

June 21, 2017

Mr. Eric D. Shaw, Director District of Columbia Office of Planning 1100 4th Street, S.W. Suite 650 East Washington, D.C. 20024

Dear Mr. Shaw,

I am writing on behalf of the Brookland Neighborhood Civic Association to convey comments on and proposed amendments to the District of Columbia's Comprehensive Plan. The Comprehensive Plan is a 20-year framework for planning and shaping the way we live, work, shop, travel and play in the District of Columbia. Since the Office of Planning launched its effort to amend the Plan, BNCA members have actively participated in the process.

BNCA's interest in the Comprehensive Plan and its contents is broad, but members have identified the following priorities:

- Continue to recognize Brookland as a stable residential and historic neighborhood that should be conserved in existing character
- Preserve economic, racial, and cultural diversity and inclusiveness
- Maintain and preserve affordable housing for all age groups and family sizes
- Preserve and enhance accessible public green space
- Preserve and protect historic sites and properties
- Protect and preserve Brookland's environmental health including land, air, water, trees, urban habitats, and climate
- Encourage revitalization of Brookland's commercial areas with a high priority on working with local businesses and contractors
- Assure a multiplicity of transportation/commuter options (e.g., walkable streets, safe and accessible bike trails, convenient bus and subway service, east/west connectivity), while reducing impacts from through-traffic and heavy trucks

Each of these items is addressed to some extent in the existing Comprehensive Plan, in general, and the Upper Northeast Element, in particular. To the extent OP entertains changes related to these priorities, BNCA's preference would be that any such changes only serve to strengthen, not weaken or eliminate, them.

We have, however, identified and are submitting proposed amendments to address several issues which we believe are not adequately addressed in the existing Comprehensive Plan:



- 1. Protecting the "Brookland Green" consistent with the agreement reached between Councilmember Kenyan McDuffie, the Mayor of the District of Columbia, and the Washington Metropolitan Area Transit Authority
- 2. Mitigating the adverse impacts of truck and commuter through-traffic
- 3. Encouraging the production of family-sized (3+ bedrooms) affordable housing
- 4. Encouraging alternatives to industrial land uses in close proximity to Metrorail stations and residential areas
- 5. Identifying historic properties that are eligible for protection as historic resources
- 6. Improving pedestrian and bicyclist safety and access

Proposed amendments for each of these issues are attached and will also be submitted online through OP's project website.

Lastly, we understand there is an effort, under the moniker "Clarifying Zoning Authority", to use the Comprehensive Plan amendment process as an opportunity to undermine the role and influence of residents in neighborhood planning by granting the Zoning Commission greater discretion to ignore the Comprehensive Plan. Any such effort should be wholly rejected.

The Comprehensive Plan should continue to affirm that development projects requiring review and approval by land-use decision-making bodies must be tied to findings of consistency with the Comprehensive Plan, Small Area Plans, and accompanying Maps (e.g., Generalized Policy Map, Future land Use Map). In determining consistency with the Comprehensive Plan, land-use decision-making bodies currently have ample authority to weigh competing Comprehensive Plan priorities so long as they have 1) made findings of fact on material contested issues, 2) there is substantial evidence in the record to support each finding, and 3) their conclusions of law follow rationally from those findings. The authority of land-use decision-making bodies (e.g., the Zoning Commission, the Board of Zoning Adjustment, etc.) need not and should not be enlarged to permit further discretion in interpreting, ignoring, and/or applying the Comprehensive Plan. Further discretion would undermine the very purpose of the District's Comprehensive Plan which is to provide reliable predictability of the effect of both Comprehensive Plan provisions and zoning regulations as well as the role of affected citizens in shaping development projects and amenities that accompany them.



Thank you for your consideration of these comments and the attached proposed amendments to the Comprehensive Plan.

Sincerely yours,

Daniel Schramm, President, BNCA

Attachments:

BNCA's Proposed Amendments to the Comprehensive Plan

- 1. Protecting the Brookland Green
- 2. Restricting Truck and Through-Traffic
- 3. Encouraging Family-Sized Affordable Housing
- 4. Encouraging Alternatives to Industrial Land Use (North Brookland)
- 5. Encouraging Alternatives to Industrial Land Use (South Brookland)
- 6. Protecting Historic Properties
- 7. Hamlin Street Ped-Bike Bridge

cc. Tanya Stern, DC Office of Planning Josh Ghaffari, DC Office of Planning Colleen Willger, DC Office of Planning



BNCA Proposed Comp Plan Amendment #1: Brookland Green

Please Complete for Both Text and Map Amendments

What type of amendment are you submitting?
_XX Text Amendment
Map Amendment

Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.

1. Replace Action UNE-2.6.A: Brookland Metro Small Area Plan with the following:

On March 3, 2009, the Council of the District of Columbia approved the "Brookland/CUA Metro Station Small Area Plan". The Plan provides guidance on the future use of vacant land, buffering of existing development, upgrading of pedestrian and bicyclist connections to Catholic University and 12th Street, urban design and transportation improvements, and the provision of additional open space and community facilities in the area.

2. Add new Action UNE-2.6.B as follows:

Acquire and preserve as permanent community park space the open space, known as the "Brookland Green", along 10th Street at the Brookland/CUA Metro Station, which is currently under the jurisdiction of the Washington Metropolitan Area Transit Authority.

3. Replace the Brookland/CUA Metro Station Small Area Plan, Metro Station Sub-Area, Recommendation 12 (page 45) with the following:

Acquire the area along the west side of 10th Street between Otis Street and Newton Street for use as permanent park space for the benefit of the community.

4. Change the Future Land Use Map from "Moderate Density Commercial/Moderate Density Residential" to "Parks, Recreation, and Open Space".



Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):

The proposed amendment would update outdated text in the December 19, 2006 Comprehensive Plan to 1) clarify that a Small Area Plan has been prepared and was approved by the Council of the District of Columbia; and 2) reflect policies and plans announced in 2014 to acquire the "Brookland Green" to preserve it as permanent park space for the benefit of the community and to transition to the low-scale residential area east of 10th Street.

