



March 11, 2020

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Elizabeth Miller, Director
Physical Planning Division
National Capitol Planning Commission
401 9th St NW #500N
Washington DC 20004

VIA: Email to Elizabeth Miller - <https://www.ncpc.gov/about/staff/>

RE: NCPC's Lighting Policy and Framework, Monumental Core Streetscape Project

Dear Director Miller:

ANC 6B welcomes this opportunity to provide comment regarding the Monumental Core Streetscape Project and its Lighting Policy and Framework component. We commend the staff and Commissioners of the National Capitol Planning Commission for their vision and creativity in addressing – in a comprehensive fashion – preservation and enhancement of the streetscape and lighting associated with the monumental core of the city.

At a properly noticed meeting on March 10, 2020, with a quorum present, ANC 6B voted 10-0-0 to offer the following questions reflecting its concerns about the application of the proposed guidance in our community.

1. Agenda materials prepared for the NCPC identify the Eastern Market Metro Park as an open space falling under the purview of the new guidance. It is not clear from published documents and hearing testimony if NCPC planning has considered the construction of a new park at the Eastern Market Metro. We are concerned that there may be a disconnect between the planning already undertaken by DGS to address community safety concerns and the guidance being developed by NCPS.

Has the NCPC had an opportunity yet to consider the alignment of proposed lightening for the interior of the park and the guidance for the park that it is developing?

2. New technology provides opportunities to improve lighting that should benefit pedestrian safety.

Will the NCPC have an opportunity to develop a specific section within its new guidance document to highlight concerns for pedestrian safety?

3. ANC 6B is concerned that the current conceptual plan for streetscape guidance is moving forward in advance of resolving issues about the architecture and placement of the small cell transmitters that are envisioned in the 5G movement. As was noted in the NCPC small cell information briefing hearing on March 7, 2019, there remains much uncertainty about what the units will look like (e.g., is hoteling possible), how they will be attached to the various existing light fixtures, or how they will be spaced. The draft streetscape document intelligently addresses such issues as verticality and massing as central features of urban design, but currently does not include guidance for the small cell transmitters as a component of the streetscape.

Will NCPC reserve final guidance until the issues regarding the architecture, placement, and number of placements for small cell transmitters has been resolved?

4. The hierarchy contemplated for streets within and approaching the monumental core, and the lighting proposed for each category, will be helpful in achieving the objective of a cohesive “light scape” and in calling attention to the monument area. However, a problem for residents of Capitol Hill, as well as a few other communities adjacent to the monument core is that, in the nomenclature of the draft document designated ‘arterial streets’ such as North Carolina are also residential streets. In the current draft, these two types of areas are proposed to receive different types of lighting (e.g., warmth, color, intensity), but many residents live on streets providing approaches to the monument area. This category definition problem will be heightened with the advent of LED lighting, as noted immediately below.

Will the NCPC guidance assure lightening that is appropriate for both busy streets such as North Carolina, SE and for the residents residing on those streets?

5. The draft document provides welcome attention to changing technology, especially with regard to the planned introduction of LED lights. However, during the information briefing on May 3, 2018, the NCPC Commissioners grappled with concerns about potential health issues associated with the conversion – often in terms of associated Kelvin ratings. ANC6B has also struggled with the issue of the determining the correct, and acceptable, Kelvin ratings of various light intensities within residential areas. NCPC has established Kelvin rating cut points in its draft document based on a recent AMA advisory. However, testimony at the NCPC meetings about the rapidity of change in LED technology leads us to question the wisdom of establishing fixed cut points at this time.

Does NCPC plan to undertake further investigation of the potential health consequences of various Kelvin scores for different categories of individuals and of different physical situations (e.g., distance from light, shielding)?

6. Finally, our ANC was surprised to find reference to areas such as Seward Square or the Eastern Market Metro Park included in a document designated “monument area.” If these areas, along with East Capitol Street, Lincoln Park, and Pennsylvania Avenue, SE, are included in the streetscape or lighting guidance of the NCPC, we believe there should be robust involvement of the relevant ANCs.

Will there be additional opportunities for the ANCs to be engaged in development of the guidelines and standards relative to lighting and streetscape design impacting on their areas as the process proceeds?

Thank you for your attention to these comments and concerns. Please address any questions or comments to Commissioner Kirsten Oldenburg, chair of the ANC 6B Transportation Committee at 6b04@anc.dc.gov.

Sincerely,



Brian Ready
Chair, ANC 6B

cc: