POLICY MEMO:

Proposed Amendments to the District Elements of the Comprehensive Plan

JUNE 2017

www.anacostiaparkcommunity.org
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Anacostia Business Improvement District
Anacostia Coordinating Council
Anacostia Waterfront Trust
Clean Water Action
Community Preservation and Development Corporation
DC Appleseed
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INTRODUCTION

The Anacostia Park and Community Collaborative (APACC)

The Anacostia Park and Community Collaborative (APACC) is a group of organizations dedicated to improving the Anacostia River Corridor. We envision community-led, equitable redevelopment of the Anacostia River parks and adjacent neighborhoods, and a thorough cleanup of the Anacostia River. Through this process, we will foster the growth of a thriving, diverse, and sustainable community that actively accepts and takes ownership of the challenges and opportunities along this cherished water source to improve the lives and livelihoods of both current and future residents.

Why did APACC participate in the amendment process for the Comprehensive Plan?

APACC submitted a joint response to the DC Office of Planning’s call for amendments to the Comprehensive Plan in the spring of 2017. We did this because our collaborative represents organizations that span a variety of missions and interests but that overlap on a central shared goal to achieve a healthy Anacostia River with exemplary parks and thriving communities along its shores, particularly east of the river.

The comprehensive plan is a 20-year legal document that lays the groundwork for the District, guiding its future development, investment and infrastructure. The plan covers land use and policy in specific geographic areas, and other chapters cover topic areas like housing, transportation, open space and economic development. It also includes maps like a Future Land Use Map and a Generalized Policy Map that illustrate what kinds of changes are intended to take place in specific neighborhoods. Forthcoming later this year will be a new Resilience Element that will address our city’s ability to recover from shocks and catastrophes.

This means that if a resident has any sort of vision for what they think their neighborhood should look over the next 20 years, then they will want to make sure their vision is reflected in the document! As a long-term and overarching policy document for the city, the Comprehensive Plan could have significant impact on the future of the Anacostia River corridor.

How does the Comprehensive Plan affect the Anacostia River?

The Anacostia River corridor is a complex, multi-layered physical, ecological and social place. While working to improve the whole river corridor, we have to talk about many issues (e.g. transportation, housing, environment) and many places (Wards 5, 6, 7 and 8, local neighborhoods and federal land) all at once. The Comprehensive Plan similarly slices up its coverage of the Anacostia into several different geographic and thematic chapters. There is no “Anacostia River Chapter” in the Comprehensive Plan; the waterfront shows up in several chapters in small ways. APACC is able to draw on the diverse expertise and focus areas of its various members to address several aspects of the Plan.

What kind of amendments did APACC submit to the Office of Planning?

APACC submitted over 35 amendments to the Office of Planning during the “open call” for amendments in mid-2017. These amendments covered a variety of topics but many focused on the issues of increasing access to the Anacostia waterfront for residents, addressing gentrification and the potential displacement of residents due in areas adjacent to the increasingly improved river, and ensuring that the parkland along the river features consistently high quality design and levels of maintenance, care and cooperation between managing agencies.
The amendments that APACC submitted to the Office of Planning are included in this document. They are marked to show what text was proposed to be added (in blue), what text was proposed to be removed (struck through) and what text should remain (regular black text). Example:

**Policy Title: Example**
Black text like this exists in the plan now and should remain. Blue text like this is new text proposed by APACC. Text that is struck through like this should be removed from the plan.

**GENERALIZED POLICY MAP**

The Generalized Policy Map designates specific neighborhoods, corridors and other areas within the District where location-specific policies and approaches should be applied. APACC proposes a new policy map area type that includes neighborhoods adjacent to the eastern shore of the Anacostia River as designated in the image below.

The impact of this amendment will be to directly address a growing concern amongst residents and advocates that restoration of the Anacostia River and its waterfront parks will not lead to revitalization of adjacent communities, but rather re-development of them. As the river and its parks become more desirable destinations, land values along the river will most likely increase and could lead to displacement of residents who can no longer afford housing costs.

The District can identify and anticipate this issue with this Generalized Policy Map amendment and begin to simultaneously revitalize these neighborhoods in ways that celebrates their proximity to the waterfront while also preventing displacement of current residents.

**Proposed Policy Area: Anacostia Waterfront Revitalization Areas**

Neighborhoods within walking distance of the eastern shore of the Anacostia River. These are often primarily residential in character. Characterized by proximity to the Anacostia River and federally owned waterfront parks. These areas present opportunities for enhanced connectivity to the Anacostia River and stronger identities as riverfront communities. Land uses that promote recreational or tourism economic activity related to the river should be promoted. Transportation projects that increase walking and biking access to the river should be encouraged. Protection and expansion of affordable housing should be encouraged.

The guiding philosophy in Waterfront Enhancement Areas is to improve enjoyment of and access to the Anacostia River waterfront while reducing displacement of residents due to rising land values associated with those improvements. New real estate development should be consistent with overlapping General Policy Areas and must be consistent with the land use designation on the Future Land Use map, but should also promote this philosophy.
Generalized Policy Map from the previous Comprehensive Plan District Elements, with APACC addendum in blue.
CITY-WIDE POLICIES

LAND USE

**Policy LU-3.5.2: Federal Sites and Adjacent Neighborhoods**
Support expansion of the federal workforce and redevelopment of federal sites in a manner that is consistent with neighborhood revitalization, urban design, economic development, and environmental quality, and socioeconomic equity goals. Federal land uses should strive to maintain land use compatibility with adjacent neighborhoods.

The introduction to the Comprehensive Plan is entitled “Planning for an Inclusive City” and notes that the District “strive[s] to be a more inclusive city.” To support this goal, the Plan should be explicit that “socioeconomic equity” is a consideration when developing federal sites as indicated in the proposed amendment above.