The proposed amendment would also amend the Brookland/CUA Metro Station Small Area Plan and the Future Land Use Map to reflect the current District agreement with the Washington Metropolitan Transit Authority to 1) prohibit development of the Brookland Green; and 2) acquire the Brookland Green and preserve it as park space for the benefit of the community.

If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:

Specific location(s):

Ward: 5

Square 3826

North: Otis Street NE East: 10th Street NE South: Newton Street NE

West: Eastern boundary of existing WMATA parking lot

Please indicate the type of change(s) the proposed amendment will accomplish (check all that apply):

__XX_ Incorporate key content from Small Area Plans and other DC Office of Planning or District government plans completed or underway since 2010

List name of plans:

_XX__ Reflect current, new or emerging issues, initiatives and policies



Identify Issue, Inititiative or Policy
_XX Change to the land use designation
_XX Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend?
XX_ Future Land Use Map
- If yes, what new Land Use Designation do you propose?
Parks, Recreation, and Open Space
Generalized Policy Map
- If yes, what changes do you propose?
Please help us understand exactly what area you propose to modify, please provide one of the following:
- Describe the area by listing the streets that mark its boundaries:
North: Otis Street NE East: 10 th Street NE South: Newton Street NE West: Eastern boundary of existing WMATA parking lot

3826

List one or more entire Squares



-	List of	ne or	more	lots	for a	a specific	Square:
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Square: 3826

Lot number(s): 14, 800, 803, 802, 9, 10, and the northeast corner of 804

For Text Amendments Only

Provide one of the follow	ing information to	o help us locate the	e test to be modified.

Provide one of the following information to help us locate the test to be modified.
Legislative Citation:
Policy Number:
Action Number: UNE-2.6.A 2416.6
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element: Upper Northeast Area Element
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.
No
XX Don't Know

For All Amendments

If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.

Attachments:

1. "District Plans to Swap Land to Preserve Brookland Green", Press Release, Executive Office of the Mayor, March 18, 2014.



2. "Brookland-CUA Metro Station – Preservation of Brookland Green", WMATA November 2013 Joint Development Solicitation Amendment #10, March 19, 2014.



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Executive Office of the Mayor Office of Communications



PRESS RELEASE

FOR IMMEDIATE RELEASE: Tuesday, March 18, 2014

CONTACTS: Doxie McCoy (EOM) 202.727.9691; doxie.mccoy@dc.gov

Ronan Gulstone (Council) 202.257.4129; rgulstone@dccouncil.us

District Plans to Swap Land to Preserve Brookland Green

(WASHINGTON, D.C.) – Today, Mayor Vincent C. Gray and Councilmember Kenyan R. McDuffie (D-Ward 5) announced a plan for the District's Department of General Services (DGS) to swap unused parcels of land in exchange for the Brookland Green site owned by the Washington Metropolitan Area Transit Authority (WMATA).

WMATA plans to redevelop the land adjacent to the Brookland Metro Station. Those plans originally included redeveloping the Brookland Green, a parcel of land that contains mature trees. Although the development immediately adjacent to the Brookland Metro station is generally favored, many residents and Councilmember McDuffie opposed the plan to redevelop the Brookland Green site.

"I'm delighted that we've been able to craft an agreement that will allow development to continue but will also save this important green space," noted Mayor Gray. "While improving and diversifying the District's economy has been one of my top goals, we've worked hard to preserve and grow green space as part of our Sustainable DC plan."

"I welcome additional commercial amenities in the Brookland neighborhood; however, it is important that projects achieve an appropriate balance between development, and the preservation of a neighborhood's character and historic features," stated Councilmember McDuffie.

Under the proposed agreement, the District would assume control of the Brookland Green site, leaving the remainder of the land to be developed by WMATA.

**

Follow Mayor Gray on Facebook and Twitter!

Follow Mayor Gray on Twitter at http://www.twitter.com/MayorVinceGray and on Facebook at http://www.facebook.com/MayorGray





NOVEMBER 2013 JOINT DEVELOPMENT SOLICITATION

AMENDMENT #10

BROOKLAND-CUA METRO STATION -PRESERVATION OF BROOKLAND GREEN

The Washington Metropolitan Area Transit Authority issues this Amendment to the November 2013 Joint Development Solicitation issued on or about November 4, 2013 (as amended to date, the "Joint Development Solicitation"):

The following amends those portions of the Joint Development Solicitation regarding proposals for the offered property at the Brookland-CUA Metro Station, JDS 2013-01.

In Amendment #5 for the Joint Development Solicitation ("Amendment #5") developers were asked to submit two scenarios for development on the South Parcel – one scenario that develops the entire South Parcel and another scenario that preserves the area referred to as the Brookland Green. Since that time, the District of Columbia has indicated its intent to acquire the Brookland Green to preserve it as permanent park space for the benefit of the community.

With this in mind, any Developer wishing to submit a Proposal for the Brookland-CUA Metro Station site shall:submit only a Proposal implementing Scenario16 <a href="mailto:shall:

Developers <u>shall not submit Proposals implementing Scenario 2 from</u>
<u>Amendment #5</u>, which contemplated development of the Brookland Green.

In all other respects, Amendment #5 remains in effect, including the proposal due date of April 4th, 2014 by 3:00 pm Eastern Time.

This Amendment is issued pursuant to Part Three, Section 1.3 of the Joint Development Solicitation.

Stan Wall
Director
Office of Real Estate and Station Planning

March 19, 2014

Washington Metropolitan Area Transit Authority

600 Fifth Street, NW Washington, D.C. 20001 202/962-1234

By Metrorai: Judiciary Square-Red Line Gallery Place-Chinatown Red, Green and Veloca Lines

> A District of Columbia Maryland and Virginia Transit Partnership



BNCA Proposed Comp Plan Amendment #2: Truck and Commuter-Through Traffic

Please Complete for Both Text and Map Amendments

What type of amendment are you submitting?
_XX Text Amendment
Map Amendment

Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.

