

December 3, 2020

Hon. Phil Mendelson
Chairman, Committee of the Whole
Council of the District of Columbia
1350 Pennsylvania Ave, NW
Washington, DC 20004
Via [REDACTED]

RE: In support of swift adoption of B23-736; recommended revisions to long-term affordability references to align with current DC law, official practice, and policy

Dear Chairman Mendelson:

Thank you for holding the hearing on B23-736, the Comprehensive Plan Amendment Act, on November 12 and 13. We want to reiterate our strong support for swift adoption of the Comp Plan. To delay past early 2021 will cause great harm to the city by continued delay of hundreds of affordable housing projects waiting at the Zoning Commission; impeding new land use policy goals of 15% affordable housing in each planning area in the city; stalling expanded housing capacity near transit, which is complemented by an expanded affordable housing IZ requirement.

If amendments are to be made to the April draft of the Comp Plan, we wish to propose the following, detailed below. These changes are consistent with much of the testimony heard at the hearing expressing a desire to strengthen the Comp Plan's policy commitments to preventing displacement of low-income residents and sustain affordable housing investments to ensure that a diversity of housing opportunities can be available to low and moderate income households across the city over time.

We especially want to associate ourselves with and endorse the testimony and follow up letter from the Douglass Community Land Trust.

The Comp Plan makes several references to the desirability of permanent affordability terms for affordable housing investments. However, it fails to accurately account for current DC law, policy and practice. We recommend correcting those references so that they align with, and build on the current state of practice in the District. The following cite specific sections of the April 2020 Comp Plan draft, and provide comments and alternative language.

1. Regarding Section 307.12 Policy LU-1.4.3: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations – revise to accurately reflect DC law, policy and practice.

307.12 Policy LU-1.4.3: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations
Explore mechanisms to encourage permanent affordable rental and for-sale multi-family housing adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. 307.12

Comment: While we concur that we should support permanent affordability (especially near Metro stations), this statement fails to refer to existing District policies and practices. We recommend updating this statement to accurately reflect current law and official practice. To state that the District should “explore mechanisms to encourage” ignores existing DC law and District government policy and practice. The District should build on and expand the use of current mechanisms. The District has experience with several permanent affordability mechanisms, thus it is far past the stage of “exploring.”

Revision 1: We recommend the following revision (in ALL CAPS and yellow highlighter):

307.12 “~~Explore mechanisms to encourage~~ CONTINUE TO EXPAND THE USE OF PERMANENT AFFORDABILITY MECHANISMS IN THE CONSTRUCTION OF affordable rental and for-sale multifamily housing adjacent to Metrorail stations,...”

Further evidence to justify this revision:

Beyond the DC Zoning Commission’s decision to establish “life of the development” as the affordability term for Inclusionary Zoning units in 2006, the DC Council and Mayor have acted since then several times to use additional mechanisms for permanent affordability. For example, one permanent affordability requirement enacted into law by the DC Council is for the sale of public land, which sets aside 20-30% of units as affordable. The DC Code states:

DC Code § 10–801. Authorization; description of property; submission and approval of resolution; reacquisition rights; notice.
(b-3)(1)(C) The units dedicated as affordable housing pursuant to subparagraphs (A) and (B) of this paragraph shall remain affordable-housing units for the life of the ground lease if the land disposition is by ground lease, or shall remain affordable-housing units in perpetuity, secured by a covenant running with the land that may be extinguished at the sole discretion of the District;

Another official practice by the District government is found in DHCD funding proposal evaluations. For example, the [DHCD 2019 Consolidated Request for Proposals for Affordable Housing Projects](#) scoring process strongly encourages “permanent, perpetual affordability” by awarding maximum points to applications that propose in perpetuity terms for the affordable units. DHCD’s Requests for Proposals over the past several years have awarded maximum points to applications, and the majority of projects selected, with these criteria:

16. Affordability Period Restriction (maximum 5 Points) Applications documenting that the owner will maintain the low-income units in compliance for a designated period beyond the affordability period required by the requested funding source will be awarded prioritization scoring points. Maximum points will be awarded to projects that commit to affordability in perpetuity.

5 points = Applicant commits to placing a permanent, perpetual affordability covenant on the property.

2 points = Applicant commits to a 60-year affordability period or longer.

1 point = Applicant commits to a 50-year affordability period or longer.

0 points = The project will meet minimum required affordability period.

2. Regarding section 510.9 Policy, H-2.1.5: Long-Term Affordability Restrictions – correct to accurately reflect DC law, policy and practice. Current language:

~~509.9~~ 510.9 Policy H-2.1.5: Long-Term Affordability Restrictions

~~Ensure that a~~ Affordable housing units that are created or preserved with public financing ~~are~~ **should be** protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by ~~federal~~ ~~programs~~ program requirements, affordable units should remain affordable for ~~the life of the building~~ **as long as possible and align with the length and magnitude of the subsidy. For land disposition and affordable housing tied to zoning relief, affordability should last for the life of the building**, with equity and asset build up opportunities provided for ownership units. ~~509.9~~ 510.9

Comment: We recommend revising this language to better reflect current DC policy, law and practice. The affordability term for inclusionary zoning is “life of the development,” and “in perpetuity” for affordable units in public land dispositions, as established in law. Further, in perpetuity is strongly prioritized in DHCD funding criteria. We recommend that this section also provide clearer references to shared equity approaches for homeownership, and landleases as long-term affordability restrictions currently used in DC as tools that should be supported and expanded.

The removal of the current IZ standard of “life of the building” and replacement with “as long as possible” is a retreat from current law and practice. We recommend not weakening and undermining current law and practice, but affirming and building on it. The section introduces

new qualifications for long-term affordability mechanisms which have already established in DC law, suggesting that the length of the affordability term be aligned with the “magnitude of the subsidy.” This new qualification undermines current law and practice that balances the goal of long-term affordability with the willingness of developers to agree to long-term affordability restrictions. The section further recommends that a land disposition last for the life of the building -- which contradicts current law enacted by the DC Council and Mayor, which requires that public land dispositions preserve the affordability of units for in perpetuity. As the proposed language undermines current DC law, policy and practice, we recommend that it be revised.

Revision 2: We recommend the following, using **yellow highlights** for our additions or restorations, **ALL CAPS** are new additions, and double strikethroughs for deletions.

509.9 510.9 Policy H-2.1.5: Long-Term Affordability Restrictions

~~Ensure that a~~ Affordable housing units that are created or preserved with public financing ~~are~~ **should be** protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by ~~federal~~ **programs** program requirements, affordable units should remain affordable for **the life of the building** ~~as long as possible and align with the length and magnitude of the subsidy.~~ **For land disposition and affordable housing tied to zoning relief, affordability should last IN PERPETUITY,** for the life of the building **OR A SIMILAR PERMANENT AFFORDABILITY TERM ACCORDING TO CURRENT LAW, POLICY OR BEST PRACTICE.** ~~with equity and asset build up opportunities provided F~~ **FOR OWNERSHIP UNITS, INCLUDING FEE SIMPLE, LIMITED EQUITY CO-OPERATIVES, AND COMMUNITY LAND TRUST OWNERSHIP MODELS USING LANDLEASES, AND COVENANTS, SHARED EQUITY AND ASSET BUILDING OPPORTUNITIES SHOULD BE PROVIDED, IN ADDITION TO CONTINUED HOMEOWNER SUPPORT THROUGH THE PROVISION OF ONGOING STEWARDSHIP SERVICES.** ~~509.9 510.9~~

3. Restore and update policy support for land trusts in Section 504.24 Action H-1.2.G

Currently deleted in April 2020 draft:

~~504.24 Action H 1.2.G: Land Trusts Support the formation of one or more community land trusts run by public, nonprofit, or other community based entities. The mission of the trust would be to acquire land while providing long term leases to developers of rental and for sale units. This approach helps ensure that the units remain affordable indefinitely. **Completed – See Implementation Table. 504.24**~~

We recommend restoring and updating this Action to reflect today’s reality that the Douglass Community Land Trust (Douglass CLT) has been incorporated to operate District-wide, and is actively acquiring and managing property. While it’s a major advance for the District to host a growing Community Land Trust, Douglass CLT needs continued official policy support in order

to reach scale and deliver on its mission to provide lasting community assets and build assets for households, while supporting the District's affordability goals and drive toward racial and economic equity. Community Land Trusts should be regarded as an active tool to help fulfill the District's affordable housing and anti-displacement goals, rather than be considered a one-time action that has been completed. Successful CLTs operate in partnership with municipal government, and restoring language around CLTs to the Comp Plan is fundamental to that partnership.

Revision 3: We recommend the restoration and updating of Action H-1.2.G:

504.24 Action H-1.2.G: Land Trusts

Support ~~the formation of one or more~~ community land trusts (CLTs) **IN THEIR ONGOING EFFORTS TO PRODUCE, SECURE AND STEWARD AFFORDABLE RENTAL AND OWNERSHIP HOUSING AND COMMERCIAL SPACES THAT WOULD** ~~run by public, nonprofit, or other community based entities. The mission of the trust would be to acquire land while providing long term leases, to developers of rental and for sale units. This approach helps ensure that the units remain affordable indefinitely~~ **IN PERPETUITY, PREVENTING THE DISPLACEMENT OF CURRENT AND FUTURE DISTRICT RESIDENTS AND BUSINESSES. CLTS PROMOTE RACIAL AND ECONOMIC EQUITY THROUGH THE ACQUISITION AND CONTINUED OWNERSHIP OF LAND, MAINTENANCE OF AFFORDABILITY BY COVENANT, OR SIMILAR LEGAL MECHANISM. A CLT HAS (1) A CHARITABLE PURPOSE CONSISTENT WITH ONE OR MORE OF THE CHARITABLE PURPOSES SET FORTH IN 26 U.S.C. § 501(C)(3); (2) A MEMBERSHIP OPEN TO LESSEES OF CLT PROPERTY AND TO COMMUNITY REPRESENTATIVES FROM THE NEIGHBORHOODS IT SERVES, AND ENTITLED TO ELECT A MAJORITY OF THE SEATS ON THE BOARD OF DIRECTORS AND APPROVE AMENDMENTS TO THE ORGANIZATION'S BYLAWS; (3) A THREE-PART BOARD OF DIRECTORS COMPOSED OF EQUAL NUMBERS OF (I) CLT LESSEES, (II) COMMUNITY REPRESENTATIVES; AND (III) ANY OTHER CATEGORY OF PERSONS DESCRIBED IN THE BYLAWS OF THE ORGANIZATION; AND (4) USES A MODEL THAT SERVES THE WIDEST GROUP OF LOW TO MODERATE INCOME DISTRICT RESIDENTS AND PROMOTES THE EFFICIENT USE OF MUNICIPAL RESOURCES THROUGH ECONOMIES OF SCALE.**

4. Improve policy support for co-operatives and co-housing

Current language:

Section 505.10 Policy H-1.3.4: Co-operatives and Co-housing

Encourage cooperatives, shared housing, and co-housing (housing with private bedrooms, but shared kitchens and common areas) as a more affordable alternative to condominiums. Explore how both housing types might support multi-generational households. ~~Such~~ housing ~~is~~ **should be** appropriately regulated to avoid adverse effects on surrounding residences and neighborhoods. 505.10

We strongly support shared equity housing approaches such as limited equity co-operatives, and believe they should be paired with technical assistance and capacity support, items not mentioned in Section 505.10. Rather it calls for them to be “appropriately regulated” to avoid “adverse effects on surrounding residences and neighborhoods.” This negative language suggests the District’s role in support of co-ops lies largely in enforcement. We suggest the policy take a more supportive tone to ensuring the success of co-operatives and co-housing.

Revision 4:

Section 505.10 Policy H-1.3.4: Co-operatives and Co-housing

Encourage cooperatives, shared housing, and co-housing (housing with private bedrooms, but shared kitchens and common areas) as a more affordable alternative to condominiums. Explore how both housing types might support multi-generational households. ~~Such~~ housing ~~is~~ **should be** ~~appropriately regulated to avoid adverse effects on surrounding residences and neighborhoods~~ **SUPPORTED TO ENSURE THE SUSTAINABILITY OF THE QUALITY OF MODERATE AND LOW PRICED HOUSING, AND ITS VALUE AS A SHARED EQUITY INVESTMENT FOR MEMBER/OWNERS.** 505.10

Conclusion

Thank you for considering our proposed amendments. As we have testified, we urge the Council to adopt the April draft Comp Plan amendments *without delay*. More harm is done by delaying implementation of the proposed update than is gained by perfecting every cause in this update cycle.

Sincerely,



Cheryl Cort
Policy Director

Testimony before the Hon. Phil Mendelson, Chairman
Committee of the Whole, Council of the District of Columbia

Regarding: **Support** for Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

By Cheryl Cort
Policy Director
November 12, 2020

Good morning, my name is Cheryl Cort and I am the Policy Director for the Coalition for Smarter Growth. We are members of the Housing Priorities Coalition, which has engaged in this process since it began four years ago. Together, we have urged the DC Council to pass the Comp Plan without delay.

The plan makes clear commitments to racial equity, equitable distribution of affordable housing, and expanded housing opportunities around transit. This update is urgently needed to encourage more inclusive neighborhoods, and begin to address the gaping racial disparities in housing and economic opportunity. Even now, more than a thousand affordable homes are stuck at the Zoning Commission, waiting for changes in the Comp Plan to move forward.

Some critics say that we need more public process. But we have had extensive public engagement over the last four years. CSG is committed to good public process, and the process has been robust and multifaceted. I’ve attended many of the meetings all over the city - from Deanwood to Tenleytown. Office of Planning provided additional outreach and extended comment deadlines. To let this process go on indefinitely – beyond four years and counting – is a disservice to the efforts of so many residents, ANC Commissioners and stakeholders who have been involved.

Our 2006 Comp Plan is woefully out of date and fails to give us the guidance we need to build a more just recovery, and address a legacy of discriminatory land use practices that have denied wealth, opportunity, and even health, to Black and Brown residents. The updated Comp Plan proposes to increase and equitably distribute housing options across the District, including setting goals for building more affordable homes in currently exclusive neighborhoods.

The Future Land Use Map (FLUM) changes are also crucial to our city’s ability to address future housing needs, and leverage new opportunities to create affordable housing. The map changes provide 15% more housing capacity, focused around transit stations and corridors. Complementing these map changes is the Expanded Inclusionary Zoning proposal at the Zoning Commission. This would require up to 20% set aside of affordable IZ units in the case of an upzoning. Given the potential increased value created by the map changes, the 20% set aside is a value capture policy that combines needed increases in housing capacity with additional affordability.

We are deeply concerned that the Comp Plan bill review could slip into next year and mean even greater delay. We need the plan update now to help guide city actions to foster a just recovery, restart stalled affordable housing plans, and guide more equitable affordable housing opportunities across the city into the future.

We urge you to pass the bill this calendar year.

Thank you for your consideration.



Alex Baca
Greater Greater Washington
Testimony to Committee of the Whole
Comprehensive Plan Amendment Act of 2020—B23-736
Nov. 12, 2020

Good morning. My name is Alex Baca, and I am testifying on behalf of Greater Greater Washington. GGWash has been engaging our supporters with the Comprehensive Plan amendment process since it began in 2016. We so appreciated the Council's dedication to passing the revised Framework element in October 2019, and are asking you now to pass OP's amendments to the remainder of the Comp Plan, which reflect the revised Framework, by the end of the year.

Our asks of the Council are informed primarily by what comprehensive plans are, and what they can do. Comp plans are fairly typical documents that guide, not regulate, general land-use protocols. The Comp Plan on its own cannot make housing more affordable, or stop displacement, but what it says is a necessary precondition to the legal or fiscal actions that may attempt to do so. Given that the District's high housing prices, low housing supply, and what will surely be a protracted recovery from Covid-19 will require close attention, passing amendments to the 2006 plan as soon as possible is the most productive action we can take right now.

There are few conflicts between the District's Comp Plan and *housing* policy. For example, GGWash is a member of the Reclaim Rent Control coalition. We have consistently testified in support of more funding for affordable housing and community planning, and will be testifying in support of expanded inclusionary zoning at the Zoning Commission on Monday. None of these things are prevented by the Comp Plan.

The Comp Plan does not influence housing policy generally, but land-use regulations specifically. The nexus of the Comp Plan and what happens with housing is *zoning*, and zoning reform is not in front of us today. Office of Planning's amendments are.

We support OP's amendments, not because they are the objectively best language—anyone that knows me knows that I can redline a document—but because it is unconscionable to extend this process further when the Comp Plan is supposed to be fully updated, not amended, every decade. I hope the council will consider procedural reforms to clarify when the Comp Plan is rewritten or amended, and what we as residents can expect when that happens.

I understand why the Comp Plan garners so much attention. Though this is an amendment cycle, most participants in the process have experienced it as a full rewrite, because of its length and level of detail. The budget is challenging, and regulations are opaque, but the Comp Plan—which is more editorial than any other jurisdiction’s comprehensive plan that I’m familiar with—says all sorts of things that resonate with us. Governance doesn’t really happen via prose, but the Comp Plan is prosaic. In that way, the 2006 document is problematic. It has misled many participants in this process into thinking that it, and amendments to it, can do more than is legally possible.

Still, I have come to love this doorstep of a document. I’ve read all of it. I have the Generalized Policy Map and the FLUM hanging in my home, which is bizarre to people who are not particularly concerned with the vagaries of the District’s planning and development regime.

Many people who *are* concerned about those things, though, are in this room today. So many of us are nearly stock characters: We reliably come to these hearings, and ask for meetings, and send our opinions, mostly unbidden, to our ANCs and councilmembers and listservs.

But *a/so* on the witness list are a number of residents who are speaking directly to their elected officials for the first time about what they’d like to see in their neighborhoods and their city. Their support for the amendments in front of us today, and their sense of urgency—not mine—is what I hope you take into account.



Comments and Ephemera

***Re: B23-736,
“The Comprehensive Plan Amendment Act of 2020”***

Submitted for the record by Greater Greater Washington, on behalf of our organization and supporters,
December 3, 2020

Dec. 3, 2020

Dear Chairman Mendelson and the Committee of the Whole,

Please find attached a compendium of testimony, comments, and other written demonstrations of in support of Office of Planning's amendments to the Comprehensive Plan specifically, and a desire for an increase in density, particularly residential, through the Comp Plan and the Future Land Use Map, more generally. I am submitting this for the public record for B23-763, the Comprehensive Plan Amendment Act of 2020, on behalf of GGWash and our supporters.

GGWash is requesting that you:

- Pass Office of Planning's amendments, with which we fully agree, as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

GGWash intentionally solicited comments in support of the Comp Plan from residents of planning areas which have not historically built more housing, or more affordable housing. Our organizing was not intended to be an "all eight wards" exercise, but, rather, a demonstration of a desire for increased density and the language that enables the construction of more housing and more affordable housing in, particularly, Rock Creek West, Near Northwest, and Capitol Hill. More information on this document and our organizing methodology can be found on page 5.

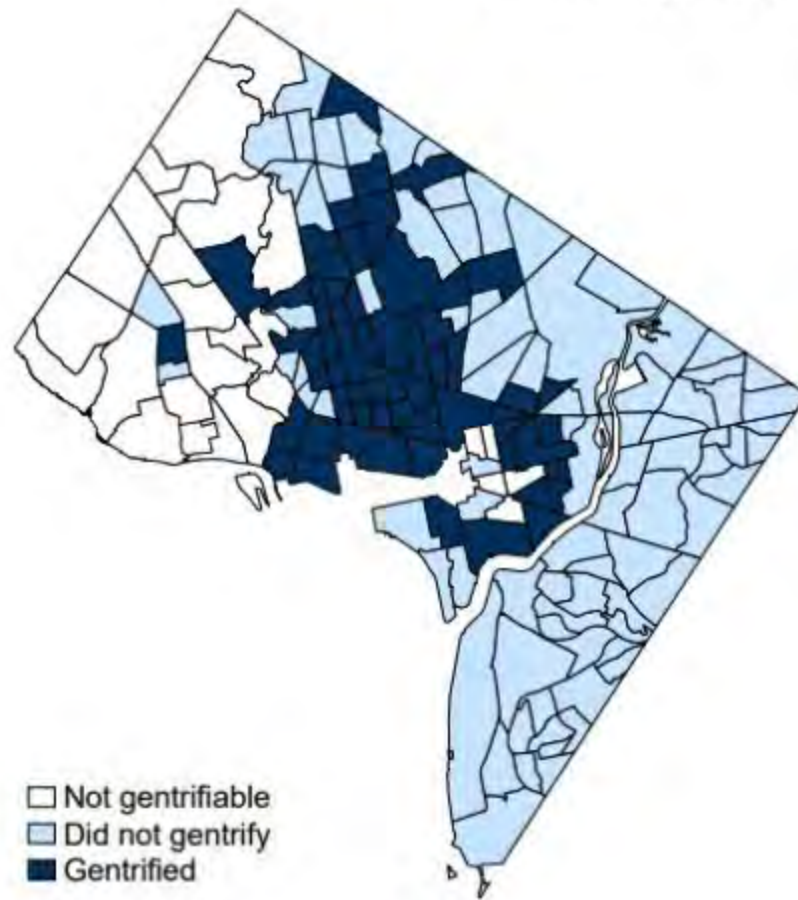
We believe that the rising cost of homes in the District, alongside the displacement of longtime residents, can be largely contributed to the existing planning regime, which enabled the development that has occurred to proceed in areas where residents are economically and socially vulnerable. A 2019 study by authors Quentin Brummet and Davin Reed, which concludes that the District is the most gentrified city in America, includes a map (see right) that identifies the eastern third of the District as "did not gentrify," the center of the District as "gentrified," and the upper western third as "not gentrifiable."

GGWash has always supported development in those neighborhoods that are "not gentrifiable," and now supports development in the neighborhoods that have "gentrified," so as to prevent displacement to the maximum extent possible in the neighborhoods that "did not gentrify."

We believe that Office of Planning's text amendments and FLUM amendments steer our future in that direction, and that OP has conducted a commendable outreach process on these amendments. However, we do not expect the Council to rubber-stamp them. In your review, I hope that this document is useful to you.

Thank you,
Alex Baca
Housing Program Organizer
Greater Greater Washington

Washington, DC



Brummet, Quentin and Reed, Davin, *The Effects of Gentrification on the Well-Being and Opportunity of Original Resident Adults and Children* (2019-07-16). FRB of Philadelphia Working Paper No. 19-30, Available at SSRN: <https://ssrn.com/abstract=3421581> or <http://dx.doi.org/10.21799/frbpwp.2019.30> / see <https://ggwash.org/view/73267/on-average-gentrification-helps-people-but-that-doesnt-mean-its-not-painful-for-some#:~:text=Authors%20Quentin%20Brummet%20with%20NORC,of%20original%20residents%20and%20children>

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About this document

In this document, you'll find nearly 300 petition signatures collected by GGWash in support of the aforementioned requests. We also asked District residents to write the Council at two distinct points: following the release of the Office of Planning's housing targets and amendments to the Comp Plan in October 2019 and up to the Nov. 12 and 13, 2020, hearing.

Emails on which we were copied have been compiled here. Some individuals wrote to the Council following both our calls-to-action, and submitted their own written testimony to the Committee. They are presented here to demonstrate our active solicitation of and engagement with people who have used GGWash's asks as guidance.

We do not take lightly requesting that people email their elected representatives, and deliberately structured our asks to be clear, easy to understand, and as aligned as possible so as to simplify the markup process. I have read the full text of the 2006 Comprehensive Plan, Office of Planning's amendments, and its rationale for adopting or rejecting suggestions from the public and Advisory Neighborhood Commissions. This is well within the scope of my role as GGWash's housing program organizer; it is not an expectation that anyone should have of the typical District resident. That said, I believe GGWash has made a concerted effort to communicate its interpretation of the Comp Plan and proposed amendments through our publication and other communications. The participation documented here was done honestly and in good faith, with those engaging fully aware of GGWash's stance.

While the Office of Planning's changes to the Future Land Use Map are not the extent of the agency's proposed amendments, I suspect that they are top-of-mind for many people who have submitted testimony to the Committee of the Whole up to this date, because density and development, two politically fraught topics, are inextricably linked. In messages where it is not explicitly stated, I think it is reasonable to interpret calls for more housing, and more affordable housing, as calls for both more density and more funding to subsidize or stabilize it. I do acknowledge that the Comp Plan can only address the former, and have therefore emphasized changes to the text or FLUM.

Our asks are written so as to not preclude language that expands upon the Office of Planning's proposed amendments. We are supportive of, if the Council finds it appropriate, strengthened language for specific anti-displacement measures, including the development of public housing and affordable housing, even while acknowledging that the largest components of implementing programs are budgetary and legislative, not precatory language in an enabling document.

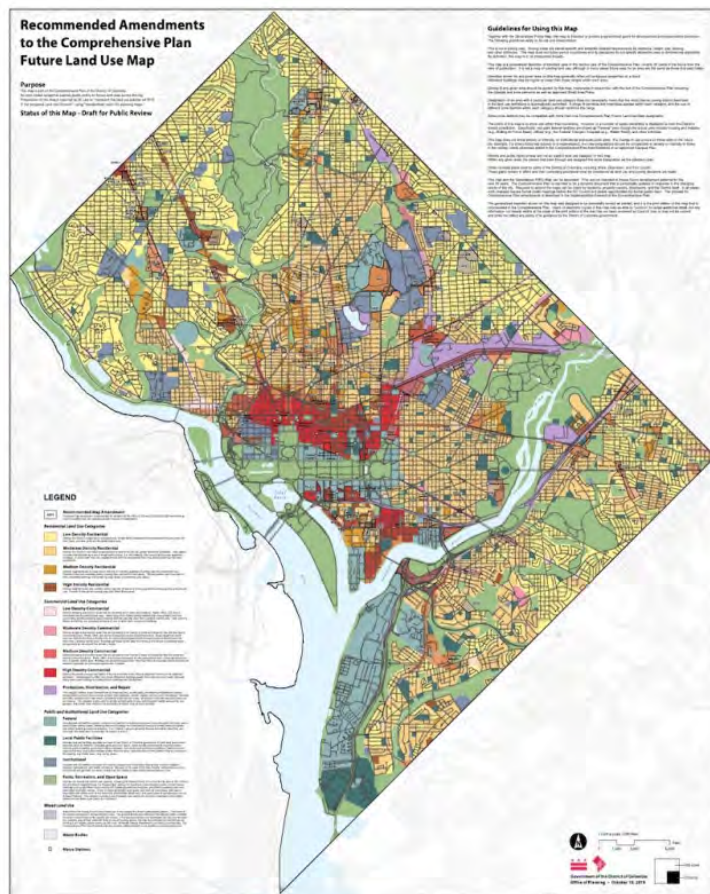
Overall, this should effectively demonstrate that GGWash's asks are supported by those who live in the neighborhoods where the built environment should change the most. This is the most effective way to begin to rectify the District's history of uneven development, and aligns with where Office of Planning has suggested that housing density should increase, in both its proposed amendments, its Housing Framework for Equity and Growth, and its single-family housing report. Further, many of those asks come alongside request for more affordable housing, which I hope the Council will be mindful up in future deliberations relevant to that topic.

—Alex

Tell the DC Council to pass the Comp Plan ASAP!

On Nov. 12, the DC Council will hold a [hearing on amendments](#) to the remainder of the 2006 Comp Plan. We need your help to get the Comp Plan passed by the end of the year, with [Office of Planning's amendments intact](#), and to ask the council to institute [procedural reforms](#) that will ensure that, the next time the Comp Plan is revised, it's done so in a predictable, transparent, and timely manner.

Greater Greater Washington has organized supporters like you around amending the 2006 Comp Plan to allow for more housing, more affordable housing, and fairer development in the District [since 2016](#). Last October, [the council passed a revised Framework element](#) that prioritizes affordable housing and anti-displacement measures while [encouraging](#) evenly distributed new growth and development.



Now, we're closer than ever to a fully amended version of the existing Comp Plan. [Proposed amendments](#) shown on the map to the right, the Future Land Use Map, [increase density and allow for more development](#) in the [affluent, whitest parts of the District](#), like [Rock Creek West](#) and Capitol Hill. **This, and the elimination of language that "protects" and "conserves" these areas, is what GGWash is fighting to keep and expand. Sign your name below to tell the council to pass amendments like these intact by the end of the year.**

Here's what GGWash will be asking councilmembers to do before, during, and after the Nov. 12 hearing:

- Pass Office of Planning's amendments, with which we fully agree, intact by the end of 2020
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Here's how you can get involved:

- Sign this petition!
 - [Sign up to testify](#) at the Nov. 12 hearing, or plan to submit written testimony.
 - Email Chairman Phil Mendelson (_____ your councilmember (look them up [here](#)—scroll down), and the at-large councilmembers to ask for the above directly, in your own voice. Speaking directly to your elected representatives about what you care about in your neighborhood makes an even greater difference than signing a petition.
-

Adding your name to this petition will also enable us to contact you directly about the Comp Plan, keep you updated on what's going on, and help you out with your testimony and your personal emails.

You can read GGWash's coverage of the past four years of Comp Plan work [here](#). (Need a primer? [We've got a few](#).) You can read more about our plans for Comp Plan advocacy through the end of the year [here](#). Please send any questions or comments to Alex Baca at abaca@ggwash.org. Thank you!

1. Chris Adams, 6601 6th St NW
2. Katherine Ahern, 500 25th Pl NE Apt 102
3. Thomas Antonsen, 3010 Wisconsin Ave NW Apt 404
4. John Aranguren, 1815 Ingleside Ter NW
5. Kyle Arbuckle, 933 M St NW Apt 3
6. Scott Archer, 1615 Q St NW Apt 1109
7. Regina Arlotto, 123 Kentucky Ave SE
8. Michael Armesto, 2323 Sherman Ave NW
9. Jacques Arseneault, 1300 36th St NW
10. Daphna Atias, 4501 Connecticut Ave NW Apt 501
11. Richard Auxier, 916 French St NW
12. Natalie Avery, 1838 Monroe St NW
13. Gavin Baker, 746 Kennedy St NE Apt 3408
14. Jon Balcom, 600 Girard St NE None
15. Dale Barnhard, 2639 I St NW Fl 1
16. Ellen Bass, 3600 Cumberland St NW
17. Katherine Beckman-Gotrich, 4932 Sargent Rd NE
18. Eric Behna, 2520 13th St NW Apt 3
19. Jacob Berg, 1311 Jackson St NE
20. Max Bergmann, 135 Tennessee Ave NE
21. Benjamin Bergmann, 4201 Cathedral Ave NW Apt 123E
22. MacKenzie Bills, 1614 17th St NW Apt 703
23. Claire Bloch, 3525 Ordway St NW
24. Alex Block, 1314 L St SE
25. Liz Borkowski, 2750 14th St NW Apt 401
26. Edward Borrego, 1812 Varum St NE
27. Andrew Bossi, 1001 4th St SW # 2
28. Patrick Boynton, 1401 S St NW Apt 501
29. Tom Bridge, 1621 Monroe St NE
30. Timmy Broderick, 3060 16th St NW Apt 701
31. Shaun Brodie, 100 Florida Ave NE
32. Colin Browne, 4325 22nd St NE
33. Chris Bryan, 1000 New Jersey Ave SE Apt 712
34. Jamie Butler, 3611 Kanawha St NW
35. Ed Carley, 1613 Harvard St NW Apt 515
36. Lisa Carr, 3601 Connecticut Ave NW Apt 402
37. James Carrington, 3208 38th St NW
38. Laurence Caudle, 1023 31st St NW
39. Rishi Chakrabarty, 1357 Taylor St NW
40. Brian Chamowitz, 1328 Newton St NE
41. Adam Chamy, 3668 Warder St NW
42. Keya Chatterjee, 1212 Wylie St NE
43. Daniel Chen, 1220 Fairmont St NW
44. Garret Christensen, 3447 17th St NW
45. Payton Chung, 560 N St SW
46. Rob Cline, 1926 38th St NW
47. John Clinton, 2030 Flagler Pl NW Bsmt
48. Yolanda Cole, 1023 31st St NW
49. Emily Conrad, 804 Taylor St NW
50. Laura Cook, 1444 Ogden St NW Apt 201
51. David Cooling, 4527 Windom Pl NW
52. Robert Coomber, 425 21st St NE
53. Henry Coppola, 2434 Monroe St NE
54. Dan Cox, 3128 Patterson Pl NW
55. Dan Crawford, 525 Park Rd NW
56. Meg Dallett, 419 Gallatin St NW
57. Kamolika Das, 3520 39th St NW
58. Colin Davis, 524 13th St NE Apt 25
59. Linnet Davis-Stermitz, 1246 Columbia Rd NW Apt 2
60. Joey De St. Aubin, 3610 18th St NE
61. William Dean, 907 Constitution Ave NE
62. Andrew DeFrank, 920 French St NW
63. Patrick Dennis, 1400 Constitution Ave NE
64. Genevieve Denoeux, 4800 Georgia Ave NW
65. Peter Denton, 1013 E St NE
66. Matthew Dickens, 17 Adams St NW
67. Alexandra Dickson, 490 M St SW Apt W810
68. Michael Donaher, 3310 Porter St NW
69. Robb Dooling, 1350 Maryland Ave NE Unit 507
70. Randy Downs, 1425 17th St NW Apt 502
71. William Dozier, 1117 10th St NW Apt 1011
72. Paula Dyan, 3210 Wisconsin Ave NW Apt 706
73. David Edmondson, 1575 Spring Pl NW Apt 25
74. Michael Eichler, 806 Rhode Island Ave NW # 1
75. Juliet Eldred, 1441 Euclid St NW Apt 301
76. Matthew Erickson, 128 U St NE # 1
77. Elisabeth Ericson, 2027 Park Rd NW Apt B
78. Ryan Eshelman, 3319 Nash Pl SE
79. Robert Eubank, 632 Morton Pl NE
80. Terri Evans, 3473 Summit Ct NE
81. George Fagan, 1527 Park Rd NW Apt B1
82. Amanda Farnan, 2112 8th St NW
83. Meghan Faulkner, 1803 Biltmore St NW Apt 809
84. Michael Feldgarden, 1750 P St NW Apt 701
85. Aaron Fernandez, 503 E Capitol St SE
86. Adam Ficke, 3615 New Hampshire Ave NW
87. Eric Fidler, 2010 5th St NW
88. Matthew Fiedler, 1415 21st St NW Apt 2D
89. Thomas Fine, 4449 Faraday Pl NW
90. Robert Fitzgerald, 1909 S St NW Apt 3
91. Ryan Fleming, 719 18th St NE Unit 1
92. Benjamin Freed, 1702 Summit Pl NW Apt 503
93. Jonah Freemark, 1744 U St NW Apt F
94. Chris French, 929 5th St SE
95. Edward Garnett, 3055 Chancellors Way NE
96. Todd Garon, 2480 16th St NW Apt 923
97. Alice Giancola, 528 Cedar St NW
98. Eli Glazier, 3300 9th St NE # 1
99. Erin Gleeson, 2824 Devonshire Pl NW
100. Brian Goggin, 1001 L St NW Apt 308

101. Daniel Gonen, 2926 33rd Pl NW
102. Amber Gove, 1349 A St NE
103. Nathan Graham, 525 Decatur St NW
104. Taylor Gutierrez, 2101 Champlain St NW Apt 407
105. Matt Haggerty, 315 Seaton Pl NE
106. Tim Hampton, 1360 Otis Pl NW
107. Brian Hanes, 1715 Swann St NW Apt 4
108. Tim Hannapel, 1631 16th St NW Apt 4
109. James Harnett, 1750 Pennsylvania Ave NW
110. Christopher Hart, 440 K St NW Apt 1212
111. Geoffrey Hatchard, 1218 Oates St NE
112. Shannon Hayes, 2801 Quebec St NW Apt 616
113. Nathan Heard, 6616 Piney Branch Rd NW
114. Alex Hendel, 748 Rock Creek Church Rd NW
115. Daniel Henebery, 1714 Newton St NE
116. Garrett Hennigan, 1031 Newton St NE
117. Rosemarie Hepner, 4020 17th St NW
118. William Herbig, 1745 N St NW Unit 406
119. Amanda Hermans, 1438 Meridian Pl NW
120. Michael Hickok, 3755 Jocelyn St NW
121. Amanda Hoey, 140 Michigan Ave NE Apt 31T
122. Matthew Holden, 1939 17th St NW
123. Corey Holman, 926 14th St SE
124. Garrett Honea, 1331 Staples St NE
125. Alex Horowitz, 919 6th St NE Apt 4
126. Brooke Howell, 70 I St SE Apt 809
127. Mao Hu, 25 H St NE Apt 343
128. Peter Huether, 2400 16th St NW Apt 645
129. Janet Hughes, 3025 Ontario Rd NW Apt 202
130. Thomas Hutcheson, 3730 Veazey St NW
131. Cole Ingraham, 1312 Levis St NE
132. Fred Jackson, 3022 14th St NE
133. David James, 812 A St SE
134. KateJentoft-Herr, 2707 Adams Mill Rd NW Apt 110
135. Geet Jeswani, 3001 Veazey Ter NW
136. Sandra Jorgensen, 1255 Oates St NE
137. Jeanne Kaplan, 3828 Georgia Ave NW Apt 537
138. Vijay Kapur, 1923 Rhode Island Ave NE
139. David Kasten, 503 10th St SE Apt A
140. Mandy Katz, 461 N St SW
141. Katherine Kearns, 1612 Potomac Ave SE
142. Ryan Keefe, 3405 Garrison St NW
143. Susan Kelleher, 2412 17th St NW Unit C02
144. Adam Kent, 1419 Perry Pl NW
145. Aaron King, 304 E St NE
146. Daniel Koenigs, 1218 T St NW
147. Melissa Kramer, 2516 Q St NW Apt Q303
148. Peter Krupa, 227 S St NE
149. Lydia La Motta, 314 V St NE Apt 102
150. Tom Lalley, 3713 Yuma St NW
151. Susan Landay Kimmel, 4101 Albemarle St NW Apt 408
152. Aaron Landry, 1615 Q St NW Apt 1203
153. John Lang, 1250 9th St NW
154. Gaurav Laroia, 1414 3rd St NW
155. Eric Lashner, 4919 16th St NW
156. Ryan Lauer, 3438 Dix St NE
157. Christopher Leinberger, 2339 Mass Ave NW # 2
158. Rachel Lesniak, 2000 Connecticut Ave NW Apt 205
159. Benjamin Lockshin, 623 Gresham Pl NW
160. Jeffrey Lockwood, 2120 Vermont Ave NW Apt 217
161. Tracy Loh, 5356 43rd St NW
162. Alex Lopez, 435 R St NW Unit 304
163. Anthony Lucadamo, 1701 16th St NW Apt 738
164. Darian Madere, 1333 Euclid St NW
165. Priscilla Magee, 1441 Clifton St NW
166. Anthony Maiolatesi, 2101 Wisconsin Ave NW Apt 705
167. Rachel Maisler, 834 Varnum St NW Unit 1
168. Robert Mandle, 303 Rock Creek Church Rd NW
169. Michael Mann, 13 R St NE Apt 2
170. Michael Mann, 541 Regent Pl NE
171. Rob Marcarelli, 308 U St NE
172. Jon Markman, 1019 10th St NE DC20002
173. Larry Martin, 6612 Piney Branch Rd NW
174. Nicolas Martinez, 243 10th St SE Apt 4
175. Brett McBride, 1639 Monroe St NW
176. Brian McEntee, 36 Q St NW # B1
177. Conor McGrath, 1717 E Capitol St SE Apt 421
178. Travis McIntyre, 2008 Klinge Rd NW
179. Patrick McMahon, 1401 Columbia Rd NW Apt 406
180. Joshua Merin, 3133 Connecticut Ave NW
181. Asher Meyers, 2908 Q St NW
182. Cheryl Miller, 2333 Ashmead Pl NW
183. Brian Miller, 2130 P St NW Apt 201
184. John Mitchell, 316 11th St NE
185. Kerry Mitchell, 1932 1st St NE
186. Monica Morin, 4540 Macarthur Blvd NW Apt B8
187. Andrew Morrissett, 604 Lamont St NW
188. Christopher Mrstik, 3023 Chancellors Way NE
189. Gail Murdock, 1316 Randolph St NE
190. Erin Murphy, 1828 4th St NW
191. Anthony Nigrelli, 1364 Monroe St NW Unit B
192. Emily Nosse-Leirer, 1443 E Capitol St SE Apt 3
193. Joe Nunes, 1506 3rd St NW
194. Kevin O'Halloran, 1319 Park Rd NW Apt 403
195. Coleen O'Leary, 4608 Bass Pl SE
196. Emily Oaksford, 625 Gresham Pl NW
197. Kyle Ogilvie, 3004 13th St NW Apt 3
198. Eric Olson, 1726 Kilbourne Pl NW
199. Janell Pagats, 3100 Connecticut Ave NW
200. Bianca Palmisano, 1400 Irving St NW Apt 505

