

BRUCE MONROE PARK NEIGHBORS

WARD ONE, WASHINGTON, DC

neighborsofparkview@gmail.com

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Dear Councilmember Nadeau, and our At Large Councilmembers Phil Mendelson, Elissa Silverman, Anita Bonds, Christina Henderson, and Robert White,

As Ward One residents living and working along the lower Georgia Avenue corridor, we are completely at a loss for the lack of planning coming from the Mayor and DC Office of Planning regarding the proposed changes to the DC Comprehensive Plan (Comp Plan). In fact, the proposed amendments are an affront to the basic concept of planning in a modern city.

The Mayor's Comp Plan amendments (and now the last minute map changes being brought forward by CM Nadeau) are not substantiated by impact assessments or efficacy studies per the law.

Citywide, the Mayor is proposing to upzone, or upFLUM, almost two hundred million square feet of likely newly developable air-rights and habitable space, roughly 2.5 times the area of Rock Creek Park (see the Mayor's changes to the Future Land Use Map'). This is no small measure of change to the entire city.

The communities affected by these changes have not been given due consideration while the developers sliced up the available green space under the guise of more affordable housing. One of these communities in Ward One is ours, the Parkview neighborhood along the Georgia Avenue corridor.

We believe the proposed amendments to the FLUM in Ward One seek to:

1. Work around Court directives and protected rights of existing neighbors –

The PUD approval for Bruce Monroe park was vacated by the DC Court of Appeals exactly because DC's planning agencies failed to do their job to actually plan for their proposed ten-story building adjacent to a low-rise rowhouse community. When the city desires new buildings and population growth of this magnitude, the social needs of the existing and future community must be considered. Whether this be new schools, parks, clinics, libraries, emergency responders, or expansion and improvement of public services and utilities. The DC Court of Appeals recent ruling on the Bruce Monroe PUD demonstrated that city planners have a responsibility to take basic civic planning concerns into account when proposing to increase the density of DC neighborhoods.

Instead of putting in the effort, the Office of Planning wants you, our Councilmembers to substantially alter our community with the swipe of a pen via FLUM map amendment. This will permanently change the open green space at Bruce Monroe and impose a out-of-scale downtown-sized building onto our rowhouse community. Changing the FLUM this way without impact studies -- to identify and mitigate harms -- dispenses with the whole neighborhood approach of planning expected by the Comp Plan itself (See Comp Plan Policy H-1.4.6). The burden of this "non-planning" will be borne by the residents and DC taxpayers when our existing fragile utilities fail and our schools are pouring over with children once again, among other key planning concerns to contend with now before changes take place.

2. Work around community input as to the future of our community – Changes to the FLUM maps eliminate community-driven planning by circumventing the

standard process of Planned Unit Developments (PUDs) such as the one at Bruce Monroe. Once the FLUM map is changed to higher densities, the Zoning Commission will be compelled as a perfunctory decision to upzone the property to meet the new FLUM designations since the law requires the DC Zone Map to be consistent with the FLUM (See Comp Plan Policy 10A 2504.13). The Mayor's proposed Comp Plan Map changes thus would result in eliminating the process of meaningful community engagement in that there will not be community-benefits agreements and there will not be any requirement for adverse impact considerations. This is the exact opposite direction we want planning to go in our city.

3. Crush an open public green space and force a downtown- sized project onto a low rise community that no one anticipated. The proposed Bruce Monroe 10-story project will substantially intensify the density of our Parkview community, and if built eliminates a well-used recreation area, community garden, and the last unprogrammed public open space along the Georgia Avenue corridor. These concerns are heightened by the fact that the rest of Georgia Avenue is being upzoned substantially in the Comp Plan changes and done so without any planning impact evaluations (see points 1 & 2).

Since the Bruce Monroe project approval was vacated by the Court, the answer from our Councilmember is to move away from actual planning and just amend the FLUM map in the name of “affordable” housing. However, no new affordable housing will be created as all of the existing units at the Park Morton public housing site will be torn down and simply moved here to Bruce Monroe. That is, there won't be an expansion of the number of public housing units despite the vast waiting list here in DC. There is also a misconception about the other new units in the project claimed to be “affordable” when these units won't be accessible to most working DC families due to enormous class & race wealth inequalities and the City's elevated definition of what “affordable” means.

Additionally, we have witnessed Park Morton public housing residents put on the record that they do not want to be moved from garden style apartments and squeezed into a large glass apartment tower, especially during a pandemic. We agree and support Park Morton residents, but the changes to the FLUM map will not help and in fact are harmful. The proposed map changes just discard community concerns to allow the development to happen as a matter of course with little community input and certainly without any codified community benefits to hold the developers to account.