The Brookland Neighborhood Civic Association (BNCA) wishes to strongly underscore our support for the following existing Comprehensive Plan text in the Transportation Element:

T-3 Transportation System Efficiency and Management

In 2004, DDOT prepared a Motor Carrier Management and Threat Assessment Study to address truck-related concerns, including truck traffic on residential streets, congestion associated with truck loading and unloading, information and services for truck operators, and security issues. Two major recommendations were made: first, to create a single, exclusive DDOT office to coordinate motor-carrier transactions; and second, to develop a set of designated truck routes. 416.4

Policy T-3.3.4 Truck Management

Manage truck circulation in the city to avoid negative impacts on residential streets and reduce the volume of truck traffic on major commuter routes during peak travel hours. 416.11

Action T-3.3. A New Office for Trucking and Goods Movement

Create a single, exclusive office within the Department of Transportation to coordinate motor vehicle transactions, as well as coordination with trucking companies and other stakeholders. This office should also work with other District agencies, to enhance curbside management policies and ensure that delivery regulations serve the needs of customers and the general public. 416.12



Action T-3.3.B: Tiered Truck Route System

Develop a tiered truck route system to serve the delivery and movement of goods while protecting residential areas and other sensitive land uses. 416.13

In addition, BNCA proposes the following specific text amendment in the Upper Northeast Area Element:

Policy UNE-1.1.12: Truck Traffic

Action UNE-1.1.D: Traffic Management Strategies

Measures should be implemented to route through traffic around residential neighborhoods and to restrict trucks and heavy vehicles on local streets. DDOT will conduct a review of the street classifications in the Upper Northeast under the Federal Highway Administration's guidelines, and then take steps to reclassify streets and impose truck restrictions where appropriate and with community input.

Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):

The existing language in the Comprehensive Plan regarding heavy trucks and other through-traffic concerns in residential areas such as Brookland needs to be strengthened. Reviewing street classifications in Brookland is a first step toward getting excessive truck traffic and other traffic violations under control. Under BNCA's proposal, DDOT would undertake a thorough investigation of truck activity on Brookland's streets, review existing classifications under federal guidelines, recommend or make changes to existing classifications to recognize these streets' local and residential character, and then impose no-truck restrictions as appropriate, and with community input.

Many of Brookland's streets are frequently used as throughways by heavy trucks. We observe trucks traversing our streets daily with impunity. The excessive truck traffic, speeding, light-running, and engine-revving are disruptive and damaging to residents' well-being. Heavy truck traffic creates vibration and damages property. The noise volume is extreme, waking residents thoughout the night, silencing conversations, agitating pets and wildlife and, in general, creating dangerous and nuisance conditions. In addition, heavy trucks emit large amounts of pollution, including highly toxic and carcinogenic diesel particulate matter. Brookland is a historic, quiet, green and predominantly residential neighborhood. Heavy trucks should be prohibited in residential areas unless they are making local deliveries.



If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:

Ward: 5
Specific location(s): Brookland
Please indicate the type of change(s) the proposed amendment will accomplish (check all that apply):
Incorporate key content from Small Area Plans and other DC Office of Planning or District government plans completed or underway since 2010
List name of plans:
Reflect current, new or emerging issues, initiatives and policies
Identify Issue, Inititiative or Policy
Change to the land use designation
Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend?
Future Land Use Map
- If yes, what new Land Use Designation do you propose?
Generalized Policy Map



- If yes, what changes do you propose?

Please help us understand exactly what area you propose to modify, please provide one of the following:

the following:
- Describe the area by listing the streets that mark its boundaries:
- List one or more entire Squares
- List one or more lots for a specific Square:
Square: Lot number(s):
For Text Amendments Only
Provide one of the following information to help us locate the text to be modified.
Legislative Citation: 2408.13-16
Policy Number: UNE-1.1.12: Truck Traffic
Action Number: Add new Action UNE-1.1.D: Traffic Management Strategies
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element: Upper Northeast Area Element
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.
No



XX___ Don't Know

For All Amendments

If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.

BNCA's proposed new text addition to the Upper Northeast Area Element is consistent with text currently found in the Capitol Hill Area Element Policy CH-1.1.13 Traffic Management Strategies: Measures should be implemented to route through traffic around residential neighborhoods, and to restrict trucks and heavy vehicles on local streets. BNCA's recommendation is also consistent with our June 8, 2017 letter to DDOT and Mayor Bowser, highlighting DDOT's ongoing failure to implement the 2015 Brookland-Edgewood Livability Study.

Attachment:

1. BNCA letter to Mayor Bowser and DDOT Director Dormsjo, June 8, 2017.



June 8, 2017

Dear Mayor Bowser and Director Dormsjo,

I write on behalf of the members of the Brookland Neighborhood Civic Association (BNCA) to convey our deep dissatisfaction with the May 5, 2017 response Director Dormsjo provided Councilmember McDuffie regarding excessive truck traffic, speeding, noise, and other traffic issues currently afflicting Brookland and surrounding neighborhoods in Northeast. While the Director's letter was directed to several specific concerns regarding Franklin Street and 13th Street, these problems are emblematic of traffic issues throughout Brookland. The Director's letter, unfortunately, reflects both a lack of understanding and a seeming disregard of the urgent need for improvements in traffic safety and quality of life for the residents of Brookland. Indeed, not once in the letter did the Director recognize that the concerns raised by the Councilmember and these residents are precisely the concerns the community has been raising for years, and which are well documented in DDOT's own August 2015 Brookland-Edgewood Livability Study.¹