201. Jonathan Parker, 711 Shepherd St NW
 202. Aaron Parrott, 95 54th St SE
 203. Moshe Pasternak, 1630 R St NW Apt 507
 204. Jacob Patterson-Stein, 1311 Delaware Ave SW
 205. Jeff Peel, 4433 Butterworth Pl NW
 206. Alek Pochowski, 2120 Vermont Ave NW Apt 409
 207. Austin Powell, 4850 Connecticut Ave NW
 208. Arjun Prasad, 1868 Columbia Rd NW Apt 709
 209. Benjamin Preis, 2222 Q St NW Apt 24
 210. Virginia Purcell, 1601 Argonne Pl NW
 211. Christopher Ramig, 2801 5th St NE
 212. David Ramos, 1801 Clydesdale Pl NW
 213. Jesse Rauch, 1390 Kenyon St NW Apt 309
 214. William Reckley, 2331 15th St NW
 215. Asaf Reich, 1729 Kilbourne Pl NW DC20010
 216. Colin Reusch, 4963 8th St NE
 217. Peter Richman, 1733 Upshur St NW
 218. Max Richman, 913 44th St NE
 219. Grace Ries, 2401 Calvert St NW Apt 720
 220. Dan Riffle, 1627 Holbrook St NE
 221. Chris Robinson, 2425 L St NW Apt 532
 222. Bryan Rodda, 119 16th St NE
 223. Mark Rodeffer, 1311 Delaware Ave SW Apt S847
 224. Caitlin Rogger, 251 10th St NE
 225. Virginia-Marie Roure, 2822 28th St NW
 226. Jeff Rueckgauer, 2130 P St NW Apt 711
 227. Ellie Ruggeri, 1023 31st St NW
 228. Robyn Russell, 1432 Montello Ave NE
 229. Emily Russell, 809 6th St NW Apt 34
 230. Jessica Sanders, 1809 H St NE
 231. Aaron Sege, 1822 C St SE Apt 4
 232. Elliot Seibert, 315 U St NE
 233. Shireen Shakouri, 1218 Perry St NE
 234. Robert Sheehan, 3001 Veazey Ter NW Apt 504
 235. Sam Sherwood, 1704 9th St NW
 236. Griffin Simpson, 3200 16th St NW
 237. Charlie Sinks, 732 Taylor St NW
 238. Jason Sliwa, 1325 Park Rd NW
 239. Sammi Sluder, 1230 13th St NW Apt 405
 240. Bob Specht, 1630 R St NW Apt 604
 241. Nia Spencer, 525 Water St SW
 242. Nick Stabile, 1443 Oak St NW Apt T1
 243. Siobhan Steen, 2112 New Hampshire Ave NW
 244. Matthew Steil, 4607 Brandywine St NW
 245. Jeb Stenhouse, 1700 V St NW Apt 3
 246. Julia Stevenson, 2955 Albemarle St NW
 247. Spencer Stieff, 1105 Harvard St NW Unit F
 248. Madeleine Stirling, 1301 M St NW Apt 216
 249. Edward Stratton, 5206 Illinois Ave NW
 250. J. I. Swiderski, 1749 Seaton St NW
 251. Elan Sykes, 1255 22nd St NW Apt 603
 252. Erin Talkington, 4406 15th St NW
 253. Anne Taylor, 47 Hanover Pl NW
 254. Catherine Teebay, 2101 NH Ave NW Apt 212
 255. Walter Tersch, 415 5th St SE
 256. Evangeline Toney-Offiah, 1618 Fort Davis St SE
 257. Rhys Tucker, 1847 Calvert St NW Apt 6
 258. Stephanie Tulowetzke, 1443 Monroe St NW
 259. Shannon Turner, 415 L St NW Apt 556
 260. Emily V, 4126 8th St NW Apt 7
 261. Rhea Vaflor, 2712 Wisconsin Ave NW Apt 311
 262. David Vine, 2750 14th St NW Apt 209
 263. Erik Virbitsky, 419 Elm St NW Apt 3
 264. Ella Wagner, 1673 Columbia Rd NW Apt 307
 265. Bob Ward, 2930 Macomb St NW
 266. Ashwin Warrior, 1339 E St SE Apt 18
 267. Daniel Warwick, 2146 Florida Ave NW Apt 7
 268. Ryan Waye, 360 H St NE Apt 336
 269. Michael Weinberger, 55 M St NE Apt PH223
 270. Ryan Westrom, 4636 Brandywine St NW
 271. Jeff Wetzel, 2031 Hamlin St NE
 272. Jonathan White, 1408 E St SE
 273. Eddie Whitehurst, 3609 13th St NW Apt 2
 274. Doug Wilson, 1720 Massachusetts Ave SE
 275. Griffin Winton-Lavieri, 2828 Conn Ave NW Apt 312
 276. Lauren Wolfe, 1322 Ridge Pl SE
 277. Greg Woodruff, 1250 4th St SW
 278. Haley Woodward, 1117 Park St NE
 279. Timothy Wright, 1151 Summit St NE
 280. Jason Wright, 1505 Monroe St NE
 281. Craig Dylan Wyatt, 1420 N St NW
 282. Shiri Yadlin, 4210 10th St NE
 283. Dane Yocco, 1731 L St NE Apt 4
 284. Izzy Youngs, 450 Massachusetts Ave NW
 285. Dmitriy Zakharov, 2122 Mass Ave NW Apt 426
 286. Abigail Zenner, 70 I St SE Apt 622

***Collected B23-73 testimony
(summer 2020-present) by ward***

Ward 1

Committee of the Whole
Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”
Testimony of Natalie Avery, November 12, 2020

Good morning, Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak today. I am a DC native and lifelong resident of Washington DC currently raising my family in Mount Pleasant. I’m here today to urge the Council to pass, intact, and without further delay, the Office of Planning’s amendments to the Comprehensive Plan.

Passing the Comprehensive Plan is absolutely essential to building a more equitable DC with more abundant housing options, especially in the neighborhoods west of Rock Creek Park where I grew up. I have been following this process for years and am deeply impressed with the level of engagement and the many ways in which the plan centers equity and reckons with the legacy of racism on our city’s built environment. The plan incorporates thousands of community comments and reflects input from dozens of community meetings.

After the Council adopted the Framework Element last year, Council staff and community members from a variety of perspectives have worked tirelessly to bring forward ideas and solutions that both honor and expand upon the core values expressed during that process.

I know you’ve heard concerns from constituents concerned about the impact of allowing more density on their quality of life. I can tell you that as a resident of a very dense mixed use neighborhood, that more density and more housing types, including multifamily buildings and duplexes and fourplexes, means a greater diversity of neighbors, more people to support great neighborhood amenities and more variety. Unlocking the ability to build more housing in parts of the city that have seen very little new residential development will not only expand housing supply, enabling more people to live in amenity rich neighborhoods. I truly believe it will bring new life and variety to areas of the city that have seen little change over the decades.

I have also heard the concerns that the plan does not do enough to stop displacement and build a more equitable DC and therefore should be further delayed. I strongly believe that passing the Comp plan is an essential step in the right direction. The work of building a more just and equitable city will continue on many fronts. Further delaying its passage will only thwart efforts to bring new housing online, including hundreds of affordable units.

Chairman Mendelson, and the rest of the Committee. Thank you for this opportunity to testify today. I am glad to add my voice to the chorus of support for Passing the Comp Plan, intact, in 2020, with no further delays.



Alex Baca <[REDACTED]>

B23-736 Testimony

3 messages

Mike Forster <[REDACTED]>

Mon, Nov 30, 2020 at 11:30 AM

To: [REDACTED]

Cc: [REDACTED]

Good morning,

I am urging you to pass the Office of Planning's amendments to the Comp Plan. It is urgent that DC's land use policies align with goals of increasing housing affordability, equitable concerns, and increased density in the city to support public transportation/biking/walking. We must confront our legacy of racial discrimination through seemingly race-neutral zoning laws and I believe the city should go further in legalizing triplexes or quadplexes city-wide. There is no valid reason to have any single-family zoning in the city in 2020. The amendments are the least we can do to create a more equitable DC.

Thank you,

Michael C. Forster

Alex Baca <[REDACTED]>

Mon, Nov 30, 2020 at 12:25 PM

To: Mike Forster <[REDACTED]>

Amazing! Thanks, Mike.

[Quoted text hidden]

—

Alex Baca

Housing Program Organizer

[REDACTED] / (410) [REDACTED] / she, they

[Join our neighborhood.](#)

Mike Forster <[REDACTED]>

Mon, Nov 30, 2020 at 12:27 PM

To: Alex Baca <[REDACTED]>

Thanks for the reminder! Between your emails and Cheryl Cort being my backyard neighbor I had no excuse to not submit a comment.

Michael C. Forster

www.forsterlawfirm.com

[Quoted text hidden]



Alex Baca <[REDACTED]>

B23-736 Testimony

Alex Hendel <[REDACTED]>

Sun, Nov 8, 2020 at 8:57 PM

To: [REDACTED]

Cc: [REDACTED]

Councilmembers,

I'm writing today in support of the **Office of Planning's amendments to DC's comprehensive plan, implemented in full**. As DC continues to grow and change, it's important that we as a city maintain the elements that make us great (our distinct neighborhoods, our many different cultures, and our unique history) while also providing the tools we need to ensure that DC remains affordable and accessible for everyone who wants to live here.

Our community needs to be given the support to grow and change, but it needs to remain a place that young people, the elderly, families, fifth generation residents, and new residents alike can all find a home. **As our region continues to grow, the upward pressure on housing prices will only continue to accelerate, and gentrification will continue to push many lifelong residents out of DC without substantial reductions on restrictions to housing supply in our most affluent areas, and investments in affordable housing tools.**

A key part of this is legalizing more dense housing in more of our city, especially in restricted single family home neighborhoods and other low density housing types west of Rock Creek Park. Diverse housing types, from single family homes, fourplexes, garden apartments, rowhouses, and large apartments all have their place in this city, but limiting what kinds of homes can be built, especially in historically white, affluent, and low density neighborhoods will not strengthen our city, and it will only exacerbate the enormous economic pressures displacing DC residents and reducing affordability.

I implore you to support any and all amendments to the comprehensive plan that legalize more density and more housing types, especially in these kinds of low density and affluent neighborhoods. Density is not a "dirty word." It is one of the most important tools the council has to support DC's continued growth, and that of its residents.

—

Alex Hendel

he/him

748 Rock Creek Church Rd, Washington DC 20010

Park View Neighborhood, Ward 1

Good afternoon Chairman Mendleson and members of the Committee, my name is Kate Jentoft-Herr and I'm a life-long resident of Ward 1. I am here today to ask you to pass the office of planning's amendments to the Comprehensive Plan intact by the end of 2020, and to express my support for other amendments that address the racial inequalities embedded in the city's zoning laws.

For far too long, the focus of the Comprehensive Plan has been to guide growth in a way that preserves "neighborhood character" rather than building a city where all neighborhoods are accessible to residents of all income levels. We now have a city that has become unaffordable to people who have called it home for decades, some even for generations, and where our housing policy has ensured that the neighborhoods with the highest opportunity have the least amount of affordable housing. This city can and must do better.

I am here today because I believe that cities will play an important role in our ability to mitigate climate change, but I refuse to accept a reality in which urbanization continues to result in displacement. We need to allow for and build more housing across the city, so that new people can move here without displacing longer-term residents.

Building more housing on its own is not a panacea, but it is a necessary step to ensuring we are able to address the affordable housing crisis in the city, and it is essential that new housing be prioritized in neighborhoods like Rock Creek West and Capitol Hill, that have not built their fair share of housing.

Lastly, I would also like to ask you to direct some attention to reforming this process. A long-term document like the Comprehensive Plan has utility, but it is not well situated to meet the changing needs of people in a rapidly changing city. We need to have more flexibility to adapt and amend this plan as things change in real time, and it serves no one well to have a process in which it takes 3 years to make amendments.

I love this city so much and I want everyone who wants to live here to be able to regardless of who they are and how much money they make. The current comprehensive plan makes that impossible, and so I am asking you once again, to pass the office of planning's amendments intact by the end of the year, so we can build a better future for all residents of this city.

Thank you for your time and consideration,
Kate Jentoft-Herr





Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Etta <[REDACTED]>

Sun, Nov 29, 2020 at 6:10 PM

To: [REDACTED]

Cc: "Nadeau Brianne K. (Council)" <[REDACTED]>

[REDACTED]

Dear DC Council Members,

Thank you for considering the Comprehensive Plan. As a Ward 1 resident for over 15 years (and former Ward 2 and 3 resident) I fully support this plan and more precisely I support adding density to the city and specifically to Ward 1. In my own building we risk being displaced and have tried for a couple of years now to find a developer under TOPA to buy our units (our building went up for sale almost two years ago). Although our building is only 3 stories tall and has room for added floors above or in the back, developers are hesitant to partner with us because of the uncertainty in the approval of added floors. On the other hand, we have had eager developers offering us tokens to leave our units so that they can turn our building into luxury condos.

Rental prices have almost doubled in 15 years and so have buying prices. Our small building is very diverse (in race, age, ethnicity, gender and class; out of 15 units, 3 families are Black, 3 are Spanish speaking Latinos, 6 are born outside the US and only 3 are white; we have babies, toddlers and senior citizens and several multigenerational families and there is a 50/50 split on blue collar vs. white collar jobs) but even middle class tenants in our building cannot afford to buy at market prices in our own neighborhood.

Adding density is one of the measures that might help keep rental prices stable especially for the most vulnerable families. Looking at creative ways to support current tenants staying/buying in place is another way to help.

Thank you for passing this plan, we are counting on you and the Council to find more affordable housing solutions for all DC residents.

Sincerely

Etta C. Klosi

President of ZooGate Tenants Association
2727 Adams Mill Road, NW,
Washington DC, 20009

[REDACTED]

[REDACTED]

[REDACTED]

The Comprehensive Plan Amendment Act of 2020

Testimony

Samuel Leone
11/12/2020

Good afternoon, Chairman Mendelson and members of the Council. Thank you for the opportunity to speak with you today.

My name is Sam Leone. I'm an economics PhD candidate at the University of California, Berkeley. I'm a resident of Ward 1. And I'm a renter.

I've come here to ask you to urgently pass a Comprehensive Plan that allows for an increase, not a decrease, in housing across the District. I believe that the Office of Planning's draft before you achieves that objective.¹ I hope that you'll either pass it as written or pass it with pro-housing amendments that, for example, further "upflum" the Future Land Use Map.²

Myself, my partner, and many of our family, friends, and colleagues - we've all wrestled with the difficulty of finding appropriate housing. And the fundamental cause of that difficulty is laws that block new construction. The economics literature is clear on this point; it shows that liberalizing land-use policies has three clear benefits.

First, increasing housing supply really does decrease housing rents. If we use zoning rules to force the number of units to remain fixed, then newcomers compete with existing residents for the same homes, bid up the prices, and cause displacement. But if instead we let the number of units grow, then we can reverse these forces and ensure long-term affordability. Evidence comes from decades of academic studies, including three recent working papers arguing that new housing can lower rents by as much as 7% and displacement by as much as 17%.^{3,4,5}

Second, more housing gives a boost to the economy. Folks across the country would love to move to the D.C. Area and take jobs in our leading public-, private-, and social-sector

¹ Baca, Alex. "We're Reading the Amendments to D.C.'s Comp. Plan. Here's What It Says about Land Use." 10/18/2019.

<https://ggwash.org/view/74354/were-reading-the-amendments-to-dcs-comp-plan-heres-what-it-says-about-land-use>

² Baca, Alex. "D.C.'s Comp. Plan Comes Down to a Lot of Maps. Here's Why This One Matters." 01/08/2020.

<https://ggwash.org/view/75544/were-reading-amendments-to-the-comp-plan-heres-our-critique-of-how-the-flum-works>

³ Asquith, Brian, Evan Mast, and Davin Reed. "Supply Shock Versus Demand Shock: The Local Effects of New Housing in Low-Income Areas." Federal Reserve Bank of Philadelphia working-paper series. 2020.

<https://www.philadelphiafed.org/-/media/research-and-data/publications/working-papers/2020/wp20-07.pdf> /

https://research.upjohn.org/cgi/viewcontent.cgi?article=1334&context=up_workingpapers

⁴ Xiaodi, Li. "Do New Housing Units in Your Backyard Raise Your Rents?" *Mimeo*. 2019.

<https://blocksandlots.com/wp-content/uploads/2020/02/Do-New-Housing-Units-in-Your-Backyard-Raise-Your-Rents-Xiaodi-Li.pdf>

⁵ Pennington, Kate. "Does Building New Housing Cause Displacement?: The Supply and Demand Effects of Construction in San Francisco." *Mimeo*. 2020.

https://www.dropbox.com/s/oplls6utgf7z6ih/Pennington_JMP.pdf?dl=0



Alex Baca <[REDACTED]>

Comprehensive Plan Amendments

1 message

Brian Lutenecker <[REDACTED]> Sun, Oct 25, 2020 at 4:00 PM
To: [REDACTED]
Cc: [REDACTED], [REDACTED] Brianne Nadeau <[REDACTED]> [REDACTED]

Dear DC Council Members:

I write to ask the DC Council to pass the Office of Planning's amendments to the Comprehensive Plan by the end of 2020 and intact as they are.

I am supportive of numerous priorities -- more housing, more affordable housing, fairly distributed housing, anti-displacement measures, and de-emphasizing the protection of wealthy, historically white neighborhoods -- that appear to have made their way into OP's amendments.

Of course, if there are any final measures that may be taken to further emphasize anti-displacement and equity in the Comprehensive Plan, I would be supportive as well.

Sincerely,

Brian Lutenecker
1845 Summit PI NW #704
Washington, DC 20009



Alex Baca <[REDACTED]>

Please Pass the Comprehensive Plan Amendments which increase housing

Porchrates <[REDACTED]>

Wed, Oct 14, 2020 at 8:10 AM

To: [REDACTED]

Bcc: [REDACTED]

Good day Council members,

My name is Jeremy Munro and I live at 1423 [Girard St NW](#). I'm writing to you today to voice my support of the Comprehensive Plan amendments done by the Office of Planning by the end of 2020. Additionally, I support any Comp plan amendments which increase the construction of more housing citywide. Finally I support any amendments which remove language like "protect and conserve" in regards to the District's built environment.

I am proud to be a Ward 1 resident, which as you know is the densest ward in our fair city. More of the city should be open to new residents, just like we are here in Ward 1. That is why I support these changes to the Comprehensive Plan.

Thank you for your time,

Jeremy Munro
1423 [Girard St NW](#)



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Porchrates <[REDACTED]>

Wed, Dec 2, 2020 at 8:42 AM

To: [REDACTED]

Bcc: [REDACTED]

Good day,

I am not an expert in zoning or land use, by any means. I leave those matters to my friends and partner who work in housing and transportation. However, I have been engaged with the Comprehensive Plan because I support greater density in DC, particularly in areas which have actively advocated against and chosen to not construct greater density in their wards and neighborhoods.

I live on Girard St NW in Ward 1. Currently from my window into the alley between Girard and Harvard streets there are four rowhouses in the process of being "built out" to double the number of units in the buildings from 4 to likely 8. I think this is great. I think it's wonderful so many people want to live here in the District and enjoy the vibrant community and culture this city has to offer. In the two years I've lived here I've seen how the city has a resilient spirit, a kind of fortitude to resist efforts to treat this city as "Just" the National Mall and other sites of national mythmaking.

We often throw around phrases like "real DC residents" or "the real DC" and though they have their limits (for example 'whomst' various stakeholders think real DC residents are), yet they are useful terms here in describing the spirit of this place.

As far as my testimony for the Comprehensive Plan amendments I support any amendments that increase density and allow us to build the housing we sorely, sorely need. Personally, I don't care where housing is built or who needs to be angered in the process, but I recognize that other people have an attachment to the built environment that I don't. I grew up in the woods in NH, NY, Iowa, and Arkansas, my family home is no more and we are scattered to the winds. I recognize of course there are people here who've been here far longer than I and who've watched the city changed. Nonetheless I view housing as a human right and as an equity issue. I would love to make DC my longterm home and buy an apartment with my partner lest you think I am some mercenary here for work who then leaves. But even that is beyond our means due to the sky high costs of housing here.

High rents, lack of choice, and concentrated development to a few areas hurt people, specifically longtime renters, and accelerate displacement.

Therefore, first, I ask the council to pass the Office of Planning's amendments to the Comprehensive Plan, intact, as soon as possible.

Second, I support any amendment that increases the construction of more housing citywide, especially in affluent neighborhoods.

Finally, I would like language to the bill text that creates better Comp Plan procedures and encourages the Office of Planning to begin the rewrite of the 2006 plan by 2022.

Thank you for your time and I hope you all have a safe end to this challenging year,

Jeremy Munro
Ward 1
1423 Girard St NW

Alex Baca <[REDACTED]>

Wed, Dec 2, 2020 at 9:15 PM

To: Porchrates <[REDACTED]>

acknowledging receipt of this great email! thank you!

[Quoted text hidden]

November 1, 2020

The Hon. Phil Mendelson, Chairman
Committee of the Whole
Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Washington, D.C. 20004

RE: Pass the Comprehensive Plan in 2020 (B23-736):

Dear Chairman Mendelson and members of the DC Council: My name is Bianca Palmisano and I am a nurse at a federally qualified health center in DC. I am a Ward 1 resident and have called DC my home for 11 years. I write to urge you to review and approve the Comprehensive Plan Amendment Act of 2020 (B23-736) this year, and not delay its passage into 2021 or beyond. In every policy conversation I’ve had with another resident of DC, their #1 concern has been housing. DC desperately needs affordable, accessible low-income housing available to the thousands of residents struggling with homelessness, including many of my patients. The Comprehensive Plan is a crucial element of that puzzle.

I am asking the council to:

1. Pass the Office of Planning's amendments to the comprehensive plan this year, without delay.
2. Support other amendments to increase the construction of affordable housing units, ESPECIALLY in affluent neighborhoods through Expanded Inclusionary Zoning. The revised Framework element of the Comprehensive Plan prioritizes affordable housing and anti-displacement measures while encouraging fairly distributed new growth and development. I support any additional amendments in that same spirit, because I believe that equity and justice for the original residents of DC should be at the core of our planning.
3. Reject amendments that call to “protect” and “conserve” communities (mostly west of the river) where there is already a paucity of affordable housing and minimal ongoing affordable housing development. DC is a city that values equity, but you wouldn’t know it by looking at our affordable housing stock. It is concentrated in “less desirable” neighborhoods where it lacks conscientious management and investment. New affordable housing production is stymied by wealthy homeowners and business in traditionally white parts of town, reproducing these patterns. If DC is to make create a comprehensive plan that truly centers equity, that means creating opportunities for development in Palisades and Glover Park, not just Deanwood and Congress Heights.
4. Add language to the bill text that creates better Comp Plan procedures and encourages the Office of Planning to begin to rewrite the 2006 plan by 2022. We can’t afford to wait on the next stage of planning and development. Washington DC has changed tremendously in the past five years alone—the Comprehensive Plan must be able to adapt with the same swiftness and agility as the city it represents.

I hope the council sees the comprehensive plan the way I do: as a crucial policy update that deserves time-sensitive priority. With so many households struggling as the city becomes

Committee of the Whole, Public Hearing on Bill 23-736, “Comprehensive Plan Amendment Act of 2020.”

less and less affordable, I believe we have no time to waste in enacting the Comprehensive Plan.



Alex Baca <[REDACTED]>

Please pass the Comp Plan amendments ASAP!

Jeb Stenhouse <[REDACTED]>

Sat, Oct 24, 2020 at 11:10 AM

To: [REDACTED]

Cc: "Nadeau, Brianne K. (Council)" <[REDACTED]> Alex Baca <[REDACTED]>

Hello Chairman Mendelson, I wanted to add my voice to those urging passage of the Office of Planning's Comp Plan amendments as soon as possible.

I live in Adams Morgan and have been dismayed at the resistance of my ANC (1C) and the disingenuousness of hyper-privileged neighbors who oppose badly needed housing developments. These privileged opponents have plenty of time and money to hogtie the city's administrative authorities and drown the judicial system with bogus interpretations of the old Comp Plan. Their obstruction to the only housing projects on the table causes the people of DC to suffer unaffordable housing cost while fueling greenhouse gas pollution that dooms future generations.

I hope you can lead the city through this critical step of affirming the Comp Plan amendments ASAP, so that we can truly move forward to build as much housing as possible in every neighborhood across this city.

Sincerely,

Jeb Stenhouse

1700 V St NW APT 3

Washington, DC 20009



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Jeb Stenhouse <[REDACTED]>

Thu, Dec 3, 2020 at 8:26 AM

To: "Committee of the Whole (Council)" <[REDACTED]>

Cc: "Nadeau, Brianne K. (Council)" <[REDACTED]>

Alex Baca <[REDACTED]>

Hello Council Members, I wanted to add my voice to those urging passage of the Office of Planning's Comp Plan amendments as soon as possible.

I am a homeowner in Adams Morgan and have been dismayed at the resistance of my ANC (1C) and the disingenuousness of hyper-privileged homeowners who oppose badly needed housing developments. These privileged opponents have plenty of time and money to hogtie the city's administrative authorities and drown the judicial system with bogus interpretations of the old Comp Plan. Their obstruction to the only housing projects on the table causes the people of DC to suffer unaffordable housing cost while fueling greenhouse gas pollution that dooms future generations.

Adams Morgan is a perfect location for adding as much housing as possible. Its excellent transit network, biking infrastructure, and outstanding walkability (including convenient access to jobs-dense downtown) would enable many more residents to live here without needing to own cars. I would far rather add car-free residents than force those people to live elsewhere and clog up our roads as they drive into and through our neighborhoods. A thriving city needs people, not cars!

I recognize that as a homeowner in Adams Morgan, I benefit financially from the status quo policy of deliberately shorting the housing supply, which unfairly inflates the value of my home. It is extremely unfortunate that we create such a perverse incentive for privileged homeowners to oppose new housing supply. However, new housing and new people also mean new economic opportunities, new amenities, and a richer culture for all of us. Keeping Adams Morgan vibrant and bringing new life to our neighborhoods will also support local businesses and maintain attractive home values for those of us already here.

Sometimes, privileged Americans need to be reminded that their position in a market is not nearly as important as their position in a community. We depend on your leadership to prioritize developing our communities over indulging ourselves at the expense of others. We must not withhold the ladders we climbed to enjoy a lifestyle that must be fairly available to all of us.

I hope you can lead the city through this critical step of affirming the Comp Plan amendments ASAP, so that we can truly move forward to build as much housing as possible in every neighborhood across this city, including and especially in Adams Morgan.

Sincerely,

Jeb Stenhouse

1700 V St NW APT 3

Washington, DC 20009



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Metin Toksoz-Exley <[REDACTED]>

Thu, Dec 3, 2020 at 10:22 AM

To: [REDACTED]

Cc: [REDACTED]

Dear Chairman and Councilmembers,

I wanted to write to you about the Comp Plan, as a Ward 1 resident, before the record closes on Dec. 3.

I live in Columbia heights and the housing situation is changing rapidly, seemingly without much foresight. Many of the buildings are being converted into ugly, unaffordable condos. These condos are not accessible for people with disabilities (how can they build condos with multiple levels without elevators or lifts nowadays?!), they are ugly, and they are making the neighborhood unaffordable. While there are many long-time residents who are seeing benefits of rising house prices, the neighborhood is bifurcating into poorly maintained rentals, and fancy new condos/townhouses. The rent is rising and is already relatively unaffordable. I live with a roommate and still pay 45% of my income in housing for a small apartment.

Right now with the covid pandemic, there needs to be more focus on both short-term survival for those struggling to make rent, but also long-term, to rethink how we are investing in our communities and housing who might have previously been unhoused.

- The rent is too high.
- There is not enough affordable housing.
- Longtime neighbors are being displaced.
- I'm afraid I will soon not be able to afford to live where I live now.
- Wealthier, less dense parts of the city must share in the responsibility of creating more housing, especially affordable housing.
- Fair housing is a right, not a privilege.
- I want the city to be affordable to most of its residents.
- I want to own a home someday.
- I want to have kids someday.
- I don't want to leave the city just because I can't afford to have children here.
- I want my neighborhood to remain diverse.
- We need more housing to help combat homelessness.
- My neighborhood could fit more apartment buildings if they were allowed.
- My neighborhood needs to do its fair share and build more affordable housing.
- We should acknowledge the destructive history of restrictive covenants and housing discrimination in D.C.

I want to support the proposed changes to the Comprehensive Plan and suggest that D.C. Council:

- Pass Office of Planning's amendments, with which I fully agree, intact as soon as possible.
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Thanks so much for your attention to this issue.

—

Metin Toksoz-Exley
3606 13th Street NW 20010
(He, Him, His)

Alex Baca <[REDACTED]>

Thu, Dec 3, 2020 at 10:29 AM

To: Metin Toksoz-Exley <[REDACTED]>

"We have to keep moving forward." Campaigning a couple years ago for ANC Commissioner, back when it was safe to mingle with new people, I remember speaking with someone who'd grown up on U Street. I only moved to the neighborhood in 2011. In just a few years, my beloved community had transformed -- many buildings towered over rowhouses; luxury apartments replaced a hot dog store. The process, I knew, had been ongoing for decades before I arrived.

I asked my neighbor, who'd been around for so many ups and downs, what she thought of all the change. Some called it gentrification. I won't forget her response: "We have to keep moving forward."

And that, I believe, is what we are called to do today. As we revise the District's Comprehensive Plan, we have a once-in-a-decade opportunity to decide how we will keep moving forward.

We must move forward to even greater inclusion, sustainability, and opportunity for all.

As ANC Commissioner, I am privileged to represent the area around 14th and U St NW. I truly believe that it is our nation's greatest neighborhood. I think most residents of DC would make the same claim. We live in a great city. People want to be here. But that means we must plan intentionally for the future we want to create.

I chaired ANC 1B's Comprehensive Plan Task Force, and we submitted detailed comments. Thank you for taking them into consideration. I am here today, not representing the Commission, to emphasize a simple point: we should pass the Comp. Plan with the Office of Planning's amendments intact.

In speaking with dozens of community members, across many public meetings we hosted, I heard many views. One thing I didn't hear was, we shouldn't revise this document -- or we should just hope things remain exactly as they are.

Perhaps that's because some of the city's most wonderful projects are right in my neighborhood. Portner Flats integrates affordable and market-rate housing along U Street. The renovated Grimke School will house an expanded African-American Civil War Museum, anchoring the cultural corridor envisioned by the Duke Plan.

The Comp. Plan must enable more of these projects, everywhere. It's a statement of principle: neighborhoods that have seen limited new development should grow, increasing in density to welcome new residents and businesses. We can't allow some neighborhoods to be "preserved" while others are the sole recipient of an international influx of capital. That approach risks destroying what makes our communities so great in the first place. And it impacts longtime District residents the most.

Let's invert our priorities. Focus on preserving and creating affordable housing. Grow our city - but especially in the wealthiest areas.

There will be ample opportunities for future public engagement, on individual projects. But we can leave that for the future. Now is the time to heed my neighbor's words. Keep moving DC forward. With OP's amendments, we will move towards the vibrant and inclusive future that our city deserves.



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Emma Zaballos <[REDACTED]>

Sun, Nov 29, 2020 at 9:24 PM

To: [REDACTED]

Cc: [REDACTED]

Hello,

My name is Emma Zaballos and I'm a resident of Ward 1. I've lived in DC for almost ten years and I hope to live here for many more - I love living here and I love the many people who have made DC their home as well. Because I love this city and want to make sure that my neighbors can afford to stay here, grow their lives and their families, and live with dignity in the District, I urge the Council to pass Office of Planning's amendments to the Comprehensive Plan as soon as possible. The amendments to the Comprehensive Plan open the door to changes in District policy that will allow more equitable development throughout the city - my dream is to have more dense, affordable, desirable, equitable housing and resources in every ward and neighborhood. It is not a perfect document, which is why I urge the Council to begin the rewriting process of this 14 year old document no later than 2022.

Should further amendments be added, I support any that increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods. I can thank a rent controlled apartment for keeping me in DC immediately after I graduated from American University. A landlord that rented below Capitol Hill's exorbitant market rates helped me and a roommate find an apartment that introduced me to the beautiful Anacostia Riverwalk Trail and Lincoln Park. DC opened the door to me and I want to keep it open for all my neighbors, present and future. I urge the Council to quickly pass the Office of Planning's amendments to the Comprehensive Plan.

Emma

Emma Zaballos

Ward 2



Alex Baca <[REDACTED]>

Re: thanks for signing ggwash's petition to get the comp plan passed ASAP

1 message

Dale Barnhard <[REDACTED]>

Tue, Oct 13, 2020 at 10:34 PM

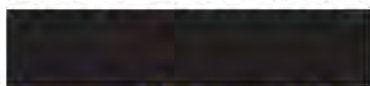
To: Alex Baca <[REDACTED]>

Cc: Madeline Barnhard <[REDACTED]> Gary Barnhard <[REDACTED]>

Dear AB, Yes, I would like to talk to you sometime. My family owns the only private property in square 5. Over the last 30m years we have made several attempts to get the city to work with us on this. We almost succeeded with Barry who despised JE, the council member who pandered to the neighborhood Nimby's (thank Barbara Khalow especially) but he is now gone. We have Brooke Pinto who doesn't seem to know much but apparently has a council seat that was funded by her parent's interest in getting her a job.

Our area here is a prime example of many urban real estate areas that could be redeveloped over the bones of a moribund, racist, car centric freeway system.

Dale Barnhard

www.foggybottomfuture.org



Alex Baca <[REDACTED]>

Re: Up zoning & housing equity

1 message

Dale Barnhard <[REDACTED]>

Wed, Nov 18, 2020 at 3:17 PM

To: Brooke Pinto <brooke@brookepintoforward2.com>

Cc: Gary Barnhard <[REDACTED]> "Pinto, Brooke (Council)" <[REDACTED]> "Hulick, Genevieve (Council)" <[REDACTED]>

Dear CM Pinto: I have written to you before about this and am pleased to see that you are holding this hearing. I will attend the Thursday evening hearing. Please understand this is not a matter of abstract planning goals, in regards to NW Foggy Bottom, specifically squares 1,4,5,6,17 although it does employ the foundational concepts in the proposed plan, it is about changing the direct harm caused to this area and the city at large from the previous plan. The previous comp plan's sector plan for this area was eliminated from development through language supplied by Barbara Khalow and placed in the comp plan under the direction of Jack Evans.

This language is in fact contrary (as is the existing zoning) to what the OP have proposed in the past. It is a manifestation of NIMBY-ism at it's worst and reflects Ms Khalow's own anti-growth and anti-urban agenda thinly hidden as concern

for parkland. She specifically said in her testimony last week that only the "Barnhard Brothers" were interested in development here. This begs the question: Compared to what? Currently we have an area which serves as an inaccessible urban DMZ that is a trash & graffiti ridden highway median, a homeless encampment, a traffic bottle neck, & a neglected avenue terminus, which all adds up to a profoundly ignominious major gateway into our city. This area is a "poster child" for all of the urban planning, political stalemate, housing market & transportation failures of an American City and it is also place that we can actually create something that would address all these issues, if we dare to do it. The revised comprehensive plan gives us this opportunity. For those citizens that see this as a developer give-away, I say that additional legislation where the city (as it does in this case) holds some of the cards (such as land ownership) we can create low income housing, transitional housing, work place, & market rate housing for families that are not just another displacing luxury development, while creating more accessible community recreation space and a suitably grand public

space to memorialize one of L'enfants vista avenues, while allowing the legacy freeway infrastructure to exist until such a time as an appropriate adaptive re-use can be implemented. I look forward to seeing you on Thursday evening.

On Sunday, July 12, 2020, 01:47:14 PM EDT, Dale Barnhard <[REDACTED]> wrote:

Yes, thank you Brooke, I look forward to discussing the NW Foggy Bottom area (Squares 1,4,5,6,17) the policy implications & politics of its development for the neighborhood & the city as a whole.

Dale W. Barnhard
FoggyBottomFuture.org

On Saturday, July 11, 2020, 09:46:40 PM EDT, Brooke Pinto <brooke@brookepintoforward2.com> wrote:

Thank you, Dale. I would like the opportunity to discuss these issues with you. I am copying my Council email as well as my Chief of Staff, Genevieve Hulick, who will ensure that someone from our team follows up to coordinate a time soon.

Best,

Brooke

From: Dale Barnhard <[REDACTED]>
Date: Saturday, July 11, 2020 at 9:27 PM
To: Brooke Pinto <brooke@brookepintoforward2.com>
Cc: Gary Barnhard <[REDACTED]>
Subject: Up zoning & housing equity

11/23/2020

Greater Greater Washington Mail - Re: Up zoning & housing equity

Dear Councilmember Pinto: please read this article on the stakes involved in the role of density in achieving housing equity in the Dc. And the importance of reasoning in the area of NW Foggy Bottom. I would like to discuss this with you at your earliest convenience.

Dale W. Barnhard

https://ggwash.org/view/78332/whys-everyone-talking-about-upzoning-its-the-foundation-of-green-equitable-cities_2

DC COMPREHENSIVE PLAN PUBLIC TESTIMONY

November 12, 2020

NAME: Gary Pearce Barnhard
ADDRESS: 2639 I Street NW, Washington, DC 20036
SUBJECT: In support of the bill with the caveat that this there is a need for the Council to both approve the amended Comprehensive Plan and support the fine grain planning processes for scalable developments to achieve the objectives of the plan.

Thanks for this opportunity to testify in support of this bill to approve the amended comprehensive plan. My name is Gary Pearce Barnhard, I was born at Doctor's Hospital on I Street NW, I am a 4th generation Washingtonian. I am the managing member of Barnhard Family LLC which owns the only private property in Square 5 of the city (2639/2637/2635 I Street, NW). Truth be told my connection to building real estate is also not inconsequential, as a robotic space systems engineer I had the honor and privilege of helping to build the most expensive piece of real estate our species has ever constructed, the International Space Station.

My concerns with respect to the District Comprehensive Plan and the planning process is that such efforts need to be focused on fostering and managing outcomes not subsumed by interminable process. This concern likely can be best expressed by example.

A long time ago, in a great city some think belongs in a galaxy far, far away some of the most desirable land for development was offered up to the ghods of freeway development with the fervent hope that traffic would flow and a plethora of benefits would befall the inhabitants.

Alas, what reality and the passage of time has wrought has proven far less sanguine. What is known as Square 5 has for over 50 years languished as a set of three nondescript town homes stranded in a sea of failed traffic intersections, bisected by a collection of freeway ramps, with effectively all the remaining ground rendered unusable/inaccessible. The magnitude of lost opportunity to the city comes into focus when the fate of Square 5 is put into the context of the available property in adjacent squares (Eye Street terminus, part of Squares 6, 4 and 1). The combined total developable land area of the seven parcels is ~500,000 Sq.ft. To put this in perspective this aggregation of parcels is larger than the entire Watergate complex (~435,000 Sq.ft.). This situation is offered not as a personnel lament for resources wasted over many real estate cycles, rather as an example of a process failure and the need to fix how the city orchestrates opportunities for fine grain development, particularly those at larger scales.

To date no reliable mechanism has been established that allows for large scale development projects in the city to move forward on a deterministic time line. Even the most coordinated Planned Urban Developments (PUDs) seem to come to resolution based on court action rather than a negotiated confluence of interests that secures the best possible outcome for the city and its inhabitants.

The amended District Comprehensive plan seeks to architect and orchestrate multiple opportunities for fine grain development. Mechanisms that are identified in the same are tangible and require the Councils support include:

DC COMPREHENSIVE PLAN PUBLIC TESTIMONY

November 12, 2020

- Allow opportunities to be realized in a manner that would enable public/private partnerships to be formed to provide the highest and best use of the land serving the community interests of citizens and the people.
- Provide a deterministic timeline with costs that are financially viable.
- Provide explicit action and a clear process to be completed.
- All stakeholders must commit to a balancing of "Matter of Right" development versus enhanced development opportunities with the goal of increasing the value of the property for all stakeholders.

A failure to achieve the objectives will result in a haphazard development with no clear optimal or all-stakeholder strategy or training to or opportunity to explain, slow down, wait for the future of the city to come, or lend our efforts to architecture that we wish to see come to pass. I request that the Council support the approval of the amended Comprehensive Plan and that the Council provide support for financial planning that is deemed necessary and appropriate to realize the objectives of the plan.

and⁵ request this opportunity to share my insights on the District Comprehensive Plan and coordinate with the Council to visit the website <http://www.foggybottomfuture.org>.

- Garret Barnard



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Yolanda Cole <[REDACTED]>

Wed, Dec 2, 2020 at 3:23 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Committee of the Whole:

I am writing to you as a DC resident and DC business owner to urge you *to pass the Comprehensive Plan Amendments as soon as possible*, to provide much needed housing at higher density and lower cost for the benefit of all the residents of our city. I am also pressing you to do this *for the benefit of DC businesses who are being negatively affected by protracted inaction* – especially in this COVID environment. More housing and mixed-use development and a stronger business community will in turn *bring in more tax dollars to the city to support the Council's priorities*.

DC Ward 2 Resident & Participant in ANC2 Review of Comp Plan Amendment

I am a resident of Ward 2F02, where I have lived on the 14th Street corridor for 15 years. I was a participant of the ANC2 committee to review and comment on the Comp Plan amendments, focusing on the Housing and Historic Preservation Elements, with input on several others. I am doing my best to lend my expertise to encourage development that is both beautiful and practical, and to help volunteer ANC members better understand the design and development process. I support training for ANC Commissioners on zoning and development principles.

DC Business Owner w/Expertise in Architecture & Development

I am Sr. Principal and Owner of Hickok Cole Architects, a large commercial design firm with expertise in multi-family housing and commercial office for over 30 years in DC. I am the immediate Past Chair

of the Urban Land Institute (ULI) District Council of Washington, a current member of the ULI Housing Initiative Council, and a Past President of the DC chapter of the American Institute of Architects (AIA), where I am Fellow (FAIA). I am passionate about providing housing across the range of affordability because more housing of any kind reduces the cost for all, and spear-headed ULI's research document on Housing Attainability in the region.

Case for Passing the Comp Plan Amendments ASAP

- The Mayor has set a much-needed target of 36,000 housing units, 12,000 of which are affordable, to be built by 2025. *We are already behind in reaching this target.*
- Current lack of clarity in the Comp Plan and the Zoning Ordinance has led to extensive litigation, delaying large and small-scale projects that could provide much of this housing stock.
- Housing costs are rising due to extensive entitlement processes, procedures, and fees *which are passed down to consumers as higher housing costs*, which many cannot afford.
- Community engagement has become more divisive, *requiring leadership, consensus and clarity* about where and how density can be achieved that also meets the Mayor's goals.
- The inevitable demographics of Millennials and Gen Z will only press us further into the need for more housing across all price ranges, *and with new and innovative housing products.*
- Our aging population will also *require us to focus on housing for seniors.*
- The Office of Planning has prepared amendments to the Comp Plan that support housing goals, *allowing more housing development to occur more quickly and at less cost.*
- The Comp Plan must be passed as soon as possible in order to *reduce cost, time and effort in the development process and to provide housing in less time at lower cost.*

COVID Conditions for Housing and Businesses

- *COVID has only made the housing crisis more of a crisis.* With many out of work and growing, we must focus on large projects that can

- provide the most affordable housing - quickly.
- Passing of the Comp Plan will give developers and investors confidence to move forward with stalled projects. *This will promote jobs across the real estate/construction industry and across DC.*
 - Local real estate and construction businesses have suffered during these times and *need the support of the Council to encourage long-stalled projects to move forward.*

Development Creates Taxes and Fees to Support DC's Budget

- Removing barriers to large tract developments is the fastest way to increase housing stock, provide and save local jobs, *and create additional revenue for the city.*
- *Increased economic development increases business income*, which also supports tax dollars for the city.

Therefore, I urge you to pass the Amendments to the Comprehensive Plan, without delay.

Yolanda Cole, FAIA, IIDA, LEED AP
Sr. Principal



1023 31st Street NW
Washington DC 20007

ext. 268 | M: | hickokcole.com



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Alex Baca <[REDACTED]>

Ward 2 Resident supporting Comprehensive Plan

Peyton Gibson <[REDACTED]> Sat, Oct 10, 2020 at 11:59 AM
To: [REDACTED]
Cc: Alex Baca <[REDACTED]>

Hello City Council Members,

My name is Peyton Gibson, I am a resident of Ward 2, and work at the National Academies of Sciences! As a civil engineer and policy analyst, my career passion is to help communities thrive through the built environment. As a Logan Circle resident, cyclist, pedestrian, renter, ANC 2F Public Transportation Committee Member, and Mutual Aid volunteer, I have a vested interest and am an ardent supporter of any plan that enables affordable housing and new growth. I'm also still in graduate school (for Transportation Engineering, but I look a lot at land use and policy) and recently wrote a policy analysis paper on Affordable Housing options in the District (and would love to share if anyone wants to read it!).

Here are my asks for you as a constituent for your meeting on the Comp Plan on Nov. 12 (which I hope to try and testify at):

1. Please pass the Office of Planning's amendments by the end of 2020
2. Continue to support other amendments that INCREASE construction of more housing citywide and *especially* in affluent neighborhoods, as long as
 1. amendments that further "UpFlum" are either maintained or expanded
 2. and they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.
3. Add language to the bill text that creates better Comp Plan procedures and encourages the Office of Planning to begin to rewrite the 2006 plan by 2022.

Thank you for your time and let me know if you have any questions!

--

Peyton Jane Gibson, EIT (she/her)

Associate Program Officer

National Academies of Sciences, Engineering, and Medicine

Board on Infrastructure and the Constructed Environment

M.S. Transportation Engineering Spring 2021 - CU Denver

[REDACTED]



Alex Baca <[REDACTED]>

Re: GGWash Comp Plan, MoveDC, and transition update**Peyton Gibson** <[REDACTED]>

Fri, Nov 6, 2020 at 1:34 PM

To: Alex Baca <[REDACTED]>

[Yep here it is!](#) Or see text below.

Hello, and thank you for allowing me to testify (tonight). My name is Peyton Gibson and I am a resident of Ward 2. I am a transportation engineer and built environment policy analyst, and I believe the updated Comp Plan is integral to addressing safety issues, promoting equity, and enhancing overall quality of life in the District. I am here to urge you to review and approve the Comprehensive Plan Amendment Act of 2020 this year, and not delay its passage into 2021 or beyond.

I, like 40% of Washingtonians, do not own a car. Although I feel fortunate not to have to deal with the nuisance of a 3000lb piece of steel, I have had way too many close calls as a pedestrian and cyclist. On October 24, a car was inches away from running over my head after a fall on H Street. Just a few days before that, I was almost flattened by a construction truck in a crosswalk right in front of my home. The list goes on and on, as I know it does for many of my neighbors.

By September, more Washingtonians had been killed by drivers in 2020 than in all of 2019. As a city that has pledged to end all traffic related fatalities in the next four years, we must enact a tangible plan quickly or publicly accept that we are risking the lives of our neighbors with our inaction.

Better access to transportation means that people don't have to pay the price of entry of owning and maintaining a car to participate in society. But you need dense, compact housing, and land-use choices that support public transit rather than personal cars, to make transit work.

Because the Comp Plan guides land use, it can encourage denser, smaller, more human-scale development and a safer built environment by virtue of creating slower streets with more public and private spaces on them. In addition to many other housing and economic development benefits, the 2020 Comp Plan will create a safe and accessible network for all residents and serve all users regardless of age, race, income, geography or physical ability.

I hope the Council will treat review and adoption of the Comp Plan as it deserves - as a time-sensitive priority to help thousands of District residents, employers, nonprofits, and other stakeholders succeed and have more sustainable opportunities to live, work, and grow. The time is now to move forward with the Comprehensive Plan.

[Quoted text hidden]



Alex Baca <[REDACTED]>

Support for Comprehensive Plan Updates

1 message

Brian Goggin <[REDACTED]> Sun, Nov 8, 2020 at 4:26 PM
 To: [REDACTED] "Silverman, Elissa (Council)"
 <[REDACTED]> "Pinto, Brooke (Council)" <[REDACTED]>
 Bcc: [REDACTED]

Dear Councilmember Pinto and other Councilmembers,

I am a Ward 2 resident writing in support of the updates to the DC Comprehensive Plan, which you will hear this upcoming Thursday, November 12th and Friday, November 13th. Although election season is ending, the fight for more local affordable housing and equity continues. And despite DC voting overwhelmingly in favor of progressive change at the federal level, our local land use regulations remain inequitable and unsustainable. We are ready for more progressive changes locally and that starts with the Comprehensive Plan updates.

Housing production, especially affordable housing production, is concentrated in historically disadvantaged areas of the city. For too long, protecting the character of single-family neighborhoods has taken priority over housing more people affordably and close to jobs and transit. Fortunately, the proposed updates to the Comprehensive Plan by the Office of Planning make significant progress in changing the tide of these regressive policies, and I'm confident that the public supports these changes. I, along with many other proponents of housing reform, ask you to please support the following:

- Office of Planning amendments to the Comprehensive Plan
- Support for other amendments if they increase rather than decrease the potential for more housing construction citywide, particularly in affluent areas
- Amendments to strike the arcane and inequitable "protect" and "conserve" language prevalent in the 2006 land use element
- Added language to the bill text that encourages the Office of Planning to begin to rewrite the 2006 plan by 2022.

Another reason I support these amendments is that community stakeholders have extensively reviewed and commented on them. The Office of Planning has been conducting community outreach and planning for these changes since 2016. During this time, they have received thousands of comments from neighbors, community leaders, and other government agencies. Recently, the [Office of Planning has identified](#) many updates to the Comprehensive Plan that strengthen our health and resiliency planning in the wake of COVID-19.

In my neighborhood, my ANC (2F) passed a letter of support for proposed Comprehensive Plan changes in the Logan Circle and Shaw. I can personally attest that many of my neighbors participated in this process and are excited to see the proposed amendments to the Future Land Use Map along 11th Street and 14th Street come to fruition. These would not only support new housing but would also help local businesses in these areas which depend on consistent daily foot traffic. We are eager to see these changes implemented, and further delay would only cause confusion and frustration.

Thank you for your time.

Sincerely,
 Brian Goggin, Ward 2 resident



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!

1 message

Brian Hanes <[REDACTED]>

Tue, Nov 10, 2020 at 7:01 PM

To: Alex Baca <[REDACTED]>

Hey Alex, I am scheduled to testify. I'll be working that day but plan to step away when it is my time. I should be able to have it on in the background so I can see the progress but can you give me a heads up if you are following it all day? I am on Friday the 13th. My testimony below:

Hello Council, my name is Brian Hanes and I am homeowner in Ward 2 of the District. I have lived in the Washington DC area since 2013 having moved from the Midwest. I am a relatively recent homeowner, having rented for the majority of my time in Washington, as well as other cities I have lived.

As a renter and recent home owner, I believe that we must do more to produce more housing in the District of Columbia. As a millennial, I witness the consequences of the high costs of housing on other people of my generation, whether they are attempting to afford buying their first home or trying to afford rent. As the population of the United States continues to grow and the district remains a desirable place to live, the population will continue to grow. A growing population means we need more housing, or else prices will continue to rise, like we have seen in other large US cities when housing production is constrained.

Research has borne out that, all else being equal, high housing costs are largely the result of strong local job markets combined with overly restrictive land use regulations. We cannot do anything about our strong local economy, nor would we want to, but we can work to do more sensible and expedient planning that allows for more housing development. We must continue to do high quality planning geared towards producing more units of housing, in all wards of the city, so that the cost of housing does not become anymore exorbitant.

To that end, I have come to ask that you pass the Office of Planning's amendments, intact by the end of 2020. I also support other amendments as long as they increase, not suppress, the construction of more housing citywide. In addition, I believe you should add language to the bill text that creates better Comprehensive Plan procedures and encourages the office of planning to begin to rewrite the 2006 plan by 2022.

The District, like other large US metropolitan areas, are in a crisis of housing affordability. This is not the result of exogenous factors, it is a policy choice. You can do much more to support more housing production, updating a 14 year old plan and removing language that is clearly exclusionary is the least you can do. Thank you for your time



Alex Baca <[REDACTED]>

Support comprehensive plan amendments that further affordable housing

2 messages

Chris Hart <[REDACTED]>

Sun, Nov 1, 2020 at 10:51 AM

To: [REDACTED]

Cc: [REDACTED]

Dear Chairman Mendelson,

I am writing to urge your support for the amendments to the Comprehensive Plan and Future Land Use Map (FLUM) as submitted by the Office of Planning (OP) at the upcoming Council hearing on this topic. I further urge you to support any additional proposed amendments that support the creation of more housing and more affordable housing in particular.

As you are well aware, the District of Columbia faces an affordable housing crisis and housing supply is not created at a rate that keeps up with demand. Due to restrictive land use policies, new housing is concentrated in areas of the city undergoing rapid gentrification (Southwest, H Street, NE; Georgia Avenue, etc.), which increases displacement pressure on current residents. Low-income residents and people of color bear the brunt of these disruptive forces.

OP's amendments are a step in the right direction toward increasing housing equity in the District of Columbia. All areas of the city must contribute to the mayor's goal of creating 36,000 housing units by 2025. Of particular importance is relaxing restrictions on new housing in affluent neighborhoods of the city, especially the Rock Creek West planning area. OP's proposals to increase allowable density along the Wisconsin and Connecticut Avenue corridors are sensible and should be passed intact.

I have been a District resident for nearly 10 years, living in Wards 2, 3, and 6. I have seen firsthand how neighborhoods have been dramatically reshaped. This is not all bad. However, the District has done far too little to ensure that native Washingtonians and other long-time residents benefit from the positive growth the District has experienced. Housing is a human right and we must do more to increase housing equity in the District.

Thank you,

Chris Hart
440 K St., NW Apt. 1212

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Emily Hogin <[REDACTED]>

Mon, Nov 30, 2020 at 3:14 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Councilmembers:

I write to ask you to support affordable housing in the District through the Comprehensive Plan Amendment Act of 2020. Specifically, I ask that you:

1. Pass the Office of Planning's amendments as soon as possible.
2. Support other amendments that increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods like mine in Dupont Circle
3. Maintain or expand amendments that further "upflum"
4. Oppose amendments that use the "protect" and "conserve" language prevalent in the 2006 land use element
5. Add language to the bill text that creates better Comp Plan procedures and encourages OP to rewrite the 2006 plan by 2022

I am a proud resident of Dupont Circle, and what I love about my neighborhood is its density, diversity, and history as a community for those who didn't have a lot of options elsewhere. I think that preserving that character of the city I love means making room for more housing and especially more affordable housing. I feel strongly that justice requires making room in all of our neighborhoods so others can get a fair shot in our beautiful city.

Thank you,
Emily Hogin

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

2016 comp plan amendments

1 message

Gil Landau <[REDACTED]> Mon, Oct 12, 2020 at 2:35 PM
To: [REDACTED] "Silverman, Elissa (Council)" <[REDACTED]> "White, Robert
(Council)" <[REDACTED]>
Bcc: [REDACTED]

Councilmembers:

Amazingly the Comp plan amendment process has been going for nearly 4 years. Please help bring this to a close by the end of this year. Our city is in desperate need of new housing and that will not happen without clarity here. Moreover, please make sure that any amendments continue to expand areas where our city can add housing for our growing population - particularly in wealthy neighborhoods like mine in Dupont where we need to do more to contribute to housing growth.

Also, please fix the procedures so that the next comp plan (which we should start ASAP) doesn't take another 4 years to create.

Thanks for your time!

Gil Landau
Dupont Circle



Alex Baca <[REDACTED]>

B23-736 Testimony

1 message

Leinberger, Christopher <[REDACTED]>

Mon, Nov 30, 2020 at 2:51 PM

To: [REDACTED]

Bcc: [REDACTED]

The attached letter is support for the Comprehensive Plan, including the Greater Greater Washington platform, including:

- Pass [Office of Planning's amendments](#), with which we fully agree, intact—as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further “upflum” are either maintained or expanded; and as long as they do not uphold the “protect” and “conserve” language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Thank you,

Christopher B. Leinberger
Co-Founding Partner & Managing Director
Places Platform, LLC

Former Charles Bendit Distinguished Scholar and Research Professor of Urban Real Estate
Former Chair, Center for Real Estate & Urban Analysis
George Washington University School of Business

<https://chrisleinberger.com/>
<https://creua.business.gwu.edu/>

11/9/2020

Greater Greater Washington Mail - Re: last day to register for comp plan testimony + movedc extension!!



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!

4 messages

Moshe Pasternak <[REDACTED]>

Mon, Nov 9, 2020 at 5:05 PM

To: Alex Baca <[REDACTED]>

Hello!

I am signed up to testify on day 1.

I've got the top 3 Ggwash asks and also plan to mention that I won by explicitly campaigning for greater density in a wealthy party of the city. Anything else you think would be helpful for me to include?

Also, will you be able to update folks on the progress of the hearing since I don't expect to be able to stay in the meeting for the full day?

Cheers,
Mo

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Maya Phillips <[REDACTED]>

Wed, Dec 2, 2020 at 5:16 PM

To: [REDACTED]

Cc: Alex Baca <[REDACTED]>

Hello Councilmember Pinto, Chairman Mendelson, and the Council,

My name is Maya Phillips and I'm a new resident of Ward 2, relocating to The District from Seattle this past Spring. I support passing the Office of Planning's amendments intact, as soon as possible. Increasing housing is vitally important to the social justice mission of keeping people housed affordably.

As a former resident of Seattle, I've witnessed firsthand the staggering racial impacts of the housing affordability crisis that exists not just on the West Coast, but right here in the District as well. Increasing housing, especially in white, affluent neighborhoods is an important first step to create affordable housing without displacing those in most need. We can no longer hide behind language like "protect" and "conserve" when we choose only to apply it to pretty buildings instead of actual residents. The amendments to the comp plan help to further these goals, so I support them and any other amendments as long as they increase housing across the city and remove language designed to suppress it. The Council should also add text that creates better procedures and encourages the Office of Planning to begin to rewrite the 2006 plan by 2022.

As a black woman, I want to see policies that support and include residents like me, instead of making it more difficult for us to find places to live in the city. I love living in DC and seeing my background reflected in the diversity that exists here. Everyone who wants to live in this city should be able to do so, regardless of their means. We have an opportunity, right now, to help meet people's most basic needs while also creating a thriving, diverse community by passing the amendments to the Comp Plan intact. We owe it to our community to do that.

Thank you for the opportunity to testify.

Best,

Maya Phillips

[REDACTED]

[REDACTED]

[REDACTED]

11/9/2020

Greater Greater Washington Mail - Re: last day to register for comp plan testimony + movedc extension!!



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!

2 messages

Benjamin Preis <[REDACTED]>

Mon, Nov 9, 2020 at 2:35 PM

To: [REDACTED]

Alex —

Thanks for the (automated) ping! Just signed up to testify on Friday, via the google form. Will be writing something up tomorrow to get to the council, plus some emails to Brooke Pinto and the at-large members.

Best,
Ben

—
Benjamin Preis
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

BENJAMIN J. PREIS, MCP

November 11, 2020

VIA EMAIL TO [REDACTED]

Committee of the Whole
Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Suite 410
Washington, DC 20004

Dear Chairperson Mendelson & Council Members:

Below is the testimony I plan to give to the Committee at the meeting on Friday, November 13, 2020. Thank you for the opportunity to speak in support of the unchanged amendments to the Comprehensive Plan from the Office of Planning. I look forward to your questions.

Sincerely,

Benjamin J. Preis, MCP

TESTIMONY TO COMMITTEE OF THE WHOLE
IN SUPPORT OF AMENDMENTS TO THE COMPREHENSIVE PLAN

BENJAMIN J. PREIS, MCP

NOVEMBER 13, 2020

Good afternoon. My name is Ben Preis, and I'm a Ward 2 Sheridan-Kalorama resident, living in the Near Northwest Planning Area. I'm a doctoral student in the Department of Urban Studies and Planning at MIT, and while I will reference my research in my remarks today, I speak only for myself and not for the Institute.

I'm here before the Council to urge you to pass the unchanged amendments to the comprehensive plan from the Office of Planning, before the end of this year. I love my neighborhood, and I want more people to be able to access the economic opportunities, amenities, and livable transit associated with Ward 2. To make that happen, the city must meet Mayor Bowser's housing production goals and build more market rate and affordable housing in areas like Ward 2 and Near Northwest. We need to bring our land use planning, transportation systems, and housing production into agreement, so that we build dense housing, near transit and job centers, at all levels of affordability. I believe that the amendments to the comprehensive plan bring us closer to that more prosperous and inclusive future.

Above and beyond the current amendments, though, I urge the Council to support amendments that enhance and extend the possibility of welcoming new housing and development in predominantly low-density neighborhoods especially in Near Northwest and Rock Creek West. This is necessary to combat economic and racial segregation, stem the tide of gentrification, and support the District's climate goals. One key way to combat economic and racial segregation is to construct more housing, at several levels of affordability, in historically exclusionary neighborhoods like mine. From my research, I know that gentrification occurs, in part, because of limited housing supply in amenity-rich neighborhoods. Allowing for future density increases in Rock Creek West and Near Northwest would also significantly address the District's climate commitments, because of the climate-emissions feedback loops associated with land use, transportation, and housing improvements.

Finally, I hope that the Council considers further steps to enhance the policies and procedures in future rewrites of the Comprehensive Plan. Regular planning, with clear timeframes, goals, and community engagement procedures will considerably enhance future comprehensive planning efforts in the District. Given demands on our time and energy, community members are unlikely to read through tracked-changes in a PDF document, and so clear procedural

guidance on future Comprehensive Plan rewrites, and the necessary follow-ups regarding Council action and zoning changes, should also be a part of the full package under consideration when the Council votes.

Again, I hope that you pass the Office of Planning amendments to the comprehensive plan, unchanged, before the end of this year. I also ask you to welcome additional amendments that increase future density in areas of critical need for market rate and affordable housing production especially in places like Ward 2. Thank you.



Alex Baca <[REDACTED]>

DC Comprehensive Plan

Diana S. <[REDACTED]>

Mon, Oct 12, 2020 at 10:10 AM

To: [REDACTED]

Cc: [REDACTED]

Bcc: [REDACTED]

Good morning,

I am a resident of Ward 2 (recently moved from Ward 6), and I am writing about the Office of Planning's amendments to the Comprehensive Plan. As you go through the hearing and markup process, I would like to ask you to pass the OP's amendments intact by the end of 2020. I am also in favor of other amendments as long as they 1) increase—not suppress—the construction of more housing citywide and especially in affluent neighborhoods, 2) maintain or expand further upflum, and 3) do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element. And, I would like to see new language that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022.

All of these asks are important to me because I believe that DC's housing crisis is urgent and needs equitable solutions that are baked into our planning processes. I feel lucky to have an apartment I can afford, but this shouldn't be a matter of luck—everyone should be able to find somewhere to live without being cost-burdened. I've lived in affluent areas, such as Capitol Hill, that remain exclusive while our neighbors bear the brunt of new development. Amending the Comp Plan is an important step forward in equitably increasing affordability and density, which is especially important for our long-term residents facing growing threats of displacement.

Again, please pass the OP's amendments intact by the end of 2020 to make DC more livable for all of us while ensuring that development is distributed fairly across the city. Thank you.

Best,
Diana Schoder



Alex Baca <[REDACTED]>

B23-736 Testimony

1 message

Samantha Sluder <[REDACTED]>

Mon, Nov 30, 2020 at 8:02 PM

To: [REDACTED]

Cc: [REDACTED]

Good evening,

My name is Sammi Sluder, and I'm a Ward 2 resident in the Logan Circle neighborhood. I've been living in DC for more than 4 years in Wards 1, 5 and 2. As a young professional who moved here right after graduating from college, DC has been an important teacher as I learn how to take care of myself, to take care of my community, and to be a responsible member of the city. It's educated me on the history of racism, the Great Migration, Black wealth, immigration, police brutality and mass incarceration among other things. It's given me context to how to be an adult and exposed me to the burdens of money, career and - very specifically - finding and paying for housing.

As one of the most expensive cities in the U.S., it's no surprise that the expense of housing is one of the largest portions if not the largest for most young and low-income people. As a young person trying to live, thrive and contribute to this city, I think about the cost of housing and the lack of housing for so many people, disproportionately and unjustly for long term Black and Indigenous residents of DC. As a white transplant, I know that I contribute to gentrification and displacement just with my presence, and I know I have a responsibility to address it.

That's why I'm asking the council to pass the Office of Planning's amendments to the Comprehensive Plan, to support any other amendments that increase housing citywide and to add language to the bill text that creates better procedures and encourages OP to begin to rewrite the 2006 plan by 2022. I love that DC has a comprehensive plan that guides our city with a vision. We must continue to create and work toward a better world rather than just reacting against the one we have now. But I also know that 2006 was a very long time ago. I was 12 years old and George W Bush was President. It's time to revise the plan to address the current needs of the city.

Thank you for taking the time to read and consider my letter. I'm eager to learn more and follow how the Comprehensive Plan continues to develop.

Best,

Sammi Sluder

--

Samantha Sluder

"One small republic of unconquered spirit." - Rebecca Solnit

[REDACTED]
Preferred Pronouns: Her/She/Hers

Check out my [LinkedIn](#), [Facebook](#), and [Twitter](#)



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Izzy Youngs <[REDACTED]>

Wed, Dec 2, 2020 at 2:46 PM

To: [REDACTED]

Cc: [REDACTED]

Bcc: [REDACTED]

Hi CM Pinto,

I want to send in my testimony regarding the Comp Plan update. I fully support any changes to the comprehensive plan that increase and streamline new housing construction, particularly higher-density by-right developments in areas where single family housing has historically dominated. I support the Office of Planning's amendments to the Comp Plan as well.

I understand this might give many homeowners heartburn, as there is traditionally a feeling that when people purchase homes, they also purchase the neighborhood at the exact point in time it was purchased, to be forever frozen in amber and never changed or adapted. But history shows that this has had incredibly unequal impacts on the community and furthered the intense segregation of the district.

While just changing the Comp Plan to allow more density may not fix the problem in its entirety, I think it's a noble effort to ensure people have options and access to a variety of housing across the district. If Covid has taught us anything, it's that supply has a huge impact on rents. My personal rent in Ward 2 went down almost \$500/month since the pandemic began, which I think is a testament to how we need to see an increase in more housing in order to keep rents low.

Thanks for your time, I appreciate your work.

Best,

Izzy Youngs

[REDACTED]

[REDACTED]

[REDACTED]

Ward 3

**WRITTEN TESTIMONY OF ELLEN BASS
BEFORE THE D.C. COUNCIL COMMITTEE OF THE WHOLE
BILL 23-736, COMPREHENSIVE PLAN AMENDMENT ACT OF 2020
November 12, 2020**

Chairman Mendelson and members of the Committee of the Whole:

I wish to express my support for the Comprehensive Plan Amendment Act of 2020, Bill 23-736 (hereafter, Comp Plan Amendment Act). I have lived in the Wakefield section of Ward 3 for 37 years. I have lived in two single-family houses one block from Connecticut Avenue, NW. Two apartment buildings are visible from my current and former houses, and my quality of life is not disturbed; on the contrary, I have benefitted from being close to public transit and retail.

This is important to the legislative proposal before this Committee, because opponents of development in Ward 3 and elsewhere use the current Comprehensive Plan, and oppose the Comp Plan Amendment Act, to fight mixed-use development and multi-unit residential buildings on transit and commercial corridors like Connecticut Avenue. They say these developments are inconsistent with their single-family-home neighborhoods, but I disagree, based upon my experience. I welcome the vibrancy, amenities, walkability and urban streetscape that this type of development fosters. It also grows the tax base for DC, rather than pushing residential development out to the suburbs with commuters paying no DC tax and causing traffic congestion.

The Comp Plan Amendment Act does two things regarding Ward 3 that are very beneficial: (1) it increases the potential density of areas on the Future Land Use Map (FLUM) along transit and commercial streets like Connecticut and Wisconsin Avenues, and (2) it changes language in the Rock Creek West Element that has been construed to discourage development of more diverse housing options (like multi-family apartment buildings) by implying that those types of development are harmful to single-family neighborhoods, which they are not if designed appropriately.

The FLUM: Increasing FLUM designations makes it possible for more housing to be built in the city near transit. This is good for the environment; it is essential to support retail, which is hurting now; and it is a way to encourage the best use of scarce urban land. It should not need saying, but apparently it does: increasing the FLUM does not mandate that larger or indeed any development takes place; it only makes it possible if the market forces are favorable and the other regulatory requirements (e.g., zoning) are met. I want to be able to walk to quality retail, and increasing the FLUM designations on major corridors makes this more likely. The current Comprehensive Plan prioritizes driving, and this is an outdated concept. Here is one example near me:

the 5000 and 5100 blocks of Connecticut Avenue, NW (between Fessenden St. and Nebraska Ave.) would have an increased density designation from moderate or low to medium residential and commercial. Currently there are three gas stations on this stretch, including one taking up a prime corner lot at Connecticut and Nebraska. We can do better for residents. More residential development would support existing retail and restaurants and encourage better and more diverse commercial use of this area.

Rock Creek West Element language: It is painfully obvious that DC is segregated by race, and that Ward 3 is overwhelmingly white. It is also very expensive. Since I have lived here, the cost of housing has skyrocketed. We need more housing options in order to attract a more racially diverse population and give those of every race at lower income levels a chance to enjoy neighborhoods which are close to transit, parks, and amenities. Changing the language in this part of the Comprehensive Plan to reflect that single-family housing areas can co-exist with other types of housing is a first step. Will the Comp Plan Amendment Act provide a complete fix to this entrenched problem? Of course not, but it is a step in the right direction. This is especially true when coupled with Inclusionary Zoning regulations, which address at least to a degree the affordable housing crisis. Also, for the most part, development here does not displace existing affordable housing.

Finally, the Council can be confident that there has been more than sufficient process leading to this point. Over a period of about five years the Office of Planning has invited input, both written and in live meetings in all the Wards. This started by inviting proposals for changes, and thousands were submitted and addressed. More recently, all the Advisory Neighborhood Commissions (ANCs) were asked to react to a preliminary draft. In Ward 3, the ANCs were supportive of changes that are now in the Comp Plan Amendments Act, and some Ward 3 ANCs even submitted additional FLUM upgrade proposals. This includes ANC 3F, which is my ANC, which submitted the FLUM designation upgrade on Connecticut Avenue discussed above. ANC 3E supported FLUM upgrades on Wisconsin Avenue. These ANCs are elected, and the Council should give their support great weight. Calling for more process amounts to asking for delay to kill a proposal that resulted from a great deal of work and comment.

In order to address the economic damage done by the Covid-19 pandemic, this Council needs to prepare the city for recovery. I submit that passing this legislation is something the Council can and should do now, as soon as possible, to help the city thrive in the future. I urge you to pass this legislation without delay.



Ellen Bass, 3600 Cumberland St., N.W.

11/11/2020

Greater Greater Washington Mail - Re: last day to register for comp plan testimony + movedc extension!!



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!

3 messages

Benjamin Bergmann <[REDACTED]>
To: [REDACTED]

Wed, Nov 11, 2020 at 6:14 AM

Hey Alex,

Just letting you know that I am signed up to testify tomorrow! By the way, I won my ANC race by a wide margin and I am excited to push for more housing in Ward 3.

Best,
Ben

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!**Benjamin Bergmann** <[REDACTED]>

Thu, Nov 12, 2020 at 12:47 AM

To: Alex Baca <[REDACTED]>

Hey Alex,

I just belatedly sent over my testimony. I unfortunately wasn't able to get it done earlier today.

Here is what I plan to say:

Good Afternoon,

My name is Ben Bergmann. I live in the Wesley Heights-area in Ward 3 and was elected two weeks ago to serve as an ANC Commissioner on ANC3D. Like many other Washingtonians concerned about rising demand for affordable housing, I am testifying today in support of the Office of Planning's amendments to the District's Comprehensive Plan. More generally, I would like to underscore my support, which I believed to be shared by many in my community, for policies and investments aimed at encouraging development of additional housing of all types in Ward 3.

For the past several months, as I campaigned for ANC Commissioner, I have talked with many of my neighbors about the need for more housing, including more affordable housing, in Ward 3. Residents in my community repeatedly affirmed that they wanted to see the District embrace smart growth policies and investments aimed at making our community more livable, dynamic, and affordable for all different kinds of people.

DC is a diverse, vibrant, and wonderful place to call home. We should all be happy about and welcome continued growth of the District's population in the years to come. But it is essential that the Council and other stakeholders, including ANC Commissioners, citizen associations, and individual homeowners, grapple with the fact that we need development. In fact, we need a lot of it. The tendency, particularly in neighborhoods west of Rock Creek Park to balk at projects—or the potential for projects—that might mildly densify an area must stop. It is my hope that amending the Comprehensive Plan with the proposed amendments will be an important step towards reducing the obstructionism and absolutism that can often define the conversation around development, re-orienting the focus away from whether a project should be delayed or blocked towards how the community can maximize benefits or improve a proposed project for everyone, including future residents.

I would just close with something that I discussed repeatedly with voters over the past few months: neighborhoods are living things. They change—and they must change. Failure to streamline the development process, incentivize affordable housing, or promote densification near metro stops and along major thoroughways will not “preserve” neighborhoods. It will simply price out more and more Washingtonians, leading to less diverse and dynamic communities.

I strongly urge the Council to pass the proposed amendments and take other steps to ensure that the District can grow in a sustainable and inclusive manner.

Thank you.

[Quoted text hidden]



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Todd Cain <[REDACTED]>

Sun, Nov 29, 2020 at 8:46 PM

To: [REDACTED]

Cc: [REDACTED]

Dear DC Council,

I am writing to express my strong support for the proposed Office of Planning amendments, and ask that the council pass the full proposed amendments as quickly as possible. I would also support any revisions from the Council to these amendments, as long as the revisions would increase, not suppress, the equitable distribution of new housing construction across DC, including in the more affluent neighborhoods.

Many years ago, I was able to afford to buy a small house in Cleveland Park. Today, even though my salary has increased greatly, I would not be able to afford a home in Cleveland Park. And while I feel grateful to be raising my family in such a lovely neighborhood, I am saddened to know that my neighborhood is not affordable to many of DC's citizens. The proposed amendments to Comprehensive Plan would help bring more equity, affordability and energy to our wonderful city.

I have followed the work of Director Trueblood and his staff with admiration. I have attended a number of public forums and presentations on the Comp Plan, and have a strong sense of all the work, research and thoughtfulness that have gone into this effort.

Washington is a growing and dynamic city, and thoughtful revisions to our Comp Plan will help ensure that equitable and widespread growth and stability continues into the future. I thank you in advance for your support of these important amendments.

With gratitude,

Todd Cain
3413 Ordway Street, NW
Washington, DC

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Fwd: Last night's CPHS meeting

1 message

Robin Halsband <[REDACTED]>

Tue, Nov 3, 2020 at 1:07 PM

To: [REDACTED]

Hello Alex

I was reviewing your website, specifically the section: *Here's how you can weigh in to make sure the Comp Plan will help, not hurt, housing production in DC.*

I saw that you're interested in seeing emails sent to Councilmembers. I'm therefore forwarding an email I sent last week to my councilmember, Mary Cheh, after a meeting with the Cleveland Park Historical Society. If you think it would be helpful to turn this into written testimony, I'd be happy to do that. But I've also submitted a letter to CM Mendelson via the Coalition for Smarter Growth, so I'm not sure whether duplicative letters, emails, testimonials from one resident are worthwhile.

Thanks for all of the important work Greater Greater Washington is doing around the Comp Plan.

Sincerely,
Robin Halsband

----- Forwarded message -----

From: Robin Halsband <[REDACTED]>

Date: Wed, Oct 28, 2020 at 10:15 AM

Subject: Last night's CPHS meeting

To: [REDACTED]

Dear Councilwoman Cheh,

As a member of the Cleveland Park Historical Society (CPHS), I want to thank you for your presentation last night (October 27). The convening didn't allow for a robust Q&A session from the viewers, so I wanted to reach out and express my support for the Comp Plan changes. The tone of last night's meeting implied that all members of CPHS oppose the changes – or at least want the vote to be delayed. I am a 15 year resident of Cleveland Park but a new member to CPHS. I joined specifically to be a voice within the membership that supports the changes.

I have due respect for the important preservation work that CPHS has done. Their work has allowed my family to enjoy the benefits of village life in an urban area, while residing in a beautiful single family home near preserved land such as Tregaron and Rosedale. But the past several years have shown us that, in many ways, this is a zero sum game: our benefits in Rock Creek West can lead to deleterious effects in other parts of the city. Nancy Macwood's concerns that Rock Creek West was singled out unfairly for more density struck me as somewhat myopic to the city's challenges. Research increasingly shows that place matters and that providing low income people more chances to live in high opportunity neighborhoods can help reduce the inequality that we're seeing across the country. Rock Creek West is one of those high opportunity neighborhoods, and consequently needs to reduce its barriers. Many CPHS members would argue that it's *because* of their preservation work that Cleveland Park is one of those neighborhoods. I agree with that and I'm appreciative. But, we need to find more of an equilibrium, and I believe the Comp Plan amendments help us do that.

I, like you, have concerns, however, about "density for density's sake". If we're going to see growth in this area, I want it to be affordable growth. I've worked in the affordable housing industry for several years now – first at City First and now at LISC. So the desire to see affordable housing is not just a community interest, but also my day job. The concern I have is that if the Comp Plan amendments are too prescriptive about the requirement for affordable units, it may make the financing of these projects that much more challenging, requiring significant public subsidy, which we know is a limited resource. I'm hopeful that the proposed increase in IZ units will help solve this issue, but I recognize that it won't likely go far enough.

11/11/2020

Greater Greater Washington Mail - Fwd: Last night's CPHS meeting

Ultimately, I support the amendments as they are, even if they risk more density than we'd like, in order to get the affordable units that we need. I'll look forward to listening in to the hearings on Nov 12-13, and will hope to see these amendments pass, if not by year-end, then soon after.

Sincerely,

Robin Halsband

2927 Macomb St



Alex Baca <[REDACTED]>

Pass Amendments to the DC Comp Plan

Mao Hu <[REDACTED]>

Mon, Oct 12, 2020 at 10:47 AM

To: [REDACTED]

Cc: [REDACTED]

Dear Chairman Mendelson,

My name is Mao Inay Hu; I live in ANC/SMD 6C05 - I am advocating for the Council to pass the Office of Planning's [amendments](#) to the DC Comprehensive Plan before the end of the year. These amendments help align the Comp Plan toward producing affordable and market-rate housing throughout all parts of the city. I believe these steps to equitably increase housing density in DC would have several key benefits:

- **Density supports the economy:** The COVID-19 pandemic has [devastated the economy of Downtown DC](#) - it's clear to me walking around how much more economic activity there is along H St. NE/by Barracks Row vs. (parts of) downtown, and undeniably part of that difference is due to where people live. Given that there is no guarantee that in-person employment or tourism will return to the same levels post-pandemic, it would be strategic to support DC businesses long-term by increasing the customer base through a larger residential population distributed more evenly throughout the city.
- **Density increases social equity:** Gently increasing density across all of DC (single family -> duplex/triplex/etc.), particularly in less-dense neighborhoods, would put downward pressure on housing costs and improve affordability for all DC residents. In particular, at the moment housing that accommodates small families is hard to find at accessible prices in wide swathes of the city. Helping more people spend less on rent and/or build their own home equity would also be a proactive way for the Council to address historic racial inequities in household wealth and opportunity.
- **Density is good for the climate:** Households living in dense, walkable neighborhoods near work or transit, like the neighborhood where I call home, will emit less carbon than those living in areas where driving is unavoidable. Given the dire state of climate change, there is a great responsibility for the Council to take action close to home. Encoding that call to action through amendments to the Comp Plan is a good way to direct the development process in a productive direction.