Additionally, APACC supports these existing policies in the Land Use element:

**Policy LU-1.2.8: Large Sites and the Waterfront**
Use the redevelopment of large sites to achieve related urban design, open space, environmental, and economic development, and socioeconomic equity objectives along the Anacostia Waterfront. Large Waterfront sites should be used for water-focused recreation, housing, commercial, and cultural development, with activities that are accessible to both sides of the river. Large sites should further be used to enhance the physical and environmental quality of the river.

**Policy LU-3.5.1: District/Federal Joint Planning**
Coordinate with the National Capital Planning Commission, the National Park Service, the General Services Administration, the Architect of the Capitol, and other federal agencies to address planning issues involving federal lands, including the monumental core, the waterfront, and the park and open space network. Encourage the use of master plans, created through participatory processes, to guide the use large federal sites.
**TRANSPORTATION**

**Proposed Policy: Support Private Water Transportation**
Support privately owned and operated water transportation operations including but not limited to water taxis and boat rental facilities with public-private funding for docks and other infrastructure.

As recognition of the waterfront as an asset and an increasingly popular place for water vessels, opportunities exist to expand the transportation role of the Anacostia River. This proposed amendment could help start or support new economic development related to the restoration and revitalization of DC’s waterfronts. Water taxis can enhance transportation access to and from destinations in the District, and new boat rental facilities may support new jobs and increased recreation options for District residents, particularly those living near the river.

In addition, APACC supports this existing policy in the Transportation element:

**Policy T-1.1.3: Context-Sensitive Transportation**
Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses.

**HOUSING**

**Policy H-1.2.4: Housing Affordability on Publicly Owned Sites**
Require that a substantial percentage of housing units build on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households. Ensure that residential developments on publicly sites, including sites being transferred from federal to District jurisdiction, meet or exceed the legal requirements to include a 20% to 30% set-aside of residential area priced affordable for low-income (50% AMI) and very low-income households (30% AMI). Use similar assets, such as the discretion to close public rights of way for residential development, as additional leverage for affordable units.

This proposed amendment reflects the 2014 enactment and policy rationale of the Disposition of District Land for Affordable Housing Amendment Act, DC Law 20-193, 61 DCR 12407 (Dec. 5, 2017). Given limited resources and the great demand for affordable housing, the District should use off-budget assets, such as public land and rights of way, to produce affordable housing and preserve mixed-income neighborhoods as the city develops.

**[Proposed] Policy H-2.1._: Preservation Strategy**
Develop a geographic strategy for preserving affordable housing that identifies areas that are likely to experience increasing housing costs and changed uses in the future and calls for proactive intervention using existing preservation tools.
The District should develop a geographic strategy for preserving affordable housing that identifies areas that are likely to experience increasing housing costs and changed uses in the future and calls for proactive intervention using existing preservation tools. This will ensure that geography is taken into consideration in deciding what affordable housing should be preserved. In its “Bridges to opportunity: A New Housing Strategy for DC”, the D.C. Comprehensive Housing Strategy Task Force recommends that geography, and particularly the housing's proximity to public transportation, be considered in determining the location of affordable housing. Housing prices are oftentimes higher, the closer they are to public transportation. However public transportation is necessary for individuals to get to work, school etc.

[Proposed] Action H-2.1.-: District’s Opportunity to Purchase Act
Implement the District’s Opportunity to Purchase Amendment Act, enacted in 2008, to allow the District to purchase housing to maintain affordability if tenants are otherwise unable to purchase.

The Comprehensive Plan needs to reflect the enactment of the District's Opportunity to Purchase Amendment Act of 2008 (DC Law 17-286, 55 DCR 11989, Dec. 24, 2008). This will allow the District to more effectively preserve affordable housing in areas at risk for price increases, maintaining the current residency of low-income individuals within the District.

Policy H-2.2.3: Tax Relief
Maintain tax relief measures for low income homeowners and low income senior homeowners faced with rising assessments and property taxes. These measures should reduce the pressure on low income owners to sell their homes and move out of the District and target geographic areas that are likely to experience rapid increases in property tax assessments.

Targeting specific geographic areas that are most at risk to experience increased property tax assessments will more effectively preserve affordable housing in DC, further maintaining low-income resident's ability to remain in the district. This is particularly the case in neighborhoods adjacent to the Anacostia River, which may develop in such a way that increasing housing costs given the proximity to current and planned waterfront amenities. Specifically targeting these areas would insure that those D.C. residents are not displaced as a result.

Aerial view of Poplar Point and the future 11th Street Bridge Park landing area in Historic Anacostia.
ENVIRONMENTAL PROTECTION

**Action E-3.3.A: Community Gardens East of the Anacostia River**
Recognizing that only two of the city’s 31 community gardens are located east of the Anacostia River, work with community leaders and gardening advocates to establish new gardens in this area. The District should assist in this effort by providing an inventory of publicly and privately owned tracts of land, including National Park Service property, that are suitable for community gardens, and then working with local advocacy groups and the federal government to make such sites available.

Community Gardens are an integral part of the Sustainable DC plan released in 2012 which sets the goal of creating “20 additional acres of land under cultivation for growing food by 2032.” While additional community gardens have been created east of the river since the original Action was adopted, a focus should still be put on these neighborhoods. National Park Service parkland should be considered as potential sites for community gardens in order to help achieve this goal, potentially including sections of Anacostia Park or other parks near the river.

**Policy E-4.2.4: River Sediment**
Reduce the level of toxins in the Anacostia and Potomac River sediment. Maintain progress toward meeting the statutory obligation to complete a record-of-decision for clean-up of the Anacostia sediment by June 2018. Remediation measures should minimize the possibility of water contamination resulting from dredging or disturbances of the river bottom.

This amendment reflects the Anacostia River Toxics Remediation Act of 2014, DC Law 20-955, s 6091–92, 61 DCR 9990 (Oct. 3, 2014). It is necessary to include the time frame stipulated by this Act to show the District’s continued commitment to complete a record-of-decision for clean-up of the Anacostia sediment by June 2018.