We would like to invite you both, along with any staff, to attend our June 20, 2017 BNCA general meeting to discuss these issues and DDOT's position in greater detail. We need to understand why DDOT now believes, in spite of the Livability Study, that the traffic issues in Brookland do not warrant serious attention and urgent action. We would like to hear from you and your staff regarding the following topics:

- What has DDOT done since August 2015 to control truck traffic and implement traffic calming measures in the Brookland Community?
- What is DDOT's plan to manage and ameliorate the ongoing influx of truck traffic due to major, ongoing construction projects in and around Brookland?
- What is the status of each of the recommendations in the Brookland-Edgewood Livability Study? For actions that have not yet been implemented, why not?
- What steps has the City taken to implement the current Comprehensive Plan elements related to excessive truck traffic, particularly as identified for the Upper Northeast, Transportation, and Implementation Elements? What changes to the Comprehensive Plan would in your view contribute to a solution to these problems?
- Why, despite the flexibility provided by the federal highway guidelines, does DDOT continue to refuse to look at re-classifying certain streets in Brookland to more accurately reflect their local, residential character?

¹ https://ddot.dc.gov/page/brookland-edgewood-livability-study.



Deficiencies in DDOT's May 5 Letter

Director Dormsjo's May 5 letter purported to address residents' concerns regarding traffic safety issues on certain streets in Brookland. I would like to highlight several flaws in this letter's reasoning and conclusions.

- Comparison of streets: DDOT asserts that the truck traffic on Franklin does not exceed the amount on Rhode Island Avenue. This is a meaningless comparison. The question is whether the truck traffic on Franklin is excessive compared to streets of similar size and character. DDOT's investigation revealed that 40-45 heavy trucks *per hour* use Franklin, which is a narrow, two-lane, residential street. That is almost one per minute. If DDOT does not understand why that amount of truck traffic is unacceptable on Brookland's residential streets, then new leadership direction at that organization is clearly needed.
- Street Classifications: DDOT continues to refuse to consider reclassifying certain streets in Brookland to more appropriately reflect their character and proper use. In doing so, DDOT has made legalistic arguments that such classifications are required by the Federal Highway Administration guidelines. Although no citation to those requirements has been provided, we assume DDOT is referring to the FHA's "Highway Functional Classification Concepts, Criteria, and Procedures." However, this is a flexible guidance that recognizes street classifications are based on many factors and considerations and are within the discretion of the local transportation agency to determine. In addition, streets are to be reclassified periodically based on new information and considerations. DDOT's rigid adherence to unspecified federal requirements appears to be a bureaucratic dodge to avoid providing a more thorough justification for its choices in Brookland. In particular, we note that each of the roadways classified as "minor arterial" in Brookland (including 12th, 13th, Franklin, and Monroe) are more appropriately considered "local" or at most "minor collector" roads under the federal guidance.³ DDOT's improper classification puts these streets on par with Michigan Avenue, which is also classified as minor arterial and is a 4-lane connecting route across the City. 12th, 13th, Franklin, and Monroe Streets NE, by contrast, are all two-lane roads that are primarily residential, have low speed limits, and do not provide cross-city access. They should be reclassified to local, or at most, minor collector. Under those new

² https://www.fhwa.dot.gov/planning/processes/statewide/related/highway functional classifications/section00.cfm.

³ Compare id. § 3.1.4 with id. §§ 3.1.5 & 3.1.6.



classifications, each of these streets could then be considered for restrictions on heavy trucks.⁴

- Identifying areas of concern: DDOT's letter asserted that an assessment was conducted over the course of just two days in September 2016. DDOT has not made the results of that assessment available to the public, so it is impossible to evaluate DDOT's assertions in the letter that the speeding and safety issues at certain analyzed locations are insignificant. But DDOT's conclusory assertions in this regard are belied both by the lived experiences of our residents, as well as DDOT's own more thorough investigation presented in the 2015 Brookland-Edgewood Livability Study. Among other things, the Livability Study found:
 - A primary quality of life concern for the community is cut-through traffic, speeding, and non-compliance (particularly along 12th, 13th, Franklin, and Michigan Avenue). See 3-8 – 3-9.
 - o These streets have the highest number of collisions between vehicles and bikes and pedestrians in the study area. See 4-4.
 - The current configuration of truck routes in the study area "contributes to a great deal of heavy vehicle through-traffic and noise along routes that also have residential uses." 4-12.
 - Roadway safety data corroborate an extremely high number of crashes along Franklin Avenue, 12th St., Monroe, and Michigan Ave., the same routes used by high volumes of cut-through traffic. See 4-13. Out of about 243 crashes from 2012-2014:
 - Franklin St alone had 65 crashes, or about a quarter of the total incidents in the area.
 - 12th St had about 63 crashes for about a quarter of the total.
 - Michigan had 81 crashes for a third of the total.
 - Monroe St had 50 crashes for about a fifth of the total.
 - Only about 7 crashes occurred in the study area off of the above streets.

⁴ We note that given its local, residential and small boutique commercial character, 12th Street's designation as a *preferred* truck route is completely inappropriate and needs to be rescinded. At a minimum, DDOT must cease *encouraging* trucks to use 12th Street NE as an acceptable cut-through.

⁵ Traffic safety conditions in Northeast Washington are clearly deteriorating rapidly, according to DDOT's statistics for 2013-2015. Among the data: The crash-rate ranking for 12th/Buchanan NE went from 906 *to 47* from 2013 to 2015 and 12th/Allison's went from 872 *to 62* in the same period. Table 7.8. Michigan/Franklin NE went from 336 *to 64* in the crash composite index ranking in the same period. Table 7.17. Rhode Island/North Capitol went from the 28th *to the 15th worst intersection in the whole City* from 2013 to 2015. Table 5.1. These statistics are completely consistent with residents' observations of a collapse in traffic safety in the Brookland area over that period. *See* https://ddot.dc.gov/sites/default/files/dc/sites/ddot/publication/attachments/2013-2015%20Annual%20DC%20Crash%20Analysis%20Report.pdf.



