



Government of the District of Columbia Advisory Neighborhood Commission 4B

By Electronic Mail

November 25, 2024

Councilmember Robert C. White, Jr. (At-Large), Chair
DC Council, Committee on Housing
1350 Pennsylvania Avenue, NW, Suite 107
Washington, DC 20004

RE: Highlighting Continued Administrative Challenges and Lack of Support from the Office of
Advisory Neighborhood Commissions

Dear Councilmember White:

Advisory Neighborhood Commission 4B, at a duly noticed public meeting, with a quorum being the “majority of the total number of commissioner positions currently filled in Commission 4B,” at its November 25, 2024, meeting voted with _ Yeas, _ Nays, and _ Abstentions to send this letter highlighting continued administrative challenges and lack of support from the Office of Advisory Neighborhood Commissions. The Commission remains committed to serving neighbors and ensuring strong, effective local governance. It has become increasingly apparent, however, that the Office of Advisory Neighborhood Commissions faces challenges in providing the consistent support needed for Advisory Neighborhood Commissions to effectively fulfill their essential roles in the community.

The DC Council established the Office of Advisory Neighborhood Commissions to provide “technical, administrative, and financial reporting assistance” to the District’s 46 Advisory Neighborhood Commissions, including reviewing quarterly financial reports and approving the release of funding, as outlined in [DC Code § 1-309.15](#). The Office is also responsible for offering resources such as training and guidance on operational procedures to help ensure that Commissions operate effectively. Rather than supporting Commissions, however, the Office of Advisory Neighborhood Commissions’ often hinders their ability to serve the public.

As the central body tasked with equipping Advisory Neighborhood Commissions with the tools, guidance, and resources they need, the Office of Advisory Neighborhood Commissions should

prioritize empowering Commissions. While some improvements have been made, such as more consistent training and the centralization of Zoom licenses for virtual meetings, many challenges persist. The Office's focus has often been on enforcement and oversight, rather than providing the operational resources necessary for Commissions to serve their communities effectively. This approach has limited the Office's ability to address critical issues, including the lack of suitable office and meeting space, disparities in technology resources, high Commissioner turnover, barriers to effective grantmaking, and ongoing confusion regarding Commission funding and disbursement. Advisory Neighborhood Commission 4B calls for a shift toward a more supportive role from the Office of Advisory Neighborhood Commissions—one that enables Commissions to operate efficiently and better serve their diverse communities.

Advisory Neighborhood Commission 4B has consistently raised these concerns, and this letter serves as another reminder of the numerous challenges faced by the Commission. In highlighting these issues, the Commission notes its past efforts to address them through formal action:

- Advisory Neighborhood Commission 4B, Annual Report 2024 (Nov. 25, 2024);
- [Letter](#): Providing Feedback on the Office of Advisory Neighborhood Commissions' Strategic Plan (Feb. 26, 2024);
- [Resolution 4B-23-1101](#): Highlighting Administrative Challenges in Issuing ANC Grants and Requesting Procedural Improvements to Facilitate Commission Grantmaking (Nov. 27, 2023);
- Advisory Neighborhood Commission 4B, [Annual Report 2023](#) (Nov. 27, 2023);
- [Resolution 4B-23-0501](#): Supporting & Providing Recommendations on B25-0257, Hybrid Meeting Accessibility Act of 2023, to Ensure Accessibility & Inclusivity (May 22, 2023);
- [Resolution 4B-23-0102](#): Highlighting History of Advocacy for and Requesting Stronger Centralized Resources for Successful Advisory Neighborhood Commissions (Jan. 23, 2023);
- Advisory Neighborhood Commission 4B, [Annual Report 2022](#) (Nov. 28, 2022);
- Advisory Neighborhood Commission 4B, [Annual Report 2021](#) (Nov. 22, 2021);
- [Resolution 4B-21-0903](#), Encouraging Enhancements to and Formalized Use of ANC Resolution Portal (Sept. 27, 2021);
- [Resolution 4B-21-0703](#), Requesting Centralized Funding and Support for Advisory Neighborhood Commission Technology and Printing Needs (July 26, 2021);

