



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



May 15, 2015

Samuel D. Zimbabwe
Associate Director
District Department of Transportation
55 M Street, SE, 5th Floor
Washington, DC 20003

Re: Proposed regulations on private improvements to DDOT-controlled pocket parks, 24 DCMR 3314

Dear Mr. Zimbabwe:

ANC6A commends the DDOT for its commitment to preserve public triangle parks for public use, a vital benefit for Capitol Hill and District of Columbia residents. At a regularly scheduled and properly noticed meeting¹ on May 14, 2015, our Commission voted 4-2 (with 5 Commissioners required for a quorum) to submit the following comments:

The regulations provide important protections for public access to triangle parks, but only for parks defined as a “triangle park” in 24 DCMR 3399. “Triangle parks” should include those parks that once were triangles at the intersection of an orthogonal street and a diagonal street, but because of subsequently built roads that intersected and divided the triangle, the triangle been transformed into two spaces, one a smaller triangle, and the other a larger trapezoid or circle. In addition, a park that currently satisfies the definition of a triangle park may be altered in the future, (e.g., by putting a street through the park) so that it is no longer a triangle. These triangle parks with altered geometry (whether in the past or in the future) must be included in the definition of “triangle parks” in 24 DCMR 3399. On Capitol Hill alone, there are a number of these parks.

A sample is:

Reservation Nos.	Address	Larger trapezoid section	Smaller triangle section
86, 87	A Street & Mass. Ave., NE	86	87
89, 89A	14th Street. & Mass. Ave. NE	89	89A

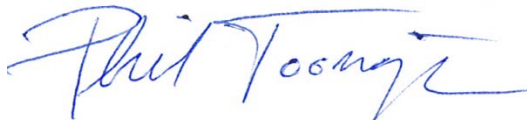
¹ ANC 6A meetings are advertised electronically on the listservs anc6a-announce@yahooogroups.com, anc-6a@yahooogroups.com and newhilleast@yahooogroups.com, at www.anc6a.org, and through print advertisements in the *Hill Rag*.

231, 232	North Carolina & Independence Ave. SE	232	231
233, 234	North Carolina & 14th Street, NE	233	234
236/237	14th Street and Tenn. Ave. NE	236	237
266	13th Street & Tenn. Ave., NE	266 (same reservation number in 2 parts)	266 (same reservation number in 2 parts)

ANC6A suggests that DDOT clarify that triangle parks such as Reservations 86, 89, 232, 233, 236, and 266 are “triangle parks as defined in 24 DCMR 3399.” The re-proposed regulations define in 24 DCMR 3399 a triangle park as a park “*generally* triangular in shape ... located at the intersection of two (2) streets (*generally*, one of which is orthogonal and one of which is diagonal) and has been set aside for public ownership.” [emphasis added]. DDOT should further clarify the definition by adding one or more of these altered geometry triangle parks to its list of examples in the regulations as none of the current examples illustrate this situation.²

ANC6A thanks you for the opportunity to submit comments on the re-proposed regulations.

On behalf of the Commission,



Phil Toomajian
Chair, Advisory Neighborhood Commission 6A

² "Examples of triangle parks include United States Reservations 142 and 143, located at the intersection of New Hampshire Avenue and 20th Street, NW; United States Reservation 230, located at the intersection of Independence Avenue and North Carolina Avenue, SE; and United States Reservation 61, located at the intersection of Massachusetts Avenue and P Street, NW."