While it is true that there are disadvantages to increased density, such as potentially increased traffic, these challenges are not insurmountable through complementary policy (e.g. bus/bike lanes). On balance, amending the Comp Plan to encourage more equitable housing development would be a boon for the city. Passing the amendments from the Office of Planning by the end of the year would be a great step toward a brighter future for more people.

Best wishes,
Mao Inay Hu



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Emma Keyes <[REDACTED]>

Thu, Dec 3, 2020 at 12:03 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Chairman and Councilmembers,

I am writing to you today about the Comp Plan, as your Ward 3 resident, before the record closes later today December 3.

I live in Friendship Heights, which was a great place to grow up but which is largely inaccessible to the majority of DC residents due to the cost of living there. My mother's house has tripled in value in the past twenty years, which although obviously nice for her, would effectively ensure that were she trying to move into the neighborhood today she would be unable to. When I move out of my mother's house, I will certainly be unable to afford to stay in the neighborhood.

Friendship Heights and the surrounding neighborhoods of AU Park, Tenleytown, and Chevy Chase are all majority white and are some of the highest income neighborhoods in the city. They also consist of mostly stand-alone single-family homes. There is a true scarcity of apartment buildings or even row houses. There is very little affordable housing to speak of. The Friendship Heights metro station in particular is ripe for high-density housing built on transit.

Wealthier, less-dense areas of the city must share the responsibility of creating more housing. Homeowner's property values should not be the first priority when there are countless people in our city who struggle to make ends meet every month. Upper Northwest must be a part of the solution. Not to mention that the broader goal of minimizing de-facto segregation in housing in the city (which itself is really the only way to minimize inequality in DC's education system) will not be achieved without building affordable housing in largely white and wealthy communities in DC. We need to acknowledge and address the destructive history of restrictive covenants and housing discrimination in DC. Plus, Upper Northwest would be a more vibrant place if it were more diverse both in terms of race and socio-economic status.

I want to support the proposed changes to the Comprehensive Plan and suggest that the DC Council pass the Office of Planning's amendments, with which I am in full agreement, intact and as soon as possible. I want to support other amendments as long as they increase, not constrict, the construction of more housing throughout the city and especially in more affluent neighborhoods like Friendship Heights; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and conserve" language prevalent in the 2006 land use element. I also support adding language to the bill text that creates better Comp Plan procedures and encourages the office of Planning to begin to rewrite the 2006 plan by 2022.

Thank you for taking the time to read this and I look forward to a more equitable and affordable city for all of DC's residents in the coming years.

Sincerely,
Emma Keyes

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

pls review asap so I can submit

2 messages

Tracy Loh <[REDACTED]>

Wed, Nov 11, 2020 at 10:19 PM

To: Alex Baca <[REDACTED]>

Testimony from Tracy Hadden Loh

Ward 3 resident

Re: Bill 23-736, the Comprehensive Plan Amendment Act of 2020

Greetings to the honorable members of this council, and thank you for taking the time to hear from folks today regarding this important bill. I am making the time myself to testify because it is personally very important to me the city adopt an amended comprehensive plan that will support the construction of more housing, especially in Ward 3 where I reside.

I was born in the 20015 zip code, and I attended Lafayette Elementary School, Alice Deal Junior High, and I am a proud graduate of Wilson High School. While I left the city to attend college and graduate school, and supported a New York career move for my husband in recent years, I moved back to my old neighborhood in the fall of 2019.

I wanted to move back to this exact neighborhood for two reasons: first, I have young children, and I rely on my parents to help care for them for financial, cultural, and emotional reasons. Second, my parents are in the 70s, and as they age I would like to be very close by to take care of them. With the current pandemic situation, I feel blessed and validated every day in prioritizing these issues – I was 100% right to give up other things in order to make this proximity happen.

But it shouldn't have taken quite so much sacrifice and been so hard. I am married and I have two children, and with our budget we had to be looking at three bedrooms or less, with a budget of \$3,000/mo. When I started looking for an apartment in September of 2019, there were exactly four two-bedroom units for rent in the neighborhood, and only ONE three-bedroom unit. That was the total inventory we had to choose from.

One three bedroom unit is not a choice.

I'm a flexible and resourceful person. But this is beyond ridiculous. The totally artificial scarcity of rental housing in 20015 and 20016 is inexcusable, and the city must adopt a comprehensive plan that will structurally reform the regulatory environment that has created these conditions.

Furthermore, such reform should not take decades. Children are being born and growing up while this Comprehensive Plan amendment process dawdles. I urge the Council to add language to the bill text to create better procedures to update this document and keep it – and our city – alive.

[REDACTED]

[REDACTED]

[REDACTED]

11/10/2020

Greater Greater Washington Mail - Re: thanks for signing ggwash's petition to get the comp plan passed ASAP



Alex Baca <[REDACTED]>

Re: thanks for signing ggwash's petition to get the comp plan passed ASAP

Monica Morin <[REDACTED]>

Mon, Nov 9, 2020 at 12:27 PM

To: [REDACTED]

Hi Alex,

What should I testify on, theme-wise? I just moved to DC in October but I've worked in DC since 2014 and live and work in Ward 3 right now at American University. Our transportation demand planning at AU (to placate the neighbors on parking etc) doesn't include AU advocating for safe bike routes for employees and students to safely bike to campus :(

Monica Hope Morin

2

Volunteer of the Year
(cell)

<http://www.linkedin.com/in/monicahopem>

Word 4



Alex Baca <[REDACTED]>

B23-736 Testimony

1 message

Peter Richman <[REDACTED]>

Sat, Nov 14, 2020 at 11:30 AM

To: [REDACTED]

Bcc: [REDACTED]

Hello,

I am writing to submit written testimony on the Comprehensive Plan Amendment Act of 2020. The testimony, which is attached here as a PDF, consists of a letter that was submitted to the Office of Planning on behalf of 43 residents of Crestwood and Sixteenth Street Heights. In short, the letter requests that the FLUM designate a portion of 16th St NW for mixed use of Medium Density Residential and Low Density Commercial.

We would like to resubmit the letter to the Committee of the Whole so that it can be part of the Committee's record.

Please let me know if you have any questions.

Regards,
Peter Richman

**Public Comment on 16th Street NW.pdf**

70K

Public Comment on Comprehensive Plan Draft Update

To whom it may concern:

The undersigned residents of Crestwood and 16th Street Heights recommend that the Future Land Use Map (the **FLUM**) designate 16th St NW between Arkansas Ave and Colorado Ave NW (**Middle 16th Street**) for mixed use of Medium Density Residential and Low Density Commercial.

Overview of Middle 16th Street

1. Middle 16th Street separates the neighborhoods of Crestwood and 16th Street Heights. This one-mile corridor is home to a large apartment complex, single-family homes, churches, schools, a foreign embassy, and access to Rock Creek Park. There are wide sidewalks and six bus stops serving four bus lines.
2. Many of the existing structures are not in compliance with the current predominant FLUM designation of Low Density Residential.

Areas for Improvement

3. Currently, the streetscape of Middle 16th Street discourages neighborhood connection and public life. The defining feature of the five-lane-wide thoroughfare is vehicular traffic. In many ways, Middle 16th Street is a wall that separates neighborhoods, rather than a zipper that binds them.
4. There are a number of mobility issues on Middle 16th Street: (i) crossing is hazardous for pedestrians; (ii) there are no bike lanes on or crossing Middle 16th Street; and (iii) bus service is inconsistent with buses bunching and frequently running off schedule.

Recommendation

5. Amend the FLUM to provide for mixed use of Medium Density Residential and Low Density Commercial on Middle 16th Street, consistent with a number of priorities described in the Comprehensive Plan (e.g., expanding housing supply (*see* 503.1) and fostering development on priority transit corridors (*see* 306.14)).

Other Considerations

6. Middle 16th Street has considerable unmet capacity to support additional housing, neighborhood retail, multi-modal transit, and pedestrian activity. The proposed change will encourage the transformation of Middle 16th Street from a car-centric highway to a more dynamic corridor that promotes civic life and neighborhood connection. *See* 404.2
7. The proposed change will also support the future extension of the dedicated bus lanes in the 16th St NW Bus Project, which will become even more critically important as the developments at Walter Reed are completed and 16th Street grows even busier. *See* 407.16.

If you have any questions about this comment letter, please contact Peter Richman at

[REDACTED]

Sincerely,

(in alphabetical order)

1. Marian Budde
Mathewson Dr and Blagden Ave NW
2. Paul Budde
Mathewson Dr and Blagden Ave NW
3. Nicolas Cordier
17th St and Varnum St NW
4. David Culver
17th St and Varnum St NW
5. Mary-Morgan Culver
17th St and Varnum St NW
6. Heather L. Dinwiddie
Mathewson Dr and Blagden Ave NW
7. John Favazzo
16th St and Buchanan St NW
8. Tom Fletcher
17th St and Varnum St NW
9. Bernard Fulton
16th St and Crittenden St NW
("I'm for more housing to address our affordable housing crisis. I also think more density near Crestwood would bring more commercial services to us.")
10. Kyle Hepner
17th St and Shepherd St NW
11. Olive Hepner
17th St and Shepherd St NW
12. Rosemarie Hepner
17th St and Shepherd St NW
("The city needs more housing, especially in high opportunity neighbors such as Crestwood, to combat our affordability challenges and reduce the barriers that have led to the economic segregation that currently exists in DC.")

13. Joshua Hertzberg
Decatur St and Iowa Ave NW
14. Thomas K. Hill
Mathewson Drive and Blagden Ave NW
15. Molly Hofsommer
15th St and Crittenden St NW
16. Camille Holmes
15th St and Buchanan St NW
17. Lukas Kohler
17th St and Varnum St NW
18. Lucrecia Ledesma
17th St and Varnum St NW
19. Estefania Marchan
17th St and Upshur St NW
20. Taryn Morrissey
17th St and Colorado Ave NW
21. Max Nacheman
16th St and Webster St NW
22. Anna Nelson
16th St and Webster St NW
23. Natascha Nunes da Cunha
Colorado Ave and Blagden Terrace NW
24. Matthias Paustian
17th St and Upshur St NW
25. Dana Priest
Crestwood
("I would love to see a dedicated bike and bus lane. Or any other ideas to make it human friendly.")
26. Pavan Rajgopal
16th St and Webster St NW
27. Peter Richman
17th St and Upshur St NW

28. Bill Rock
17th St and Varnum St NW
29. Marcia Rock
17th St and Varnum St NW
("More climate-friendly transport options are critical. Affordable housing is too.")
30. Agustin Rossi
15th St and Crittenden St NW
31. Jenny Schuetz
17th St and Taylor St NW
32. Deanne C. Siemer
Mathewson Dr & Blagden Ave NW
33. Joe Sill
17th St and Taylor St NW
34. Matt Singerman
15th St and Webster St NW
("The lack of housing in our region is an ongoing crisis, and major arterial streets such as 16th St are prime candidates to help house more people.")
35. Natasha Spivack
Allison St and Blagden Ave NW
36. Jennifer Snyder
16th St and Shepherd St NW
37. Veronica Vela
17th St and Argyle Terrace NW
38. Raha Wala
18th St and Blagden Ave NW
39. Barry Wiggins
17th St and Varnum St NW
40. Linda White
16th St and Nicholson St NW
("I'm for greater density. Many already agree that greater density attracts more business. I think greater density also limits opportunities for crime...few people on the streets create more crime opportunities.")

41. Howard P. Willens
Mathewson Dr and Blagden Ave NW

42. Michael Yudzon
Allison St and Blagden Ave NW

43. Andrew Zimdahl
18th St and Varnum St NW

Date: January 7, 2020



Alex Baca <[REDACTED]>

crestwood neighbors?

3 messages

Alex Baca <[REDACTED]> Fri, Nov 13, 2020 at 11:38 AM
To: Jenny Schuetz <[REDACTED]> Peter Richman <[REDACTED]>

Hi friends! I remember y'all submitted a letter to Brandon Todd re: the Comp Plan, approximately a million years ago, yes?

As you probably know, the Comp Plan hearings are happening this week. The record for written comments is open until Dec. 3. If you haven't already, I would definitely recommend submitting that letter—and anything else that you might want to say about the Comp Plan (GGWash's ask are [here!](#))—to [REDACTED] so that it can be part of the record.

Let me know if you need help with anything!

ab

—

Alex Baca
Housing Program Organizer
[REDACTED] / (410) [REDACTED] / she, they
[Join our neighborhood.](#)

Peter Richman <[REDACTED]> Sat, Nov 14, 2020 at 11:32 AM
To: Alex Baca <[REDACTED]>
Cc: Jenny Schuetz <[REDACTED]>

Great idea! Just sent.

Absolutely crazy to see this letter was submitted to OP in 2020.

[Quoted text hidden]

Alex Baca <[REDACTED]> Mon, Nov 16, 2020 at 11:03 AM
To: Peter Richman <[REDACTED]>
Cc: Jenny Schuetz <[REDACTED]>

Fabulous! Thank you for ccing me :)

[Quoted text hidden]

10/28/2020

Greater Greater Washington Mail - Please Pass the Comp Plan's amendments



Alex Baca <[REDACTED]>

Please Pass the Comp Plan's amendments

2 messages

Alice Giancola <[REDACTED]>

Fri, Oct 23, 2020 at 5:08 PM

To: DC C Phil Mendelson <[REDACTED]>

Chairman Phil Mendelson
Councilmember Todd

Dear Phil and Brandon,

Please add our names to the list of your constituents who would like to see the Office of Planning's amendments to the Comp Plan passed intact by the end of 2020.

It's way overdue.

Alice and Tony Giancola
528 Cedar St, NW
20012

Alice Giancola <[REDACTED]>

Fri, Oct 23, 2020 at 5:14 PM

To: DC Brandon Todd <[REDACTED]>

Chairman Phil Mendelson
[Quoted text hidden]

My name is Rosie Hepner, and I am Ward 4 resident.

I am testifying to support the Office of Planning's amendments to be passed intact by the end of this year, and fully support the Future Land Use Map with increased density in Rock Creek West and any measures that reduce displacement.

DC is an increasingly unaffordable city and, for those who do live here, a segregated city. We know how this came to be from legal segregation and racial covenants, to redlining and NIMBYism. The updated Comp Plan can begin to right these wrongs and make DC a more equitable and inclusive city.

Now, I know this isn't a hearing on transportation, but as a cyclist it infuriates me that the roads in the city are clogged with drivers from Maryland and Virginia, while I dodge potholes, car doors and reckless drivers. Yet I know this is a symptom of a housing crisis: so many of those drivers exist because they have either been priced out of DC or can't find reasonably priced housing near transit. The built environment has failed them, and we pay for it in traffic, pedestrian deaths and pollution. And especially now, in light of the ongoing pandemic, DC's essential workers -- from our emergency responders, to nurses and grocery store clerks -- should be able to live in the communities they are so selflessly serving, not commuting to them.

And I know this isn't a hearing on health, but it makes my blood boil that a [recent Georgetown study](#) showed the life expectancy difference between a Ward 3 resident and a Ward 8 resident is 15 years. There are many other studies that show the correlations between life expectancy and wealth generation by zip code. And that happens in large part because of our housing: the quality and location of housing, lack of stable housing and experience of evictions, access to schools, healthcare and amenities, and proximity to polluting industries.

On a personal note, last year I unexpectedly went into labor 8 weeks early. My daughter was born not even 3 1/2lbs and spent a month in the NICU. But, we had access to an incredible hospital. After she was discharged, we were able to bring her home, one we could afford in a safe neighborhood, near her neonatal specialists, a short bike ride to the daycare she'd come to attend, near parks and spaces for her to play. And for that, she is now a thriving 18 month old. This is a result of our privilege, it is not the norm and I hate that our premature birth experience could have been worse, or fatal, if we lived in a different zip code, or even if the color of our skin was different. The statistics on pre-term labor, infant deaths, and maternal deaths are all worse for black families. And this is a result of our segregated built environment; it is the reason that one DC resident will likely live 15 years longer than another.

All this was just to say that I think the OP amendments are a step in the right direction and can improve DC's equity and inclusivity for our future generations, because we need it.



Alex Baca <[REDACTED]>

Fwd: It is bittersweet to be parting ways 🙋

Jonathan Robinson <[REDACTED]>

Mon, Oct 26, 2020 at 7:01 AM

To: Alex Baca <[REDACTED]>

Curious what you think of this...

----- Forwarded message -----

From: Jonathan Robinson <[REDACTED]>

Date: Mon, Oct 26, 2020 at 7:28 AM

Subject: It is bittersweet to be parting ways 🙋

To: 16th Street Neighborhood Association <[REDACTED]>

...OR Why my family is leaving the 16th Street Heights.

Hi all, some of you may know me, but for those who don't, my name is Jonathan Robinson. I'm your (now, former) neighbor and friend, happily enjoying the neighborhood with my wife and our small, spunky West Highland white terrier named Rosie. I've been living at the corner of 15th and Buchanan in a lovely basement rowhouse apartment since 2012. I moved here on a whim because my then-roommate was looking for an apartment with high enough ceilings that he could practice his upright bass and I wanted to be near the S or 50 bus lines. But in those 8 years, I fell in love with our neighborhood, whether it was sitting on our landlord's porch during Halloween giving out candy to trick or treaters and eating an entire pie from La Villa Pizzeria (RIP), swimming as much as possible at Upshur Pool, or the camaraderie and solidarity we have felt with our neighbors during the current public health crisis we are still living through.

But why is this a bittersweet parting? Because it didn't and shouldn't have to be this way. We wanted to stay in this neighborhood, but discovered that if we wanted to own an affordable starter home in this region it would be impossible to do so here. Just how unaffordable is our neighborhood for people who want to own a home and be part of our community here? According to [Zillow](#), single-family homes in this neighborhood are valued at nearly \$830k and are forecasted to rise to just under 1 million dollars by the end of 2021.

According to the [DC Fiscal Policy Center](#), our neighborhood has some of the least affordable starter homes in the city (further to the right on the graph is less affordable), and this is especially the case when taking into account how large the single-family homes are in our neighborhood.



Alex Baca <[REDACTED]>

B23-736 Testimony

1 message

Jenny Schuetz <[REDACTED]>

Tue, Dec 1, 2020 at 3:57 PM

To: [REDACTED]

Bcc: [REDACTED]

Dear Chair Mendelson, Councilmembers Todd, Bonds, Grosso, Silverman, and White:

The District needs more housing, especially more moderately priced housing. Even before the COVID-19 recession, nearly [one in four renter households](#) spent more than half their income on rent. Although the District has seen considerable new housing development in recent years, very little has been built in DC's most affluent neighborhoods. My own neighborhood, Crestwood, has added essentially no new housing in the past 20 years. That isn't an outcome of housing markets: it is the result of [low-density zoning](#). By prohibiting any type of housing except single-family detached homes (the most expensive housing type), Crestwood and other affluent neighborhoods effectively bar access to lower-income households. Even modest zoning changes to allow ["gentle density"](#) could result in substantially more housing, at substantially lower prices, in the District's high-opportunity neighborhoods.

To help address the District's persistently high housing costs and deeply entrenched patterns of racial segregation, I ask that you pass the Office of Planning's amendments to the Comprehensive Plan intact, before the end of 2020. Further, the next round of updates to the Comp Plan should be more predictable, timely, and transparent.

Allowing rowhouses, duplexes, and apartment buildings to be built in mostly single-family areas like Crestwood would add to the vibrancy of our neighborhoods. More people living in denser spaces can support more locally-serving retail and restaurants--an even more critical issue, given the current economic slowdown. The 16th Street corridor has excellent bus service and will soon have dedicated bus lanes; allowing moderate-density apartments would allow more people to take advantage of these transit investments.

Adopting revisions to the Comp Plan that allow more diverse housing to be built throughout the District will help to create more equitable and vibrant neighborhoods. Thank you for your consideration and your continued service to the District.

Sincerely,
Jenny Schuetz
[4116 17th St NW](#)
[Washington DC 20011](#)



Alex Baca <[REDACTED]>

B23-736 Testimony

1 message

Jeremy Welsh-Loveman <[REDACTED]>

Wed, Nov 11, 2020 at 6:57 PM

To: [REDACTED]

Cc: Alex Baca <[REDACTED]>

Dear Chairman Mendelson and the Committee of the Whole,

I would like to submit written testimony in support of the Mayor's proposed amendments to DC's Comprehensive Plan. I think the proposed amendments would further the Council's goals of housing affordability, environmental sustainability, and equity. The Council should pass the Office of Planning's amendments intact by the end of 2020.

The Council should support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods. Amendments that further "upflum" should be either maintained or expanded. Further amendments should not include language about how neighborhoods should be "protected" or "conserved". This language was prevalent in the 2006 land use element and should be removed because it restricts the supply of housing and access to exclusive neighborhoods. The goal of any amendment to the comprehensive plan should be to make housing more affordable and to protect the environment, both of which will be furthered by more apartment housing construction.

It is imperative that the Council pass the Office of Planning's amendments by the end of 2020 so that the District can move forward with the next iteration of the comprehensive plan. This update process has gone on for several years, long enough to examine and debate all the issues, and the District needs to move on and prepare for the future.

Washington DC has done [better than other high-income cities, such as New York City or San Francisco](#), when it comes to producing housing and this has blunted some of the pressure on rents that we have seen in those cities. However, many areas of the District where construction has taken place, such as NoMA or Navy Yard, are running out of zoned capacity. Additionally, many areas of the District, especially in the Rock Creek West planning district area, have not allowed their fair share of new housing. [DC's Housing Equity Report from 2019](#) reported that only 480 units of affordable housing had been created in Rock Creek West, compared to 6,960 units in nearby Mid-City and 4,010 units in Near Northwest. One has to only walk around the Metro stations in Ward 3 (Cleveland Park, Woodley Park, or Tenley Town) to see how little construction is going on or how little change there has been in the past 40 years.

By passing the Office of Planning's amendments the Council will be increasing the production of affordable housing, especially in high opportunity areas of the city such as Rock Creek West. [Research](#) also shows that a lack of housing construction in higher-income areas drives gentrification, as there is not enough room for people in Ward 3 they bid up housing costs in other areas throughout the City. DC has seen this as gentrification has spread further and further from the urban core. The [research literature](#) is clear that increased housing production, and less restrictive zoning laws, reduce housing costs. The ["vast majority of studies have found that locations with more \[housing supply\] regulation have higher house prices and less construction."](#) Market rate rental construction has [been shown to reduce rents](#) by up to 7%, as higher income people are drawn into the new buildings, opening up space for other renters in existing units.

Additionally, as long as additional housing supply is allowed, newer, more expensive housing will filter down over time. [Research](#) indicates that “23.4 percent of the rental units that were affordable to very low-income renters in the U.S. in 2013 had filtered down from higher rent categories in 1985.” The problem in many neighborhoods in DC, such as Cleveland Park, is that the newest apartment buildings are 40 years old and instead units have filtered up over time as the number of higher-income households has increased but the supply of housing has stayed the same. Therefore passing the Office of Plannings amendments will: increase the supply of affordable housing immediately through inclusionary zoning; increase supply of housing and reduce the rent of older, current units; and increase the supply of affordable housing in the future through filtering.

Beyond the impact on housing affordability, passing the Office of Plannings amendments will also further the District’s goals to fight climate change. Climate Change is an existential threat to humanity, it will negatively impact the most vulnerable populations throughout the world, and DC should do everything in its power to reduce CO2 emissions. Now that DC has passed the Clean Energy Act the best thing the Council can do to fight climate change is allow for more, dense, walkable development, especially near mass transit. DC already has what few cities in America do, a subway system. Allowing more people to live in DC, where they can take mass transit to work, would reduce CO2 emissions. Allowing more apartments is vital, because [“with more compact development, people drive 20 to 40 percent less, at minimal or reduced cost, while reaping other fiscal and health benefits.”](#) Additionally, the US Department of Energy has found that households [“living in apartment buildings with five or more units use about half as much energy as other types of homes.”](#) This is because apartments are better insulated by the other apartments around them and they are smaller. DC has stringent energy efficiency requirements for new construction as well, guaranteeing that allowing new apartment buildings will increase the average efficiency of housing in DC.

Lastly, as DC and the world recover from the COVID19 pandemic it is important that DC continue to grow and bring in additional revenue. New construction and additional residents will allow the DC Government to have more resources to pursue a wide variety of important goals, such as education or the construction of even more affordable housing.

Taking into account the significant benefits in terms of housing affordability, environmental sustainability, and revenue generation, the Council should move quickly to pass the Office of Planning’s Comprehensive Plan amendments. Thank you for your time and consideration of this important matter.



Alex Baca <[REDACTED]>

Please Pass the Comp Plan Amendments

Michael Whelan <[REDACTED]>

Sat, Oct 10, 2020 at 12:13 AM

To: [REDACTED]

Cc: [REDACTED]

Dear Chair Mendelson, Councilmember Todd, and At-Large Councilmembers,

My name is Mike Whelan and I live on Kansas Ave in Petworth. I'm also a candidate for ANC and am running for that office because I want to make sure we can keep housing affordable here in my neighborhood. The only way we can do that is if DC is welcoming towards our new neighbors, instead of trying to turn them away or say that they can only live in one or two neighborhoods.

Because I support welcoming new neighbors to our community, I am really glad that the Office of Planning has put together such a great set of amendments to the Comprehensive Plan. These amendments build upon the "framework element" that you passed almost exactly one year ago by pushing for housing across the whole city, ensuring that each neighborhood does its fair share to solve our housing crisis. I ask that you **pass all OP amendments with urgency** - at least before the end of the year.

I would also urge you to support any other amendments that may be offered up by members of the Council if they further bolster the goal of ensuring that every part of DC accommodates homes for people. This is especially true because COVID-19 has shown that we really need to support our small local businesses. Here in Petworth, we have had a spate of business closures on Upsher Street, even before the pandemic. I am hopeful that if we can get some more neighbors in the community, we could support more great local businesses.

If any Councilmembers propose amendments to weaken the OP's proposal or exclude some part of the city from doing its fair share to support homes for our neighbors, I ask you to please vote those amendments down. Language like "protect the neighborhood from apartments" is immoral during a housing crisis, and unfairly biased against renters and people who live in apartments, such as myself.

Please also add language to the plan to speed up this process next time. I can't believe it's been a year since the framework was passed!

Thank you to each one of you for listening, and for your hard work to keep our city safe during this pandemic.

Very Best Wishes,

Mike Whelan
4014 Kansas Ave NW, Apt 105
Washington DC, 20011

Word 5



Alex Baca <[REDACTED]>

Fwd: Comprehensive plan

Katie Beckman-Gotrich <[REDACTED]>

Sat, Oct 24, 2020 at 5:47 AM

To: [REDACTED] <[REDACTED]>

----- Forwarded message -----

From: Katie Beckman-Gotrich <[REDACTED]>

Date: Sat, Oct 24, 2020 at 5:45 AM

Subject: Comprehensive plan

To: [REDACTED]

CC: [REDACTED]

Dear chair and council members- I'm a 8 year resident of our beautiful city and have set roots, buying a home and raising a Washingtonian. Even a year is long enough to see how the working poor are pushed to the margins. I believe our prosperity as a community loses in being rooted in our history, centering our most vulnerable neighbors. To ensure the shared prosperity of our community, I'd like to see Office of Planning's amendments to the Comp Plan passed intact by the end of 2020. We need this long term vision to include all residents and not just future investors. Thank you for your consideration.

Your neighbor,
Katie Beckman-Gotrich
[4932 Sargent Rd NE, Washington, DC 20017](#)
[REDACTED]

PS-Defund MPD.

--

Have a great day,
Katie

Katherine A. Beckman-GotrichPreferred gender pronouns: [they/them/theirs](#) or [she/her/hers](#)**Co-Director, Training**[Rising Organizers](#) | [Support Our Work](#)

"Hatreds never cease by hatred in this world; through love alone they cease. This is an eternal law."

- Buddha

--

Have a great day,
Katie

Katherine A. Beckman-GotrichPreferred gender pronouns: [they/them/theirs](#) or [she/her/hers](#)**Co-Director, Training**[Rising Organizers](#) | [Support Our Work](#)



Alex Baca <[REDACTED]>

B23-736 Testimony - more co-ops and permanent affordability

2 messages

Sam Jared Bonar <[REDACTED]>

Thu, Dec 3, 2020 at 9:17 AM

To: [REDACTED]

Cc: "Barnes, Dianne (SMD 5E09)" <[REDACTED]> "White, Robert (Council)" <[REDACTED]> "Silverman, Elissa (Council)" <[REDACTED]>

Dear Chairman and Councilmembers,

I wanted to write to you about the Comp Plan, as a Ward 5 resident, before the record closes on Dec. 3.

I live in Edgewood and I see such a need for more collective ownership and permanent, deep affordability. We can't just say we want to build a bunch of affordable units without making sure they stay affordable and without finding new ways to let people have shared equity in their homes. I believe the way to do this is to focus on shared ownership and collective equity through expanding programs for co-ownership, cooperatives, community land trusts, and other innovative ways that are hard to get a loan or investment for right now under current law. I also want us to consider building housing on golf courses and large buildings that got tax subsidies but are lying mostly unused, especially in a pandemic. And we should create safe spaces for those who wish to live in tents or tiny homes so that they can confidently create what they need outside of our systems of shelters and control.

In addition, I agree with a lot of others who express that we must be willing to build large affordable housing developments that house families at 30% AMI and lower. If the building is mixed use, it must be majority lower income or else it will continue to kick the problem down the road. And wealthier, less dense parts of the city must share in the responsibility of creating more housing, especially affordable housing.

I want to support the proposed changes to the Comprehensive Plan and suggest that D.C. Council add more language supporting the development of limited-equity cooperatives and community land trusts. This is how we make home ownership available to more people: collective the land and the wealth of the city so everyone can have equity in our prosperity as a city. I also agree with GGW's recommendations:

Pass Office of Planning's amendments, with which I fully agree, intact as soon as possible.

Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.

Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

I hope you're finding strength in these crazy times and I hope you're willing to boldly defy the status quo and make a housing system that works for the people.

Thanks very much,

Sam Bonar

—

Creative Advocacy Lab: deliciousdemocracy.com

[REDACTED]

Testimony of Edward Garnett

Before the Committee of the Whole
Council of the District of Columbia
The Honorable Phil Mendelson, Chairman

“Comprehensive Plan Amendment Act of 2020”

November 13, 2020

9:00 AM

Zoom Video Conference Broadcast
1350 Pennsylvania Avenue, NW Washington, DC 20004

Good afternoon, Chairman Mendelson and members of the Council. My name is Edward Garnett, and I am a resident of the Edgewood neighborhood in Ward 5.

I appreciate the opportunity to testify during this hearing and out of respect for your time and that of the other participants, I will keep my remarks brief.

I would like to focus on three areas:

1. I would like to commend Andrew Trueblood and his team at the Office of Planning for managing this process in a fair and transparent manner and in as quick a fashion as possible, under the limitations of the law.
2. Like many other participants in this hearing, I urge you to pass the Office of Planning's amendments, which I agree with, as quickly as possible -- preferably by the end of the year.
3. As a former ANC Commissioner in Edgewood, I supported more housing being built, in some cases actually "in my backyard" (visible from my back deck), because I think our city has a housing crisis. In 2017, I proposed several amendments, some of which were included in the proposed legislation and I would like to highlight today.

Parks, Recreation, and Open Space Element: Institutional Green Space Insurance and Funding

The first amendment would be to attempt to resolve the issue of a lack of publicly accessible green space in Edgewood, but also more broadly in Ward 5 and around the city, by encouraging private institutions to provide cooperative use to the public. In Edgewood and Brookland, we have the benefit of having great institutions surrounding us, religious institutions, college campuses, and large swathes of "green space." While some of our neighbors, notably Catholic University, are very generous in having open campus policies and allowing neighborhood use, other large institutions feel they cannot have public access because of insurance and liability reasons.

In the proposed amendment to Parks, Recreation, and Open Space Element Section 818.3 on Institutional Open Space, I suggested adding the text:

818.3 Policy PROS-4.2.1: Institutional Open Space Encourage local institutions—, such as private and parochial schools, colleges and universities, seminaries, hospitals, and churches and cemeteries—, to allow the cooperative use of their open space lands for the benefit of District residents. [*Explore funding and insurance mechanisms that would incentivize and preserve local institutions that choose to provide cooperative use.*]

I encourage the Council to include this amendment and also seriously consider how to enable public access to the vital resource of otherwise private green space in our city.

Upper Northeast Area Element: Edgewood and the Brookland Small Area Plan

The remainder of my amendments apply to Chapter 24, the Upper Northeast Area Element, and specifically Section 2416, the Brookland Metro Station Area. My neighborhood of Edgewood lies directly south and west of the Metro Station and tracks. We are fortunate to have seen a growth in transit-orient development spearheaded by Catholic University around the metro station and I thank the residents and leaders who came before me for enabling this smart growth that enables me to live in our neighborhood.¹

We are lucky to have great transit and access to the Metropolitan Branch Trail, enabling many of my neighbors to get around the city without driving. We should adopt policies that encourage this behavior as it benefits all residents of our city by reducing car traffic and if you squint hard enough, the entire world, as it reduces global warming from greenhouse gas emissions.

To that end, I recommend adopting all the recommended amendments in Section 2416. The good news is that Brookland already has two great planning documents in place – the 2009 Brookland Brookland-CUA Metro Station Small Area Plan and the 2015 Brookland-Edgewood Livability Study. The bad news is that despite it being several years later, many of the recommendations of these documents have not been enacted. While outside the scope of today's hearing, I highly suggest that the Council set deadlines for enactment of these type of plan recommendations or the explanation of the agencies responsible as to why they were not completed.

I have only one additional suggestion for the Council and the Office of Planning - while the 2009 Small Area Plan is heavily referenced in the proposed Comp Plan amendments, the 2015 Livability Study is not. I recommend the inclusion by reference to this document, which makes valuable recommendations for improving walking and bicycling in the neighborhood, including by adding an additional pedestrian/cyclist bridge across the metro tracks.

Thank you for the opportunity to testify on this important topic and for your public service.

¹ While I did not previously recommend this amendment, I would note that this growth has made the text in 2416.1 incorrect – “The station is abutted by low-density residential uses on the east, and a mix of light industrial, commercial, and institutional uses on the north, south, and west.” This text should be updated to reflect that the west and south of the station actually has quite a bit of residential – thank you!

10/28/2020

Greater Greater Washington Mail - please pass the city's Comp Plan (and amendments) as soon as possible



Alex Baca <[REDACTED]>

please pass the city's Comp Plan (and amendments) as soon as possible

1 message

Geoffrey Hatchard <[REDACTED]>

Fri, Oct 23, 2020 at 3:35 PM

To: [REDACTED] Kenyan McDuffie <[REDACTED]>

Bcc: [REDACTED]

Councilmembers,

I am writing with a simple request - I ask that you please pass the updated Comprehensive Plan amendments that the Office of Planning is recommending as soon as possible. We know that we are suffering from a housing crunch here in the city, and we need to do all that we can to move things forward quickly so we'll have more housing in the pipeline for DC.

I won't go into detail, as I know these are extraordinary times and we are all quite busy, and I understand that there are still multiple hearings left in this process, but I just hope that you will do all you can to expedite the process and vote in the affirmative for the items that have hearings shortly.

Thank you very much!

Geoffrey Hatchard
1218 Oates Street NE



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Geoffrey Hatchard <[REDACTED]>

Thu, Dec 3, 2020 at 4:10 PM

To: [REDACTED]

Cc: Kenyan McDuffie <[REDACTED]>

Bcc: [REDACTED]

To whom it may concern,

My name is Geoffrey Hatchard and I live in the Trinidad neighborhood of Ward 5. I've been a homeowner here for 11 years, and I wanted to share my thoughts on the District's Comprehensive Plan and what it could do to ensure that more people are able to live in the city that I'm proud to call my home.

I urge you to please pass the amendments proposed by the Office of Planning's staff as soon as possible. These are intelligent changes, worked on diligently by smart public servants who are doing their best to make Washington DC an even better place than it already is.

Over the last decade, the city has seen an enormous amount of growth. Much of that has been organic, which to me means that new housing has been built in areas where there was a lot of vacant land, or where it was easy to build because there was little opposition from existing neighbors or other folks who might find a reason to oppose new neighbors. Lots of that growth happened in Ward 6, in places like the Wharf, Near Southeast, and NoMa. Ward 5 had a fair share of that growth as well, in places like Fort Lincoln and near the Brookland, Fort Totten, and Rhode Island Avenue Metro stations.

Now, as growth moves into places that aren't blank slates, we need to get creative to ensure that we continue to add room to welcome new neighbors and ensure our children who want to stay in the city have an affordable place to put down their own roots. That means making sure that each ward and corner of the District accommodates continuing growth. Here in Ward 5, that means places that aren't large brownfields need to be utilized intelligently to add more housing, and across the city, the well-heeled should be welcoming new neighbors as much as those with less political juice.

I want to see room for new neighbors near Bloomingdale (hello, McMillan!). I want to see room for new neighbors along Rhode Island Avenue NE, and near the Starburst in both Trinidad and Carver-Langston. These are all areas that the Office of Planning has designated for growth, and I want to make sure we see these areas grow to the best of their abilities. More neighbors means that businesses will be able to thrive in the adjacent commercial areas, and that will help create a beneficial cycle of opportunity for existing residents and new ones.

All of this can be done in a way that fits in with the existing neighborhoods. Smart, simple rules can help shape new growth such that it feels like an extension of the existing neighborhoods where that growth is happening. We can make a city that's safer and more livable while being creative and thoughtful about these changes.

Washington DC needs to continue to grow, and it needs to make sure that it's incorporating good ideas from both locally and elsewhere to avoid the risk of getting stagnant. Cities that aren't growing and innovating are the ones that are being left behind. We need to make sure that we're continuing to refine and perfect our Comprehensive Plan—so that it's nimble and adaptive. I encourage each of you to also work on passing additional legislation that will enable better procedures to keep our Comprehensive Plan up-to-date and world-class.

Thank you,
Geoffrey Hatchard
[1218 Oates Street NE](#)

[REDACTED]

**Committee of the Whole, Public Hearing on Bill 23-736,
the “Comprehensive Plan Amendment Act of 2020”**

Good morning, Chair Mendelson and members of the Committee. My name is Garrett Hennigan. I am speaking to you today as a public witness, a 7 year Ward 5 resident, and a lifelong Washingtonian. I am here to ask the Council to adopt the Office of Planning’s amendments, to support allowing greater housing density throughout DC, and to approve the Comp Plan by the end of 2020.

I love this city, its people, and its energy. It is exciting to see our population growing and Statehood closer than ever. But we cannot avoid the reality that DC’s prosperity is coming at a grave cost to Black communities, communities of color, and our most vulnerable residents who face rising housing costs, displacement, and rapid change in their neighborhoods. I firmly believe that OP’s amendments to the Comp Plan are critical tools to address these disparities in housing and economic opportunity.

Since you will hear from experts better equipped to talk details, I wanted to share a recent conversation. Last month, visiting with my parents outside their Chevy Chase DC home where my brother and I grew up, my mom was catching me up on neighborhood news. A house down the block recently finished a year-long rebuild and had an open house. This newly refurbished, 4 bedroom house on a small corner lot is advertised at a staggering \$1.65 million. An unimaginable price compared to what my upper middle class parents paid for their home in the 80’s.