In addition, APACC supports these existing policies and actions in the Environmental Protection element:

**Action E-4.3.D: Reduction of Helicopter Noise**
Encourage the federal government to reduce noise from the operation of helicopters, especially over residential areas along the Potomac and Anacostia Rivers during night-time and early morning hours.

**Action E-4.3F: I-295 Freeway Noise Buffering**
Consistent with DDOT’s noise abatement policy, continue to pursue development of sound barriers and landscaping to shield neighborhoods abutting the I-295 (Anacostia) Freeway, Kenilworth Avenue, and I-395 (SE/SW Freeway) from noise levels that exceed acceptable standards.
Policy E-4.4.5: Clean-Up of Contaminated Sites
Ensure that necessary steps are taken to remediate soil and groundwater contamination in the city, both in areas where future development is likely and in areas that are already fully developed. In addition, require soil and groundwater evaluations for any development that is proposed on a site where contamination may be possible due to past activities. Depending on the site, it may also be necessary to investigate the effects of contamination on air quality, surface water, or river sediments, or to conduct an ecological risk assessment. If contamination is found to be above acceptable levels, require remediation and, where necessary, long term monitoring and institutional controls.

Action E-4.6.B: Neighborhood Clean-Ups
Co-sponsor and participate in neighborhood and citywide clean-up activities such as those currently being held along the Potomac and Anacostia Rivers, and those held around schoolyards and District parks. Encourage Advisory Neighborhood Commissions and other community groups to develop and announce cleanup campaigns in conjunction with the city’s bulk trash removal schedule.

Policy E-5.2.3: Interpretive Centers
Support the development of environmental education and nature centers in the District, particularly in recovering habitat areas such as the Anacostia River shoreline.

Action E-5.2.A: Partnerships for Environmental Education
Develop partnerships with environmental nonprofits and advocacy groups to promote environmental education in the District. Examples of such programs include the Earth Conservation Corps effort to employ inner-city youth in environmental restoration along the Anacostia River, the Anacostia Watershed Society’s tree planting, clean-up, and riverboat tour events, and the National Park Service summer programs for high school students at Kenilworth Park.
**ECONOMIC DEVELOPMENT**

**Proposed Amendment - Policy: Promote Waterfront Tourism**
Promote the Anacostia and Potomac waterfronts as a tourist destinations in an effort to capitalize on the economic benefits of tourism in neighborhoods adjacent to the river.

This amendment will help the District capitalize on the potential economic assets of the Anacostia and Potomac rivers. While the National Mall already attracts tourists to the city, the rivers and waterfronts are unique features of the city surrounded by already-existing parkland. This amendment would support inter-agency and public-private efforts to market the rivers as destinations, potentially leading to jobs for residents, recreation opportunities for residents and visitors, and increased land value along the rivers.

**Proposed Amendment - Policy: Waterfront Commercial Revitalization**
Expand commercial revitalization programs such as tax increment financing and district enhancement programs to include additional commercial districts within walking distance of waterfront areas.

This amendment will help the District capitalize on the potential economic asset of the Anacostia river. As the Anacostia River is improved and becomes a more popular destination for residents and visitors, the development and support of commercial and retail areas adjacent to the waterfront will help enhance the waterfronts’ success as an economic generator. Neighborhood business corridors within walking distance of the waterfront will provide economic development, jobs and an increased tax base for the District, especially in Wards 7 and 8.

This amendment proposes expanding tools that the District already uses to support business corridors (for example, district enhancement programs) in order to encourage new businesses. The location of these efforts would be required to comply with other existing policies.
PARKS, RECREATION AND OPEN SPACE

The Parks, Recreation and Open Space element of the Plan includes policies and actions relating to parks, recreational facilities and other open space-related public amenities. Included in this element is a table of different classifications of parks. APACC proposes that an additional category of parks be added to this list.

Table 8.1 Park Classification System

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<th>Category</th>
<th>Description</th>
<th>Amenities</th>
<th>Radius</th>
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<tr>
<td>Mini-Park</td>
<td>Pocket parks or triangles. Range from landscaped “islands” to places for socializing, playing chess, etc.</td>
<td>Benches, seating areas, public art, landscaping</td>
<td>¼ mile radius</td>
</tr>
<tr>
<td>Neighborhood</td>
<td>Provide informal centrally located setting for neighborhood-based recreational amenities, possibly including recreation centers.</td>
<td>Playgrounds, tot lots, basketball courts, open lawn areas for unstructured play, seating and picnic areas, community gardens, and interpretive or educational exhibits</td>
<td>½-mile radius</td>
</tr>
<tr>
<td>Community</td>
<td>Larger parks with more structured recreational opportunities, including recreation center buildings with a range of DPR programs.</td>
<td>Active play-oriented outdoor facilities such as ball fields, athletic courts, playfields, indoor and outdoor facilities, natural amenities such as trails, natural areas, and picnic grounds</td>
<td>1-2 mile radius, with connections to bike and pedestrian trail networks</td>
</tr>
<tr>
<td>Regional</td>
<td>Large multi-use parks that draw users citywide or from beyond adjacent neighborhoods.</td>
<td>Very large areas of open space, recreation centers, lighted athletic fields, group picnic areas, hiking, multiple activity areas</td>
<td>Citywide</td>
</tr>
<tr>
<td>Natural Resource Areas</td>
<td>Parks established to conserve open space and sensitive natural resources or heritage assets. If adjoined by open, level areas, then recreational fields and play areas may be appropriate.</td>
<td>Low-impact passive activities such as hiking and environmental education</td>
<td>N/A—not demand-driven</td>
</tr>
<tr>
<td>Sports Complexes</td>
<td>Programmed athletic fields and multi-use indoor complexes, custom designed for specific programmed uses.</td>
<td>Track and field, natatorium, softball, soccer, tennis, basketball, volleyball, racquetball, football, boxing, martial arts</td>
<td>Citywide</td>
</tr>
<tr>
<td>Special Use</td>
<td>Parks dedicated to a single use such as a zoo or amphitheater. Accommodate highly organized activities and provide economic as well as social and physical benefits. May have highly specialized management requirements.</td>
<td>Golf courses, aquatic or spray parks, sculpture parks, dog parks, arboretums, historic homes, amphitheaters, skate parks, climbing centers</td>
<td>Citywide</td>
</tr>
<tr>
<td>School Parks</td>
<td>Public land on school property developed with playgrounds and open fields, designed for student activities but also available for community use.</td>
<td>Running tracks, playgrounds, athletic fields, basketball courts</td>
<td>½ mile to 2 mile radius</td>
</tr>
<tr>
<td>Trails and Bikeways</td>
<td>Hard or soft paved paths providing linkages within or between parks, facilitating access and exploration.</td>
<td>Paved or dirt trails, boardwalks, promenades</td>
<td>½ to ¼ mile to access point</td>
</tr>
<tr>
<td>Waterfront Park</td>
<td>Parks along the Anacostia or Potomac Rivers that provide access to the water’s edge.</td>
<td>Trails, boardwalks, seating areas, shade, athletic fields, open space, natural areas, boating facilities, docks, concessions, cultural facilities, event space, outdoor classrooms</td>
<td>Citywide</td>
</tr>
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</table>
Waterfront Parks are increasingly important to the District of Columbia (for example, Georgetown Waterfront Park has become a popular destination since the last Comprehensive Plan update) but these parks do not easily fit into the categories presented in Table 8.1.

