



Advisory Neighborhood Commission 4A
Government of the District of Columbia
Washington, DC 20011 and 20012

RESOLUTION #4A-10-6-20-2

**Opposing Relocation of Emergency Shelter for Persons
Experiencing Acute Mental Illness from Connecticut Avenue
to 6420 13th Street NW in Brightwood**

October 6, 2020

Introduced by Commissioner Patience Singleton, 4A04

WHEREAS, the Advisory Neighborhood Commissions (“ANCs”) are the bodies of government with the closest ties to the people and they are expected to advise the city on issues, including fees, taxes, zoning, social services programs, health, emergency preparedness, economic development, transportation and infrastructure issues;

WHEREAS, the government of the District of Columbia is required by law to give “great weight” to comments from ANCs;

WHEREAS, ANC 4A is an interested party and stakeholder. ANC 4A covers more than 16,000 DC residents and includes the Ward 4 neighborhoods of Brightwood, Colonial Village, Crestwood, North Portal Estates, Shepherd Park, and Sixteenth Street Heights;

WHEREAS, ANC 4A recognizes the need to support District of Columbia residents experiencing mental illness by providing housing and treatment options along a continuum of care, selecting the facility most appropriate to an individual’s needs;

WHEREAS, ANC 4A recognizes that DC’s single-family, low-density housing stock that is affordable for middle class families is a scarce resource;

WHEREAS, Ward 4, and Brightwood in particular, has an over-concentration of social service facilities placing disproportionate social and economic pressures on this racially and socioeconomically diverse community. This over-concentration persists, despite a commitment by the city that such services must be shared equally by all wards of the city. According to a 2010 Washington Post article, at least 84 (or 1/4th) of facilities regulated by the city’s social service agencies and 40% of facilities serving DC residents with developmental disabilities are located in Ward 4. In contrast, it is estimated that Ward 3, which is majority white and affluent, has fewer than a handful of social service facilities that place social and economic pressures on their surrounding neighborhoods.

WHEREAS, ANC 4A was informed on September 2, 2020, that Woodley House purchased a detached single family house within SMD 4A04 (6420 13th Street NW) and plans to operate Crossing Place, an 8-bed emergency shelter and crisis stabilization program for persons experiencing acute phases of severe mental illness;

WHEREAS, Woodley House has applied for a Certificate of Occupancy and license from the Department of Consumer and Regulatory Affairs (DCRA) and is seeking further certification from the Department of Behavioral Health (DBH), its current oversight agency;

WHEREAS, Crossing Place has operated successfully at 2731 Connecticut Avenue for more than 40 years. The only other private emergency shelter, housing a psychiatric stabilization program, Jordan House, is located on North Capitol Street. Both programs have been able to offer a welcoming home-like environment for residents needing to recover from a mental health crisis while located in townhomes along heavily trafficked and mixed-use corridors for decades;

WHEREAS, clients remain at Crossing Place from 2 to a maximum of 14 days, this facility is distinguished from Woodley House's two traditional group homes (Valenti House and Holly House) where the residents remain for extended periods of time and are often integrated into the community;

WHEREAS, Crossing Place serves between 150 and 200 clients annually who are admitted 24 hours a day. Woodley House declined to address concerns that patients would arrive via emergency vehicle at 3 am or that the site could be frequented by emergency vehicles, indicating that increased emergency vehicle traffic is an expected impact of their operation, regardless of where they are located;

WHEREAS, the proposed Crossing Place location is less than 500 feet from a group home, which would not only increase the concentration of such facilities in Ward 4, and the attendant social and economic pressures, but particularly in this area of Brightwood.

WHEREAS, Woodley House, Inc. has not given a consistent or convincing reason for the proposed relocation of Crossing Place from a major street in the mostly white and affluent Ward 3 to quiet residential street in a predominately black neighborhood in Ward 4. The corporation initially claimed that the move was precipitated because when they remodeled the property "some years ago, [they] lost valuable common area space and wanted a home that will be more comfortable for the people we serve." Leadership of the organization has most recently claimed that the basis for relocating is to obtain more Medicaid funding made available under a new DC Department of Behavior Health rule under the 1115 Initiative for expanded Medicaid services;

WHEREAS, Woodley House has been secretive in its approach and dismissive of the concerns of residents and our community leaders and declined to answer many of the most-pressing questions posed by ANC 4A commissioners and community members,