She was shocked. Is this what it takes to move into this neighborhood now? How, she asked, could anyone but the most wealthy ever move here to take advantage of the neighborhood’s local schools, fantastic parks, reliable transit, grocery stores, and all the other opportunities that I had growing up there? They could not. I could not. Chevy Chase needs more housing options that people can afford. Without them, she said, the neighborhood and its demographics could never change.

Looking around, she was not worried about having more neighbors or larger buildings or any of the other objections people raise in opposition to density. Instead, she was struck by the brazen unfairness of our city’s housing policy that hoards resources and opportunity for the wealthy, then restricts those neighborhoods to the most expensive and inefficient kind of housing: single family homes. She would gladly accept a duplex next door to prevent displacement somewhere else.

This anecdote is playing out all over the city, making housing deeply unaffordable for most people in far too many neighborhoods and it is rapidly changing the demographics and culture of this city. The Council cannot afford to draw out this process. We need more housing at all affordability levels now, and this Comp Plan update is the tool to do it.

Please say yes to increasing housing options and making our city more equitable by passing the Comp Plan intact in 2020. Thank you.



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Lydia La Motta <[REDACTED]>

Thu, Dec 3, 2020 at 9:35 AM

To: [REDACTED]

Cc: [REDACTED]

Good Morning,

I wanted to write to you about the Comp Plan, as a Ward 5 resident, before the record closes later today.

I live in Eckington and what was once a very residential neighborhood with long-time DC residents is rapidly changing due to an influx of construction. Neighbors are being displaced and it will continue to worsen. I have one neighbor in particular who lives in a dilapidated building where the landlord refuses to do maintenance, in an effort to scare him out so he can, I assume, tear the building down or sell the now valuable lot.

I want my neighborhood to remain diverse and affordable. I have lived here for over 5 years now and while there have been great changes, like the refurbishing of the Eckington Rec Center, the new buildings are going to quickly gentrify this great neighborhood.

In addition to a lack of affordable housing that I'm sure we will soon see, I am incredibly worried about the nearby amenities becoming unaffordable for my current neighbors. Tearing down the shopping center with the Save-A-Lot & Foreman Mills to replace it with condos and a movie theater might be appealing to some, but where will we be able to buy affordable groceries within walking distance? What is going to replace that store, which I know people commute to from outside our neighborhood because it's one of the few very affordable grocery stores in the whole city? If folks can't afford to take care of themselves here, they are going to leave this neighborhood and it will lose its soul.

I want to support the proposed changes to the Comprehensive Plan and suggest that D.C. Council:

- Pass Office of Planning's amendments, with which I fully agree, intact as soon as possible.
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Thanks very much,
Lydia La Motta

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Mann, Michael <[REDACTED]>

Mon, Nov 30, 2020 at 1:36 PM

To: "Committee of the Whole (Council)" <[REDACTED]>

I am writing on behalf of a community group called "[Historic Designation without Representation](#)" with over 60 members throughout the city, and also as an individual, a Professor at GWU and resident of Ward 5.

We would like to throw our weight behind the efforts of GGWash and hope you will

- Pass Office of Planning's amendments, with which we fully agree, intact—as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further “upflum” are either maintained or expanded;
- and the removal of the “protect” and “conserve” language prevalent in the 2006 land use element

We see more “conservation” in a city with 2x more conserved land than any other american city as a modern tool for redlining. [See impacts on affordable housing here](#) and [on the map](#).

—

[Michael Mann PhD](#)
Associate Professor
Dept. of Geography
George Washington University

[REDACTED]

[REDACTED]

[REDACTED]

Testimony

Robyn Russell

1432 Montello Ave. NE

Washington, DC 20002

My name is Robyn Russell, I am a resident of DC and a homeowner of eight years in the Trinidad neighborhood in the 5th ward. I am testifying today to express my strong support for three things:

1. I am requesting the Council pass the Office of Planning's amendments by the end of 2020. As you know, amendments to the 2006 Comp Plan have been ongoing since 2016. These amendments increase density and allow for more development, which will ultimately lower housing costs. The need for more affordable housing is urgent, and we can't wait any longer to have an updated Comp Plan.
2. I support adding language to the bill that creates better Comp Plan procedures and encourages the Office of Planning to begin to rewrite the 2006 plan by 2022. Again, we cannot wait.
3. I am open to other amendments as long as they increase construction of more housing citywide and particularly in affluent neighborhoods, such as Rock Creek West, Near Northwest, and Capitol Hill. I would also support amendments to further "upflum," as long as they are either maintained or expanded, and as long as they do not maintain the "protect" and "conserve" language so common in the 2006 land use element.

As you know, passing these amendments to the Comp Plan will allow passage of much-needed policies to address the shortage of dense, affordable housing in the District.

I am also testifying today on behalf of dozens of homeowners like myself in the District who consider themselves YIMBYS. I know we don't always testify at hearings like this, but we need to more, because there is a massive group of young homeowners in the city who want more affordable housing built, even if it means their property values won't rise as fast.

We know much of DC is zoned like a suburb with many single-family homes, many more than most other cities.¹ We want more apartment buildings. We want the city to build up. We want more high-density units in our neighborhoods. We want people of all backgrounds and income levels, including those experiencing homelessness, to have affordable places to live as our neighbors – and to have access to the good schools that often comes with living in wealthier areas. We are tired of walking down the street every day to see people living in tents. We are one of the richest cities in America. There is no excuse for this. We can do better, and we must do better. Because every person deserves a safe place to call home.

If we don't do this because it's the right thing to do, which I hope we will, we should do it because it's the smart thing to do. If we don't build more dense, affordable housing units, and the cost of housing continues to rise at unsustainable rates, people will start to leave the city.

¹ <https://www.dcpolicycenter.org/publications/single-family-zoning-2019/>

Some cities, such as San Francisco, are already seeing this, and this trend will be exacerbated by COVID.

Jenny Schultz at Brookings,² along with numerous other researchers, have outlined the data showing cities must build more housing and less expensive housing to allow residents to remain and thrive. And that increased supply starts with zoning reform enabled by an updated Comprehensive Plan.

² <https://www.brookings.edu/policy2020/bigideas/to-improve-housing-affordability-we-need-better-alignment-of-zoning-taxes-and-subsidies/>

Ward 6



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Alex Block <[REDACTED]>

Thu, Dec 3, 2020 at 10:45 AM

To: [REDACTED]

Cc: [REDACTED]

Greetings, Chairman Mendelson and Councilmembers:

I am writing in support of the Office of Planning's amendments to the Comprehensive Plan and urge the Council to adopt them without delay.

I support the Office of Planning's efforts to position the District for managing growth and embracing the opportunities that growth provides for our city. Despite some faults, the 2006 plan's subtitle of '**growing an inclusive city**' hit on all the right themes that the District should strive for:

- **Growing:** we are lucky enough to be positioned within an expanding economy. Embracing growth is the most just method for achieving our goals - it opens up doors of opportunity for the entire community. Most importantly, it recognizes that change is inevitable and ensures we can shape that change in the most beneficial way possible.
- **Inclusive:** ensuring we plan for equity in our communities, embrace diversity, and opportunity. Making sure we aren't pulling up the ladder of opportunity as property values rise.
- **City:** Embracing the value of Washington as an urban place with all of the benefits and dynamism that cities can offer.

I also encourage the Council to learn from this process and adopt language that directs the Office of Planning to create a new comprehensive plan as soon as possible. I'm glad that the District is taking the time to amend the plan itself, but the process has proven unworkable. The plan itself calls for amendments every five years, and this particular amendment cycle will be old enough to attend kindergarten by the time the Council finally takes action.

Thank you for the opportunity to submit testimony via writing, and thank you for your consideration.

Regards,

-Alex Block
1314 L St SE, Washington DC

—
Alex Block
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



**Testimony of
Payton Chung
Sierra Club, Washington DC Chapter
to the District of Columbia Council, Committee of the Whole
Hearing on Bill 23-736, the Comprehensive Plan Amendment Act of 2020
November 12, 2020**

The Sierra Club's Washington DC Chapter applauds the work that the Mayor's Office of Planning, the Department of Environment and Energy, and the Department of Transportation have put into updating the 2006 Comprehensive Plan for 2020. We urge the Council to adopt the Office of Planning's (OP) amendments soon, as they will amplify the implementation of critical recent environmental victories. We also urge OP to begin laying the groundwork now for an all-new Comprehensive Plan, which will be necessary to guide the District's built environment towards its midcentury goal of net zero carbon emissions.

These updates have strengthened the Comprehensive Plan to better reflect the Club's mission "to enlist humanity to protect and restore the quality of the natural and human environment."

Many policies that the Chapter has championed are reflected in this document, including incorporating DC's carbon neutrality goal and implementation of a cleaner energy system; fishable and swimmable surface waters throughout the District; a zero-waste goal for solid waste source reduction; and reducing safety and health dangers from the transportation system. The Club has worked with the Council and other District agencies on improving legislation and plans, including the Clean Energy DC Omnibus Act, the Sustainable Solid Waste Management Amendment Act, and the Vision Zero Action Plan, and we are glad to see that the updated Comprehensive Plan text reflects these policies and plans. We are also heartened to see new text addressing necessary climate adaptation and resilience measures, as these measures will only become more necessary in the years ahead.

We also applaud suggested revisions to the Housing Element, such as policy H-1.1, which seek to better balance jobs and housing in high-opportunity parts of the District and region. This policy reflects the Sierra Club's Urban Infill Policy, which states:

An essential strategy for reducing urban related carbon emissions is supporting dense, mixed-use communities and land uses that prioritize walking, biking or transit to meet daily transportation needs, as well as balancing jobs and housing within the region... All neighborhoods should be open to people of all income levels and backgrounds.

We look forward to engaging soon with the District in the multi-year process that will shape the next Comprehensive Plan. That should begin over the next year or two, with a public process to foster agreement on the core values and guiding vision that the upcoming plan will achieve. This approach has proven critical to helping other climate-leader cities around the world adopt transformative new Comprehensive Plans, and to make significant progress towards achieving their climate and equity goals.

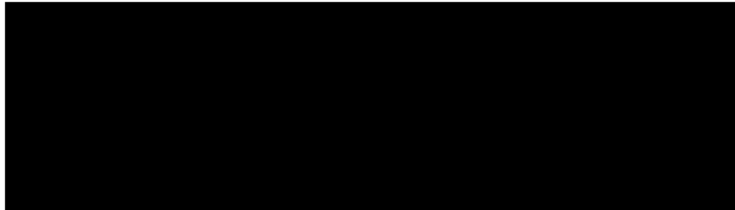
The 20-year horizon of the next Comprehensive Plan, from the 2020s to the 2040s, must be an era defined by a just transition away from the fossil-fuel era. Otherwise, the continued suitability of the District of Columbia as human habitat will be in grave doubt.

We have, on several occasions, applauded the District's commitment to achieving net zero carbon by 2050. The built environment (buildings and transportation) account for the lion's share of DC's carbon emissions, so the Comprehensive Plan will shape much of this transition. Future Comprehensive Plans should root themselves in foundational themes of sustainability, resilience, and justice, rather than siloing "environmental protection" off into one element among many.

OP should take lessons and inspiration from its colleagues at DOEE and DDOT, whose strategic plans make achieving sustainability the goal, not just an element. An example is DOEE's 2012 Sustainable DC plan, which set a goal of cutting carbon emissions from transportation and set a travel mode target, with 75% of commute trips via non-auto modes. A complementary target urged 20-minute neighborhoods, with daily services within walking distance for all District residents. DDOT then adopted DOEE's goal as its own, requiring that mode share goal be achieved through its 2014 MoveDC Plan and rejecting scenarios that did not achieve it.

Those two plans treat a sustainable built environment in DC as a destination that actions can achieve, and make measurable progress towards, rather than merely as one of many worthy directions that we can reactively steer existing movement towards. The current Comprehensive Plan timidly assumes that the unsustainable, unjust status quo and "business as usual" can only be tinkered with; the next Comprehensive Plan must instead boldly imagine and forge a sustainable future.

Thank you for the opportunity to address the Council on this important bill.



Payton Chung
Chair, Smart Growth Committee
Sierra Club, Washington DC Chapter



Alex Baca <[REDACTED]>

Bill 23-736, Comprehensive Plan Amendment Act of 2020

Payton Chung <[REDACTED]>

Tue, Nov 17, 2020 at 8:30 PM

To: [REDACTED]

Bcc: [REDACTED]

[Testimony given at the Ward 6 town hall on 17 November 2020. I gave testimony earlier on behalf of the Sierra Club, Washington DC Chapter.]

(An annotated edition, with hyperlinks to learn more, is at <https://westnorth.com/2020/11/17/testimony-on-comp-plan-update-ward-6/>)

Thanks to Councilmember Allen for this opportunity to speak. I'm Payton Chung, I'm a ten-year homeowner in Southwest Waterfront. I have 20 years of experience in urban planning policy, notably in urban design and affordable housing.

Comprehensive planning is how a city adapts to an inevitable future. No plan, and indeed no action a city can take, can prevent that future from occurring.

One inevitable aspect of the future that deeply worries me, as one of three billion humans living near sea level, is climate change. I previously testified that the updated comp plan does an adequate job of outlining several of the challenges and forward steps that DC will need to take over the next decade to forestall and adapt to the climate catastrophe. If left unchecked, many of Ward 6's most vulnerable areas, for example the James Creek corridor along Delaware Ave SW, will be uninhabitable within my lifetime. I also testified earlier that the next iteration of the Comp Plan should address this existential threat to DC's future as its foundation, not as one element among many.

I'd like to touch upon the price of housing. Increased rents cause new buildings, not the other way around. Once rents surpass a level that can pay the surprisingly high underlying cost to build new houses, then new buildings will get built. Stopping new buildings might avoid offending some people's aesthetic sensibilities, but does absolutely nothing to change the underlying demand for new housing. We can see this in the fact that rents have increased faster in Capitol Hill, with almost no new housing construction, than in Capitol Riverfront, which has lots of new housing construction.

I'm glad that the comp plan accepts that more houses are needed right here in Ward 6. Ward 6 residents enjoy many transportation choices, and so we produce far less carbon per capita than most Americans. The most effective contribution that neighborhoods like ours can make to the climate crisis is to let some more people in on our secret, and allow more neighbors to benefit from this fantastic location. To be clear, almost all of DC's population growth results from babies that are born here, so growth is a matter of letting children stay here, not a matter of outsiders vs. insiders and us vs. them.

DC alone can't change growing income and wealth inequality, or the fact that new houses are expensive to build – though it must continue to expand subsidies to help lower income residents access homes in high opportunity areas. But moderate- and middle-income residents could afford new construction on the private market, if only it were legal to build new homes everywhere, not just in a few tiny areas that I've called "instant neighborhoods," and the comp plan calls Land Use Change Areas. This comp plan update begins to soften the distinction between Land Use Change Areas and Neighborhood Conservation Areas. That distinction has succeeded too well at comforting the District's already comfortable single-family homeowners, sometimes overwhelming LUCAs with lots of change all at once, and pushing all new housing demand into high-rise apartments, which are the absolute most expensive kind of house to construct.

DC's zoning makes it illegal to build all but the most expensive possible houses: detached palaces surrounded by huge yards in Ward 3, or high-rise studios surrounded by costly concrete and steel in Ward 6. Yet somehow, we act surprised that housing costs are out of reach. Allowing a broader variety of housing choices across the entire spectrum of housing types and neighborhoods, and particularly making it simpler to add new units in less costly low-rise apartments, will better balance the housing market and make sure that our housing dollars, whether private or public, go further.



Alex Baca <[REDACTED]>

Pass the Comp Plan this year

Andrew DeFrank <[REDACTED]>

Fri, Oct 23, 2020 at 5:16 PM

To: Charles Allen <Charles@charlesallenward6.com>, [REDACTED]

Cc: Alex Baca <[REDACTED]>

Dear Chairman,

I am a Ward 6 resident and lifelong Washingtonian asking you to please lead the passage of the Comprehensive Plan changes, intact, by the end of 2020. We can't wait for important changes that will make it easier for more Washingtonians to find an affordable home in the city. Please work to make sure it passes by the end of this year.

Thank you,
Andrew DeFrank

--

Andrew DeFrank
[REDACTED] | @andrewdefrank



Alex Baca <[REDACTED]>

Testimony on B23-736

1 message

Andrew DeFrank <[REDACTED]>

Tue, Nov 10, 2020 at 12:36 PM

To: [REDACTED]

Cc: Alex Baca <[REDACTED]> Charles Allen <Charles@charlesallenward6.com>

Hello,

This is my written testimony regarding the Comprehensive Plan. I am a Ward 6 resident and lifelong Washingtonian, asking the Council to pass the proposed changes to the Comprehensive Plan by the end of 2020. We can't wait for important changes that will make it easier for more Washingtonians to find an affordable home in the city. We need to build a lot more housing, especially in wealthy areas that are the proposed changes to the plan upzones for higher density. I grew up on Capitol Hill, and I believe my neighborhood can and should fit a lot more people into it. I think that's more important than historic preservation. A lot of my friends grew up on the Red Line between Woodley Park and Friendship Heights. I believe those neighborhoods can and should fit way way more people into them, especially because of how wealthy those areas are. They can and should take on the change associated with more and new neighbors, because the alternative is displacement in less wealthy parts of our city east of the river. The capital of the United States should be a big city, because big cities are where economic opportunity, progressive cultural values, and new ideas flourish. Why not us? Why not make Washington a place where millions of people find an affordable home, come to love their community, and help make our country a more prosperous, more inclusive place?

Thank you,
Andrew DeFrank
Shaw Resident

—

Andrew DeFrank
[REDACTED] | @andrewdefrank

Dear DC Council Committee of the Whole,

I am a Ward 6 homeowner and a former Advisory Neighborhood Commissioner for 6C06 (NoMa). I am also a likely Commissioner-elect for 6A06 (H Street NE) (pending a final vote count) and a current member of DC's Multimodal Accessibility Advisory Council that advises the DC government on public spaces for people with disabilities.

Most importantly, I am Deaf and have watched too many of my Deaf friends leave DC because they could no longer afford to live here.

In my individual capacity, I strongly support:

1. Passing the Office of Planning's amendments, with which I fully agree, intact by the end of 2020.
2. Passing other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.
3. Adding language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022.

Thank you for all you do,

Robb Dooling

[REDACTED]

1350 Maryland Ave NE, Washington, DC, 20002



Alex Baca <[REDACTED]>

Comprehensive Plan suggestions

3 messages

Robb Dooling <[REDACTED]>
 To: Christopher Chris Laskowski <[REDACTED]>
 Cc: Alex Baca <[REDACTED]> Keya Chatterjee <[REDACTED]>

Tue, Nov 24, 2020 at 10:00 AM

Hello Chris,

Many thanks for asking for ideas from Ward 6 residents, especially in last week's meeting; I regret that I wasn't able to attend.

As the 6A06 commissioner starting in January, I strongly support upzoning along our Metrobus and Streetcar routes on Florida Ave NE, H St NE, Maryland Ave NE, 14th St NE, and 15th St NE.

In particular, the success of several multi-story apartment buildings on residential 14th St NE in this district shows that additional density would work well here and complement Capitol Hill rowhouses instead of detracting from them. I aim for more. Capitol Hill needs to do its fair share to resolve our affordable housing crisis.

All my best,
 Robb

Laskowski, Christopher "Chris" (Council) <[REDACTED]>
 To: Robb Dooling <[REDACTED]>
 Cc: Alex Baca <[REDACTED]> Keya Chatterjee <[REDACTED]>

Tue, Nov 24, 2020 at 10:19 AM

Thanks so much, Commissioner-elect. I can check, but do you happen to know if that's something 6A included in its requests to OP?

Chris Laskowski
 Legislative Director
 Office of Councilmember Charles Allen
 (sent from my phone)

On Nov 24, 2020, at 10:00 AM, Robb Dooling <[REDACTED]> wrote:

[Quoted text hidden]

Robb Dooling <[REDACTED]>
 To: "Laskowski, Christopher Chris (Council)" <[REDACTED]>
 Cc: Alex Baca <[REDACTED]> Keya Chatterjee <[REDACTED]>

Tue, Nov 24, 2020 at 10:33 AM

Here you go: <https://anc6a.org/wp-content/uploads/ANC6A-Comments-DC-Comprehensive-Plan.docx.pdf>.

In particular, we want to add a development zone around the National Arboretum. That is in 5D and 5C, but just a few blocks from us.



Alex Baca <[REDACTED]>

Comprehensive Plan

Ryan Fleming <[REDACTED]>

Fri, Oct 23, 2020 at 6:04 PM

To: [REDACTED]

Bcc: [REDACTED]

Dear Council members,

I am happy to hear the Office of Planning is amending the comprehensive plan. It is so important for DC to build housing in all parts of the city. Cities grow, change, and adapt. To keep wealthier parts of the city cast in amber, while poorer areas bear the brunt of development, is inequitable and frankly a policy that should not be relegated to the past. Let's move past this form of modern day redlining and housing discrimination.

The culture of DC runs deep, and we do not need a freeze on housing to "protect" and "conserve" the character of DC. Wealthy homeowners use this language too often to prevent new neighbors of diverse backgrounds. Those words hurt, disadvantage and eliminate opportunity for the most vulnerable people in the city.

As a Ward 6 resident, I welcome a new comprehensive plan, and I welcome new neighbors of all kinds. Let's make every neighborhood in DC affordable, walkable, and diverse.

Best,
Ryan Fleming
Ward 6
18th St NE, Kingman Park.



Alex Baca <[REDACTED]>

Comprehensive Plan Comment

2 messages

Megan Kanagy <[REDACTED]>

Sat, Nov 28, 2020 at 2:33 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Chairman Mendelson,

I am writing to urge you to pass the Comprehensive Plan with the Office of Planning's amendments fully intact by the end of 2020. Additional details of my comments are below.

Thank you,
Megan Kanagy
Ward 6 resident

- Pass Office of Planning's amendments intact by the end of 2020
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Alex Baca <[REDACTED]>

Wed, Dec 2, 2020 at 12:35 AM

To: Megan Kanagy <[REDACTED]>

Megan, you're the best—thank you thank you.

[Quoted text hidden]

--

Alex Baca

Housing Program Organizer

[REDACTED] / (410) [REDACTED] / she, they

[Join our neighborhood.](#)



Alex Baca <[REDACTED]>

Comprehensive Plan Amendment

1 message

Jon Markman <[REDACTED]>

Fri, Oct 23, 2020 at 3:43 PM

To: "Allen, Charles (Council)" <[REDACTED]>

Bcc: [REDACTED]

Councilman Allen,

I'm writing to urge you to support the Office of Planning's proposed amendments to the 2006 Comprehensive Plan. As you know, DC is desperately in need of more housing, and one of the major roadblocks standing in the way of getting it built is the unnecessarily restrictive in the Comprehensive Plan.

The Office of Planning's proposed amendments are a good start in making it easier to build denser, more affordable housing throughout DC, rather than just a few of its neighborhoods. My wife and I have been blessed to be able to live in DC for over 10 years now, but many of our friends aren't able to afford it, and so are either moving to the suburbs or never coming in the first place. And this is to say nothing of the folks even less fortunate who are struggling even more mightily to find and afford a place to live in our city.

DC can and must do better. It must work to eliminate exclusionary land use rules and practices and make it easier to build more housing. This is especially true as DC stands to gain greatly from people leaving New York for other, less crowded, cities. Insofar as additional amendments are offered that further these, or other valuable, goals, great! I encourage you to support them as well. What the Comprehensive Plan really needs is a complete rewrite (it's almost old enough to vote!) and I hope that is in the cards soon. But the basic steps proposed by the Office of Planning must be adopted in full, and they must be adopted as soon as possible.

Thank you for all your hard work on behalf of your constituents and have a great weekend!

Jon Markman
10th and K St NE



Alex Baca <[REDACTED]>

B23-736 Testimony

2 messages

Caitlin Rogger <[REDACTED]>

Mon, Nov 30, 2020 at 6:25 AM

To: [REDACTED]

Cc: "Allen, Charles (Council)" <[REDACTED]>

Alex Baca <[REDACTED]>

Dear Councilmembers,

I am writing to express my support for passing the Office of Planning's Comprehensive Plan amendments as soon as possible (in my personal capacity as a ward 6 District resident).

To achieve both equity and sustainability targets, DC needs to commit to systematic approaches to substantially increase housing supply, particularly affordable housing. Passing the Comp Plan soon will do that.

I support any additional amendments that increase the construction of more housing citywide, especially in wealthier neighborhoods.

I would like to see language added to the bill text that creates better Comprehensive Plan procedures and encourages the Office of Planning to begin writing the 2006 plan by 2022.

Many thanks.

Best wishes,
Caitlin Rogger

Alex Baca <[REDACTED]>

Mon, Nov 30, 2020 at 12:26 PM

To: Caitlin Rogger <[REDACTED]>

You're the best. Thank you.

[Quoted text hidden]

--

Alex Baca

Housing Program Organizer

[REDACTED] / (410) [REDACTED] / she, they

[Join our neighborhood.](#)



Alex Baca <[REDACTED]>

Re: last day to register for comp plan testimony + movedc extension!!

Aaron Sege <[REDACTED]>

Wed, Nov 11, 2020 at 10:20 PM

To: [REDACTED]

Hi Alex,

Thanks for all this info! I will be testifying on Friday morning. Procrastinated on my writing my testimony so unfortunately didn't finish it in time to seek your edits, but attaching here for your records. I plan on identifying myself as a Greater Greater Washington "member," (I don't think they'd get the "neighbor" terminology). Also liberally deployed the term "upflumming." Reading your coverage and GGWash's formal comment to OP was immensely helpful for understanding the Comprehensive Plan, and its respective Elements and FLUM.

And thank you for the heads up on the ward-level meeting. Per your recommendation, I will try to additionally speak at the Ward 6 meeting.

Best of luck making it through the slog these next few days!

Thanks again,

Aaron

A
[REDACTED]

On Mon, Nov 9, 2020 at 3:04 PM Alex Baca <[REDACTED]> wrote:

Hi! Hello! Happy Monday!

Today is the last day to sign up to testify in person (via Zoom) on amendments to the Comprehensive Plan, which will be heard by the DC Council this Thursday and Friday. To do so, email [REDACTED] before 5 p.m. today and say that you'd like to be added to the witness list! More information here. [Here's](#) what we're asking for—feel free to borrow our language—and here are some testimony tips.

I expect that this will be a long slog of a hearing. It's already planned across two days. So, let me know if you've signed up, and I'll do my best to ping you when it's close to your time to testify on Thursday or Friday. If you need help, or want me to review what you've written, just email me at [REDACTED] and I'd be happy to assist.

I'm still working on my own testimony, but looking forward to letting councilmembers know why I support more housing in the District, particularly in Rock Creek West, Near Northwest, and Capitol Hill. This chart, from Office of Planning's [Housing Framework for Equity and Growth report](#), is completely maddening, to me:

Council of the District of Columbia
Committee of the Whole
Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020.”

Testimony of Aaron Sege
Member, Greater Greater Washington
Ward 6 resident

Good morning, Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak today. My name is Aaron Sege. I am a member of Greater Greater Washington and a resident of Ward 6. I’m here to urge the Council to adopt the Office of Planning’s (OP’s) recommended amendments to the Comprehensive Plan (Comp Plan) by the end of 2020. I also support any other amendments that plan for increased construction of housing citywide, especially in affluent neighborhoods. Additionally, I hope the Council adds bill language that encourages OP to begin rewriting the Comp Plan by 2022.

I want to first talk a bit about my DC story and my values, and then what kind of amendments I support for the Comp Plan.

I moved here two years ago for a job in the federal government. It was difficult to find housing within a reasonable commute that was affordable on my government salary. I eventually found an affordable apartment, but many of my coworkers and friends were not so lucky: they ended up in Virginia. I also know other young people who, due to the high cost of living here, have left the region entirely.

At the same time that I want affordable housing for myself and others who move here, I don't want our arrival to displace longtime residents, many of whom are Black residents. DC is a community, and I care about my neighbors. We should all be able to live here.

Hypothetically, if DC adds zero housing, and there is zero vacancy, someone like me can only move here if someone else leaves. In practice, we've seen displacement even amidst housing construction because that construction was outstripped by demand. Last year, the Council amended the Comp Plan's Framework Element to align with this view, by stating that DC's housing affordability and displacement crisis is triggered not by a "housing boom," but by a "population boom."¹ Additional housing is a solution, not the problem.

The 2006 Comp Plan, and specifically its Future Land Use Map (FLUM) contributed to the housing squeeze by stifling housing growth in wealthier neighborhoods. OP's new amendments would help address our housing shortage equitably by "upflumming" some areas in wealthier neighborhoods. I hope these amendments are adopted without delay.

At the same time, I would like more "upflumming" in my area of Capitol Hill. As far as I can tell, OP recommended only one amendment in Capitol Hill south of H Street. Amendment 9903 would allow a mix of "moderate density residential" and "medium density residential," the latter of which is defined as four to seven stories, on 14th Street between D and E Streets SE.²

Increased density is great, but if you walk over to that block, you will see a beautiful new

¹ Council of the District of Columbia, [Bill 23-1](#), "To amend the District of Columbia Comprehensive Plan Act of 1984 to modify the Framework Element..." Amendment in the Nature of a Substitute, Section 220.5.

² District of Columbia Office of Planning, ["Recommended Amendments to the Comprehensive Plan Future Land Use Map."](#) October 10, 2019

Safeway at the base of a five-story apartment building.³ In other words, that area *already* includes medium density, and the FLUM amendment is only playing catch-up. The rest of Capitol Hill south of H Street remains “flummed” at “moderate density,” or “row house neighborhoods with low-rise garden apartment complexes.”⁴ That is a precise description of the neighborhood as it currently exists. Yet a FLUM is meant to chart land use for the *future*. Instead of freezing our neighborhood in amber, we should allow it to grow.

So I also support any other amendments that plan for increased construction of housing citywide, especially in wealthier neighborhoods. And I support the call for OP to begin rewriting the Comp Plan by 2022.

³ Lorinc, Eata. [“Luxury Community Breaks Ground in Capitol Hill.”](#) Multi-Use Living News. July 29, 2018.

⁴



Alex Baca <[REDACTED]>

Fwd: B23-736 Testimony

2 messages

Abigail Zenner <[REDACTED]>

Wed, Dec 2, 2020 at 9:49 PM

To: Alex Baca <[REDACTED]>

Not my best work, but I got it in. :) I can not bring myself to use the word upflum in my testimony.

Abigail Zenner
Pronouns: she/her/hers

[REDACTED]

----- Forwarded message -----

From: **Abigail Zenner** <[REDACTED]>

Date: Wed, Dec 2, 2020 at 9:47 PM

Subject: B23-736 Testimony

To: <[REDACTED]>

Cc: Allen, Charles (Council) <[REDACTED]>

<[REDACTED]> <[REDACTED]> <[REDACTED]>

Councilmembers,

Thank you for accepting testimony by email. I am offering this testimony as a long-time District resident. I currently live in Ward 6 in the Navy Yard neighborhood but prior to my current residence I lived in Glover Park in Ward 3 for many years. I was also an ANC Commissioner there from 2015-2016.

We have always known that the District needs more housing. For years we have been gaining residents and it has gotten harder to find a place to live. We need to keep building more especially in places near where I live now in Ward 6 and where I used to live in Ward 3. It is striking how many more options for housing there are on the Navy Yard side of the highway compared to the Capitol Hill side. It just takes a short walk to understand that building more helps give people more options for finding housing. We have to be able to plan for a growing city and a growing population so we can better plan for the future.

I ask that you pass the Office of Planning's amendments to the comprehensive plan. We must encourage more housing construction all over the city and especially in and near places like where I live now and where I used to live.

Now more than ever we need more options, more housing, all over the city.

I also ask that the council add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022. Better procedures makes for better planning for the future.

Thank you for accepting and considering this testimony.

Abigail Zenner
Pronouns: she/her/hers
70 I Street SE Apt 622
Washington, DC 20003

[REDACTED]

Alex Baca <[REDACTED]>

Wed, Dec 2, 2020 at 11:38 PM

To: Abigail Zenner <[REDACTED]>

Collected pro-density statements (winter 2019-present) by ward

Ward 1



Alex Baca

(no subject)

3 messages

James Benson

Fri, Jan 10, 2020 at 12:07 PM

To:

Cc:

Dear Office of Planning and ANC 1A01,

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

Recently, my ANC has had proposed changes to land use included Future Land Use area 1114 which provides moderate density residential and low density commercial space. I want to commend my ANC for requesting this amendment and humbly encourage OP to go further in increasing allowable density in ANC 1A01, Columbia Heights, and citywide.

I live in the Spring Rd/Perry PI neighborhood and I think we're doing an decent job with housing. I applauded the revitalization of the low-density apartments where Spring PI turns into Perry PI but am also quite taken aback by the residential condos built across the street, which are extremely overpriced (one being over \$900k) and have been sitting vacant since their completion almost two years ago.

The former development can keep housing prices low while the latter will ultimately increase them. What I'd like the city to avoid *is* the latter. Rent is already too high in many neighborhoods and lifetime residents, iconic businesses, and established restaurants are being displaced constantly. What would my neighborhood be like if Mac (on my block) isn't sharing his soulful music on the weekends in the spring and summer? Or the closure of my local ethnic grocery store Panam? Not the neighborhood I moved into and not one I'd want to stay in.

The single-family unit model (example: aforementioned condo project) would likely bring in the same type of person that complained about the infamous Shaw Metro PCS Go-Go music and/or a Whole Foods. Both of which can displace the heart of our city, causing lifetime residents to move further and further away for more affordable options.

With Amazon on the heels of arrival, we need to show newcomers that we welcome and nurture the soul and spirit of our neighbors, neighborhoods, and city. Any changes must be inclusive of those.

We also need to show developers that our properties are not for-profit. The last thing I want is for myself or my beloved neighbors to be priced out of *OUR* neighborhood. That's why I'm writing today.

I want to support the proposed changes to the Comprehensive Plan and suggest that:

- The entire city should be moderate-density mixed-use, and areas close to transit should be high-density mixed use.
- The Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements.
- I especially want to support the changes about how D.C.'s "established" neighborhoods should be "supported" instead of "protected."
- The Comprehensive Plan should incorporate more language from HUD's Affirmatively Furthering Fair Housing rule.
- I support more affordable, denser housing in wealthy parts of the city.

I hope you consider the soul of our city when you make your decisions and not the pockets of the elite that plague it.

I'm optimistic you agree with my sentiment and am always willing to have further discussions.

Thank you for your time,
James Zachary Benson
1520 Spring PI NW



Alex Baca <[REDACTED]>

Feedback on the Comp Plan Update

4 messages

Devin Brady <[REDACTED]>

Thu, Jan 9, 2020 at 12:58 PM

To: [REDACTED]

Cc: [REDACTED] Alex Baca <[REDACTED]>

Hello!

I live in Adams Morgan, in the Mid City policy area, and in general I strongly support the Comp Plan Update.

In the Summary of Major Policy Themes, I'm concerned about the phrase "Improve traffic circulation along major Mid-City arterial streets". If this means more cars on our roads and those cars traveling at higher speeds, that is a big problem. The streets of Adams Morgan are not highways whose purpose it is to speed suburban commuters to their destinations. They are our front yards, where people live and work, where children play. The need of Adams Morgan residents to safely walk and bike their own streets must be paramount, far above traffic circulation. Our streets are frankly an under-utilized resource because they are only thought of as where "traffic circulation" happens. Many Adams Morgan residents, like myself, do not own cars and our streets do not serve us.

Relatedly in the Mid City planning area, the streets around the Columbia Heights Metro station need to be fully closed to cars, and allow buses, bikes, and pedestrians only. The constant danger from cars keeps Columbia Heights from being the beloved public space it could be. What was done on 14th Street in Manhattan recently, turning it into a car-free busway, is exactly what should happen on 14th Street NW here in DC (in the blocks around the station).

Finally, we need more housing in DC and I support the Comp Plan in its efforts to build more housing in currently-exclusive areas west of Rock Creek Park. In a housing crisis, we cannot have any regulation that mandates a mansion-only zone. We should be able to build up to 5 stories of housing on any habitable land in the city, and even taller around Metro stations. To the furthest extent possible we must remove the red tape of DC bureaucracy and the veto power of individual busybodies that prevents new housing from being built quickly on every block in the city.

Thank you,
Devin Brady

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Thank you for a new housing vision

7 messages

Josh Bushinsky <[REDACTED]>

Tue, Oct 15, 2019 at 10:39 PM

Reply-To: [REDACTED]

To: [REDACTED]

Elissa (Council)" <[REDACTED]>

"Nadeau, Brianne K. (Council)"

"Silverman,

Bcc: [REDACTED]

Dear Mayor Bowser, Councilmembers, and Director Trueblood -

I'm writing to thank Mayor Bowser and Director Trueblood for advocating a vision of a dense DC community built for everyone, and for their leadership in promoting new housing in all neighborhoods.

As a Ward 1 resident, I know the beauty of a dense, livable community.

Tonight I picked up my 5 year old from kindergarten and we rode our bikes home. On the way home we ran into our neighbor and his children (7) and (4), and in the alley behind our house met two other neighborhood kids. For a beautiful and brief 15 minutes, before everyone had to go inside for dinner, bathtime, dishes, homework, housework and paid work, we had half a dozen neighborhood kids and their parents clustered in the alley, playing and talking and being together.

These interactions are simply not possible when we live separated by acres of lawn, or in 6,000 sq. ft. houses.

But density is not just critical because it fosters community. Density is critical because its a requirement to affordably house all of D.C.'s residents. And it is critical to tackling the climate crisis.

I know that there will opposition to new housing, particularly in the wealthiest and least dense parts of this city. But we cannot limit our efforts to provide new housing to those places where no one will protest. Multi-family homes and apartments have an important place in all of the best, most livable cities in the world, and surely they have a place in D.C., in all of our neighborhoods.

Thank you for articulating a vision that will address housing affordability, the climate crisis, and a better, more equitable future for D.C. and its residents.

Josh Bushinsky
Ward 1

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

DC's Comprehensive Plan (updated)

4 messages

Andrew DeFrank <[REDACTED]>

Fri, Jan 10, 2020 at 11:07 AM

To: [REDACTED]

Cc: [REDACTED]

<

Nadeau, Brianne K. (Council) <[REDACTED]>

"Winston, Dan (SMD 1B12)"

Dear Office of Planning and ANC 1B,

Please ignore my previous email. Read this one instead!

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

The proposed changes to Bruce Monroe Park, lower Georgia Avenue, the future neighborhood of McMillan, and Shaw matter to me. Living in Mid City as a young adult has been a great experience because it has provided me with the opportunity to live, learn, and grow surrounded by tons of people from many different backgrounds. I grew up on Capitol Hill, and I believe that my ability and privilege to easily access family friends, food, parks, shops, Metro, and so much more by foot shaped the parts of myself I'm proud of more than anything else in my life.

In order for more people to have the positive childhood and adult experiences I've had living in densely populated parts of Washington, DC, we have to aggressively change the rules in order to provide for more development. There isn't enough affordable housing in DC. I've spent a ton of my time as a Washingtonian in the homes of wealthy friends of mine along the Red Line corridor between Woodley Park and Friendship Heights. Those who live in those neighborhoods have to share the responsibility of creating more housing, especially affordable housing.

I want to live in a DC where it's possible to live in the upper reaches of Chevy Chase or 16th Street Heights, raise kids, and access downtown via public transportation in 30 minutes without being incredibly wealthy. The only way to do that is by making changes to the Comprehensive Plan that allow for more density across the city, so that when we eventually come to understand that single family housing zoning isn't fit for the capital of the United States, people will be amenable to it.

The Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements. I especially want to support the changes about how DC's "established" neighborhoods should be "supported" instead of "protected."

While I may dream of apartment buildings far taller than any that exist in the city right now (besides maybe The Cairo) in places like Van Ness, Brookland, Ivy City, Palisades, Tenleytown, and Hill East, I understand that the best thing I can do right now is to write to you to support the OP's proposed amendments to the remaining sections of the Comprehensive Plan.