A new classification for Waterfront Parks will ensure that District officials approach these parks differently than neighborhood parks, which is appropriate because of their unique role in the park system. Waterfront Parks provide amenities that no other park can, like boating facilities, and require a different planning and management approach than other types of parks. The impact of this amendment will be that the District is better prepared to plan, design and manage its waterfront parks, which are becoming more important to the city’s economy and identity as a waterfront city.

Policy PROS-1.2.2: Improving Access

Improve access to the major park and open space areas (including Federally owned land) within the city through pedestrian safety and street crossing improvements, new or improved pedestrian infrastructure, wayfinding, signage, beautification, bike lanes and storage areas, and adjustments to bus routes.

PROS-1.2.2 of the Comprehensive Plan acknowledges that federal lands “are used by city residents” and therefore “they should be considered when identifying under served areas and assessing the need for local parks improvements.” The addition of the parenthetical “including federal lands” in this policy, ensures that federal lands are not excluded, when improvements to access are considered in parks and open spaces across the District, which maintains congruence with PROS-1.1.2.

The second amendments to this policy regarding pedestrian infrastructure further reflects goals set out in the Sustainable DC Plan. Goal 1 of the Health and Wellness section of the plan is to “Inspire healthy, active lifestyles for all residents, regardless of income, ability or employment.” Improved pedestrian access, signage, wayfinding and beautification all promote and provide access to healthier lifestyles in an equitable and fair manner.

Policy PROS-1.3.2: Parks and Environmental Additional Objectives

Use park improvements to achieve environmental, social and economic objectives such as water quality improvement, air quality improvement, and wildlife habitat restoration, economic development, educational programming and other objectives. Consider achieving certification through comprehensive sustainability evaluation frameworks like SITES or LEED.

While the existing policy PROS-1.3.2 recognizes that parks play an important role in local environments, parks also play significant social, cultural and economic roles in cities. The impact of this amendment would be to ensure that District parks are successful in many different ways and benefit people in addition to the natural environment. Established evaluation frameworks like Sustainable Sites Initiative (SITES) and LEED provide a framework for park planners, designers and managers to ensure that a park is reaching its full potential. This change also reflects the motto and philosophy presented in the DC Parks and Recreation Master Plan to encourage residents to “move, grow and be green”.

**Policy PROS-1.4.5: Park Amenities on NPS Land**
Where consistent with other policies in the Comprehensive Plan and NPS plans, and where supported by nearby neighborhoods and needs assessments, encourage and coordinate District efforts with federal government projects that would provide new recreational amenities such as soccer fields, picnic areas, docks, boat launches, splash pads or swimming facilities and trails serving that increase equitable access of District residents to amenities on national parkland.

Several elements within the Comprehensive Plan emphasize the importance of the District government coordinating efforts with the Federal government. For example: PROS-4.1.1: National Park Service Partnership, Action PROS-3.1.F: Park Land Transfers and Policy PROS-2.2.7: “Public-Private Partnerships for Recreation”. The ideal relationship between the Federal and District government is a common thread that is seen throughout the Comprehensive Plan. It is important to emphasize the collaborative nature of this relationship, particularly as it relates to park amenities on NPS land.

Furthermore, this amendment reflects Goal 1 in the Health and Wellness section of the Sustainable DC Plan reflects the need to, “Inspire healthy, active lifestyles for all residents, regardless of income, ability or employment.” The addition of a more extensive list of recreational activities as well as the inclusion of equitable access to these resources.

**Proposed Amendment - Policy: Waterfront Parks Impact Fee**
Establish a Waterfront Parks Impact Fee that would require developers building projects in proximity to waterfront areas to help cover the cost of improvements to and programming on the Anacostia and Potomac waterfronts. Such a fee would be based on a standard amount per square foot with the proceeds used to expand existing program offerings or improve parkland along the waterfront.

The impact of this new proposed amendment will be to ensure that programs and facilities in waterfront parks are improved as communities around them are revitalized. The fee would subsidize improvements to the public parks that will benefit all District residents and visitors, and it would be appropriate because of the value added to real estate development projects by their proximity to high-quality waterfront park amenities. This amendment is based on “Action PROS-1.4.A: Park Impact Fee.” Focusing specifically on the DC’s waterfronts is important because the likelihood that these areas will be improved and that land values adjacent to them will increase is currently high and predictable. This also reflects existing policies like Policy UD-1.3.1: DC as a Waterfront City and the goal to become an “Inclusive City.”