- [Resolution 4B-21-0601](#): Calling for Virtual Testimony Option for DC Government Hearings (June 28, 2021);
- [Citywide Letter](#) to the DC Council, Calling for Hybrid (Virtual and In-Person) Meetings for Advisory Neighborhood Commissions (June 10, 2021) (signed by all Advisory Neighborhood Commission 4B Commissioners);
- [Resolution 4B-21-0509](#): Calling for Legislative Revisions and Supports to Allow Hybrid (Virtual and In-Person) Meetings for Advisory Neighborhood Commissions (May 24, 2021);
- [Letter](#) regarding Ensuring Adequate Resources for Successful Advisory Neighborhood Commissions (Jan. 25, 2021);
- [Resolution 4B-21-0104](#): Calling for Fair and Equitable Elections Procedures and Improved Mechanisms to Fill Advisory Neighborhood Commission Vacancies (Jan. 25, 2021);
- Advisory Neighborhood Commission 4B, [Annual Report 2020](#) (Nov. 23, 2020);
- [Resolution 4B-20-1002](#): Encouraging Best Practices to Assure Broad Inclusivity and Robust Participation in DC Government Hearings at the Commission's (Oct. 26, 2020);
- [Letter](#) regarding Administrative Support and Infrastructure for Advisory Neighborhood Commissions (Sept. 24, 2019); and
- [Resolution 4B-19-0403](#): Supporting Implicit and Unconscious Bias Training and Diversity, Equity, & Inclusion Initiatives for Advisory Neighborhood Commissions (Apr. 22, 2019).

As Advisory Neighborhood Commission 4B has noted before—which bears repeating—one of the biggest operational challenges Commissions face is **the Office of Advisory Neighborhood Commissions' tendency to prioritize enforcement and excessive oversight over providing the technical assistance and support that Commissions need to function effectively**. This imbalance often results in **viewpoint discrimination**, hindering the ability of Commissions to serve the public and perform their duties as elected representatives.

A clear example of this is the Office of Advisory Neighborhood Commissions' recent request to the Board of Ethics and Government Accountability for an ethics opinion aimed at limiting Commissioners from signing onto letters on political or world issues. This request came at the same time a citywide Commission sign-on letter was circulating, urging the DC Council to support a ceasefire in Gaza. The Office's involvement in seeking this opinion represents a significant overreach of its authority, improperly attempting to restrict Commissioners' ability to take positions on important issues affecting their constituents. If adopted, BEGA's [draft advisory](#)

[opinion](#) would set a dangerous precedent by curbing Commissioners' ability to engage in political discourse, thus undermining their independence and role in representing their communities. This not only reflects viewpoint discrimination but also underscores the Office's misplaced focus on enforcement, rather than providing the necessary guidance and support for effective Commission work.

The Office of Advisory Neighborhood Commissions' focus on control is further evident in its efforts to restrict independent training programs for Commissioners, such as those offered by organizations like Greater Greater Washington. When Greater Greater Washington sought to provide educational resources to newly elected Commissioners, the Office appears to have encouraged the Board of Ethics and Government Accountability to deem these trainings as "illegal gifts." Although the Board of Ethics and Government Accountability later reversed its position after a threat of legal action, the Office of Advisory Neighborhood Commissions followed up by sending an official letter to Commissioners advising them to scrutinize external "training" programs like those offered by Greater Greater Washington (scare quotes, as used by the Office). This intervention, rather than assisting Commissioners, sends a not so subtle message that the Office will continue to try to obstruct training by outside organizations. Once again, OANC's actions represent a clear example of viewpoint discrimination—limiting access to resources based on ideological preferences.