A densely populated, equitable, and vibrant Washington, DC is worth fighting for.

Thank you very much,
Andrew DeFrank



Alex Baca <[REDACTED]>

Fwd: In support of the Comp Plan

3 messages

patrick mcmahon <[REDACTED]>

Fri, Jan 10, 2020 at 4:39 PM

To: [REDACTED]

three thumbs up!!

----- Forwarded message -----

From: Nadeau, Brianne K. (Council) <[REDACTED]>

Date: Thu, Jan 9, 2020 at 3:36 PM

Subject: Re: In support of the Comp Plan

To: patrick mcmahon <[REDACTED]>



Sent from my pocket-sized office

On Jan 9, 2020, at 3:35 PM, patrick mcmahon <[REDACTED]> wrote:

To the Office of Planning and my representatives,

Good afternoon! I'm writing in support of the proposed amendments to the Comp Plan. To me, they reveal an ambitious vision for a better city and I urge you to support them.

A denser, taller Washington D.C. will ensure accessibility and affordability here for generations to come. Especially west of Rock Creek Park. Amending the Future Land Use Map to raise density on every lot in the city (to moderate-density mixed use or greater) will have a leveling effect and bring the promise of new housing to neighborhoods across the city, even those that have made hobbies of organizing against it. (Especially those neighborhoods, in fact.)

In 20 years of steady growth, the housing supply hasn't kept up with demand, and that disparity has resulted in an unaffordable city for most of us. Worse, the uneven distribution of new housing construction has meant that some residents bear the weight of out-of-control housing costs twice—both in higher rents and the disruption of constant construction while other neighborhoods see little to none. We see, hear, and read this inequality in every conversation about gentrification.

A problem of this scale can only be solved collectively.

Dense new housing construction in every ward will bring new residents into the city (of all income levels), create jobs, expand the tax base, and help achieve the city's climate goals. On climate specifically: I ask that the Comp Plan be further amended to prevent the imposition of setback, lot size, and parking requirements which are A) bad policy and B) used to discriminate against certain forms of housing, often the more affordable variants.

I'm proud to be able to write this email and support these amendments. I've lived in Maryland, Virginia, and the District for all but four years of my life. For far too long, the city's housing affordability crisis has been accepted—it's been chalked up to "the way things are" when it never had to happen.

We have the opportunity to make things better, and I think we should.

Thank you for your time,

Patrick McMahon
Ward 1, ANC 1C05



Alex Baca <[REDACTED]>

Comp Plan Comments

3 messages

Jeffrey Pavlak <[REDACTED]>

Sat, Jan 11, 2020 at 12:47 AM

To: [REDACTED]

Cc: [REDACTED]

To whom it may concern:

My name is Jeff Pavlak, I live in Columbia Heights (ANC 1B, SMD 1B07), and I write to you in regards to the Comprehensive Plan (Comp Plan). I believe the Office of Planning (OP) has made real improvements with regards to housing. The OP's amendments to the Future Land Use Map are positive in increasing density on specified corridors (e.g. Wisconsin Ave).

However, this city today faces a grave affordability problem driven by scarcity; specifically, the absence of supply. The city should be doing everything it can to increase density city wide, including west of Rock Creek Park. Right now, scarcity has artificially increased the cost of housing, effectively created a shadow tax on residents, and resulted in the outflow of residents who are less capable of purchasing access to housing. Fixing this problem will require allowing the city to permit more housing, which should be the goal of each tool of policy the city has access to.

Thank you for your time and the thoughtfulness of your work product.

Sincerely,

Jeffrey S. Pavlak
Washington, DC

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Fwd: Comprehensive Plan Public Comment

1 message

Alex Baca <[REDACTED]>

Mon, Jan 13, 2020 at 9:24 AM

To: Alex Baca <[REDACTED]>

----- Forwarded message -----

From: Sabrina Valenti <[REDACTED]>

Date: Fri, Jan 10, 2020 at 4:50 PM

Subject: Comprehensive Plan Public Comment

To: <[REDACTED]>

CC: <[REDACTED]>

Dear Office of Planning and ANC 1D,

I am writing to express my support for the Office of Planning's proposed amendments to the Comprehensive Plan. I hope that the Office of Planning continues to increase allowable density in 1D and citywide.

I recently moved to DC from Baton Rouge, Louisiana; I originally lived in ANC 1A, and recently relocated to 1D after upheaval in my personal life. I know with absolute certainty that DC is the right place for me to live, and the social connections I have formed in the 5 short months I have lived here are what have allowed me to overcome the personal challenges I have faced since moving here in August.

I knew when I left Baton Rouge that I wanted to move somewhere that supported people like me, who rent their apartments and get around on foot or by bike or bus instead of by car. While DC is inarguably superior to Baton Rouge in that respect, I feel this city still has a long way to go to become truly equitable. One way to make DC better is to increase the allowable density of all available land. People thrive in human-scaled communities, as I have learned firsthand, and the best way to accomplish human-scaled development is to allow more people to live in one place.

Specifically, I would like to see the Office of Planning implement the following policies:

1. The minimum FLUM designation should be moderate-density mixed-use citywide.
2. The Comprehensive Plan should remove all language regarding parking minimums, minimum lot size requirements, and setback requirements.
3. The Comprehensive Plan should reference Affirmatively Furthering Fair Housing principles.
4. The amendments to Section 309.10 (page 37 of 72, Land Use), which shift the city's approach to "established" neighborhoods from "protect[ing]" to "conserv[ing]" are excellent, and I strongly support this language.

More people should have the opportunity to come live in DC as I did. It is deeply unfair that large swathes of the city are only livable for people making six figure salaries, and more so that many residents of the wealthiest wards are perfectly happy to keep it that way. DC should be a city for everyone, whether or not a person is from the DMV, or makes "enough" money to live here. DC is a living, breathing city, and it should be allowed to evolve to accommodate everyone who would like to build a new life here. I know that without more affordable housing and without safer, human-scaled infrastructure, that won't be possible for me. I

12/3/2020

Greater Greater Washington Mail - Fwd: Comprehensive Plan Public Comment

sincerely hope that the Office of Planning can ensure that the DC I want to live in will exist for everyone--not just now, but in the future, and not just for people like me, but for everyone.

Thank you,
Sabrina Valenti

--

Alex Baca

 | @alexbaca



Alex Baca <[REDACTED]>

New Housing Targets

4 messages

Matthew Yglesias <[REDACTED]>

Thu, Oct 17, 2019 at 3:21 PM

To: Matthew Yglesias <[REDACTED]>

Bcc: [REDACTED]

I wanted to congratulate the Office of Planning for the new affordable housing targets that were released this week, and make sure that my elected representatives are aware that from my perspective the only problem with these ideas is that they're not aggressive enough.

In particular, there seem to be some concerns about whether the city can actually finance the production of that many subsidized units. One natural way to accomplish that would be to encourage much more construction of market rate housing, by broadly changing land use rules across the city (but especially in the most affluent areas) to facilitate the construction of more dwellings. The proposed changes to the Future Land Use Map seem to be in that spirit, but one could probably go further with it. I live right off the 14th Street corridor where we've had a lot of new construction of condos and apartments in recent years and it's a shame those buildings aren't taller and thus able to house more people and support an even more thriving ecology of street-level retail. And it's a shame that 14th Street aside, so much of the neighborhood is set aside for small row houses like the one I live in, with no possibility of replacing them with larger more modern structures that could house more people and also be built to be more energy efficient.

And of course while my neighborhood could (and should) accommodate a lot more density, the gains to allowing more density west of Rock Creek Park where the land is even more expensive and the zoning is more restrictive would be even larger. We should allow modest-sized apartments to be built anywhere in the city, and places right by Metro stations or walkable to downtown should allow really big apartment buildings. Lots of market rate construction would greatly increase the city's tax base, make it easy to finance (and site!) subsidized units for low income families, and support the overall creation of a city that is bigger, more prosperous, more affordable, and more ecologically sustainable.

All of which is to say: The new targets are good, the spirit of the new FLUM seems good, but you guys should push to go further in both directions and follow up with big changes to the actual zoning and historic preservation processes. I think affordable housing is important, I think job creation is important, and I think climate change is important. Every city official and council member I've ever spoken to claims to believe those things are important too, and what I'd love to see is people to start proposing the kind of big land use policy changes that would actually move the needle on those topics. Failing that, maybe just write back and say that at the end of the day you actually don't care about these things and really just want to make sure nobody's street parking or view needs to change. That would be a healthy thing to have a political debate about!

Yours,
Matthew Yglesias
[1315 Riggs Street, NW](#)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ward 2



Alex Baca <[REDACTED]>

Comprehensive Plan

3 messages

Fri, Jan 10, 2020 at 12:44 PM

To:
Cc:

TO: Office of Planning

CC: ANC 2F commissioner John Guggenmos

CC: Councilmembers Bonds, White, Grosso, Silverman, and Mendelson

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I want to commend commissioner John Guggenmos for contributions pertaining to the Future Use Land Map and encourage OP to go further in increasing allowable density in ANC 2F, and citywide.

I live in Logan Circle and love the way that it is a perfect example of housing density and mixed uses. While residential rents are higher than average, I do feel that the ever increasing supply of housing units has stabilized that situation in my neighborhood and is a good trend for the rest of the city. I also advocate adding affordable units to all new developments to correct all the types of segregation that linger from the days before Home Rule. Fair housing is a right, not a privilege. Wealthier, less dense parts of the city, need to share in this responsibility of creating more housing supply, especially affordable housing. We should acknowledge and mitigate the destructive history of Zoning, restrictive covenants, historic preservation as a racist weapon and housing discrimination in D.C. Rental assistance for the elderly is absolutely the right thing to do to help us remain in our city. Ultimately, we need more housing supply to help combat homelessness.

With regard to commercial rent increases driving our locally owned businesses out, increased supply may impact that, but not as well as in the residential sector. As a matter of public policy, I advocate mandating that landlords invest in the ownership of our small local businesses who rent their space so that they have something to lose when they strangle our neighborhood shops out of business with rent increases.

I specifically want to support the proposed changes to the Comprehensive Plan and suggest that:

- The entire city should be moderate-density mixed-use, and areas close to METRO and major bus arteries should be high-density mixed use.
- The Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements.
- I especially want to support the changes about how D.C.'s "established" neighborhoods should be "supported" instead of "protected."
- The Comprehensive Plan should incorporate more language from HUD's Affirmatively Furthering Fair Housing rule.
- I support more affordable, denser housing in wealthy parts of the city.

I have loved this city since I chose to move here in 1982, and am very proud of all of your efforts through the decades to make this place so much more wonderful.

Thank you very much,

Aaron Chilbert

[REDACTED]



Alex Baca <[REDACTED]>

Thank you for the neighborhood housing targets!

1 message

Aimee Custis <[REDACTED]> Tue, Oct 15, 2019 at 2:09 PM
To: [REDACTED] "Silverman,
Elissa (Council)" <[REDACTED]> "Bonds, Anita (Council)"
<[REDACTED]>
Bcc: [REDACTED]

Dear Mayor Bowser, Director Trueblood, and Councilmembers --

I'm writing to thank Mayor Bowser and Director Trueblood for your leadership this morning in releasing the by-neighborhood housing targets to help get us to 36,000 new units.

I am THRILLED to see my elected leaders (and Director Trueblood) giving us a real roadmap for what an equitable distribution of new housing in the city could look like, and what that means for those of us who live in more fortunate, well-to-do parts of the city. We ALL need to do our part to provide housing -- a basic human right -- to our fellow District residents.

While there is so much we need to do to tackle the city and region's housing crisis, this is big, tangible step in the right direction. I urge you, my Councilmembers, to support this effort - especially the west-of-Rock Creek Park targets and other targets for Wards 3 and 2, even though it may be politically difficult.

It is high time we see bold leadership like this. Today's announcement is necessary, but hardly sufficient, to the scale of our housing crisis -- even if we meet every single one of the targets set today.

As a proud District resident (Ward 2) I hope to see more, not less, brave leadership like this from all of you going forward.

Thank you!

Aimee Custis

[REDACTED]

aimeecustis.com



Alex Baca <[REDACTED]>

I support revisions to the Comp Plan (and a major UPFLUM!)

2 messages

Aimee Custis <[REDACTED]>

Wed, Jan 8, 2020 at 7:51 PM

To: [REDACTED]

Cc: "Cunningham, Kari (SMD 2B07)" <[REDACTED]> "Silverman, Elissa (Council)"

<[REDACTED]> "Bonds, Anita (Council)" <[REDACTED]> "White, Robert (Council)" <[REDACTED]>

Bcc: [REDACTED]

Dear Office of Planning, Councilmembers, and ANC 2B,

I'm writing to express my support for Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I'm writing today as a constituent and a resident of D.C. I am committed to working to build a city that allows other to do the same, so that safe, stable, affordable, accessible, and fair housing is not a privilege, but a right.

I support OP's amendments. **Honestly, I would like the amendments to the Comp Plan and the Future Land Use Maps (FLUM) to go further in adding greater density, especially in affluent parts of the city and especially around high-frequency transit lines.**

In addition, I'd like to see the addition of more language that commits both the Housing and Land Use elements to Affirmatively Furthering Fair Housing principles. The Trump administration has consistently sought to weaken this Obama-era rule, so local commitment to the same ideals and actions is more important than ever.

Thank you for your leadership and service. Let's do more!

Sincerely,

Aimee Custis

[REDACTED]

aimeecustis.com

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Fwd: Comprehensive Plan Public Comments

1 message

Alex Baca <[REDACTED]>

Mon, Jan 13, 2020 at 9:23 AM

To: Alex Baca <[REDACTED]>

----- Forwarded message -----

From: George Fagan <[REDACTED]>
 Date: Fri, Jan 10, 2020 at 4:50 PM
 Subject: Comprehensive Plan Public Comments
 To: <[REDACTED]>
 CC: <[REDACTED]> <[REDACTED]> <[REDACTED]>

Dear Office of Planning and ANC 2B,

I am a new resident of ANC 2B. I come from New Orleans—where many lives hinge on zoning and land use decisions. DC has not been impacted by environmental or human-caused disasters as directly as New Orleans has; however, the District faces its own unique set of challenges. I wholeheartedly and broadly support increased density measures in 2B, the Mid-City planning area, and citywide.

Even under New Orleans' unique land use regime, density is the lifeblood of the city—for better or worse. For instance, 80 percent of public or partially subsidized housing was destroyed during Hurricane Katrina. Only a small portion of this housing was ever rebuilt, and the city continues to face both a housing and density crisis. All of this is to say that dense, practical, development has the potential to alleviate equity concerns in D.C. as much as it does in New Orleans, and I support such measures.

I write as a citizen of D.C. I write as a New Orleanian. I write as a privileged person who disproportionately benefits from zoning and land use legislation. I am duty-bound to create spaces in my life and my city that treat systematically, historically disadvantaged citizens of D.C. as equals.

As a lawyer, I am fully aware of the dog-whistling Supreme Court opinions that have dictated the aesthetic and exclusionary zoning regime of the past half-century. D.C. has a chance to depart from these post-Jim Crow zoning and land use rules and regulations through a number of specific measures: 1) moderate-density mixed-use across the entire Future Land Use Map (FLUM) 2) no parking-minimum controls (nor lot or setback requirements) in the Comprehensive Plan 3) adherence to traditional fair housing principles in the Comprehensive Plan and 4) amendments to Section 309.10 that focus on conservation rather than preservation, as is consistent with my personal and professional approach to zoning and historic preservation laws.

In the past, my home has been flooded, my neighbors have been displaced by municipal public housing failures, and my home state is slowly disintegrating into the Gulf of Mexico. My home city has and continues to slowly drown because of climate change and the city's unwillingness to help those who are most affected by its consequences.

Thank you,
 G. Connor Fagan



Alex Baca <[REDACTED]>

Ward 2 Resident supporting Comprehensive Plan

3 messages

Peyton Gibson <[REDACTED]> Sat, Oct 10, 2020 at 11:59 AM
To: [REDACTED]
Cc: Alex Baca <[REDACTED]>

Hello City Council Members,

My name is Peyton Gibson, I am a resident of Ward 2, and work at the National Academies of Sciences! As a civil engineer and policy analyst, my career passion is to help communities thrive through the built environment. As a Logan Circle resident, cyclist, pedestrian, renter, ANC 2F Public Transportation Committee Member, and Mutual Aid volunteer, I have a vested interest and am an ardent supporter of any plan that enables affordable housing and new growth. I'm also still in graduate school (for Transportation Engineering, but I look a lot at land use and policy) and recently wrote a policy analysis paper on Affordable Housing options in the District (and would love to share if anyone wants to read it!).

Here are my asks for you as a constituent for your meeting on the Comp Plan on Nov. 12 (which I hope to try and testify at):

1. Please pass the Office of Planning's amendments by the end of 2020
2. Continue to support other amendments that INCREASE construction of more housing citywide and *especially* in affluent neighborhoods, as long as
 1. amendments that further "UpFlum" are either maintained or expanded
 2. and they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element.
3. Add language to the bill text that creates better Comp Plan procedures and encourages the Office of Planning to begin to rewrite the 2006 plan by 2022.

Thank you for your time and let me know if you have any questions!

--

Peyton Jane Gibson, EIT (she/her)

Associate Program Officer

National Academies of Sciences, Engineering, and Medicine

Board on Infrastructure and the Constructed Environment

M.S. Transportation Engineering Spring 2021 - CU Denver

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Letter of Support and Feedback to the Comprehensive Plan Updates

2 messages

Brian Goggin <[REDACTED]> Tue, Jan 7, 2020 at 10:20 PM

To: [REDACTED]

Cc: [REDACTED] "Silverman, Elissa (Council)" <[REDACTED]> "Forman, Jason (SMD 2F01)" <[REDACTED]> Bottino, John C. (SMD 2F03) <[REDACTED]> "Fanning, John (SMD 2F04)" <[REDACTED]> "Ferebee, Janice (SMD 2F08)" <[REDACTED]>

Bcc: [REDACTED]

Dear Director Trueblood and Office of Planning staff:

I am a Ward 2 resident (ANC 2F) writing in support of the Office of Planning's proposed amendments to the Comprehensive Plan. As a millennial, renter, and young professional, I have greatly benefited from DC's efforts to accommodate growth. After arriving almost 2 years ago, I have made new friends, taken in DC's cultural institutions, found a great job, and learned to call this place home. In the future, I hope to put down deeper roots here and welcome others to do the same.

And I'm not alone. Significant job growth; a pedestrian-friendly environment; fantastic green spaces, museums, and public facilities; and a diverse, vibrant city have so many others wanting to call DC home. However, not everyone is so fortunate as I am. The cost of living, spurred primarily by a general lack of housing, prevents many from following in my footsteps and has pushed out many of those wanting to remain here. Moreover, housing scarcity in DC pushes growth out to the suburbs, worsening the degradation of our environment in an age of unprecedented climate change.

We must relieve this housing scarcity through building more, and the only way to do that in a land-constrained city like DC is through increased density. This means building up or living closer together with less open space in between. And to that I say, yes please. The status quo housing and land use patterns are a luxury from the past that we can no longer afford to indulge. Because of this, I greatly support the many amendments to the Future Land Use Map (FLUM) that increase density from low to moderate and from moderate to medium density, especially around our transit corridors that can most easily accommodate this growth. I also support the changes to the Land Use element (especially Section 309.10) that strike language aiming to "Protect and conserve" single-family neighborhoods. This kind of language has stymied equitable development in the past by keeping the wealthy, exclusive single-family neighborhoods off-limits to growth.

Instead, I strongly support the inclusion of language that sets housing production targets by neighborhood throughout the city, including those with low density. For example, I support the proposed additions in Sections 503.8 and 504.25 of the Housing Element, which support developing more in high-cost areas and setting affordable housing targets by area.

I also support the following proposed changes to the Future Land Use Map (FLUM) and Generalized Policy Map (GPM) in and around my ANC (ANC 2F):

- **FLUM amendments 9938 and 9810** that increase allowable densities and building uses along 11th Street, a key corridor in Shaw. I live close by and can attest firsthand that this is an extremely wide street that can handle additional residents with accompanying multimodal infrastructure.
- **FLUM Amendments 9808 and 179**, which increase allowable residential density along the 14th Street corridor and near the Shaw Metro station, respectively.
- **Generalized Policy Map Amendment 9965** that proposes to change 14th Street between Riggs Street and S Street from a Neighborhood Conservation Area to a Main Street Mixed-Use Corridor.

Outside of my ANC, I also support the proposed FLUM amendments in the Rock Creek West planning area. This exclusive part of DC has built little to no new housing in the recent past, and should instead allow for more growth, especially along its transit-oriented corridors. Therefore, I support the following proposed amendments to the FLUM that increase the potential housing in this area:

- **9822 (Woodley Park Metro)**
- **2123 and 9807 (Cleveland Park Metro)**

- 180, 1690, and 9945 (Van Ness-UDC)
- 2238, 9821, 2382 (Chevy Chase)
- 2155.9, 2155.8, 9976, 2095, 2155.6, 2322, 2155.5, 2155.12, 2155.2, 2430, 2155.11, 2155.1, 2155.14, 2154.3, 2154.1, 2154.23, 2154.21, 2155.13 (Tenleytown and [Friendship Heights](#))
- 2795, 9814, 2803 (Wisconsin Avenue National Cathedral Area)

Lastly, although these changes are very positive, I think that we should go even further to help create an inclusive and affordable DC. The Comprehensive Plan is about planning for the long-term future, a future we know will require accommodating much more growth. To that end, I support the following:

- **Making the baseline density for the entire city, outside of parks, recreation, and open space, moderate-density mixed-use.** This would represent the most effective and equitable strategy for planning for future growth. And it would allow for this growth everywhere rather than permitting certain areas of the city to opt out.
- **Including more language that commits both the Housing and Land Use Elements to Affirmatively Furthering Fair Housing (AFFH) requirements.** AFFH is a piece of the Fair Housing Act of 1968 that requires municipalities to take "meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities." The federal government is dismantling enforcement of AFFH under President Trump; and therefore, it is especially critical that we express our local commitment to doing so. One effective way to do this is to increase allowable density and to reduce other barriers to housing construction in the Rock Creek West and Capitol Hill planning areas, which have produced little to no affordable housing in the past.
- **Adding right of return language to the Housing Element.** There is a large stock of aging subsidized housing in the District that needs redevelopment. In doing so, the DC government should guaranty existing residents of this housing the right to return after redevelopment if they so choose. This is especially important in regards to public housing, which houses some of our most vulnerable residents. For example, this language could be added to the "Principles for the Redevelopment of Existing Affordable Housing" callout box in Section 509.4 of the Housing Element.

Thank you for your hard work on these updates and listening to my input.

Sincerely,
Brian Goggin

Alex Baca <[REDACTED]>
To: Brian Goggin <[REDACTED]>

Wed, Jan 8, 2020 at 11:20 AM

This is so great, and so detailed! I really appreciate it. Thanks so much for sending, Brian.

[Quoted text hidden]

--

Alex Baca
Housing Program Organizer
[REDACTED] / (410) [REDACTED] / she, they
[Join our neighborhood.](#)

I appreciate ANC2B's work thus far in promoting micromobility and increasing micromobility safety in the council area. I encourage the OP to go further in increasing allowable density in ANC 2B, Ward 2, and city wide.

I live near Meridian Hill Park, below the U street corridor and north of Dupont, an area where housing can scarcely be said to be affordable. On the Future Land Use Map, the area is characterized as "moderate density residential," where there are mostly single family homes, 2-4 unit buildings, and some very low-rise apartments. However, I believe that wealthier, less dense parts of the city should share in the responsibility of creating more housing, especially affordable housing. Our neighborhood could stand to have more apartment buildings if they were allowed.

I want to support the proposed changes to the Comprehensive Plan and suggest that the entire city should be moderate-density mixed-use, and areas close to transit should be high-density mixed use. The Plan should not have any parking-minimum requirements, minimum lot requirements, or setback requirements. I especially want to support changes about how D.C.'s established neighborhoods should be 'supported' instead of 'protected.' I support more affordable, denser housing in wealthy parts of the city like ours.

I think the changes to the DC Comprehensive Plan show great promise for our community to uphold fair housing as a right, not a privilege, and look forward to a more inclusive, diverse, and denser District.

Thank you very much,

Claire Park



Alex Baca <[REDACTED]>

Fwd: Comments on draft update to Comprehensive Plan

2 messages

chris robinson <[REDACTED]>

Tue, Jan 7, 2020 at 3:52 PM

To: [REDACTED]

commented after encouragement from your article. meant to CC.

----- Forwarded message -----

From: chris robinson <[REDACTED]>

Date: Tue, Jan 7, 2020 at 3:51 PM

Subject: Comments on draft update to Comprehensive Plan

To: <[REDACTED]>

Cc: <[REDACTED]>

Thank you for considering my feedback on the update to the District's master planning document. I'm a ward 2 resident. Although I own a car, I overwhelmingly walk, use mass transit and ride my bike to get around and commute. Accordingly, my top priorities are improving transportation alternatives.

In the document, I highlight the following areas of concern:

Chapter 21 - Near Northwest Specific

2108.11 Policy NNW-1.1.10: Parking Management—

On street parking is poor use of limited street space. Residential parking is an irritating giveaway of public space to a limited, privileged group of car owners which creates hazardous conditions for non-motorized street users and should be replaced with wider sidewalks, and dedicated lanes for buses and non-motorized road users. If parking is really the greatest and best use of available space, off street parking will be built for profit.

I suggest the District, **in order to encourage use of alternative transportation, commit to implementing programs to remove the amount of on-street parking, to be replaced with street space to dedicated bus lanes and/or other non-motorized modes, and/or more pedestrian friendly streetscapes.**

Policy NNW-1.1.14: Improve transit connections to Georgetown by implementing a transit way on K Street downtown and extending the H Street streetcar. 2108.15

This does not go far enough. Transit connections to Georgetown won't be improved by the K street improvement because the K street plan only encompasses K between 12th and 21st. In fact, nothing in [DDOT's stated goals and benefits](#) of the project include anything about improving the connection to Georgetown. Tying in with my previous comment about parking, **the District should plan to remove on-street parking along M street.** Have you ever walked on M street? It's awful. Also, consider that much of the upper northwest quadrant's only mass transportation connection is the Wisconsin avenue bus line. This bus line largely runs through Georgetown via M street. My girlfriend relies on the Circulator to get to work. It's a horribly unreliable bus. It's not uncommon for her to wait 20 minutes during rush hour for a bus to come. M street is a horrible bottleneck and it's a disgrace that the District favors street parking there over wider sidewalks and dedicated bus lanes. While the MoveDC plan is a good place to start, the District should be ambitious with more specific issues in order to provide more political support and cover to potentially controversial improvements.

400 - Transportation.

NEW Action T.3.F: Improve Truck Safety Implement a truck safety campaign aimed at pedestrian and cyclists, that focuses on the need to share the road, and identifies potential truck conflict locations with bike lanes, transit stops and streetcars.

*I propose: Improve Truck Safety Implement a truck safety campaign aimed at pedestrian, cyclists **and truck drivers**, that focuses on the need to share the road, and identifies potential truck conflict locations with bike lanes, transit stops and streetcars. **The District should also implement programs to require trucks to use side guards and other safety devices to help reduce the risk of catastrophic injury and death to cyclists.***

For good measure, I've copied my ANC Commissioner and favored candidate for the Ward 2 election.

Thank you

Chris Robinson
1255 25th st NW

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Re: Neighborhood Housing Targets

2 messages

Dmitriy Zakharov <[REDACTED]>

Sun, Oct 20, 2019 at 12:55 PM

To: [REDACTED]

Bcc: [REDACTED]

Mayor Bowser, Director Trueblood, and Councilmembers,

I would like to add my voice to the chorus of those who have written you already to express my **strong support** for the District's commitment to establishing concrete, meaningful targets for more housing. I am personally of the mind that 36,000 new units is nowhere near enough, but neither Rome nor Washington were built in a day, and the public announcement of real by-neighborhood targets is a watershed moment. For your leadership and contributions to making this a reality, I thank you - and encourage you to keep at it.

As someone who has spent his entire adult life in DC and now calls Ward 2 home, I am especially passionate about making sure that more privileged neighborhoods absorb their fair share of new construction. I include in this category my own Dupont Circle surroundings, which I am able to enjoy solely because a rent-controlled apartment building I can afford was built here decades ago, before every bit of proposed density in this area was met with reflexive obstruction.

There are countless reasons to support greater residential density in DC, not least of which is the superior environmental and resource efficiency of such a built environment, which our climate crisis makes increasingly urgent. I know that change can be painful for many, and you face significant political headwinds in seeing this course of action through. Please know that there is significant grassroots support for using the tools of public policy to make DC's growth inclusive, equitable, and sustainable.

Sincerely,
Dmitriy Zakharov

[REDACTED]

Ward 3



Alex Baca <[REDACTED]>

Comprehensive Plan

2 messages

Danny Clark <[REDACTED]>

Fri, Jan 10, 2020 at 2:10 PM

To: [REDACTED]

Cc: [REDACTED]

Bcc: [REDACTED]

Dear Office of Planning and ANC3B members,

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I live near the border of Glover Park and Cathedral Heights on Wisconsin Avenue and there is not enough density in the neighborhood. While there are apartment complexes on one side of the street that serve the needs of students and working families, on the other side there are single family homes that cost millions of dollars that serve only wealthy residents. There is not enough affordable housing in our neighborhood as low density housing is prioritized. Glover Park and Cathedral Heights need to do their fair share to build more housing in DC so it can be affordable.

I want to support the proposed changes to the Comprehensive Plan and further suggest that richer, less dense parts of the city need to share in the responsibility to create more housing. The entire city should be moderate-density mixed use, and areas close to transit should be high-density mixed use. Single family homes along a major bus route, like there are in my neighborhood, is not conducive to housing affordability or good transportation policy.

My wife and I are expecting a child and want to remain in DC to raise our children. We're lucky to have some financial stability that lets us live in this wonderful city. I want to make sure that the city my child grows up in is affordable for all. By committing to building more housing, especially affordable housing, we can accomplish this.

Thank you for considering my comments,

Daniel Clark

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

My Comments as City Resident, on D.C.'s Comprehensive Plan

4 messages

Elizabeth Hagerty <[REDACTED]>

Fri, Jan 10, 2020 at 10:47 AM

To: [REDACTED]

Cc: [REDACTED]

Dear Office of Planning and ANC 3F,

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I recently viewed the Future Land Use Map, and I would like to thank you for the proposals to increase residential density along Wisconsin Avenue. I hope you will encourage the Office of Planning to increase allowable density in ANC 3F, Ward 3, not just along major thoroughfares, and throughout the city.

I live in Northern Cleveland Park. I have lived here since 2016. In the past four years, the rent for my one bedroom apartment (which I financially have to split, with a new roommate each year...) has risen from \$1,500/mo to \$1,898/mo.

The rents in DC are skyrocketing, while paychecks for a full time job are not increasing at anywhere near the same rate. I love this neighborhood, with the mix of city and safety. I can't afford a car and rent in this area, so I love being near public transit, which also is good for the environment. If I move further out into a suburb, I will be forced to be another car on the road and add to commuter congestion. I expect I won't be able to live in this neighborhood much longer with the city's housing crisis. At age 30, with a full time job, I still have a roommate. I would love to live in a studio for some privacy, but apartments being built now are increasingly "luxury" facilities with unnecessary extras pricing previous residents out of the area. Reserving a few units for a strict limited program is not the answer. We need to make sure we are only raising rents along with the raise in minimum wage. I am also very aware, as a millennial, that I see my peers buying tear down and rebuild houses in quickly gentrifying neighborhoods, displacing the previous residents and lowering DC's diversity yet again. I have also seen a huge surge in homelessness in our ward since just 2016. We need more housing in DC, and that means increasing apartment buildings and affordable housing.

As Ward 3 is partially wealthy, established, residential homeowners in the ward I anticipate a "not in my backyard" response to higher density housing areas and affordable housing in the area. More housing will not bring danger or traffic to the area. There is a heavy police presence in the ward between the DC police, AU police, and Secret Service for the embassies. Apartment residents want to use the public transit Cleveland Park and Tenleytown offer. I've found DC residents are proud to say they are a socially caring, liberal minded, intelligent population. If home owners and our elected officials from Ward 3 and around the city truly care about the next generations, protecting the environment, maintaining a diverse population, ending homelessness, allowing tax dollars to benefit the city, and making the best choices for the future of DC, they need to focus on this true crisis. We need to build more affordable housing to keep up with demand.

I would specifically like to ask why there is a huge, empty building that once held stores (empty for 3+ years) on the corner of Wisconsin Avenue and Upton Street, NW? Also, I am strongly concerned that the community being built on Wisconsin Avenue slightly south of that intersection, where the bank association was and across from Sidwell, will have extremely high rents and once again force existing tenants out of the neighborhood. Also, why in the proposed amendments are you only increasing residential density in Tenleytown to medium density? The areas around that metro and Van Ness are always losing rental businesses. They come and go within 6 months. If you put in apartments, we will shop / eat / spend our money in those stores and restaurants that go empty in your downtown areas and look bleak. As a resident of DC in Ward 3, ANC 3F, I am getting in touch to support the proposed changes to the Comprehensive Plan, and after research also suggest the following additions:

- The entire city should be moderate-density mixed-use, and specifically areas close to transit should be high-density mixed use. The Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements.
- I especially want to support the changes about how D.C.'s "established" neighborhoods should be "supported" instead of "protected."
- The Comprehensive Plan should incorporate more language from HUD's Affirmatively Furthering Fair Housing rule.
- And finally, I support more affordable, denser housing in wealthy parts of the city.

12/3/2020

Greater Greater Washington Mail - My Comments as City Resident, on D.C.'s Comprehensive Plan

In summary... I just want you all to really focus on the changes you can make to improve the district's lack of affordable housing. This is the most "close to home" issue that keeps me up at night. I'd be more than happy to discuss any of my thoughts via email or phone.

Thank you so much for representing me in our city government.
Above all, please remember that fair housing is a right, not a privilege.

Sincerely Yours,
Elizabeth Hagerty
4115 Wisconsin Avenue, NW
Apartment 411
Washington, DC 20016

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Proposed Amendments to Comprehensive Plan

3 messages

Lise Mossik MacPhee <[REDACTED]>

Fri, Jan 10, 2020 at 12:21 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Office of Planning and Commissioner Lee Brian Reba,

I'm writing to express my support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

I live in Woodley Park and believe that wealthier, less dense parts of the city share in the responsibility of creating more housing, especially affordable housing. Fair housing is a right, not a privilege. I want the city to be affordable to residents, especially long-time residents, and the most important way to combat homelessness is to create more housing. My neighborhood needs to do its fair share and build more affordable housing. We need to acknowledge the destructive history of restrictive covenants and housing discrimination in DC.

I encourage Commissioner Reba to support the Comprehensive Plan. I want to support the proposed changes and suggest that:

- The entire city should be moderate-density mixed-use, and areas close to transit should be high-density mixed use.
- The Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements.
- I especially want to support the changes about how DC's "established" neighborhoods should be "supported" instead of "protected."
- The Comprehensive Plan should incorporate more language from HUD's Affirmative Furthering Fair Housing rule.
- I support more affordable, denser housing in wealthy parts of the city.

I hope that we can all work together to make successful housing plans for this great city.

Thank you very much,
Lise MacPhee



Alex Baca <[REDACTED]>

Comp Plan Comments

2 messages

Griffin Winton-LaVieri <[REDACTED]>

Tue, Jan 7, 2020 at 8:19 PM

To: [REDACTED]

Cc: [REDACTED]

[REDACTED] Jordan
Riesenberg <[REDACTED]>

e o,

I would like to express my support for the proposed amendments to the District's Future Land Use Map and draft changes to the Land Use Element. To be fair, I think that the District should go even further with this Plan, particularly in Ward 3 where I live. High density should be allowed to extend further than just a single block from Connecticut and Wisconsin Avenues; Metro stations and frequent transit routes have larger watersheds and optimizing transit along with the District's climate goals. Additionally, the District should follow Minneapolis and Portland in allowing multi-petals to be built throughout the District. Neighborhoods such as Capitol Riverfront, NoMa, and SW Waterfront have seen admirable increases in density in recent years but this is inequitable and unfair if other neighborhoods do not contribute to the fight against the District's housing crisis by allowing the construction of both affordable and market rate housing. I understand that "perfect" should not be the enemy of "good" but would urge the District to act boldly to be a welcoming home for the many not the few.

Thank you for your time and consideration,

Griffin Winton-LaVier
2828 Connecticut Ave NW

[REDACTED]

[REDACTED]

Word 4



Alex Baca <[REDACTED]>

Support for Comp Plan housing targets

1 message

Jenny Schuetz <[REDACTED]>

Tue, Oct 15, 2019 at 9:34 PM

To: [REDACTED]

Dear Mayor Bowser, Councilmember Todd, and Director Trueblood:

Thank you for your leadership in setting affordable housing targets for every District neighborhood. Neighborhoods like mine, Crestwood, need to do more to provide housing that is affordable to low, moderate, and middle income households. I strongly support building more market rate and subsidized housing, including apartments, in Crestwood and other affluent neighborhoods across the District. Too many of our neighbors struggle to afford decent housing - those of us who are comfortably housed have a moral obligation to help.

I know that the politics of increasing housing density in single family neighborhoods is challenging, but many of us in those neighborhoods support your goal, even if our voices are not always the loudest ones in public meetings.

Thank you for your leadership. I look forward to welcoming more neighbors.

Sincerely,
Jenny Schuetz
4116 17th St NW



Alex Baca <[REDACTED]>

I support the Comp Plan Amendments

4 messages

Michael Whelan <[REDACTED]>

Fri, Jan 10, 2020 at 11:21 PM

To: [REDACTED]

Cc: "Todd, Brandon (Council)" <[REDACTED]>, "Hilley, Bennett (SMD 4C06)" <[REDACTED]>

Dear Planning Office Staff,

I am writing with my comments on the Comp Plan. I'm also CCing my ANC commissioner, Ward councilmember, at-large council members, and a local land use expert who studies and writes about the Comp Plan.

First, I am glad that the Planning Office worked so hard on the amendments, and I support them.

Secondly, I would urge to Future Land Use Map to recognize the need to add more density (jobs, but especially housing) in all parts of the city. We can't keep up with the number of people who want to live in DC if we only build a bunch of new apartments in Navy Yard and other new high-rise zones. There needs to be new housing of all types throughout the city. I am glad to see that you have already taken a step in this direction by noting that DC's established neighborhoods should be "supported" rather than "conserved."

Third, here are some things that should be eliminated from the comp plan and really any planning that DC does:

- Single-family zoning. Minneapolis made waves last year when they got rid of single-family zoning. Now, Oregon and California have gotten rid of it statewide. Single-family zoning is inherently exclusionary and says that people living in duplexes, apartments, and other non-single-family quarters are less deserving of housing than others. It has no place in an egalitarian society, especially one that is facing a massive housing crisis.
- Minimum parking requirements. One of the reasons we face a housing crisis is because builders are required to construct huge amounts of unnecessary parking that costs a ton of money. This parking also incentivizes people to drive even when they live in parts of the city with good public transit, which is not the kind of behavior you want to incentivize during a time of climate change.

Finally, I just want to say that I love my neighborhood - Petworth. I love it because it gives something to everybody. We have high-rise apartments, Victorian rowhouses, and everything in between. I live on Kansas Avenue and I'm excited because right now on the next block, near Georgia Ave, a new apartment tower is being built. I can't wait for it to be finished! More people will move in. They'll patronize local businesses and maybe open some of their own. Maybe some will be parents who will get involved at the local schools. And who knows who else! It will be great to see what they bring to the neighborhood. Please write a Comp Plan that lets them move here.

Thanks,
Michael Whelan
[4014 Kansas Ave NW](#)

Word 5



Alex Baca <[REDACTED]>

Back the Comprehensive Plan

2 messages

Connor Bevan <[REDACTED]>

Fri, Jan 10, 2020 at 4:14 PM

To: [REDACTED]

Cc: [REDACTED]

Dear Office of Planning and Councilmember McDuffie,

I would like to first offer my support and encouragement for your continued support for the need to address critical structural issues in DC's housing market.