- o The Study identified intersections at 12th/Franklin, 13th/Franklin, and Rhode Island/12th as among the very worst in the area for traffic safety. 4-14.⁶
- Although both Franklin and Monroe Streets are "restricted truck routes" they had heavy truck usage in the study period. 4-15.
- The Study recommended a number of minimum safety improvements, the status of which is unknown to the community. See 5-5.
 - The Franklin Street Corridor was singled out for special attention due to the significant traffic, truck, and safety issues associated with that street. See 5-6 and 5-18 (identifying multiple improvements needed at virtually every intersection along Franklin Avenue).
- Most of the implementation actions identified in Chapter 6 of the Study have never been implemented.
- Measuring vibration from trucks: The letter claims that DDOT conducted an analysis of vibrations on Franklin Street using a seismograph machine. DDOT apparently took measurements at the roadside and sidewalk areas near potholes and concluded that the levels of vibration would not cause structural damage to homes. However, the methodology DDOT used is highly suspect. According to a report by the National Research Council of Canada, due to the physical mechanics of vibration, roadway vibrations intensify within structures compared to the level felt on the ground near the roadway.⁷ For instance, at 25 km/h, the vibration level of a truck measured on the ground in front of a house may measure at 19.9 mm/sec² while on a second-story floor inside the house, it measures at 37.3 mm/sec²—nearly double the level of vibration!⁸ The report recommends: "Measurements should be made at locations where the vibration levels reflect the purpose of the evaluation. To evaluate the effect of vibrations with respect to human annoyance, measurements should be taken at locations where the vibration level is greatest, normally at the midpoints of floors" (emphasis added). Traffic vibrations also tend to be worst in areas underlain by soft clay, which is the soil type common to Brookland. DDOT's dismissive conclusions regarding roadway vibrations in the historic buildings in Brookland are clearly flawed and need to be reconsidered.

⁶ Residents have begun collecting videographic evidence of violations in a public Dropbox: https://www.dropbox.com/sh/1yvg2iku54ki3vt/AAALbVGmQg5dR8xSMnlas7Zca?dl=0.

⁷ I can personally attest that I have experienced this precise phenomenon at my house on 12th St. NE, which noticeably vibrates when trucks pass, though ground vibration cannot be felt on the sidewalk outside.

⁸ CNRC, Osama Hunaidi, "Traffic Vibrations in Buildings" (2002), at 2, table 1, available at https://www.nrc-

cnrc.gc.ca/ctu-sc/files/doc/ctu-sc/ctu-n39_eng.pdf.

⁹ *Id.* at 3.



Again, we extend an urgent invitation to you both to attend our June 20 BNCA meeting to explain DDOT's thinking and plans to improve traffic safety in the Brookland area. Please let me know at your earliest convenience whether you can attend the June meeting. I would also be happy to sit down with your staff for a smaller meeting prior to a BNCA meeting, if you believe that would be a constructive way to proceed. The status quo is not acceptable.

Sincerely,

President, BNCA

CC:

Hon. Del. Eleanor Holmes Norton Councilmember Kenyon McDuffie Councilmember Mary Cheh MPD Commander William Fitzgerald ANC 5B Chairwoman Ursula Higgins



BNCA Proposed Comp Plan Amendment #3: Family-Sized Affordable Housing

Please Complete for Both Text and Map Amendments

What type of amendment are you submitting?	
XX Text Amendment	
Map Amendment	

Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.

Replace existing text in Housing Element Policy H-1.3.1: Housing for Families with the following:

Preserve and provide a larger number of housing units for families with children. Offer suitable regulatory, tax, and financing incentives to protect existing and encourage production of new affordable family-sized housing (i.e., for families at 60% or below Median Family Income) consisting of three, four, and five bedroom units. Require regular reports on the number of 3+ bedroom units in each ward, the number and size of low income families, and an assessment of the number of 3+ bedroom-sized units needed to house such low income families.

Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):

Much new housing under construction in DC today consists of studio and one- and two-bedroom apartments. Family-sized housing is fast-disappearing. If we want our neighborhoods to be diverse in family type and size, we need housing that is diverse in size and that accommodates larger families. Also, we need the tools, data, and information for an accurate understanding of the housing necessary to meet the needs of all District residents including larger families.

If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:

Ward: Brookland, Ward 5, Citywide



Specific location(s):
Please indicate the type of change(s) the proposed amendment will accomplish (check all that apply):
Incorporate key content from Small Area Plans and other DC Office of Planning or District government plans completed or underway since 2010
List name of plans:
Reflect current, new or emerging issues, initiatives and policies
Identify Issue, Inititiative or Policy
Change to the land use designation
Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend? Future Land Use Map
- If yes, what new Land Use Designation do you propose?
Generalized Policy Map
- If yes, what changes do you propose?
Please help us understand exactly what area you propose to modify please provide one of

- Describe the area by listing the streets that mark its boundaries:
- List one or more entire Squares

the following:



- List one or more lots for a specific Square:
Square:
Lot number(s):
For Text Amendments Only
Provide one of the following information to help us locate the test to be modified.
Legislative Citation: 505.6
Policy Number: Policy H-1.3.1: Housing for Families
Action Number:
If you are proposing to add new text to the Comprehensive Plan, provide the Element th new text should be placed.
Element: Housing Element
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.
No
_XX Don't Know
For All Amendments If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.