In considering the above points, we conclude by asking:

- **THAT OUR COURT-ORDERED RIGHTS REGARDING THE BRUCE MONROE PUD NOT BE CIRCUMNAVIGATED BY CHANGING THE COMP PLAN MAPS WITHOUT TRANSPARENT PLANNING EVALUATIONS ON THE PUBLIC RECORD.**
- **ENSURE THAT THE PARK MORTON RESIDENT-LED EQUITY PLAN BE ADOPTED AND ENFORCED AS SOON AS POSSIBLE.**
- **INSTEAD OF ELIMINATING NEEDED GREEN SPACE ALONG THE GEORGIA AVENUE CORRIDOR, ENSURE THE NEEDED AFFORDABLE HOUSING IS BUILT IN THE MANY OTHER INFILL OPPORTUNITIES HERE.**

- **THAT ANY PROPOSED UPFLUMING AND SUBSEQUENT UPZONING IN WARD ONE BE CONSIDERED “CONTESTED CASES” AND ALSO BE ACCOMPANIED BY IMPACT ASSESSMENTS AS REQUIRED BY THE LAW. ***
- **THAT SMALL AREA PLANNING BE DONE NOW FOR OUR NEIGHBORHOOD BEFORE ANY COMP PLAN MAP CHANGES GO INTO EFFECT SO THAT WARD ONE PLANNERS & RESIDENTS CAN ENSURE WE HAVE ADEQUATE COMMUNITY SERVICES TO COINCIDE WITH A DESIRE FOR MORE POPULATION GROWTH.**
- **AND, THAT ANY ZONING HEARINGS FOLLOWING ON FROM ANY COMP PLAN MAP CHANGES MUST BE DESIGNATED “CONTESTED CASES” SO THAT PROPOSED NEIGHBORHOOD DENSITY INCREASES ARE SUPPORTED BY OPEN COMMUNITY-INPUT AND PROMISED COMMUNITY BENEFITS IN WRITING.**

If the above requests cannot be met, we the undersigned, ask you to reject the Mayor’s proposed Comprehensive Plan changes and that you demand the DC Office of Planning go back and conduct the proper progress reports and impact studies to ensure basic planning is happening in the city so that we may extol beneficial development and simultaneously mitigate potential harms to both existing and future residents.

Respectfully Signed,

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 - Christopher Baysmore Irving Street
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 - Elizabeth Finn Kenyon St NW
 - Stefanie Garcia Irving Street
 - Andre Gaspar Irving St
 - Joshua Greenfield Ward 1
 - Connor Holm Fairmont Ave
 - Lauren Johnson Ward 1
 - Ellen Kaplan Irving St
 - Adil Keceli Hobart Place
 - Katy Lang COLUMBIA RD
 - Saskia Loewy Westminster St
 - Rachel Melo Columbia Rd
 - Laura Milanowski Irving St
 - Cleve Parmer Ward 1
 - Cecilia Perry Cathedral Ave
 - Maura Reilly Park Road
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 - Nicole Schroyer Fairmont Ave
 - Caroline Space Rock Creek Church Rd
 - Sha Sturdi Ward 1

- Hannah Sumiko-Daly Ward 1
- April Thompson Irving St
- April Ubanowski 11th Street NW
- Aaron Wiseman Irving St.
- Gordon Wong Rock Creek Church Road
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Authorized signatures with full information gathered by Google forms and can be provided upon request and approval by signatories.

*** DC laws and regulations regarding the DC Comprehensive Plan, among others:**

- DC Code 1 306.04 (d) “[Amendments to the DC Comprehensive Plan] § – shall be accompanied by an environmental assessment of the proposed amendments .” ...
- 10A DCMR 2512.1, .2 “Implementation progress reports . . . [are a] . . . vital part of keeping the planning process open, transparent, and responsive. It can also be a vehicle for review and refinement of implementation priorities, deletion of completed actions, and the addition of new actions or policies . . . [and should be a] . . . highly publicized effort to demonstrate the important role the Comprehensive Plan plays in decisions that affect the change, growth and development of the city.”
- 10A 2515.2, .3 “The greater the degree of change [to the DC Comprehensive Plan] proposed, the greater the burden of showing that the change is justified. The following supporting information will be required ... when an amendment is proposed: e. The anticipated impacts of the change, ... including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change. f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment.”