I live in Trinidad, where ballooning rent prices continue to force out lifetime residents, and eat into the earnings and livelihoods of even those who can afford to stay. I will admit – my presence in this neighborhood is undoubtedly part of the problem. I moved to the neighborhood less than a year ago, and as a white man from California, I'm indicative of the type of gentrification that continues to plague DC, especially in Near Northeast.

When I considered moving to DC to take a job at a cash-strapped international nonprofit, I was faced with a couple options: move into a rapidly gentrifying neighborhood, and exacerbate churning demographics, or pack up and move way out into Virginia and Maryland, a decision that would have involved me doubling or tripling my commute times, and incurring the expenses and carbon footprint that come with owning a vehicle.

I'm sure you all are no stranger to stories like mine. DC is unique in that people from all over the country – and world – yearn to come here and inspire change.

That's what I'm asking of you all here today. The idea that housing need be a zero-sum game (my residence is akin to the displacement of another) is only made possible by our own regulatory failures. The fact of the matter is, DC and the entire Capitol Region are experiencing growth like nowhere else in this country. Investment and human capital continues to find a home in DC. Yet, far too often, we shy away from growth and prosperity, opting instead for the foolhardy ignorance that posits that can freeze this district in time.

That's why I'm asking you to support the proposed changes to the Comprehensive Plan, and take a step beyond to ensure that our locale can meet its dire housing shortage while protecting the most vulnerable members of our community. DC is an city – let's finally act like one. From Friendship Heights to Anacostia, this city should welcome infill and density, particularly in areas close to transit. Minimum parking requirements, setback requirements and lot size restrictions only have the pernicious effects of encouraging, the type of wasteful, sprawling urban planning that pollutes our air, eats into our natural environment, and makes transportation and mobility that much more difficult. Wealthy areas of town should no longer get to turn their backs on new developments and affordable housing. It's time to do away with "protecting" and "defending" neighborhoods, and instead looking after the people that make our neighborhoods so vibrant. Doing so means embracing change.

Thank you,



Alex Baca <[REDACTED]>

Comprehensive Plan Comment

4 messages

Josh Kramer <[REDACTED]>

Thu, Jan 9, 2020 at 11:09 AM

To: [REDACTED]

Cc: Alli Bailey <[REDACTED]>

Dear Office of Planning and ANC5D,

I'm writing, along with my wife, Allison Bailey, to express our support for Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan. We want to commend ANC 5D for passing a resolution pertaining to the Future Use Land Map and encourage OP to go further in increasing allowable density in 5D, Ward 5, and citywide.

We live in Trinidad, north of H St NE, and while our neighborhood is mainly rowhouses, it has more than its share of multi-unit apartment buildings, with a bit more room to grow. But it's only right that wealthier, less dense parts of the city share in the responsibility of creating more housing, especially affordable housing.

We can retain the "character" of neighborhoods without freezing them in amber forever. Some change is normal and healthy and should be allowed for if not encouraged outright. We should acknowledge the destructive history of restrictive covenants and housing discrimination in D.C. and keep that in mind when majority white neighborhood groups fight every new development project.

We are proud of our ANC commissioners for taking this process seriously through meetings and public sidewalk talks. We agree with their request to upzone the corridor in Carver Langston and enthusiastically agree with the statement, "more multi-bedroom units in a neighborhood with a growing population of children is an important way of addressing the future needs of our city and community."

In general, we want to support the proposed changes to the Comprehensive Plan and suggest two more: The entire city should be moderate-density mixed-use, and areas close to transit should be high-density mixed use. Also, the Comprehensive Plan should not have any parking-minimum requirements, minimum lot size requirements, or setback requirements.

My wife and I own our rowhouse in Trinidad but we do not want to see our neighbors — many of whom were born here or have lived here for decades — displaced from the neighborhood. We value the diversity of our community and want to make sure people who want to stay here can stay here. There must be more affordable housing and fair housing throughout the city or we are delaying the inevitable transformation of D.C. into an unaffordable whitewashed place like San Francisco or Manhattan. We can avoid that if we plan to, starting with the Comprehensive Plan.

Thanks very much,

Josh Kramer and Allison Bailey

Linehan, Ryan (SMD 5D01) <[REDACTED]>

Thu, Jan 9, 2020 at 11:23 AM

To: Josh Kramer <[REDACTED]>

Cc: plandc <[REDACTED]>

Alli Bailey <[REDACTED]>

<[REDACTED]>

<[REDACTED]>

Phil (COUNCIL) <[REDACTED]>

(SMD 5D02) <[REDACTED]>

5D04) <[REDACTED]>

<[REDACTED]>

"Silverman, Elissa (Council)" <[REDACTED]>

"Mendelson,

"Shropshire, Keisha L.

"Blacknell, Bernice S. (SMD

"Burkett, Jason E. (SMD 5D06)"

"Lee, Clarence (SMD 5D07)" <[REDACTED]>

Thank you Josh & Alli. ANC 5D could not agree with you more and we will be voting on these and additional changes to the comp plan next Tuesday at our regular monthly meeting.



Alex Baca <[REDACTED]>

THANK YOU for robust neighborhood housing targets!

2 messages

Dan Malouff <[REDACTED]> Tue, Oct 15, 2019 at 4:28 PM
To: [REDACTED]
Bcc: [REDACTED]

Dear Mayor, Councilmembers, and Staff,

Thank you for releasing robust neighborhood housing targets, and a strong proposed comp plan. The housing under-supply facing our city & region is the greatest local urban planning problem we face, and I am SO HAPPY that we have the leadership to begin addressing it head-on.

For affordability, for the climate, for social justice, and for so many other reasons, we can no longer sit back and allow Not-In-My-Back-Yard politics to rule. Gigantic sections of the city can no longer be fenced off from helping to solve these problems.

Today's announcement of robust neighborhood housing targets, and Comp Plan updates to accommodate them, is a welcome first step. While there is still much to do and many hard fights to win, THANK YOU for taking this difficult and necessary step.

I'll be here, voting to support you.

Sincerely,
Dan Malouff
Ward 5

[REDACTED]

[REDACTED]

12/3/2020

Greater Greater Washington Mail - Fwd: Robyn thanks for your support!



Alex Baca <[REDACTED]>

Fwd: Robyn thanks for your support!

6 messages

Robyn Russell <[REDACTED]>

Sat, Oct 12, 2019 at 12:08 PM

To: [REDACTED]

Hello Greater Greater Washinton Team and/or Alex,

I just sent the email below to David, who I realize no longer works on this portfolio, but I would love to find out how I can voice my support for inclusive zoning in the forthcoming Comprehensive Plan. Many thanks for any talking points or sign on letter language you can provide.

Warmly,

Robyn

Ps - Thanks to Alex for your great coverage of this important issue.

Sent from my iPhone

Begin forwarded message:

[REDACTED]
[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

affordable housing

4 messages

Shawn S. <[REDACTED]>

Wed, Oct 16, 2019 at 3:52 PM

To: [REDACTED]

Bcc: [REDACTED]

Dear Office of Planning,

I wanted to thank you for making affordable housing expansion a priority in DC. I hope it is a good start in ensuring **all** parts of the District (including my own in Brookland) commit to a big increase in public, subsidized, and cheaper market housing. Brookland is a low-density neighborhood with excellent public transportation options and should be especially willing to take on the responsibility of mitigating the gentrification and displacement we're seeing in so much of DC. Plus, having more residents of different ages and income levels would mean a variety of new customers for businesses in our neighborhood.

Thank you!

Shawn Sukumar

Resident, 5B04

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ward 6



Alex Baca <[REDACTED]>

Support for Office of Planning Comp Plan Amendments

5 messages

regina arlotto <[REDACTED]>

Wed, Jan 8, 2020 at 7:43 PM

To: [REDACTED]

Cc: "Holtzman, Steve (SMD 6B05)" <[REDACTED]> "Mendelson, Phil (COUNCIL)" <[REDACTED]>

"Allen, Charles (COUNCIL)" <[REDACTED]> "Bonds, Anita (Council)" <[REDACTED]>

"Grosso, David (Council)" <[REDACTED]>

Good evening all-

I am writing to express my full and unequivocal support for the Office of Planning's proposed amendments to the remaining sections of the Comprehensive Plan.

My husband and I bought our first house on Capitol Hill in 1994, when it was still an affordable neighborhood in the city. Both of us grew up in the DC suburbs, and we made a very conscious decision to live in DC and raise our family here. We looked for a house we could afford that was in walking distance to a grocery store, a bank, and the metro. We landed on the 100 block of Kentucky Avenue Southeast. My husband was a DC public school teacher, and I was just out of graduate school working at an architectural history firm. Thanks to the DC HPAP program, and fast forward a couple of decades later, we're still here, in our second Hill house, across the street from our first. All three of our kids are proud DCPS graduates (well almost, as #3 is a senior graduating in June) and our oldest son has graduated from college and has moved back to DC, working at a law firm and living in a group house near Union Station.

We've had many opportunities to move out of DC and buy a bigger house closer to my husband's job in Anne Arundel county. In fact, his employer almost made it a requirement for him to move to the county when he was hired as Superintendent of Anne Arundel County Public Schools in 2014. George made the case to stay in DC and commute to Annapolis, and the school board agreed. We love it here and can't think of living anywhere else. But for over twenty years, we have lamented the lack of density in our neighborhood. We don't have the vibrancy, diversity, and economic development that other areas of the city enjoy due to our unreasonably low density, mostly residential neighborhood. I especially want higher density in my neighborhood, Capitol Hill.

Should ANC 6B pass any resolutions pertaining to OP's proposed amendments, I hope that they are supportive, and encourages OP to go further in increasing allowable density in 6B, and city-wide.

I want more density, more integrated neighborhoods, fairer housing, better transit, and more responsible land use. I want parking minimums eliminated, and the practice of subsidizing parking stopped. I would also like to see the addition of language that commits to the Housing and Land Use Elements to furthering Fair Housing principles. I want my kids and their friends to be able to afford to live here and raise their families here too.

Thank you for this opportunity to comment on the Comprehensive Plan amendments, and I look forward to the progress DC will make once these amendments are adopted.

With best regards,

Gina Arlotto
123 Kentucky Avenue SE

[REDACTED]



Alex Baca <[REDACTED]>

I support the Comprehensive Plan update

2 messages

Payton Chung <[REDACTED]>

Fri, Jan 10, 2020 at 7:08 PM

To: [REDACTED]

Bcc: [REDACTED]

To Director Trueblood, Office of Planning staff, and Councilmembers:

Overall, I support the amendments that the Office of Planning has suggested to the District's 2030 Comprehensive Plan. The suggested amendments do a good job of balancing the needs of the District's future with the realities of the present. A Comprehensive Plan, after all, is meant to be a plan for the District's future, not a plan for the present or the past, and making sure that future residents have a place here is a matter of generational equity.

I particularly appreciate that the plan begins to broaden access to "established" neighborhoods that have, for the past century, excluded newcomers through zoning rules (particularly setback and minimum lot size rules) that have no basis in public health or safety.

I also appreciate that more parts of the District will be more open to changing their built fabric. All parts of DC have seen changes to their social fabric, but recent generations of the Comp Plan have limited changes to the built fabric to a select few islands -- like my home in Southwest Waterfront. Like many of my neighbors, I have welcomed this change as a positive, and am thrilled to have better public and private services nearby. Yet it is a basic matter of geographic equity and basic fairness that other parts of DC not be able to simply say "no, put everything else elsewhere."

The amendments are also a matter of survival for Southwest. Due to the climate crisis, low-lying areas like my neighborhood face extinction within my lifetime due to sea level rise. The amendments addressing resilience and sustainability, combined with welcoming more residents to DC's already (comparatively) energy-efficient, carbon-efficient, and water-efficient neighborhoods, will go some way towards mitigating this looming and entirely predictable disaster.

I believe the amendments could even go further, particularly given that DC is falling short on its housing-equity and net-zero carbon goals, but I understand that is perhaps a matter better suited to the political system than the planning system.

Sincerely yours,

Payton Chung

—

Payton Chung opines for himself * <http://westnorth.com>
"Urbanism works when it creates a journey as desirable as the destination." Paul Goldberger

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Neighborhood planning targets

4 messages

Chris Coletta <[REDACTED]> Wed, Oct 16, 2019 at 11:12 AM
To: [REDACTED]
Bcc: [REDACTED]

Dear Mayor Bowser, Director Trueblood, Councilmembers --

I was very pleasantly surprised -- thrilled, even! -- to read the news yesterday about the release of neighborhood-by-neighborhood housing targets for the District.

It's exciting to see our city leaders ask affluent neighborhoods to bear their share of the housing burden. I share the belief that every person, every neighborhood, ought to do their part to give DC residents the basic human right of a decent place to live.

That applies especially to those folks, like me, to whom DC has been kind.

We're taking a step in the right direction this week. It's far from the only step, and we must do more, but it's an important step nonetheless. I urge my Councilmembers reading this email to do whatever you can to make these these targets reality -- particularly in Ward 6, where I have lived for nearly 10 years and which, as I've heard Councilmember Allen say repeatedly, urgently needs more affordable housing.

(Incidentally, the ability to build more affordable housing would be a very good reason not to bring a certain football team back to the RFK campus.)

I'm grateful for this leadership and looking forward to more of it. Thank you!

Yours,

Chris Coletta
122 16th St SE

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Support for the Comprehensive Plan

4 messages

Matthew Eugene Goldman <[REDACTED]>

Fri, Jan 10, 2020 at 5:35 PM

To: [REDACTED]

Dear representatives of the people of DC,

I am writing to voice my support the latest iteration of the Comprehensive Plan. I am strongly in favor of efforts to create more housing in the District, as well as safer streets, more walkable communities, and less car dependence. I would like to see an even stronger emphasis on affordable housing and more efforts to reduce inequalities, segregation, and social marginalization. I hope that in the future more housing will be built in the already wealthy neighborhoods of NW DC, and more effort will be made to ensure that development in Wards 7 and 8 will be inclusive and provide more opportunities for jobs and affordable housing for local residents, and not result in displacement or the other costs of gentrification that long term residents in DC are often are forced to bear.

Best,
Matthew Goldman
ANC 6C05

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Housing Equity Report

6 messages

Holman, Corey (SMD 6B06) <[REDACTED]> Wed, Oct 16, 2019 at 9:22 AM

To: ATD EOM3 <[REDACTED]> Mayor Bowser <[REDACTED]>
 Cc: "Williams, Tyler (EOM)" <[REDACTED]> "Mendelson, Phil (COUNCIL)" <[REDACTED]>
 "Allen, Charles (COUNCIL)" <[REDACTED]> "Trueblood, Andrew (OP)" <[REDACTED]> Planning
 <[REDACTED]>

Mayor Bowser,

I am writing this morning to express my unending support for the goals laid out in your Housing Equity Report. We could have a never ending conversation about the recriminations in how we, as a self-appointed progressive city, ended up fueling hyper gentrification and displacement. But we are here and we have to fix this. Your report lays out a road map that will help defray the future destruction of communities and families which should allow us to share the city we love with as many people who want to live here sustainably, and not just those who can afford to live here while ignoring the climate consequences of our current exclusionary practices.

On a technical level, I am still reading through the proposed amendments to the Comprehensive Plan and I will share my detailed thoughts and those of my constituents and neighbors through ANC 6B's official Comp Plan report. At first glance, though, I am hearted by some of the changes to the Future Land Use Map and Generalized Policy Map and aspects to the written elements. But I worry the framework still contains too much exclusionary language and quite simply does not chart a path to 36,000 new units by 2025, let alone 12,000 affordable units. This is something we will hash out over the next few months, of course, and I look forward to these discussions.

I support your plan for returning Capitol Hill to it's past density with market-rate and affordable housing and will be a supportive partner in that fight. We have a moral imperative to do this. For our neighbors, for our climate, and for our children.

-Corey

Corey Holman
 Commissioner, SMD 6B06
 Chair, ANC 6B Planning and Zoning Committee
 Call/Text: [REDACTED]
 Twitter: @CoreyHolman
 Website: <https://www.coreyholman.com>

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

12/3/2020

Greater Greater Washington Mail - I support Greater Greater Washington's comments on the Comprehensive Plan!



Alex Baca <[REDACTED]>

I support Greater Greater Washington's comments on the Comprehensive Plan!

2 messages

Dave Kasten <[REDACTED]>

Wed, Jan 8, 2020 at 10:55 PM

Reply-To: [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Hi,

As someone who moved to DC in 2009, I support the Comprehensive Plan! BUILD MORE THINGS IN MY BACKYARD. I routinely read Greater Greater Washington and trust their perspective on building more; in particular, I support their comments, especially the claim that folks in Rock Creek, Near Northwest, and Capitol Hill (my neighborhood) should have to bear more of the burden for affordable housing. Get rid of regressive policies like minimum parking requirements and street setbacks!

BUILD MORE NEAR ME!

Sincerely, and thanks for listening,

David Kasten
[503 10th St SE](#)

[REDACTED]

[REDACTED]



Alex Baca <[REDACTED]>

Thank you for working on housing equity

2 messages

Ryan Lintelman <[REDACTED]>

Tue, Oct 15, 2019 at 4:17 PM

To: [REDACTED]

Bcc: [REDACTED]

Mayor Bowser,

Thank you for your leadership in releasing the new Housing Equity Report and goals this morning to help get the District closer to meeting its short- and long-term needs for housing and broader equity and affordability.

It's wonderful to know that you and Director Trueblood are dedicated to achieving these ambitious goals despite the potential political opposition. As I'm sure you agree that affordable housing should be a basic human right, this is a top priority for me as a voter. I hope that you receive many such messages of support from District residents and that together we can pursue even more ambitious goals in the future, given the enormous scale of our housing crisis.

As a proud district resident (Ward 6), I support the housing equity plan and your work to make the District a better place to live and raise families for the future.

Thanks,

Ryan Lintelman
350 G St SW Apt N213
Washington DC 20024

[REDACTED]

[REDACTED] [REDACTED]



Alex Baca <[REDACTED]>

comments on Comp Plan

4 messages

Caitlin Rogger <[REDACTED]>

Fri, Jan 10, 2020 at 4:09 PM

To: [REDACTED]

Cc: [REDACTED] Amber Gove <[REDACTED]>

Bcc: [REDACTED]

Dear OP,

I support the amendments to the Comprehensive Plan (I'm writing in my role as a citizen and resident of ward 6).

Here are a few comments.

Transportation

I would like to see the transportation element incorporate measures to reduce the numbers of single-occupancy vehicles on the road and vehicle miles traveled in the District. Prioritizing cars over every other means of transportation yields enormous costs, and drivers of cars (including myself) should help foot that bill or find alternative means.

I also suggest eliminating minimum parking requirements and elimination of any language that requires parking. I strongly encourage OP not to subsidize parking through economic development deals.

Housing

I think the FLUM should allow for greater density in all parts of the city, especially in planning areas with limited affordable housing (including mine, Capitol Hill, and also Rock Creek West and Near Northwest).

Thank you.

Best wishes,

Caitlin Rogger

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Addenda of GGWash's advocacy materials

BLog posts



Why's everyone talking about upzoning? It's the foundation of green, equitable cities.

ZONING By [Alex Baca](#) (Housing Program Organizer) July 7, 2020 3



[H Street corridor](#) by Ted Eytan licensed under [Creative Commons](#).

This article was first [published](#) on June 11, 2019. Zoning is an issue that remains critically important in the region and beyond, so we decided to share this article again.

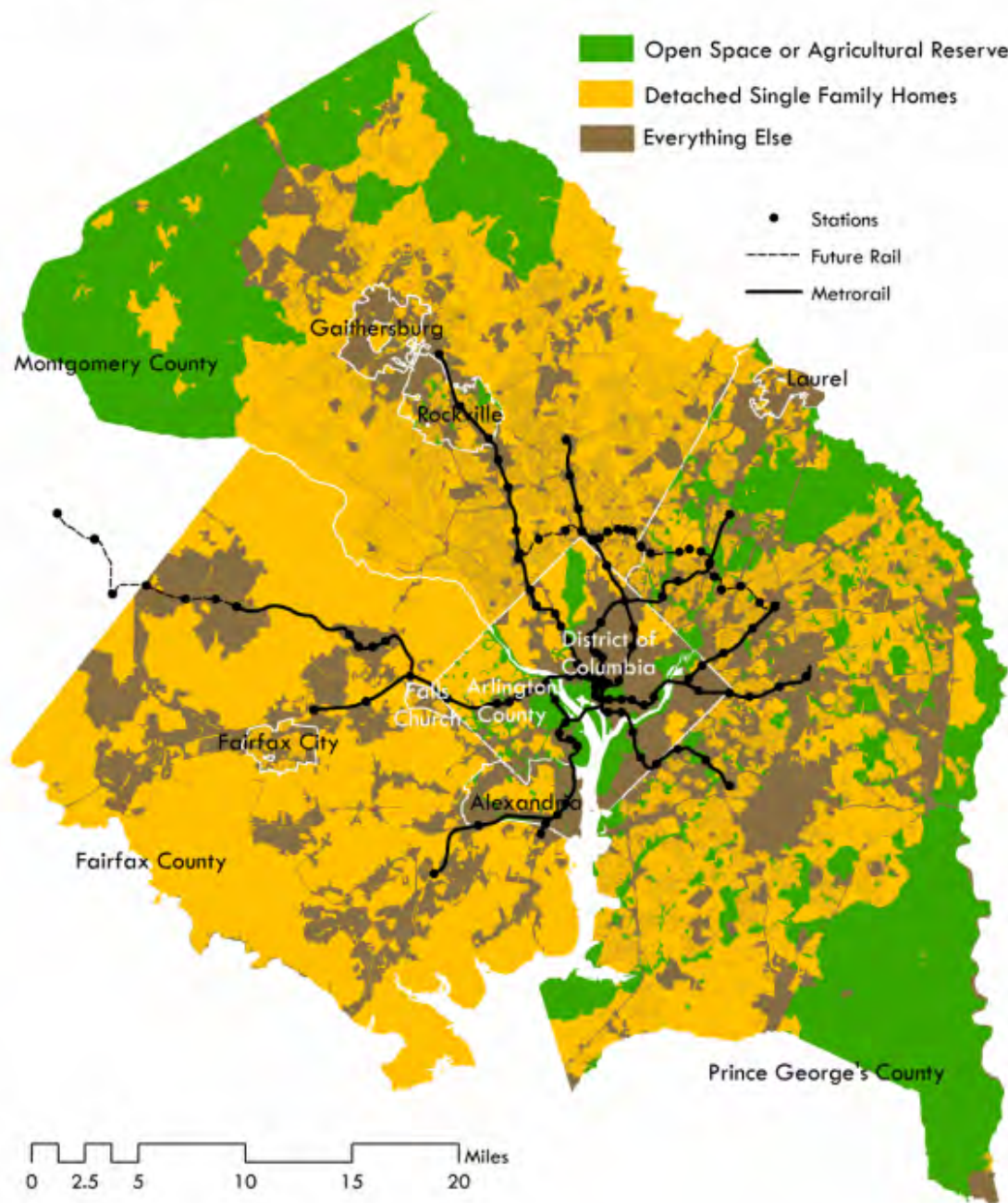
Though we write about zoning [plenty](#) on GGWash, it's a topic that's been regarded by the wider public as too wonky, too insider, and too jargon-like

to figure into everyday life. But zoning literally *is* everyday life, because it governs what goes where. And it's circumstantial to affordability, equality, equity, and the distribution of goods, services, and wealth.

Lately, zoning is more buzzword-y than usual because cities like Minneapolis, and states like California and Oregon, are considering changes to their existing zoning regimes. [Upzoning](#)—changing zoning laws to make legal taller and/or denser buildings—is increasingly viewed as one way to address high housing costs.

[Why upzone](#)? On most of the land in most cities in America, all you can build is a single-family home, typically on a large lot. In her 2014 book, *Zoned In the USA*, land use and planning scholar Sonia Hirt argues that American-style zoning is exceptional for this reason. As Tracy Hadden Loh showed [here](#), 72% of our region is zoned single-family (this includes the Montgomery County Agricultural Reserve), while 42% of DC alone is zoned single-family.

Zoning in the Washington, DC Region



ggwash.org/contributors/thloh

 @busysparrow

Image by Tracy Hadden Loh.

Other countries have [higher rates of homeownership](#), and [their own](#) land-use restrictions on what things can go where, but none are as prescriptive about separating uses, and none treat single-family zoning with as much disproportionate privilege as we do. Americans' sense of entitlement

toward land has resulted in a reverence toward single-family homes and, Hirt suggests, is in our national DNA:

The issue at hand is what American cultural historian Leo Marx (1991) has called an American “ideology of space” and Dutch comparative geographer Gerrit Wissink (1962) has called the unusual space-relatedness of American culture: the high value that Americans tend to assign to vast spaces and their subjugation to human will. The seed of this explanation dates back at least to Frederick Jackson Turner’s ([1893], 2003) famous, if highly controversial, essay in which he sought to link American’s geography with the American “character.” Turner’s argument was that continuous exposure to the raw edge of civilization made Americans uniquely reliant on self and family. It also made them hostile to government control.

Besides the fact that “subjugating vast spaces to human will” is not a proclivity I consider healthy, the enshrining of single-family homes is increasingly at odds with the realities of 2019 and beyond. Right now, too many people can’t afford housing, and the planet is increasingly warming.

Neither of these parallel crises is helped by the fact that the only thing you can usually build in most American cities is a single-family home, which is on average [more expensive](#) than a home in a multiplex, and [far worse for the environment](#). By preventing multifamily homes outright, single-family zoning dramatically curtails the construction of more, smaller homes. Apartment living might not be for everyone, but it shouldn’t be off-limits to build the [kinds of neighborhoods](#) we say we love.



In Somerville, Massachusetts, population 80,000, only 22 of the buildings are legal under the current zoning code. [Image](#) by Tim Sackton licensed under [Creative Commons](#).

Upzoning throughout a whole city, or perhaps a whole state rather than individual or selective parcels, is increasingly acknowledged as a way to contend with certain aspects of the affordability crisis simply by allowing for *more housing*. Without upzoning, any hypothetical social housing program would be immediately stymied in the majority of places under our current zoning regime, [concentrating poverty even further](#).

Broad upzoning would be good for the planet, too, because it means that more people can live in places where they can walk or take transit where they need to go. People don't just disappear, or stop moving to a place. They move as close to what they prioritize—their jobs, good schools, or amenities—as they can afford, and when they can't afford to be as close as they'd like, they'll go farther out, not simply vanish.

Zoning caps how many units can go in a given neighborhood, and thus, how many people can live there. Neighborhoods that are expensive are so in part because lots of people want to live in them. Eventually—again, to be as close as they can afford to what matters to them—people will spill over

into the next most proximate neighborhood. Eventually, lower- and middle-class people will be pushed out and won't be able to afford to move in.

Because we have so significantly limited what we can build in our cities, for so long, right now, [there's no such thing as an American city that has run out of room](#). We should consider making space for, yes, *all people*, regardless of their class or race.

“One-size-fits-all” might be OK

Regardless of how you feel about upzoning, [it may be coming to a city near you](#). In some ways, this is just returning many cities to a more accurate version of their original character. For all the contemporary stress and finger-pointing around upzoning, many US cities have also *downzoned* over the past 60 years. As Benjamin Schneider [wrote for *The Nation*](#):

Los Angeles went from being zoned to accommodate 10 million people in 1960 to 4.3 million in 2010. San Francisco's 1978 citywide downzoning decreased the number of housing units that could be built in the city by 180,000, equivalent to more than 50 percent of the city's housing stock at that time.

Schneider notes that in Chicago, where 80% of the city is off-limits to multifamily housing, downzonings have been [heavily concentrated](#) in white, wealthy neighborhoods. Under Mayor Bill de Blasio, New York's zoning changes have followed [a similar pattern](#): Poorer neighborhoods get upzoned, allowing for more development, and wealthier ones get downzoned. That means people who are already relatively advantaged have been legally absolved of [their responsibility to share](#) their neighborhood's resources. In DC, Lanier Heights residents [organized](#) to ban more housing in their neighborhood by asking the city to downzone it in 2016.

One-size-fits-all solutions are often knocked as ignorant of the concerns of local communities. But localities have a stronger [track record](#) of keeping people out—often via zoning—than building enough homes for the people who live there, or want to live there. [Recent maps from DC's Office of](#)

Planning show how the city's neighborhoods that are disproportionately zoned single-family are also the neighborhoods that have seen the least amount of new housing.

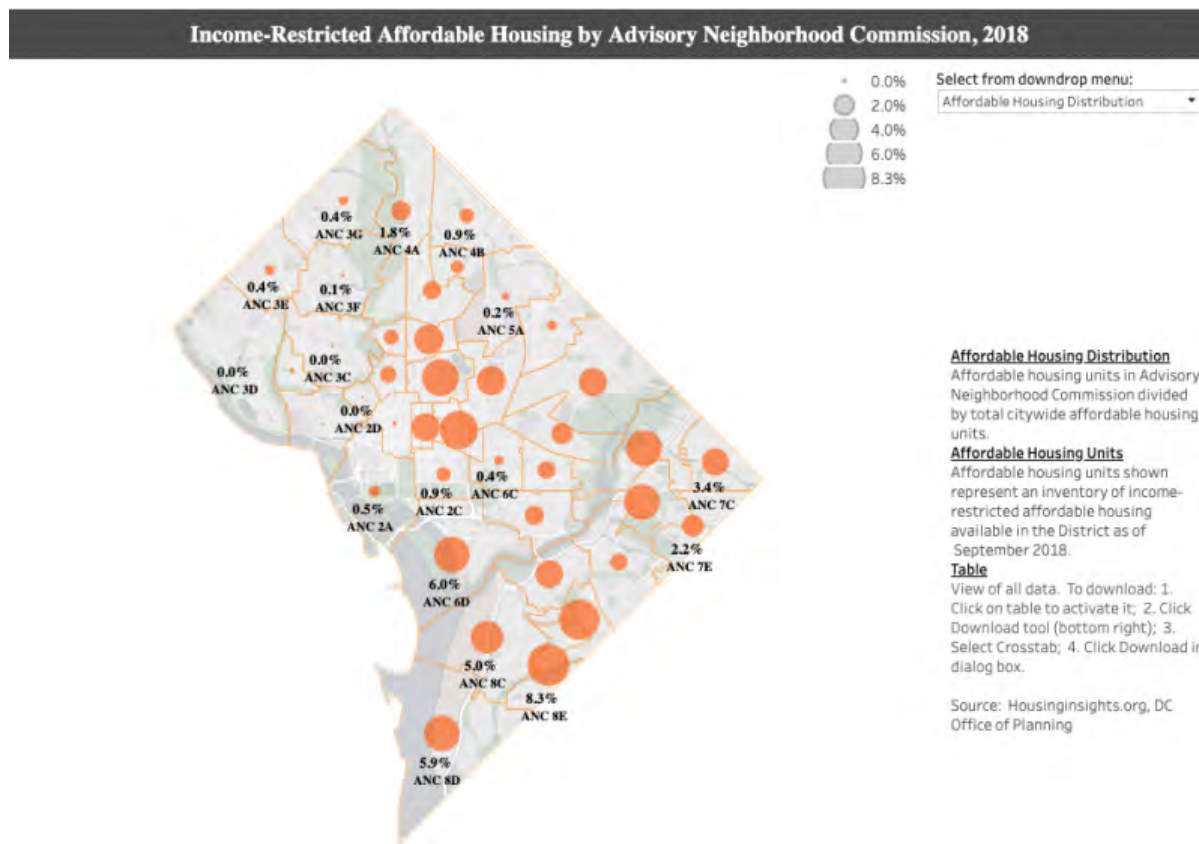


Image by DC Office of Planning.

Plus, as Chicago and New York show, twiddling only particular knobs in certain places says that development is OK in some places (typically disadvantaged neighborhoods) and off-limits in others (typically wealthy ones). Spot or selective upzoning isn't equitable and won't make housing more affordable.

A one-size-fits-all upzoning increasingly looks, at this point in time, like a necessary reset button that we will have to push if we are serious about both affordability and climate.

Zoning in DC

Until 2006, DC's zoning code had not changed for nearly 50 years. That rewrite took, all told, 10 years. By the time it went into effect in 2016, it had spanned the Fenty, Gray, and Bowser administrations. Our zoning rewrite

didn't downzone or upzone anything en masse. It *did* legalize accessory apartments and scaled back parking requirements. It was just slightly behind the boom in acknowledgement of the connection between affordability, [climate change](#), and zoning's discontents that has permeated the discourse around upzoning in [Minneapolis](#) and [California](#).

Ideally, DC's zoning code would have progressively upzoned the city, allowing more housing first in planning areas or wards that have resisted it or are legally off-limits, and, after that, increasing the amount of housing allowed in all other neighborhoods as the city continues to grow. Preferably, this would have been accompanied with additional legislation to strengthen tenant protections, like expanding rent-control and TOPA deals, as well as the acquisition of land by the city to be used to build affordable housing.

The Comprehensive Plan, whose framework element is not yet up for vote, does not and cannot address zoning directly. If Mayor Muriel Bowser's administration is serious about [building 36,000 more units by 2035](#), the measures of her mayor's order for housing will likely need to be addressed, in part, through upzoning.

It's not just about building more

Beyond allowing more housing to be built in places where it is currently illegal to do so, there are moral reasons to dismantle single-family zoning. The origins of zoning the United States are far from benign. [Euclid v. Ambler](#), the landmark 1926 case that confirmed the then-emerging practice of separating uses through zoning, famously includes this tirade against apartment buildings (this language is nearly a century old, yet will sound familiar to anyone who's recently attended a public meeting):

“Very often the apartment house is a mere parasite, constructed in order to take advantage of the open spaces and attractive surroundings created by the residential character of the district. Moreover, the coming of one apartment house is followed by others, interfering by their height and bulk with the free circulation of air and monopolizing the rays of the sun which otherwise would

fall upon the smaller homes, and bringing, as their necessary accompaniments, the disturbing noises incident to increased traffic and business, and the occupation, by means of moving and parked automobiles, of larger portions of the streets, thus detracting from their safety and depriving children of the privilege of quiet and open spaces for play, enjoyed by those in more favored localities — until, finally, the residential character of the neighborhood and its desirability as a place of detached residences are utterly destroyed”

In the United States, we used the precedent set by *Euclid v. Ambler*—that separating buildings based on what they’re used for is both legal and preferred—to [justify the use of zoning](#) and other legal mechanisms, like [covenants](#), to spatially [separate people from each other](#) on the [basis of race](#). As a result of decades of planning our cities with codes that say that this is OK, we’ve come to see how [zoning exacerbates inequality](#).

That zoning’s application has legally enshrined deep and persistent racial exclusion in America is [not up for dispute](#). Fortunately, we are working toward an increased national understanding that excluding anything but single-family homes is a proxy for [excluding other people](#). When we’re next confronted with the opportunity to make a decision about upzoning or downzoning in DC, we should consider what history has to tell us.

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Tagged: [dc](#), [government](#), [history](#), [housing](#), [maryland](#), [montgomery county](#), [planning](#), [zoning](#)



Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.



Gentrification is beneficial on average, studies say. That doesn't mean it's not painful for some.

DEMOGRAPHICS By **Alex Baca** (Housing Program Organizer), **Nick Finio** (Contributor)
August 6, 2019 46



[New construction at T Street and 14th NW.](#) by Randall Myers used with permission.

Gentrification produces mostly positive effects for the existing, generally lower-income residents of upscaling neighborhoods, some recent studies show. But that doesn't mean that there are no losers. Neighborhood change

is as complex as it always has been, which means there are near-infinite ways to decipher and judge its effects on individuals.

Authors Quentin Brummet with NORC at the University of Chicago and Davin Reed at the Federal Reserve Bank of Philadelphia released [a paper](#) in July that studies the effects of gentrification on the economic well-being of original residents and children. In this study, “original residents and children” are defined as the people who lived in a neighborhood in the year 2000, and either remained there or moved out as the neighborhood gentrified over the next decade. Gentrification is defined as the net-positive in-movement of people with college degrees into a lower-income census tract.

Its main findings are that neighborhood mobility is [already high across income categories](#): 70% to 80% of renters change neighborhoods over a decade, and 40% of homeowners do, too. When a neighborhood is gentrified, the likelihood that original residents move increases only slightly, by about 5%. That likelihood is slightly higher for lower-income renters.

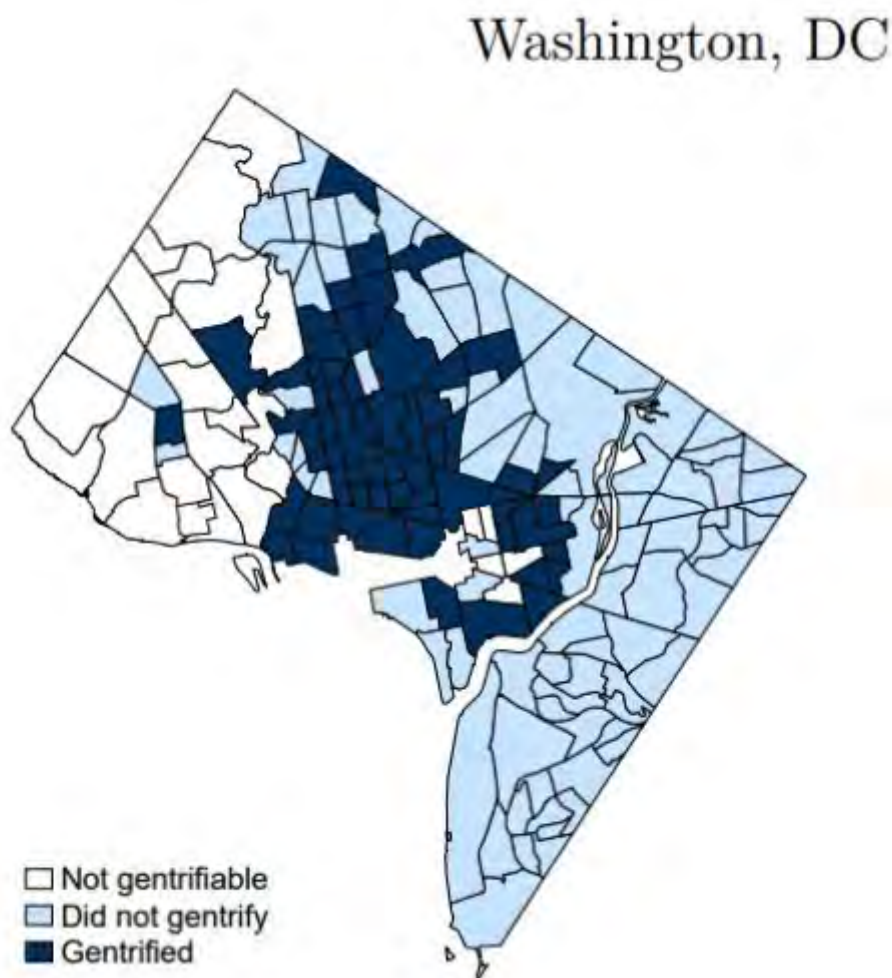
Brummet and Reed conclude that gentrification only marginally increases out-movement, and, importantly, that those who remain experience certain benefits. Those benefits include exposure to lower poverty rates, increases in home values, and other correlates of neighborhood opportunity.

Gentrification in DC is exceptional

Of course, this [made a splash](#), and the study received lots of [coverage](#). [CityLab](#) has a thorough summary of its particulars and results. In short, the methods are impressive: The authors use a unique and very large set of Census panel data to track the life trajectories of people between 2000 and 2010-2014. They look at the 100 most populous metropolitan areas in the country.

The authors rank Washington as the “most gentrifying central city” in the country from 2000 to 2010-2014, ahead of other hotspots like Portland, Seattle, and Denver, echoing a few other [recent reports](#). Their map,

produced at the end of the paper, shows the familiar pattern of gentrification in and around DC's core.



From page 30 of the study.