**Proposed Amendment - Action: Temporary Open Space Improvements**
Deploy temporary, removable improvements to public spaces to provide public realm amenities like shade, seating and vegetation to enhance areas that are planned to improved in the future yet remain currently underused.

The impact of this amendment would be to help sites that are currently slated for redevelopment as parks but that are currently not reaching their potential as vibrant public spaces do so. Temporary, “pop-up” improvements like those employed in the placemaking and tactical urbanism movements can provide basic amenities like seating and shade but can also bring unique art, events and cultural significance to once uninviting spaces. This amendment will help the District capitalize on the full potential of its open space, transforming currently underutilized land into successful parks and public spaces in interim periods before long-term designs and
construction of future parks are complete. This could be applied to EventsDC’s RFK Campus Future initiative and other long-term open space planning projects.

**Policy PROS-2.1.1: Recreational Facility Development**

Improve the physical and psychological health of District residents by providing a variety of recreational and athletic facilities, including playing fields, tennis courts, swimming pools, basketball courts, **boating facility**, docks, trails and paths, and open areas for other sports activities.

The impact of this amendment would be to ensure that the recreation potential of the Anacostia river is recognized and capitalized on for residents. More boating facilities and docks would provide increased access to water-based recreation like kayaking, canoeing and paddleboarding. Boating on DC’s rivers is both an athletic activity and a mentally relaxing activity that can help achieve the stated goal of the Policy to “improve the physical and psychological health of District residents by providing a variety of recreational and athletic facilities.”

**Policy PROS-3.2.3: Linkages Between the Waterfront and Nearby Neighborhoods**

Establish stronger linkages between the waterfront and adjacent upland neighborhoods including Deanwood, Mayfair, Kenilworth-Parkside, River Terrace, Fairlawn, Twining, Kenilworth, Historic Anacostia, Carver-Langston, Kingman Park, Hill East, Capitol Hill, Barney Circle, and Southwest. Maximize public access to the waterfront from these areas through the continued development of a riverwalk and shoreline trail, improved public transportation, redesigned bridges and freeways, additional pedestrian access routes including trails and bridges, and the extension of neighborhood streets and avenues to the water’s edge.

The impact of this amendment would be to ensure that efforts to “establish stronger linkages between the waterfront and adjacent upland neighborhoods” address the most significant barriers to waterfront access that include limited pedestrian access routes over, under or around highway and railroad infrastructure. Additional pedestrian bridge crossings or clearly marked and safe passages under highways will help residents reach the new sections of the Anacostia RiverWalk Trail, which has been expanded since the last Comprehensive Plan update but which still has more portions left to be completed. This not only reflects community priorities expressed about limited access to the waterfront, but it also aligns with policies PROS-3.2.4: Waterfront Visibility and Accessibility and UD-1.5.1: Mitigating Freeway Impacts.

**Proposed Amendment - Policy: Anacostia River Facility Network**

Support a network of river facilities along the Anacostia River that provide water access, recreational equipment, educational space and other amenities, equitably distributed along the Anacostia River and easily accessible from nearby neighborhoods. Coordinate efforts with federal agencies and federally operated facilities.

The impact of this amendment will be to capitalize on the valuable recreational asset of the Anacostia River and ensure that as boating and other recreation in and along the river increases, support for these activities is distributed equitably along the river so that residents of any neighborhood adjacent to the river have access to them. The creation and support of a network of river facilities will require robust coordination with federal agencies and local initiatives like the 11th Street Bridge Park.

While Policy PROS-3.2.5: Water-Oriented Recreation states that the District should provide for a variety of water-oriented activities, this proposed amendment specifies on the support of physical facilities that support water-
oriented activities, and it specifies that the District should ensure that these facilities are equitably accessible for all residents.

The creation of a network of river facilities is bolstered by the upcoming 11th Street Bridge Park; Policy PROS-3.2.5: Water-Oriented Recreation; the forthcoming Kingman Island Master Plan by DOEE; MoveDC; and the National Park Service Draft Management Plan/Environmental Assessment for Anacostia Park that establishes framework for a network of boating facilities.

In addition, APACC supports these existing policies and actions in the Parks, Recreation and Open Space element:

**Action PROS-1.4.A: Park Impact Fee**
Study the feasibility (including potential fiscal and economic effects) of adopting a park impact fee that would require residential developers to help cover the cost of parkland acquisition and improvement. Such a fee would be based on a standard amount per dwelling unit or square foot, with the proceeds used to acquire or improve nearby parkland.

**Policy PROS-3.2.4: Waterfront Visibility and Accessibility**
Improve access to the shoreline parks from across the city, and reduce barriers to waterfront access created by railroads, freeways, and non-water dependent industrial uses. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan that has been approved by the District government.

**Policy PROS-3.2.5: Water-Oriented Recreation**
Provide for a variety of water-oriented activities, including fishing and boating, on the District’s rivers. Recognize both the Anacostia and Potomac Rivers as vital aquatic resources than can accommodate kayaking, canoeing, sculling, fishing, and other forms of water-oriented recreation.
**URBAN DESIGN**

**Policy UD-1.3.2: Waterfront Public Space and Access**
Develop public gathering spaces along the waterfronts, including promenades, viewpoints, boating and swimming facilities, and parks. Such space should be designed to promote continuous public access along the rivers, and to take full advantage of site topography and waterfront views. Design treatments should vary from “hardscape” plazas in urban settings to softer, more passive open spaces that are more natural in character. *Work with federal agencies to ensure continuous transition of character and quality of urban waterfront public space.*

**Policy UD-1.3.3: Excellence in Waterfront Design**
Require a high standard of design for all waterfront projects, with an emphasis on shoreline access, integration of historic features and structures, an orientation toward the water, and the creation of new water-oriented public amenities. *Work with federal agencies to ensure continuous transition of character and high standard of design across local and federal properties.*

These amendments ensure internal consistency within the current comprehensive plan, particularly with regards to the “Maximizing Access Through Partnership” (PROS-4.1.1) and “Federal Coordination” (UD-2.1.5) elements. PROS-4.1.1 generally calls for “The need for joint planning to coordinate federal and district open space planning” while UD-2.1.5 specifically reflects the need to “coordinate with the federal government to achieve a constant urban design vision for Central Washington.” These amendments will ensure that collaboration with the federal government, that is called for in other areas of the Comprehensive Plan, is extended to waterfront areas.