BNCA Proposed Comp Plan Amendment #4: Re-Purposing Industrial Land (North)

Please Complete for Both Text and Map Amendments
What type of amendment are you submitting?
Text Amendment
_XX Map Amendment
Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.
Change the Future Land Use Map (FLUM) in the area north of the Brookland/CUA Metro Station to remove "Production, Distribution, and Repair" and replace with residential/commercial "Mixed Land Use" area.
Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighbrohood, area, or location):
The FLUM currently depicts the geographic area as a "Mixed Land Use" area for 1) "Moderate Density Commercial" use, and 2) "Production, Distribution, and Repair" use. The proposed amendment would eliminate the "Production, Distribution, and Repair" use and replace it with a residential/commercial "Mixed Land Use" area. This will benefit the area because it will encourage any future development in the area to be mixed-use residential/commercial and discourage future inappropriate industrial uses in this area immediately adjacent to the Brookland/CUA Metro station and Moderate Density Residential areas.
If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:
Ward: 5
Specific location(s):
North: Perry Place, NE



East: 10th Street, NE

the following:

South: Michigan Avenue, NE West: CSX/WMATA tracks

that apply):
Incorporate key content from Small Area Plans and other DC Office of Planning or District government plans completed or underway since 2010
List name of plans:
Reflect current, new or emerging issues, initiatives and policies
Identify Issue, Inititiative or Policy
XX Change to the land use designation
Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend?
_XX Future Land Use Map
- If yes, what new Land Use Designation do you propose?
Mixed Land Use: Residential/Commercial
Generalized Policy Map
- If yes, what changes do you propose?

Please help us understand exactly what area you propose to modify, please provide one of



-	Describe	the area	by	listing the	streets	that	mark	its	boundaries):
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North: Perry Street, NE East: 10 th Street, NE South: Michigan Avenue, NE West: WMATA property
- List one or more entire Squares
Square 3822
- List one or more lots for a specific Square:
Square: 3822
Lot number(s): 36, 808, 816, 818, 819, 815
For Text Amendments Only
Provide one of the following information to help us locate the test to be modified.
Legislative Citation:
Policy Number:
Action Number:
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element:
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.

___ No



_XX__ Don't Know

For All Amendments

If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.



BNCAProposed Comp Plan Amendment #5: Re-Purposing Industrial Land (South)

Please Complete for Both Text and MapAmendments
What type of amendment are you submitting?
TextAmendment
_XX MapAmendment
Please provide a brief description of the amendment you propose. If you have speci for the amendment, please provide it here.
Change the Future Land Use Map (FLUM) in the area of southern Brookland along the C WMATA rail tracks to remove "Production, Distribution, and Repair" and replace with a residential/commercial "Mixed Land Use" area.

Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):

specific text

the CSX/

The FLUM currently depicts the area as a "Production, Distribution, and Repair" use area. The proposed amendment would eliminate the "Production, Distribution, and Repair" use and replace it with a combined residential/commercial "Mixed Land Use" area. This will benefit the area because it will encourage any future development in the area to be mixed-use residential/ commercial and discourage future inappropriate industrial uses in an area near both the Brookland/CUAMetroStationandthe Rhode IslandAvenue/Brentwood Metro Station and Low and Moderate Density Residential areas.

If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:

Ward: 5

Specific location(s):

North: Girard Street, NE East: 10th Street, NE



South: Douglas Street, NE West: CSX/WMATA rail tracks

the following:

Please indicate the type of change(s) the proposed amendment will accomplish (check all
that apply):
Incorporate key content from Small Area Plans and other DC Office of Planning or
District government plans completed or underway since 2010
v v
List name of plans:
Reflect current, new or emerging issues, initiatives and policies
Identify Issue, Inititiative or Policy
24010119 200409 211101101101
_XX Change to the land use designation
Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend?
_XX Future Land Use Map
- If yes, what new Land Use Designation do you propose?
- If yes, what new Land Ose Designation do you propose:
Mixed Land Use: Residential/Commercial
Generalized Policy Map
- If yes, what changes do you propose?
- 11 yes, what changes do you propose:
Please help us understand exactly what area you propose to modify, please provide one of



-	Describe the area b	Эy	listing	the streets	that	mark its	boundaries:
---	---------------------	----	---------	-------------	------	----------	-------------

North: Girard Street, NE East: 10 th Street, NE South: Douglas Street, NE West: WMATA property
- List one or more entire Squares
Square 3840 – Lot 809, 810, 807, 24, 23, 803 Square – 3841 – Lot 825, 833, 834, 829, 38, 832, 78 Square 3846 – 82, 846, 856
- List one or more lots for a specific Square:
Square: Lot number(s):
For Text Amendments Only
Provide one of the following information to help us locate the test to be modified.
Legislative Citation:
Policy Number:
Action Number:
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element:

Brookland Neighborhood Civic Association P.O. Box 4457, Washington, DC, 20017 BrooklandCivic.org

Is this amendment supported by an ANC resolution?



 Yes. If yes, please don't forget to attach the resolution.
 No
Don't Know

For All Amendments

If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.



BNCA Proposed Comp Plan Amendment #6: Historic Resources

Please Complete for Both Text and Map Amendments
What type of amendment are you submitting?
_XX Text Amendment
Map Amendment
Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.
Amend Policy UNE-1.2.2 as follows (proposed new text in brackets):
Protect historic resources in Upper Northeast, including Gallaudet University, the Brooks Mansion, Crummell School, the homes of Ralph Bunche and Samuel Gompers, the Franciscan Monastery, Langston Terrace housing project, Langston Golf Course, the Hospital for Sick Children, Glenwood Cemetery, the Fort Circle Parks[, Brookland's King David Masonic Lodge #28, Holy Name College and James Sherwood Farmhouse and former Metropolitan Police Department's Youth Division at 1700 Rhode Island Avenue NE, and Michigan Park's St. Joseph's Seminary].
Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):
Would expand the list of local historic resources. Although not currently landmarked, these properties are widely considered eligible for protection as historic resources.
If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:
Ward: 5
Specific location(s):



King David Masonic Lodge #28, 3501 12th Street, NE Holy Name College and James Sherwood Farmhouse, 1400 Shepherd Street, NE Former MPD Youth Division, 1700 Rhode Island Avenue, NE St. Joseph's Seminary, 1200 Varnum Street, NE

Please indicate the type of change(s) the proposed amendment will accomplish (check a that apply):
Incorporate key content from Small Area Plans and other DC Office of Planning of District government plans completed or underway since 2010
List name of plans:
_XX Reflect current, new or emerging issues, initiatives and policies
Identify Issue, Inititiative or Policy
Change to the land use designation
Remove outdated information or other technical correction
Other:
For Map Amendments Only
Which map would you like to amend?
Future Land Use Map
- If yes, what new Land Use Designation do you propose?
Generalized Policy Map
- If yes, what changes do you propose?