- They did not address the safety concerns people in the community expressed, such as questions about frequent arrivals of emergency vehicles, staff and resident turnover, logistics for accommodating family visits (parking, traffic, etc.), and key safety issues, including whether patients would be accompanied by staff when leaving the facility.
- They will not provide information on funding from the DC Department of Behavioral Health (DBH).
- The Executive Director claimed that many of the clients were professionals and students and that if the facility was located in Beverly Hills, it would be considered a “spa.” Less than 2 weeks later, they sent a letter acknowledging that 62% of the clients are formerly homeless, many have criminal records, and often return to other shelters after discharge.
- They did not respond to requests for information about the relative number of Ward 4 individuals treated versus other wards to support claims that this location helps keep residents in their communities or is more convenient;

WHEREAS, Woodley House has repeatedly misrepresented the nature of the facility and not been transparent about the type of facility planned for this location. For instance,

- Staff removed the words “emergency shelter,” “acute,” and “crisis” from its website describing Crossing Place after receiving questions from ANC 4A commissioners and officers of the Brightwood Community Association about whether the facility was an emergency shelter. Despite having had these terms on its website for a number of years, staff feigned ignorance about those terms having been used to describe Crossing Place, calling it an oversight. This is simply not credible.
 - Emergency shelters are a different class of facility for which this property is not zoned for 8 beds.
 - The American Psychological Association’s *Report and Recommendations Regarding Psychiatric Emergency and Crisis Services* (2007) does not contemplate placement of an emergency psychologic residential facility in a low density neighborhood, supports that a psychiatric emergency involves a risk of harm to self or harm to others, and indicates that assaultive behavior should be anticipated in even the lowest level of care for a psychiatric emergency;

WHEREAS, Woodley House has been evasive when asked about the legal basis for their alleged Matter of Right to occupy the property as an emergency shelter for the stabilization and short-term treatment of transient persons who are experiencing an acute episode of severe mental illness;

WHEREAS, Woodley House, Inc. has not addressed, nor alleviated, concerns that residents have raised about safety. The facility will not be locked, according to the Executive Director, but will have sensors on all doors that alert staff should a patient

leave unexpectedly. They initially claimed that no clients are allowed to leave the premises unaccompanied. However, they later noted that clients are allowed to venture outside of the facility unaccompanied after two days, regardless of whether the client has attained a stable mental health status. They also acknowledged that police have been called to the property on numerous occasions at the current Connecticut Avenue address for missing clients;

WHEREAS, Woodley House has declined to answer questions about and assure the community that there are no conflicts of interests between the developer, realtor, Board members or staff in the selection and/or purchase of this property. Woodley House paid \$1.2 million for the home in SMD 4A04, which is almost \$300,000 more than other recently sold and renovated homes in the immediate area and reportedly sold the Connecticut Avenue property for \$1.5 million;

WHEREAS, the relocation of Crossing Place from Woodley Park to Brightwood raises important racial and social justice issues that the District of Columbia should weigh heavily in considering whether the proposed location is appropriate for the proposed activity, equitable for the residents of Brightwood, and in line with the city's development plan;

THEREFORE, BE IT RESOLVED, Advisory Neighborhood Commission (ANC) 4A opposes the proposed relocation of Crossing Place from a busy mixed-used corridor in Ward 3 to a quiet residential neighborhood in Ward 4. A residential street in Brightwood is not the appropriate place for an emergency shelter which operates as a 24 hour a day business;

BE IT FURTHER RESOLVED, Woodley House reconsider its decision to relocate the psychiatric stabilization program in the middle of a residential community given issues surrounding social equity and the appropriateness of the facility;

BE IT FURTHER RESOLVED, that DCRA decline to issue the Woodley House a Certificate of Occupancy as a community based residential facility until all zoning issues are resolved;

BE IT FURTHER RESOLVED, that DBH decline to certify Crossing Place as a psychiatric stabilization program at 6420 13th Street NW;

BE IT FURTHER RESOLVED, that the DC Council consider legislation that would prevent concentration of social service facilities in certain communities as a social equity issue. Allowing the concentration of such facilities in communities of color further exacerbates historic economic and development inequalities;

BE IT FURTHER RESOLVED, that Commissioner Patience Singleton, ANC 4A04, is hereby authorized to serve as the Commission's representatives in all matters relating to this resolution.

ADOPTED by unanimous vote at a regularly scheduled public meeting (notice of which was properly given, and at which a quorum of six of seven members was present) on October 6, 2020, by a vote of 6 yes, 0 no, 0 abstain.

Respectfully submitted,

Gale B. Black (signed manually)

Gale Black
ANC4A Chair

Cc: Honorable Muriel Bowser, Mayor
Councilmember Brandon Todd, Ward 4
Department of Behavior Health
Department of Consumer and Regulatory Affairs
Councilmember Robert White, At-Large
Councilmember Anita Bond, At-Large
Councilmember Elissa Silverman, At-Large