**Policy UD-1.3.6: “Activating” Waterfront Spaces**
Encourage design approaches, densities, and mixes of land uses that enliven waterfront sites. Architectural and public space design should be conducive to pedestrian activity, provide a sense of safety, create visual interest, and draw people to the water. *Support programming and events that create visual interest and social activity and draw people to public waterfront spaces. Collaborate with private and federal entities to support programming and events on waterfront spaces not owned by the District.*

This amendment to the policy will benefit the District by ensuring that open space can fulfill the intention of the amendment (to “enliven waterfront sites”) regardless of whether the site is not yet designed or funded. “Tactical urbanism” and “placemaking” efforts across the world have demonstrated that inexpensive, temporary and easily implementable improvements like events and “pop-up” furniture can create lively social spaces in the absence of expensive physical improvements. Given the long timeframe associated with planned improvements to many waterfront sites in DC, the support of events and programming suggested by this amendment will help the District achieve its goal of activating the waterfront in the short term.
In addition, APACC supports these existing policies and actions in the Urban Design element:

**Policy UD-1.3.1: DC as a Waterfront City**
Strengthen Washington’s civic identity as a waterfront city by promoting investment along the Anacostia River, creating new water-related parks, improving public access to and along the shoreline, and improving the physical and visual connections between the waterfront and adjacent neighborhoods.

**Policy UD-1.5.1: Mitigating Freeway Impacts**
Reduce the negative effects of freeways on neighborhoods by decreasing blight around freeway overpasses and underpasses, and improving pedestrian and bicycle overpasses. Longer-term solutions that address the design of the freeways themselves also should be explored. Such solutions should consider rebuilding freeways to reduce their “iron curtain” effect and developing the air rights over sunken freeways.

*The Anacostia River Festival in 2017 demonstrated how temporary installations of seating and events can “activate” an otherwise empty waterfront space.*
COMMUNITY SERVICES AND FACILITIES

Action CSF-1.1.B: Criteria For Re-Use
Establish formal, measurable criteria for determining when a public facility can be deemed surplus, obsolete or too poorly located for its current public use, and therefore subject to a lease agreement for an interim use. Specific criteria should also be developed that spell out the limited circumstances when District-owned community facilities may be sold or traded for other suitable uses. Where possible, such criteria should favor use by community, civic and non-profit organizations, especially those whose mission serves the community around the facility. (Creative community re-use can be a valuable addition in under-served communities where ample community meeting space, in particular, is difficult to secure.)

Proposed Policy: Study the Potential Linkage of the Comp Plan, Capital Improvement Program and National Park Service Planning Efforts
Acknowledging the significant land holdings managed by the National Park Service within the boundaries of the District of Columbia, and that their management, maintenance and continued resiliency have a strong impact and ramifications for DC’s future, the District’s Comprehensive Plan should seek ways to remain aware of major developments in NPS’s management and environmental plans and should leverage shared interests in land management, environmental remediation, and study ways to work collaboratively on urban park projects. Closer collaboration has many downstream benefits, such as helping diversify local and national interest in off-the-Mall parcels (Fort Circle parks, Anacostia Park, etc.), improving access to lesser used park areas, creating more agile urban park projects, initiating a use pattern for NPS-built park public facilities, allowing possibilities for creative financing of capital projects in keeping with NPS’ and the city’s shared mission goals. While issues of local and federal sovereignty and jurisdictional prerogatives remain jealously guarded, there are real opportunities for the District of Columbia and the National Capital Parks to strengthen their ties especially in the urban context, to forge the cutting edge of public-public partnerships in urban park design and management in one of the most recognizable city landscapes in the world.

In addition, APACC supports these existing policies in the Community Services and Facilities element:

Policy CSF-1.2.1: Capital Improvement Programming
Use the capital improvement program process to coordinate the phasing, prioritizing, and funding of public facilities.

Policy CSF-1.2.2: Linking the Comp Plan and Capital Improvement Program
Use the District’s Comprehensive Plan, particularly its analysis of growth needs and service adequacy, to establish priorities for the funding of capital improvement projects. Public facility planning should be done systematically and comprehensively and should be based on analytical data about community needs, service levels, and projections—in addition to facility condition assessments.
Policy CSF-1.2.3: Construction and Rehabilitation

Improve the coordination of public facility construction and rehabilitation projects to minimize public costs, maximize community benefits, and avoid service disruption.

The National Capital Planning Commission’s model of DC demonstrates an older vision for the Anacostia River that may not be related to the vision of District agencies or the National Park Service’s management plan for Anacostia Park.

A green infrastructure project on public land.
INFRASTRUCTURE

Proposed Amendment - Policy: Expand Waterfront Access East of the River

Expand access to the waterfront for communities east of I-295 through improvements to existing pedestrian access points including enhanced wayfinding, safety and beautification. Investigate strategies to overcome the barrier to the waterfront created by I-295 including the construction of additional pedestrian bridges or tunnels.

The proposed amendment will ensure that infrastructure that enhances access to the Anacostia River is built and distributed equitably for residents who live along the eastern shore of the river's length in the District. These neighborhoods are separated from the waterfront by barriers created by I-295, and while some neighborhoods could be better connected to the waterfront through simple measures like better signage and sidewalk facilities, other areas may need additional infrastructure to reach the waterfront. This incorporates key content from the 2014 Update to the Anacostia Waterfront Initiative Transportation Master Plan Update (DDOT).