Please help us understand exactly what area you propose to modify, please provide one of the following:

- Describe the area by listing the streets that mark its boundaries:
- List one or more entire Squares
- List one or more lots for a specific Square:
Square: Lot number(s):
For Text Amendments Only
Provide one of the following information to help us locate the test to be modified.
Legislative Citation: 2409.2
Policy Number: Policy UNE-1.2.2 Protecting Local Historic Resources
Action Number:
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element: Upper Northeast Area Element
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.
No
_XX Don't Know
For All Amendments



If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.



BNCA Proposed Comp Plan Amendment #7: Hamlin Street Ped-Bike Bridge

Please Complete for Both Text and Map Amendments

What type of amendment are you submitting?							
_XX Text Amendment							
Map Amendment							

Please provide a brief description of the amendment you propose. If you have specific text for the amendment, please provide it here.

Amend Policy UNE-2.6.2 as follows (proposed new text in brackets):

Policy UNE-2.6.2 Pedestrian [and Bicyclist] Access

Improve pedestrian [and bicyclist] safety and access to the [Metropolitan Branch Trail and the] Brookland Metro station, particularly eastward along Monroe Street (linking to the 12th Street NE shopping area) and Michigan Avenue (linking to Catholic University). [Implement future pedestrian/bicyclist bridge across the CSX/WMATA tracks at Hamlin Street, NE.]

Describe the impact(s) of the amendment you propose. Explain why the proposed amendment will benefit the District of Columbia and/or a specific geographic area (if it applies to a specific neighborhood, area, or location):

The proposed amendment is aimed at improving safety and access to important sites and amenities for both pedestrians and bicyclists. Implementing pedestrian/bicyclist bridges across the CSX/WMATA tracks will improve pedestrian and bicyclist safety, east-west connectivity between the Brookland and Edgewood neighborhoods, and access to the Metropolitan Branch Trail. Currently, there are only two east-west crossings available for pedestrians and bicyclists: at Franklin and Monroe Streets, NE.

If applicable, provide the Ward and/or name of the geographic areas, neighborhoods, locations or sites affected by this proposed amendment:

Ward: 5



Specific 1	ocation(s):
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Please help us understand exactly what area you propose to modify, please provide one of the following:



- Describe the area by listing the streets that mark its boundaries:

Across CSX/WMATA tracks at Hamlin Street, NE
- List one or more entire Squares
- List one or more lots for a specific Square:
Square: Lot number(s):
For Text Amendments Only
Provide one of the following information to help us locate the test to be modified.
Legislative Citation: 2416.4
Policy Number: UNE-2.6.2
Action Number:
If you are proposing to add new text to the Comprehensive Plan, provide the Element the new text should be placed.
Element: Upper Northeast Area Element
Is this amendment supported by an ANC resolution?
Yes. If yes, please don't forget to attach the resolution.
No
_XX Don't Know

Brookland Neighborhood Civic Association P.O. Box 4457, Washington, DC, 20017

<u>BrooklandCivic.org</u>

For All Amendments



If applicable, please attach any photos, maps, Advisory Neighborhood Commission resolutions, or other documents that may clarify or support the proposed amendment or assist in evaluating it.

- Brookland/CUA Metro Station Small Area Plan, December 2008; Recommendations and Implementation, Transportation, Walkability and Connectivity Recommendations, Item #4 (page 53).
- Brookland-Edgewood Livability Study, August 2015; Hamlin Street Ped-Bike Bridge (page 5-15).

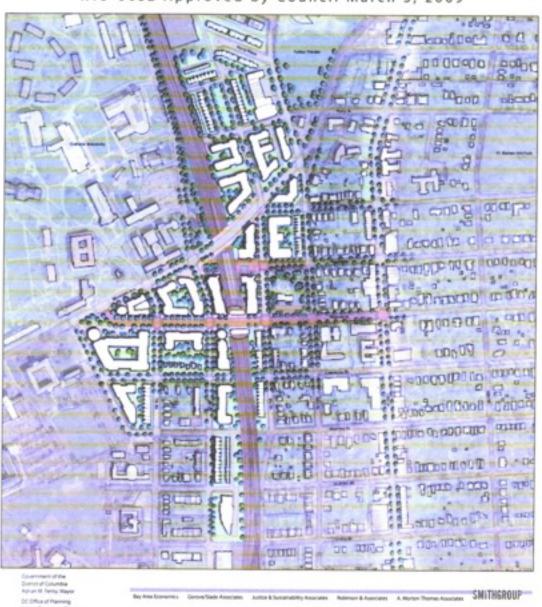




Brookland/CUA Metro Station Small Area Plan

Washington, DC

December, 2008 R18-0032 Approved by Council March 3, 2009





6. RECOMMENDATIONS AND IMPLEMENTATION

This section describes the Implementation Strategy, including the partner agencies and community organizations, public funding, and the time-frame necessary for accomplishing the goals of the Small Area Plan. The time frame correspond to the following: short-term (1-2 years), mid-term (2-5 years), long-term (5+ years)