Perhaps most troubling, in 2023, the Director of the Office of Advisory Neighborhood Commissions submitted [a letter opposing a proposed development before the Board of Zoning Adjustment](#), challenging the relevant Commission's support for the project. The stated opposition was based on the unfounded claim that the relevant Commission had failed to properly notice a meeting. The Director's attempt to intervene in a neighborhood development issue—a matter squarely within the purview of Advisory Neighborhood Commissions—was wholly improper. As the head of the office tasked with supporting Advisory Neighborhood Commissions, the Director's attempt to impose different standards for meeting notices than what is required under existing law, seemingly because he disagreed with the views of the Commission on a development, is an unacceptable exercise of influence and demonstrates how the Office of Advisory Neighborhood Commissions' focus on enforcement can overshadow its support role.

These examples illustrate that the Office of Advisory Neighborhood Commissions' actions are driven not just by an overzealous focus on enforcement but by viewpoint-driven decisionmaking. The Director's personal preferences on issues like historic preservation seem to influence the agency's interventions, undermining the independence of Commissions and their ability to represent their communities. While the Office of Advisory Neighborhood Commissions has previously attempted to undermine the actions of Commissions and Commissioners by [labeling](#) them as "angry", "hostile," "lack[ing] ... understanding," and "activists" driven by "special interest groups," the agency itself has a pattern of pushing special interests rather than fulfilling its mandate to empower Advisory Neighborhood Commissions.

The above concerns regarding the Office of Advisory Neighborhood Commissions' improper and excessive focus on enforcement have limited the Office's ability to meaningfully address several other critical issues that continue to impede the Commission's ability to effectively serve the community. These include:

- **Lack of Office & Meeting Space:** Since December 2018, Advisory Neighborhood Commission 4B has struggled with the absence of both dedicated office and meeting space. The Commission's funding is insufficient to rent private office space, hire administrative staff, and secure necessary technical support and physical space for meetings. Despite efforts to rely on District-owned facilities, the lack of adequate space and the District government's failure to fulfill its obligation under [DC Code § 1-309.13\(q\)](#) to provide office space has reinforced disparities and hindered the Commission's operations. Since March 2019, ANC 4B has held meetings virtually, but the Commission's former meeting venue, the Metropolitan Police Department's Fourth District, lacks the infrastructure to support hybrid meetings, and its location is inconvenient for many Commissioners and neighbors. Additionally, District-owned facilities like those operated by DC Public Schools charge Commissions [higher for-profit business rates](#), making them an impractical option. This continued lack of suitable, affordable meeting space limits the Commission's ability to serve its community. The Commission urges the Office of Advisory Neighborhood Commissions to prioritize providing clear and consistent support to ensure that each Commission has the infrastructure necessary to operate effectively, including affordable office and meeting spaces that support both in-person and hybrid meetings.
- **Disparities in Technological Resources:** While the Office of Advisory Neighborhood Commissions has provided centralized Zoom licenses for virtual meetings, it has failed to standardize other technological resources or offer clear guidance on their use. This includes essential tools such as hybrid meeting technology, Commission websites, and language access resources. Advisory Neighborhood Commission 4B has encountered significant challenges in ensuring fully hybrid meetings due to a lack of suitable infrastructure, including both meeting space and the necessary technology. The inconsistent availability of this infrastructure has created disparities across the city, with some Commissions unable to implement hybrid meetings, ultimately limiting engagement from residents who rely on virtual participation. Additionally, as the Commission has repeatedly pointed out, the Office offers no centralized support for Commission websites or their administration. Without centralized website support, there is also a lack of guidance on how to ensure that websites and other electronic resources are adequately translated to meet language access needs. These issues highlight the urgent need for the Office of Advisory Neighborhood Commissions to provide consistent and reliable technological support, ensuring that all Commissions are equipped to serve their diverse communities effectively.
- **Commissioner Turnover & Loss of Institutional Knowledge:** Advisory Neighborhood Commission 4B faces significant turnover, with many of its Commissioners—including all

Executive Committee Officers—preparing to leave at the end of this term. This turnover threatens the Commission’s institutional knowledge, as departing members take valuable institutional knowledge with them with no guidance from the Office of Advisory Neighborhood Commissions about ending their service and transitioning to new Commissioners. High turnover is partly driven by the lack of centralized resources, leading to burnout among Commissioners who struggle to balance their responsibilities. The Commission urges Office of Advisory Neighborhood Commissions to track demographic data and conduct exit surveys to better understand the causes of turnover and develop more effective retention strategies, particularly for diverse or marginalized communities.

