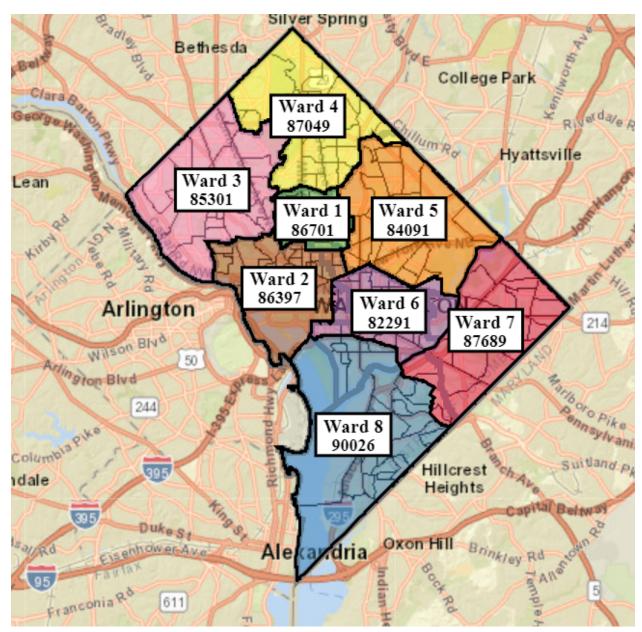
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Chair, Advisory Neighborhood Commission 6A

CC: All DC Councilmembers, via email

Annex:





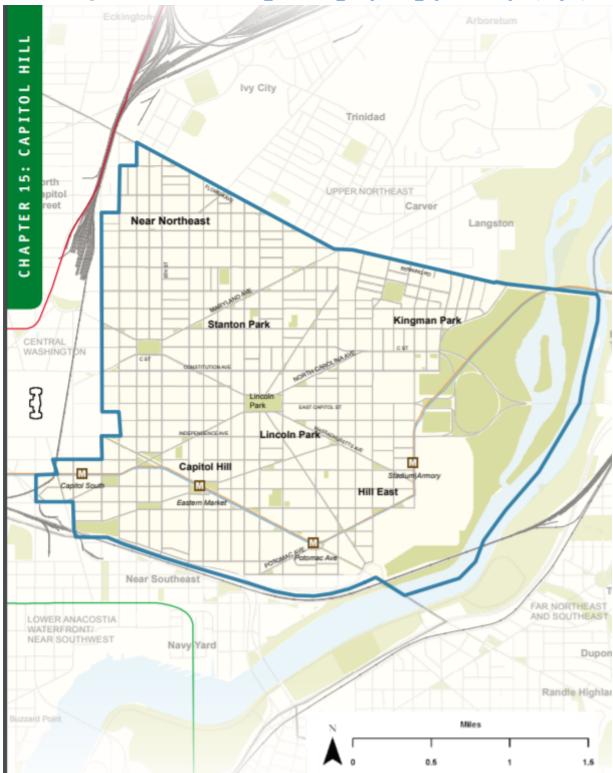
Demographics for above map

District	Color	Hide	Lock	TOTAL	TARGET_DEV	G_WHITE	G_BLACK	G_AIAN	G_ASIAN	G_HPI	G_OTHER	G_TWOORMORE
Unassigned				0	0	0	0	0	0	0	0	0
Ward 1				86,701	508	43,249	18,964	702	5,355	89	9,016	9,326
Ward 2				86,397	204	55,704	9,891	310	9,307	63	3,487	7,635
Ward 3				85,301	-892	60,841	6,102	191	7,087	32	2,142	8,906
Ward 4				87,049	856	24,685	39,020	645	2,298	34	11,619	8,748
Ward 5				84,091	-2,102	21,791	47,053	466	2,627	86	5,615	6,453
Ward 6				82,291	-3,902	45,971	23,056	195	4,695	55	1,754	6,565
Ward 7				87,689	1,496	2,627	78,747	359	336	35	2,098	3,487
Ward 8				90,026	3,833	18,326	62,977	325	1,840	38	1,563	4,957

Comparison Chart of Discussion Maps:

	Discussion Map 1	Discussion Map 2	Discussion Map 3	MAP 3 WITH ALTERATIONS
Population of the reconfigured Ward 6	<u>82,409</u>	<u>82,702</u>	<u>85,378</u>	<u>82,291</u>
Change in black population in Ward 6	-7,834	-8,979	-9,420	-5,584
Population of the reconfigured Ward 7	<u>90,039</u>	<u>86,220</u>	<u>84,412</u>	<u>87,689</u>
Population of the reconfigured Ward 8	<u>85,965</u>	<u>87,947</u>	<u>87,079</u>	<u>90,026</u>
<i>Change in white population in Ward 8</i>	+6,770	+6,150	+6,933	+14,453

*Note, the above information relies on the publicly available demographic information in the Subcommittee's mapping tool: <u>https://dcredistricting.esriemcs.com/redistricting/</u>



Attachment A: p. 4 from <u>District Elements</u> Volume II Chapter 15 April 8 2011.pdf (dc.gov)



Attachment B: from page 19 District Elements Volume II Chapter 19 April 8 2011.pdf (dc.gov)