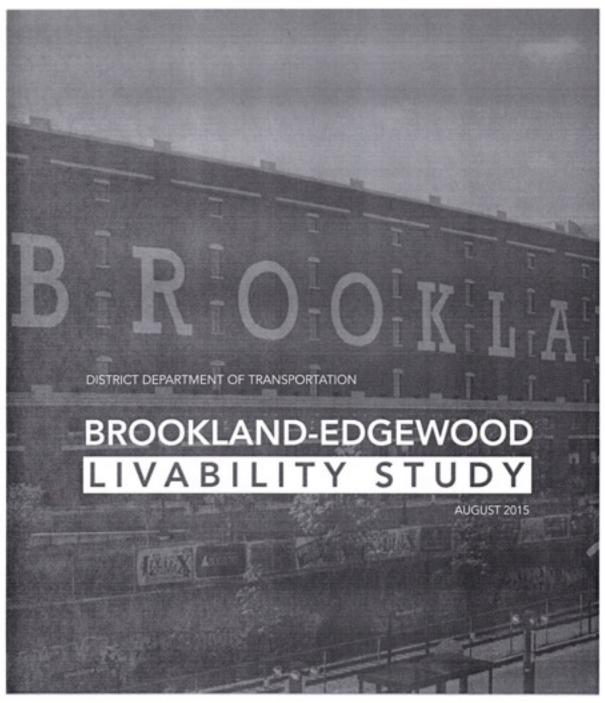
		Brookland/CUA Metro Station Area Plan Recommendations			
Land Use and Neighborhoo	od Char	acter Recommendations			
Principles	Item	Recommendations	Partner Agencies/ Organizations	Public Funding Needed	
Protect existing neighborhood	1	Establish a Brookland Arts/Cultural District by providing incentives and encouraging arts uses with the oreation of new development and public spaces. OP will work with Catholic University, Dance Place, and other known arts organizations to facilitate opportunity for collaboration.		×	MID-TERM
	2	Develop a neighborhood branding and way finding strategy for Brookland	DDOT.	×	SHORT-TER
	3	Establish Brooks Mansion as a future civic community building for Brookland	OPM	ж	LONG-TERM
	4	Engage Paper and DDOT in discussions regrading the turying of utilities with, new development.	DDOT, Pepos, OP, DMPED	×	LONG-TERM
	5	Implement DDOT Streetscape and Transportation Study Improvements to create a pleasant, inviting, memorable, pedestrian, and walkable neighborhood	0007	×	SHORT-TER
	8	OP will engage ANC SA to establish a design reveiw committee to formalize community design review of planned unit development projects.	OP, ANC		SHORT-TERM
Economic Development & N	Veighbo	rhood Amenities			
Principles	tiem	Recommendations	Partner Agencies/ Organizations	Public Funding Needed	Time Frame
Strengthen and support the 12th Street commercial come: Add new retail and businesses to compliment 12th Street and provide leaded services; Acquire services from and provide jobs for local residents; Create an enhanced civic infrastructure and support local schools; Create apportunities for cultural events and public art; Enhance the public retain by addressing safety and disantiness issues.	1	Coordinate the programming of new retail along Monroe and at the Metro Station in order to compliment and strengthen 12th Street.	DMPED, OP, WDCEP	х	SHORT-TERM
	2	Maintain a competitive tocal business framework by encouraging aesthetic property enhancements and building upgrades by property owners as well as enforcing property upkeep and compatibility with existing building code.	DSLBO, DORA	×	MID-TERM
	3	Encourage area businesses to collaborate in public safety initiatives and techniques, including Crime Prevention Through Environmental Design.	MPD, DSLBD,	х	MID-TERM
	4	Provide smaller, alternative office products (office condos, second-story office spaces) for new neighborhood-serving businesses and small professional firms.	DCOP, DCOZ		LONG-TERM
	5	Encourage property and business owners in the Brookland commercial area to perficipate in coordinated brancing and marketing initiatives.	RE-STORE DC. DSLBD.	×	SHORT-TERM
	6	Work with residents and stakeholders to create a list preferred community benefits that can be addressed as planned unit developments are generated.	OP		SHORT-TERM
ransportation, Walkability a	and Con	nectivity Recommendations			
Principles	Item	Recommendations	Partner Agencies/ Organizations	Public Funding Needed	Time Frame
Metro and 12th Street;	1	Integrate the implementation of the DDOT Brookland Streetscape and Transportation Study with the implementation of the Brookland/CLIA Metro Station Small Area Plan.	0007	х.	SHORT-TERM
	2	Improve connectivity and reestablish the grid of streets and blocks where new development occurs.	DOOT	×	MID-TERM
	3	Develop a strategy for improving streetscape, lighting and increase pedestrian safety along John McCormack Road.	DDOT, GUA	×	SHORT-TERM
hance the public realm through proved streetscape, way finding, hting, landscaping and burying utilities.	4	Implement future pedestrian bridges across CSX/WMATA tracks. Suggested locations are at Kearny and Hamiin Streets.	DDOT, CSX, WMATA	х	LONG-TERM

Table 6.1 - General recommendations

Brookland / CUA Metro Station Small Area Plan

Recommendations and Implementation 53











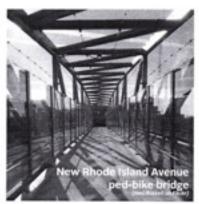
HAMLIN STREETPED-BIKE BRIDGE

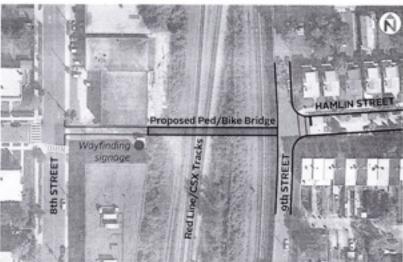
RECOMMENDATIONS

- Conduct feasibility study to examine right-of-way, grade, and construction issues
- Identify potential funding sources



- Hamlin Street bike boulevard with sharrows and wayfinding signage
- æ
- Additional connectivity and wayfinding to the Metropolitan Branch Trail





RECOMMENDED in previous/existing plans

 Brookland-CUA Metro Station Small Area Plan

ISSUES

- Currently there are only two primary east-west crossings are available for pedestrians and cyclists, Franklin and Monroe Streets
- » Improving neighborhood east-west connectivity

BROOKLAND - EDGEWOOD LIVABILITY STUDY