Pedestrian walkways over Highway 295 present an obstacle for residents to get to the waterfront in terms of comfort and wayfinding.
We understand the importance of the arts, not only as a means of individual expression but also as a means of collective encoding, preserving and transmitting of our cultural values and traditions.

Our national interest to promote not only the quintessential core of a singular American culture as it evolves, but also embrace the multiplicity of cultures that form the strength, diversity and resiliency of the fabric that informs and binds American culture.

By increasing the number of cultural encounters and language exchanges as a means of broadening our perspectives, insights and skill sets, we also strengthen our nation’s defense by encouraging a deeper exposure to world cultures as expressed through arts and language as we promote our own.

Doing so also builds and broadens the base of successive generations of supporters, consumers and producers of the arts. Arts and culture are not simply objects of passive enjoyment but must retain a participatory component, i.e., the part that collectively encodes, embodies, preserves, documents and transmits cultural values over time. Furthermore, many residents have an interest not only in consuming the arts but in also producing art, which may also promote opportunities for artistic and technical advancement as well as economic opportunities.

**Policy AC-1.1.4: Cultural and Artistic Diversity**
Ensure that neighborhood cultural facilities accommodate a wide variety of arts disciplines, cultures, individuals and organizations. *This may mean that facilities must be equipped not only to showcase a finished product, work or performance, but also sufficient space in which to develop, rehearse and practice works of cultural and artistic diversity.* Facilities should also accommodate the special needs of seniors and persons with disabilities.

**Proposed Policy: Participation of Residents**
Support and increase the participation of residents in the District’s arts education programs.

**Proposed Policy: Re-commitment to Language and Culture Learning**
Recommit federal and local resources to foreign language and culture learning in order to develop in-house expertise in languages that strengthen national security. Promote cultural exchanges with student visits to sites that highlight cultural diversity, including embassies, cultural fairs and tours.

In addition, APACC supports this existing policy in the Arts and Culture element:

**Policy AC-4.4.4: Participation of Artists**
Support and increase the participation of artists in the District’s arts education programs.
GEOGRAPHIC AREA POLICIES

FAR NORTHEAST & SOUTHEAST AREA ELEMENT

The Far Northeast & Southeast Area Element includes a majority of Ward 7 east of the Anacostia River, although the boundary of the area is not based on Wards.

APACC’s proposed amendments for this element focus primarily on issues of access to the Anacostia River and enhanced park and recreation facilities and open space areas for residents of this area, particularly youth and children.

Policy FNS-1.2.2: Connecting To the River
Link the neighborhoods of Far Northeast and Southeast to the Anacostia River through trail, path, transit, sidewalk, pedestrian crossing, pedestrian safety and road improvements. Provide new amenities and facilities and support programming and events in the waterfront parks that meet the needs of Far Northeast and Southeast residents. Increase residents’ visible and physical access to the Anacostia River.

This amendment to the existing policy will benefit District residents by leading to increased walkable access to the waterfront. Many parts of the waterfront in Far Northeast and Southeast are separated from neighborhoods by road infrastructure built for cars. Focusing on adding additional pedestrian amenities will help residents find their ways to the waterfront without needing to own or get in a car.

The further impact of this amendment will be to support programming, events and other activities that help residents connect to the waterfront even when physical improvements like amenities and facilities cannot be afforded or take long periods of time to be constructed. This helps ensure that the intention of the policy -- “Connecting to the River” -- is more achievable under a variety of circumstances.

In addition, this amendment ensures that the new amenities in waterfront parks help to increase access of residents to the river itself, both to see it from the parks but also to get to the water itself. This will benefit the District by equitably adding amenities that to these neighborhoods that do not currently exist here but exist in other parts of the waterfront

Policy FNS-1.2.8: Facilities for Children and Youth
Develop additional parks, recreation centers, playgrounds, waterfront access and other facilities which meet the needs of children and youth in the Far Northeast/Southeast community. The District must recognize that children are the future of Far Northeast/Southeast, and should have a positive and healthy environment in which to live, play, and grow.

The impact of this amendment will ensure that the unique asset and amenity of the Anacostia River waterfront is capitalized on as an opportunity to accomplish the Policy’s stated intention to “meet the needs of children and youth in the Far Northeast/Southeast community”.

Access to the waterfront is a unique and valuable asset that should be included alongside parks, recreation centers and playgrounds.
CHAPTER 17: FAR NORTHEAST AND SOUTHEAST
**Policy FNS-1.2.9: Kingman and Heritage Islands**
Retain Kingman and Heritage Islands as natural sanctuaries. Uses should be limited to an interpretive nature center, trails, public art, small vessel boating access (docks or launches), passive open space, outdoor classrooms and pedestrian accessways. Coordinate efforts with federal agencies to improve pedestrian access to Kingman Island from both sides of the Anacostia River and ensure a continuity of high-quality public space design.

The impact of this amendment will be to ensure that potential and already existing facilities of boat access and outdoor classrooms on Kingman Island will be supported by the Comprehensive Plan. Both of these types of features are included in draft versions of the forthcoming master plan for Kingman Island under development by the District Department of Energy & Environment, and will provide value to all District residents.

The second addition to the existing policy will increase access to the natural and recreational amenities on Kingman Island by Ward 7 residents and residents of the River Terrace community in particular. Currently, River Terrace residents have to access Kingman Island by crossing the Benning Road bridge, despite their proximity to the space as the bird flies. Additional pedestrian bridges to the island from River Terrace park are proposed in early concepts developed by EventsDC for the RFK Campus and can be built in ways that do not compete with boating traffic.

This incorporates key content of: 2017 Kingman Island Master Plan by Department of Energy & Environment and the RFK Campus Future designs proposed by EventsDC. It also reflects the goals of PROS-3.2.4: Waterfront Visibility and Accessibility, PROS-3.2.5: Water-Oriented Recreation, and UD-1.3.1: DC as a Waterfront City.