- **Barriers to Effective Grantmaking:** While recent reforms have made the Advisory Neighborhood Commission grant process more flexible, significant challenges remain due to inconsistent communications, delays, and unclear guidance from the Office of Advisory Neighborhood Commissions during the review and approval process. Advisory Neighborhood Commission 4B has faced ongoing issues with the Office’s review of grants and decisions on whether to withhold funding related to both allowed and disallowed grants. These issues have included grants being disallowed months after Commission approval and delayed or withheld Commission funding despite repeated efforts to clarify and meet the Office’s requirements. As a result, the Commission has had to budget for the possibility of grant disallowance and the withholding of funding in order to ensure financial integrity. To address these challenges, Advisory Neighborhood Commission 4B recommends creating a publicly accessible compendium of grant actions to promote transparency and consistency, establishing a formal process for resolving disagreements with the Office of Advisory Neighborhood Commissions when grants are disallowed or Commission funding is withheld, and fostering greater collaboration among the Office of Advisory Neighborhood Commissions, the DC Council, the Office of the Attorney General for the District of Columbia, and other stakeholders to clarify eligibility criteria and resolve inconsistencies in the grant process. By adopting these measures, the grant process can be made more transparent, equitable, and effective, enabling Advisory Neighborhood Commissions to better serve their communities.
- **Confusing Communication and Release of Allotments:** The Office of Advisory Neighborhood Commissions’ inconsistent communications regarding the release of quarterly allotments continues to create confusion and delays in funding. Rather than withholding a specific allotment for a specific issue related to that Quarterly Financial Report, the Office withholds funds across the board, often from another allotment, unnecessarily delaying essential funding and creating confusion. This lack of clarity and accountability not only hampers the work of Advisory Neighborhood Commissions but also illustrates the Office’s failure to provide the support necessary for Commissions to serve their communities effectively.

Rather than focusing on empowering Advisory Neighborhood Commissions, the Office of Advisory Neighborhood Commissions continues to take actions that seem aimed at creating confusion, conflict, and unnecessary complexity. Advisory Neighborhood Commission 4B continues to call for a renewed focus on empowering Advisory Neighborhood Commissions, educating them on their duties and best practices, and providing the tools and resources necessary for success. Only through such efforts can the Office of Advisory Neighborhood Commissions truly support the work of Advisory Neighborhood Commissions across the District's neighborhoods.

Advisory Neighborhood Commission 4B has voted with _ Yeas, _ Nays, and _ Abstentions to appoint the Commissioner for Single Member District 4B08, Alison Brooks; the Commissioner for Single Member District 4B03, Zurick T. Smith; the Commissioner for Single Member District 4B04, Evan Yeats; and the Commissioner for Single Member District 4B02, Erin Palmer, to be authorized to communicate this letter and represent Advisory Neighborhood Commission 4B in communication with you or any DC government entity regarding this matter. The Commission appreciates your prompt response.

Sincerely,

Alison Brooks, Chair, ANC 4B08 Commissioner
Zurick T. Smith, Vice Chair, ANC 4B03 Commissioner
Evan Yeats, Treasurer, ANC 4B04 Commissioner
Erin Palmer, Secretary, ANC 4B02 Commissioner

cc: Kent Boese, Director, Office of Advisory Neighborhood Commissions

Members, DC Council, Committee on Housing
Shawn Hilgendorf, Committee Director, DC Council, Committee on Housing

Councilmember Janeese Lewis George (Ward 4)
Emily Cassometus, Senior Counsel, Office of Councilmember Janeese Lewis George

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Enclosures