**Policy FNS-2.8.1: Kenilworth-Parkside Open Space improvements**
Support federal efforts to improve and restore the Kenilworth Marsh, the Aquatic Gardens, and other parkland on the upper reaches of the Anacostia River. Kenilworth Park and the Kenilworth Aquatic Gardens. Engage with federal efforts to remediate contamination in Kenilworth Park and coordinate with federal agencies to anticipate the construction of future District-managed park amenities in Kenilworth Park. Coordinate these efforts with District plans to Design improvements to Kenilworth Park that enhance ecology, increase walking and biking access to Kenilworth Park from adjacent neighborhoods, connect Kenilworth Park to nearby parkland including the U.S. National Arboretum through riverfront trail and bridge projects, restore habitat and improve ecological conditions along Watts Branch and upgrade the Kenilworth Parkside ballfield and recreation center and establish state of the art recreation facilities focused on both land-based and water-based recreation.

The impact of this amendment will be focus District agency attention on the future of Kenilworth Park and its legislatively-mandated eventual transfer from federal to District ownership. As federal agencies design and plan remediation strategies for the former landfill, District agencies should engage with these agencies early on to leverage the design of remediation projects as an opportunity to prepare the site for its future use.

This proposed amendment would clarify the District’s goals for the park once it is under District management. It also expands the District’s stated intentions beyond just restoring habitat and conditions along Watts branch to include an approach for the entire park that satisfies other District policies like PROS-3.2.4: Waterfront Visibility and Accessibility, PROS-3.2.5: Water-Oriented Recreation, and UD-1.3.1: DC as a Waterfront City.

The future District park at the former Kenilworth Landfill presents a major opportunity to create a high-quality...
waterfront park within walking distance of several Ward 7 neighborhoods that previously suffered the noxious impacts resulting from their proximity to the landfill.

**Proposed Amendment - Policy: River Facilities for Children and Youth**

Develop additional docks, education centers, boat rental and other facilities which expand access to the Anacostia River for children and youth in the Far Northeast/Southeast community.

This amendment combines the goal of FNS-1.2.8: Facilities for Children and Youth to “recognize that children are the future of Far Northeast/Southeast, and should have a positive and healthy environment in which to live, play, and grow” with the ongoing restoration of the Anacostia River to ensure that the young people of Far Northeast/Southeast are provided with world-class youth-friendly waterfront access once the remediation of the Anacostia River and parklands, particularly the Pepco Benning Road facility and the former Kenilworth Landfill, are complete.
**FAR SOUTHEAST AND SOUTHWEST**

The Far Southeast and Southwest Area Element includes a large section of Ward 8, although the boundary of the area is not based on Wards.

APACC’s proposed amendment for this element focuses on connecting to the Anacostia River. The impact of this amendment will be to increase walkability to the Anacostia River in addition to the other infrastructure improvements listed in the policy. Highway 295 presents a barrier with to the river for Far Southeast and Southwest and improving the pedestrian experience of crossing over the highway with pedestrian bridges, or under the highway through underpasses, can help achieve this policy’s stated goal of “reconnecting the neighborhoods of the Far Southeast/Southwest to the Anacostia River”.

**Policy FSS-1.2.3: Connecting To the River**

Reconnect the neighborhoods of the Far Southeast/Southwest to the Anacostia River, particularly through the redevelopment of Poplar Point, improvement of pedestrian access over and/or under Highway 295, implementation of the Anacostia Waterfront Initiative park and trail improvements, and reconstruction of the Anacostia River bridges.
LOWER ANACOSTIA AND NEAR SOUTHWEST

The Far Southeast and Southwest Area Element includes a large section of waterfront area that has recently been developed and is still experiencing revitalization west of the river. It also includes sections of Anacostia Par adjacent to neighborhoods in Ward 8.

APACC’s proposed amendment for this element focuses on connecting to the Anacostia River and coordination of city efforts with federal landowners and agencies.

**Policy AW-1.1.8: Barriers to Shoreline Access**

Minimize the visual and accessibility impacts of railroad and highway infrastructure, surface parking, access roads and industrial uses along the Anacostia River shoreline. In particular, the impacts of freeways on waterfront access should be mitigated by supporting the redesign of these facilities as tunnels or landscaped boulevards. **Investigate options for mitigating the limitations on shoreline access imposed on neighborhoods east of the Anacostia by highway infrastructure.**

The impact of the first portion of this amendment is to include access roads in the list of potential barriers to shoreline access in Lower Anacostia Waterfront Near Southwest. Currently, access roads around the southern landing of the South Capitol Bridge and surrounding Poplar Point create visual blight and confusion and can deter people from finding their way to the shoreline. Removing or redesigning these roads could help achieve the stated goal of the policy to “Minimize the visual and accessibility impacts” of various uses along the shoreline.

The impact of the second portion of the amendment would be to further reduce accessibility impact of infrastructure to Anacostia shoreline by investigating potential future projects to overcome the barrier that Highway 295 presents to residents in Lower Anacostia Waterfront Near Southwest.

In addition, APACC supports these existing policies in the Lower Anacostia and Near Southeast element:

**Policy AW-1.2.2: Waterfront Cultural and Commemorative Sites**

Encourage the siting of new museums, memorials, civic gathering places, and cultural attractions on or near the Anacostia River as a way to catalyze revitalization and meet the demand for additional commemorative works without further crowding the National Mall and monumental core of the city. Such facilities should make the most of their waterfront locations and create an integrated system of gracious, beautiful, and vibrant places.

**Policy AW-1.2.4: Anacostia River Parks**

Create a connected network of waterfront parks from Hains Point to the Sousa Bridge, and continuing through adjacent upriver Planning Areas to the Maryland border. These parks should be easily accessible to surrounding neighborhoods and accommodate the need for more local and regional serving recreational activities in the city. New parks should be an integral part of any new waterfront neighborhood, and should showcase the remarkably diverse landscape along the Anacostia River. A variety of active and passive recreational settings should be provided.