This study, like other recent macro-scale econometric studies on gentrification, reports most of its results in averages. A neighborhood out-mobility rate increase of a few percent *on average*, across gentrifying neighborhoods in the whole country, can mask what's happening at the hyper-local scale. In certain neighborhoods, out-movement through displacement, whether direct or indirect, has likely been much higher.

When we talk about gentrification in DC, we often use U Street, Shaw, Bloomingdale, and Columbia Heights as signifiers of it, even though what's happening in them, and neighborhoods like them, is exceptional. A [2017 paper by Kyle Fee](#), a researcher at the Cleveland Fed, classified neighborhoods in Cleveland, Columbus, Cincinnati, and Pittsburgh by a

typology of change. He concluded that while most neighborhoods remained the same over time, the rate of change in some neighborhoods increased the rate of change overall:

In general, this analysis shows that from 1970 to 2010, most neighborhoods tended to remain the same from decade to decade. However, the overall rate of neighborhood change has increased in all four of the cities studied during the past two decades, with Cincinnati and Pittsburgh experiencing the greatest change from the 1990s to the 2000s

Most neighborhoods in most American cities [are not gentrifying](#). But the intensity of what happens in the neighborhoods that are is often so unfair, and so visible, that we respond in kind: virulently. So, we're not challenging Brummet and Reed's econometric findings, which we think are solid. But we know that econometrics are not the sole criteria on which to judge the effects of neighborhood change on individual residents.

Brummet and Reed refer frequently to "the baseline" from which they measure change. It's important to remember that "the baseline" for a lot of people in many neighborhoods—not just the ones that gentrify—is poverty and instability. This tracks with the [extensive](#) research showing that concentrated poverty results in [more displacement](#) than gentrification. (This is famously illustrated by [Matthew Desmond's *Evicted*](#).) Poverty [undergirds](#) gentrification's ill effects.

What about gentrification's other impacts?

Still, the conclusions of Brummet and Reed's work can feel insensitive, given the lived experience of people in neighborhoods where there is an influx of wealth. The authors themselves note that their research's greatest shortcoming is that it doesn't estimate the costs of leaving a neighborhood.

Gentrification can harm people through direct costs like moving costs, or the security deposit for a new apartment, which—given that few people have enough cash to cover emergency expenses—could easily unfold into an even more precarious financial situation. And though gentrification's social

and cultural costs are well-covered by many qualitative studies, that's exactly [what feels so unaccountable as to be the overwhelming driver of change](#).

If people perceive that their neighborhoods are so different they no longer think of them as home, does it matter if they're able to comfortably remain in their homes? Does it matter that the places that they live are safer, healthier, and more accessible—which often means that the homes there become more expensive? How much does it matter if they benefit economically?

Lance Freeman's 2006 book, *There Goes the 'Hood*, dissected a similar question. His research has continued to provoke [thoughtful discussion](#) of whether we'll accept change, or if we'd prefer neglect. An excerpt of it [reads](#):

This book argues that indigenous residents do not necessarily react to gentrification according to some of the preconceived notions generally attributed to residents of these neighborhoods. Their reactions are both more receptive and optimistic, yet at the same time more pessimistic and distrustful than the literature on gentrification might lead us to believe. Residents of the 'hood are sometimes more receptive because gentrification brings their neighborhoods into the mainstream of American commercial life with concomitant amenities and services that others might take for granted. It also represents the possibility of achieving upward mobility without having to escape to the suburbs or predominantly white neighborhoods. These are benefits of gentrification typically not recognized in the scholarly literature.

Yet the long history of disenfranchisement, red lining, and discrimination also inspires a cynicism toward gentrification that might not be evidenced elsewhere. Though appreciative of neighborhood improvements associated with gentrification, many see this as evidence that such amenities and services are only provided when whites move into their neighborhoods. Moreover, many see these improvements as the result of active collaboration

between public officials, commercial interests, and white residents. Though much has been written about displacement and somewhat less about the political consequences of gentrification for indigenous residents, this dimension of cynicism toward gentrification has not been explored.

Brummet and Reed's paper gives us approximately zero data on how people feel about living in a different place, and how they feel about their neighborhoods changing. But we think that's OK. Its authors don't purport to do that, and they offer valuable insight by placing the small number of neighborhoods that are nearly always discussed simultaneously with gentrification in relief, against many, many other neighborhoods nationwide. Their recommendations—accommodating the increased demand for housing close to amenities and city centers by building more of it—align with GGWash's worldview.

Another recent study based on Medicaid data found that gentrification did not displace low-income children in New York. It was conducted by Ingrid Gould Ellen, professor of urban policy and planning and director of NYU's Furman Center for Real Estate and Urban Policy; health economist Sherry Glied, dean of NYU's Robert F. Wagner Graduate School of Public Service, and Kacie Dragan, project manager for NYU Wagner's Policies for Action Research Hub.

"These kids move a lot, whether their neighborhood gentrifies or it doesn't gentrify," Glied told [CityLab](#). NYU's researchers found that health outcomes for children who stayed in gentrifying neighborhoods improved. But those benefits accrue within a shifting and rocky landscape that's replete with other factors. Per CityLab:

When vulnerable families did move, they tended to move longer distances (which the researchers can track by their exact addresses). Low-income families leaving gentrifying areas were more likely to change zip codes or move to another borough (although they were no more likely to leave New York City altogether). Maybe that's because these families must travel farther to find affordable housing.

People—ourselves included—can't help but view new buildings as representative of development and growth. Our country's history of racial and economic segregation has meant that change is [almost unilaterally uneven and unfair](#). Housing policies and mechanisms like the DC's Affordable Housing Trust Fund and Affordable Housing Preservation Fund, legalizing apartments, increasing voucher amounts and [expanding access to services](#), and compliance with fair-housing laws can mitigate this, but can't completely or individually staunch the racial wealth gap.

By the transitive property of signifiers of neighborhood change, the very new buildings that could possibly mitigate some negative effects of newcomers, by literally absorbing them without much displacement, are almost universally regarded as symbolizing the physical and cultural exclusion of current residents. Data can nearly never account for that.

Correction: Quentin Brummet's affiliation is with NORC at the University of Chicago, not the Federal Reserve Bank of Philadelphia.

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Tagged: [class](#), [demographics](#), [gentrification](#), [housing](#), [housing shortage](#), [housing supply](#), [race](#)



Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.



Nick Finio is the Associate Director of the [National Center for Smart Growth](#) at the University of Maryland, College Park, where he is also a PhD Candidate in Urban and Regional Planning. His dissertation is



How DC can build more homes in exclusive neighborhoods west of Rock Creek Park

HOUSING By [Alex Baca](#) (Housing Program Organizer) August 1, 2019 28



[Image](#) by Dan Reed licensed under [Creative Commons](#).

It's hard to build nearly anything other than a single-family house in DC's wealthiest and most exclusive neighborhoods. Mayor Muriel Bowser's stated [goal to build 36,000 units of new housing in DC by 2025](#) is likely to run up against the fact that neighborhoods west of Rock Creek Park, which are zoned nearly entirely for single-family homes, don't allow duplexes, fourplexes, or other, denser types of homes by default.

The Advisory Services program at the [Urban Land Institute](#), a nonprofit research organization, is studying the barriers to building more housing in [Rock Creek West](#), one of the city's 10 area elements. The Office of Planning lumps together parts of the city into [area elements](#) for its purposes. Area elements aren't aligned with ward boundaries and so, unlike wards, don't change with redistricting. Rock Creek West is [mostly comprised of Ward 3](#), but includes some bits of Ward 4 and Ward 2, too.



Map of Rock Creek West. [Image](#) by DC Office of Planning.

The full report will be out in September, but ULI shared some of [its preliminary findings](#) at a presentation on July 12. Philip Payne of Ginkgo Residential, a moderate-income apartment manager in Charlotte, North Carolina, chaired the ULI panel and interviewed a long list of local experts to craft some solutions—including me. We were asked to identify barriers

to new housing production in Rock Creek West, what tools and policies we could use to address these barriers, and [more](#).

When we talk about how white and affluent areas of the city [have not added new homes](#), we're mostly talking about neighborhoods in Rock Creek West like Chevy Chase DC, Tenleytown, and McLean Gardens. There aren't many new homes built there, period, and there are especially few subsidized units. Other parts of the city, [like the Wharf](#) and NoMa, have seen cataclysmic changes, in part because development is pushed to them by the restrictiveness of neighborhoods where little is built at all.

[Recent data from the Office of Planning](#) shows that there are only 471 affordable housing units (which it defines as units restricted by income to lower-income households) in Rock Creek West. All other area elements have at least 2,000 affordable units. The area element with the greatest number of affordable units is Far Southeast/Southwest, which has 15,517.

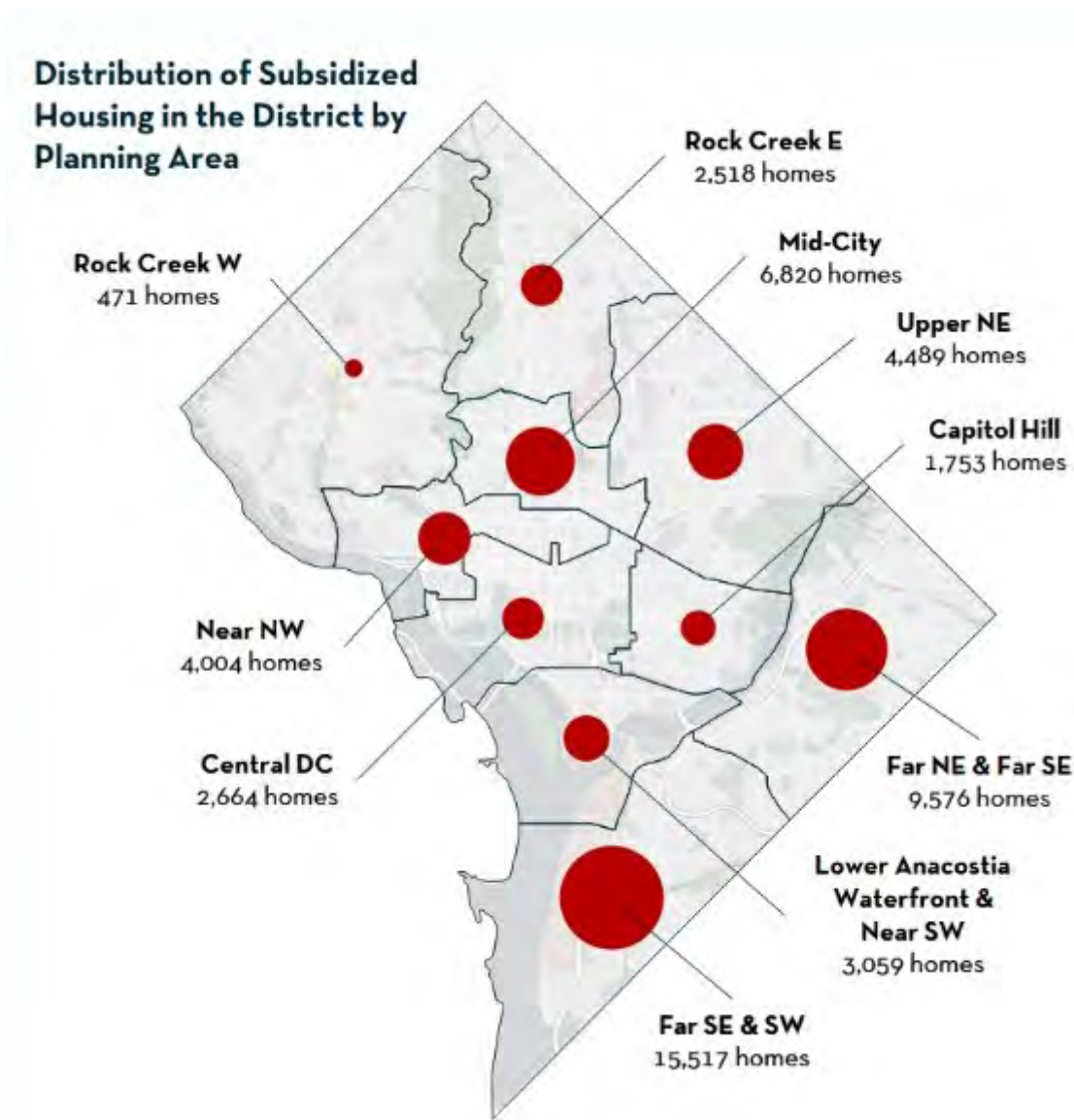


Image by DC Office of Planning.

More cities and states around the country are beginning to grapple with the long legacy of [de jure racial segregation](#). Wealthy, white neighborhoods can easily lock out people of color and lower-income people with the aid of zoning codes that say only single-family homes are legal to build. Some jurisdictions are passing policies to address this, like Oregon, which recently [legalized fourplexes statewide](#). Heather Worthington, a member of this Advisory Services panel, is Minneapolis' long-range planning director, where [triplexes were legalized citywide](#) last year.

ULI's presentation notes that Ward 3 is 80% white, that the majority of its homes are owner-occupied, that housing values there are higher than anywhere else in the District, and that it's overwhelmingly zoned for single-

family homes. This means that you can't build anything *but* a single-family home unless you request an exception.

If Bowser's administration is going to make meaningful progress toward its goal, the city will have to build new housing in Rock Creek West. ULI's [laundry list of recommendations](#) to make this easier to do includes reforming inclusionary zoning, upzoning areas near transit, and creating a by-right density bonus for affordable housing.

DC's plans still prioritize wealthy white homeowners

It's good that an outside actor like ULI is calling out the restrictiveness of Rock Creek West specifically. And it's refreshing to see recommendations that stem from the incontrovertible truth that all parts of the city will have to accommodate more homes, rather than an entertainment of the false notion that parts of it can continue their exceptional practices of exclusivity

But innovation and policy-crafting are not the holdup to building more housing in wealthy neighborhoods near Rock Creek Park. That we don't build much housing there, or much affordable housing, is and always has been a political choice. Our plans codify this. For example, the most damning effect of the current Comprehensive Plan's [Framework Element](#) is how it describes the types of areas it divides the District into.

Here's how neighborhood conservation areas are described:

Neighborhood Conservation areas have very little vacant or underutilized land. They are primarily residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will be modest in scale and will consist primarily of scattered site infill housing, public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated. Neighborhood Conservation Areas that are designated "PDR" on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have

historically provided. The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas but they are small in scale.

Now, neighborhood enhancement areas:

Neighborhood Enhancement Areas are neighborhoods with substantial amounts of vacant residentially zoned land. They are primarily residential in character. ... The main difference between Neighborhood Enhancement and Neighborhood Conservation Areas is the large amount of vacant land that exists in the Enhancement Areas. Neighborhood Enhancement Areas often contain many acres of undeveloped lots, whereas Neighborhood Conservation Areas appear to be “built out.” As infill development takes place on undeveloped lots, special care must be taken to avoid displacement nearby. Existing housing should be enhanced through rehabilitation assistance. New development in these areas should improve the real estate market, reduce crime and blight, and attract complementary new uses and services that better serve the needs of existing and future residents.

The “more than two dozen land use change areas,” meanwhile:

...Include many of the city’s large development opportunity sites, and other smaller sites that are undergoing redevelopment or that are anticipated to undergo redevelopment. Together, they represent much of the city’s supply of vacant and underutilized land.

Taken together, it’s very clear that the existing framework element—which, remember, was written in 2006—was deliberately designed to protect already-advantaged neighborhoods and push development away from them, to where it would presumably be less bothersome to the “homevoters” who are more likely to show up in protest.

This has shaken out just as the plan says: Parts of the city, like Rock Creek West, have not seen as much development because they, basically, didn't have a lot of vacant lots. If your neighborhood has, or had, blocks of lived-in houses and not gap-toothed blight, it was, or is, worthy of conservation. Area elements or wards with lots of vacant lots, like Ward 6, [saw lots of development](#), not solely because of developer speculation and profiteering, but because the city preordained it in its own plans.

Conveniently, where the framework element says you should build, and where it says you should conserve character, roughly tracks with where in the city you are legally allowed, by zoning, to build more or less housing. The types—neighborhood conservation areas, neighborhood enhancement areas, land use change areas, and commercial/mixed use areas—are visually displayed on the Plan's [Generalized Policy Map](#).

The Generalized Policy Map also shows similar spatial patterns as [where you are required to build single-family homes](#) (which was [the subject of a recent DC Policy Center report](#)), [where subsidized units have been built](#), and [where one can find life-saving shade](#).

Development is uneven and unfair, but it doesn't have to be

We've written frequently that development in DC, even when it brings much-needed new housing, is [uneven](#) and [unfair](#). In [written testimony from March 2019](#), I implored DC's Department of Housing and Community Development to comply with fair housing principles:

Two-thirds of new housing permits have been in two of DC's 10 planning areas: Central Washington, which includes downtown and NoMa, and "Lower Anacostia Waterfront," which encompasses Southwest Waterfront and Navy Yard/Capitol Riverfront (as well as Poplar Point, which has not had any development yet). The 2006 Comprehensive Plan predicted these two areas would get about 30% of the growth rather than two-thirds.

As the DC Council works through the Framework Element, it's important to consider how all of the above intersects with proposals like those that ULI

is offering. If the Comp Plan is a guiding text for how the city is supposed to work, and the Framework Element's intent is "to provide the foundation for the rest of the Comprehensive Plan," it shouldn't accrue additional advantage to particular neighborhoods where residents with a high level of social capital frequently stymie and block much-needed new housing.

A Framework that continues the current chapter's legacy puts DC at risk of violating the Fair Housing Act. It also directly conflicts with, and could possibly negate, ULI's suggested strategies like upzoning areas near transit and creating a by-right density bonus for affordable housing.

The Framework Element is a bill; the Comp Plan is as much a planning document as it is a political one. Every two years, DC residents have the opportunity to elect some councilmembers and ANC commissioners. Every four years, we elect a mayor.

If we want to move the needle on housing, we should choose our representatives on the basis of their commitment to both building housing in places where it's effectively off-limits; to subsidizing housing that the private market cannot make affordable on its own; to thoughtfully preventing displacement through practices like build first, TOPA deals, and rent stabilization; and to standing up to the vocal minority of constituents who will protest any proposed change to their habitus.

Since this year is not an election year, in lieu of voting you can respond to Office of Planning's survey about [where affordable housing should be built in the District](#).

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Tagged: [au park](#), [chevy chase dc](#), [comprehensive plan](#), [dc](#), [demographics](#), [forest hills](#), [government](#), [hawthorne](#), [housing](#), [office of planning](#), [planning](#), [rock creek](#), [tenleytown](#), [udc](#), [zoning](#)



Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.

28 COMMENTS

T READED NEWEST AT BOTTOM NEWEST AT TOP

TomQ on August 1, 2019 at 12:31 pm

Let's start the countdown to a post from someone from Ward 3 protesting that any changes to the zoning laws will lead to the elimination of the handful of rent controlled (but not income screened) units in Ward 3.

REPLY LINK REPORT

GGWatcher on August 1, 2019 at 1:58 pm

Let's also start the countdown to a post from someone who says we should start bulldozing the single-family homes in Ward 3. Because based on past posts on this topic, those types of comments are certain to follow.

REPLY LINK REPORT

Java Master on August 1, 2019 at 2:54 pm

The “progressives” believe that because life is unfair to some, that confiscatory land use rules and income transfer programs (subsidies) will solve the housing affordability problem. Affordability is a problem for almost everyone entering the housing market these days. Single family homes already situated in long-established single family neighborhoods are not the problem it is made out to be except by those with expensive distributive political agendas, who seek to take from others something they have not earned for themselves.

REPLY LINK REPORT

CrossingBrooklynFerry on August 1, 2019 at 3:50 pm
who says we should start bulldozing



The comp plan, which charts the path for DC's growth, is being amended. What's taking so long?

PLANNING By **Alex Baca** (Housing Program Organizer) September 20, 2019 8



The Comp Plan guides future growth and development in DC. [Image](#) by Ted Eytan licensed under [Creative Commons](#).

DC's Comprehensive Plan sets the course for how the city will grow, and the Framework element sets the tone for the rest of this important planning document. Right now the DC Council is in the process of updating the

Comp Plan, starting with the Framework—but getting the amendments passed has been a slog.

The bill's first hearing was almost a year and a half ago on March 2018, and the DC Council was expected to cast its final vote on the Framework upon its return from recess on September 17. However, it wasn't on the docket. The Framework bill is now scheduled for a vote on October 8.

There are a couple of reasons why we think that the council isn't taking up the bill for another few weeks, but first, a recap.

Catch me up on the Comp Plan again?

The first vote, on July 7 of this year, was on a version of the bill edited over a 16-month period by Chairman Phil Mendelson, following the March 2018 hearing. [As we wrote then](#):

In the [amendments](#) he released on July 7, Mendelson scaled back [what was initially offered](#) by the Office of Planning (OP) in September 2017. [His approach](#) to the Framework is more traditional, and restores much of the 2006 Framework's emphasis on "neighborhood character." This language, while neutral on the surface, is often used to justify exclusionary policies.

Also on July 7, Ward 1 Councilmember Brianne Nadeau [proposed two amendments](#). One requires Office of Planning to study, by the time amendments are submitted to the land use element of the Comp Plan, "options for increasing the variety of housing types in areas zoned for single-family detached and semi-detached housing; and the implications on equity and affordability of allowing small multifamily buildings in all residential zones." (We anticipate this will be sometime next spring.) This was accepted as friendly, or without opposition.

The second defines "high-priority public benefits" for the zoning commission to consider when evaluating [planned unit development](#) (PUD) proposals. These types of projects allow developers to build more densely than what is allowed in exchange for public benefits, such as more

affordable housing or money for local parks (more on them later). The chairman did not accept it as friendly, but he did agree to work with Nadeau on it over the summer.

The Comp Plan has been the subject of citywide discussion for nearly three years, since about midway through Bowser's first term. Then, former planning director Eric Shaw solicited public input to inform Office of Planning's amendments to the 2006 Comp Plan, which were released in September 2017. Various interest groups and coalitions, including GGWash's Housing Priorities Coalition, offered their own amendments.

The future of a lot of housing rests on the Framework element

The Framework element is the most important part of the Comp Plan. When the zoning commission evaluates PUD proposals, it does so on the basis of whether the proposed developments will be in compliance with the Framework and the Future Land Use Map (FLUM) it contains, because those parts of the plan offer the most specific guiding language for how the city's built environment should look, feel, and function. PUDs are allowed to exceed zoning regulations up to the density determined by the FLUM.

The Framework has received particular attention in recent years because of its role in the numerous lawsuits filed against significant development projects, like [McMillan reservoir](#) and [901 Monroe](#). Though the zoning commission deemed PUDs like those two in compliance with the Comp Plan, the plaintiffs' allegations in these cases hinge on claims that they are *not*, and mostly exceed the density allowances detailed in the Framework element and the FLUM.

After a bill has a public hearing, it gets a first and second vote, during which councilmembers can amend it further. The Framework bill's first reading was the July 7 Committee of the Whole meeting; its second is now October 8. While there will be future bills and hearings about the rest of the Comp Plan updates, the March 2018 hearing allowed for public comment on the same bill that we're still discussing a year and a half later, which will determine what changes are made to the 2006 Framework element. (If it seems like the process is taking awhile, that's because it is.)

What's going to happen at second reading?

Mendelson often releases complex bills close to the date on which the council will vote on them. The version of the Framework bill voted on at first reading was released by his office a week before the Committee of the Whole meeting. We anticipate that the same will happen with the version that will be voted on, and hopefully passed, at second reading.

The chairman's office has worked on the bill over the summer, and is continuing to edit it. But it's really, *really* hard to explain the minute changes that they've made. At this point, the best way to think about the Framework is as, ahem, a blog post that you've fussed with over and over, to the point that you can't really remember what the original said, and you're not clear what kind of impact your writing is going to have.

With that in mind, we feel like the most important thing to look out for are whether Nadeau's amendments—both of which we wholeheartedly support—make it through. Since the chairman committed to working with Nadeau over the summer on the amendment he didn't accept as friendly, we feel positive about this.

There's also the matter of Section 227.2. As it was amended by the chairman between March 2018 and July 7, it [contains language](#) that's particularly relevant to how the zoning commission interprets whether PUDs should be approved.

Trueblood's letter reflects concerns raised in an email to councilmembers and the Office of Planning by zoning commissioner Rob Miller. Per [Washington Business Journal](#):

Trueblood and Miller both fear that a section of the amendments that gives the Zoning Commission authority to set density and height limits for PUDs could open up a new avenue for legal challenges. The language contains a familiar standard for the commission to meet — determining that any zoning designation should be “not inconsistent with the comprehensive plan” — but also directs the body to examine other factors, like assessing if a

new development is “generally compatible with the physical and visual character of the surrounding neighborhood.”

Miller wrote to lawmakers that this section “gives much more ammunition than already currently exists” to PUD opponents looking to challenge the developments in court, according to a copy of his letter provided to the WBJ. He didn’t respond to a request for additional comments.

Trueblood largely agrees. He feels the language could create more confusion as judges review the commission’s decisions, which has been the source of several successful challenges to PUDs.

“It seems to potentially create new standards,” Trueblood said. “In our view, any potential for new standards leads to confusion and alternate readings and potential disagreements and those are oftentimes resolved in the courts.”

Trueblood and Miller also worry that calling out some specific priorities, like compatibility with the existing neighborhood, could send the message that the plan’s other goals aren’t as important if they aren’t mentioned. In particular, they think this emphasis could overshadow the importance of affordable housing in the document, a key issue for Mayor Muriel Bowser in her second term.

Basically, if one were to sue a PUD over its conformance with the descriptions of density in the Framework, which is what most of the recent PUD lawsuits have done (because descriptions of density are proxy for the physical and visual character of a neighborhood), the current language would aid their case.

Mendelson prefers this language, while OP and at least one zoning commissioner are at odds with him in their preference for greater weight toward affordable housing, which necessarily is created through new development—and which may not be in lockstep with a neighborhood’s character.

Why have we not passed this dang bill yet?

There was a lot on the council's docket on Tuesday. The first Committee of the Whole meeting after recess is busy by default; this one included the council investigation into Jack Evans' ethical misconduct. Also this week was one particular congressional hearing on whether DC deserves to be a state (it does).

The Framework, which is much more esoteric than statehood and self-dealing, got punted. Miller's letter was circulated to councilmembers and Office of Planning early in September, and generated a good deal of public and internal feedback. It's probably worth taking a few weeks to sort all that out.

But it's also worth remembering that, early in his political career, Mendelson sued a PUD himself. In 1988, as a member of the Tenley and Cleveland Park Emergency Committee, he alleged that there was not sufficient outreach to residents regarding a PUD proposal. It's not hard to read the charge of "insufficient public outreach" as an indirect way to protest new development altogether. (Indeed, the case was [quite substantially slapped down by the court of appeals](#).)

The chairman is the most powerful player in the Comp Plan saga, because even though the Comp Plan is a plan, changes to it are passed as a bill. He has the greatest control over this piece of legislation, including when it's introduced and what it says.

That anyone could operate completely free from the influence of their own lived experience is an irrational expectation, so it's worth paying attention to the chairman's career, which has been marked by [preferring neighborhood preservation](#) to new development. As City Paper [succinctly explained](#) in 2012:

So, what does Mendelson's record tell us about his priorities? To briefly sum it up: Mendelson is as much of a nitpicker on development as he is on [everything else](#), and usually falls on the side of less rather than more.

He's also a member of the [Committee of 100](#), a preservation group which has engaged with the Comp Plan through the Grassroots Planning Coalition, which has emphasized community preservation as a means to affordability. While there are certainly many opportunities in real life for neighborhood stability and affordable housing to blend nicely, a document whose role is to provide guidance for subsequent legal decisions, like the Comp Plan, does have to choose between one thing or another. So there is a real and salient question about [which the Comp Plan prioritizes: affordable housing or neighborhood stability](#).

So, fast forward 20 years from TACPEC's lawsuit. WBJ's September 17 story about the delayed vote ends with this comment from Mendelson:

"Housing is a high priority and affordable housing is a high priority, but they're not the only high priority," Mendelson said. "Depending on the project, there could be other high priorities...One of them was compatibility [with the neighborhood]. What's wrong with that? That's important. That's very important."

Ostensibly, these changes to the Comp Plan are part of an amendment cycle, not even a full rewrite. That they've been going on nearly three years isn't because the Comp Plan is too wonky—it's a deliberate political choice.

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Tagged: [affordable housing](#), [andrew trueblood](#), [comprehensive plan](#), [dc](#), [dc council](#), [housing](#), [phil mendelson](#), [planning](#), [zoning](#), [zoning update](#)



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Mayor Bowser wants affordable housing to be equitably distributed across the District

HOUSING By **Brian Goggin** (Elections Committee, Community Engagement Committee)
September 24, 2019 15



A single-family home under construction along Foxhall Road. This is typical of the only new construction allowed in the Rock Creek West planning area. Image by the author.

Neighborhoods [west of Rock Creek Park](#), which are among the District's wealthiest, have not built their fair share of affordable housing, said DC

Mayor Muriel Bowser at a recent panel. And that's a real problem in a housing-strapped city.

Now, armed with her new goal to build 36,000 new units citywide by 2025, Bowser has indicated she wants to change that. She and former DC mayor Anthony Williams [discussed recommendations](#) to add more housing last week during the Urban Land Institute's Fall Meeting.

GGWash Housing Program Organizer Alex Baca recently [summarized](#) the issue and the advisory team's preliminary findings. ULI has now released the [report](#) if you'd like to read it in full.

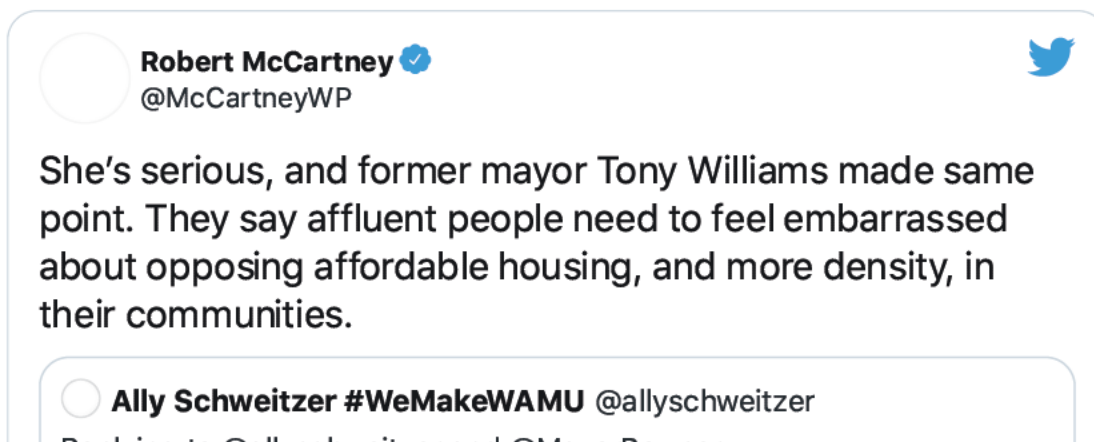
Yet the most notable moments from the discussion were not the report itself, but rather the mayor's strong comments in support of more housing in the area. She said:

"We have to give people a mission that they can embrace or be called out, and they have to explain why they're not behind this very good thing for all of us who live in the city now and for the next generation of people who will live in the city."

People will rationally pursue their own self-interest; we know that. And that is why we have a government to come collect the collective good for all of us."

You can watch and listen to the entire session [here](#).

The Washington Post's Robert McCartney commented on Twitter:



Mayor Bowser wants affordable housing to be equitably distributed across the District – Greater Greater Washington
 replying to @allyschweitzer and @mayorbowser

To get D.C. residents and leaders to embrace adding more affordable housing to their neighborhoods, @MayorBowser says, use shame. That gets laughs, but I'm pretty sure she's serious ... #ULIFall

11:53 AM · Sep 20, 2019



♡ 32 💬 17 people are Tweeting about this

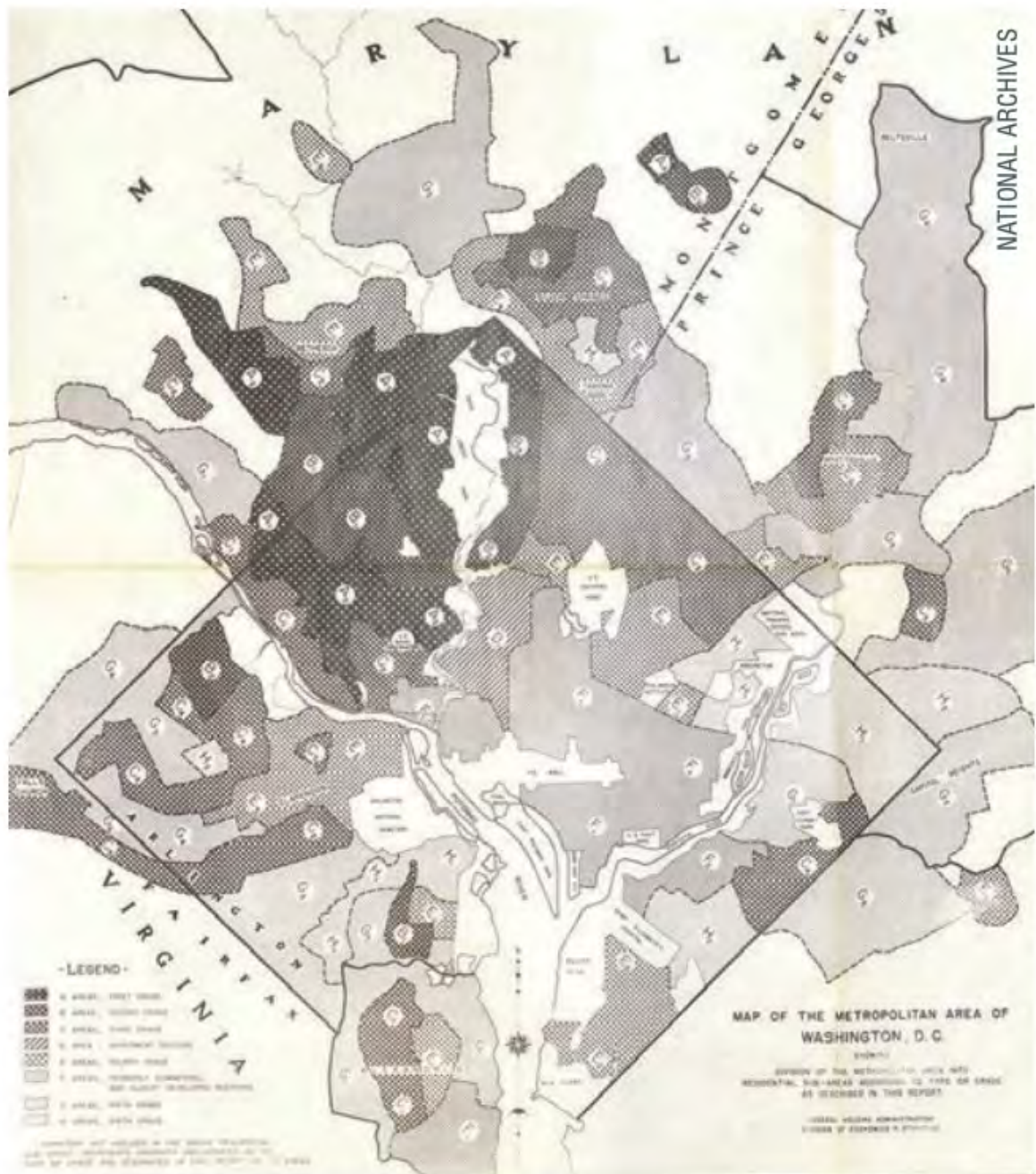
Such strong words in support of density are rare from elected officials. But neighborhoods west of Rock Creek Park have a long history of exclusion, so there is an especially good reason for the mayor to comment in this case.

How Rock Creek West came to be

Rock Creek West is a 13-square-mile planning area in the northwest quadrant of DC, as defined by the DC Office of Planning. Much of it falls into Ward 3, although it also encompasses parts of wards 1, 2, and 4. Many of these neighborhoods are among the most privileged areas of DC. They're 80% white and have the highest average family income, net worth, home values, and percentage of homeownership in the city, according to the ULI report.

This is not by accident, but [rather by design](#). In the late 19th century, the area saw [deed restrictions that excluded African Americans and Jews](#). Later in the mid 20th century, the Federal Housing Administration deemed this area the safest for insuring mortgages, mainly because it was white and wealthy.

By contrast, it rarely insured mortgages in poorer, blacker parts of DC.



Federal Housing Administration's 1937 grades for the Washington, D.C., region.

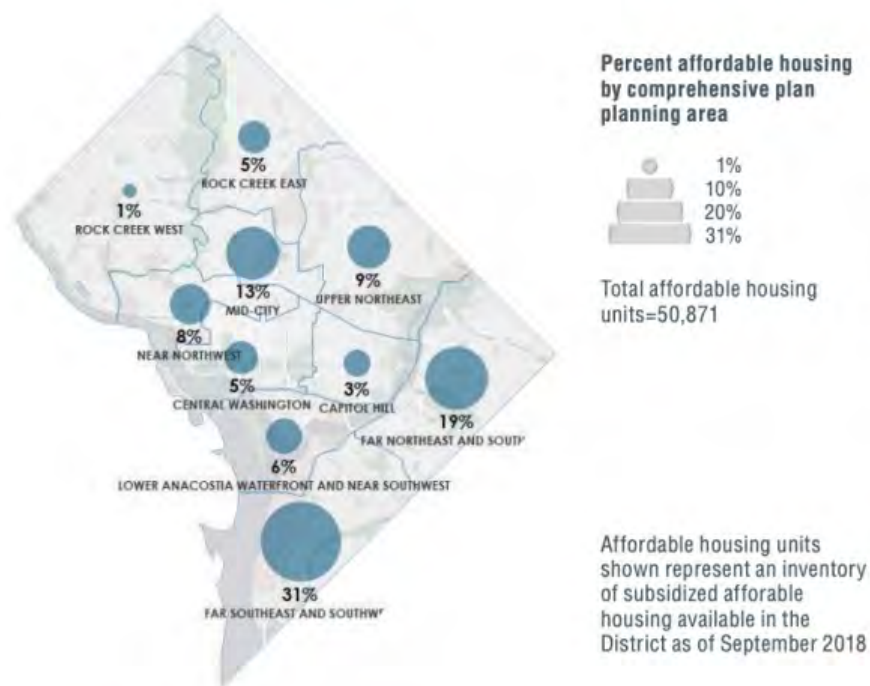
[Map](#) taken from ULI's *Affordable Housing Washington, DC* report. July 7-13, 2019.

While these explicitly racist policies didn't last forever, DC has reinforced the resulting segregation by restricting most of the area to detached single-family homes. This keeps it off-limits to most newcomers who don't have a great deal of wealth. While single-family homes make up only 30% of the total housing units in the area, they account for 80% of the land area.

This restrictive zoning has stymied new development, particularly of new subsidized housing, west of Rock Creek Park. Of the city's approximately

50,000 subsidized housing units, only about 1% are located there.

Distribution of Subsidized Affordable Housing, 2018



The percentage of affordable housing in each of the 10 planning districts. The Rock Creek West area has the least affordable housing.

Map taken from ULI's *Affordable Housing Washington, D.C.* report. July 7-13, 2019.

In their interviews with area stakeholders, some residents west of Rock Creek Park considered their relatively high share of rent-controlled units (16% of the District's total) as their fair contribution of affordable housing.

However, other wards have comparable amounts of rent-controlled housing *plus* much more subsidized housing, which adds up to a lot more places for middle- and low-income residents to live in those places.

Vouchers and Rent-Controlled Units

Ward	Approximate total vouchers*	Percentage	Rent-controlled units	Percentage
1	602	5%	13,034	16%
2	219	2%	12,297	16%
3	196	2%	12,818	16%
4	750	6%	7,022	9%
5	1,772	14%	7,027	9%
6	1,442	11%	4,827	6%
7	3,085	25%	10,144	13%
8	4,477	36%	11,976	15%
Total	12,543	100%	79,145	100%

Sources: DCHA 2018 Oversight and Performance Hearing, Committee on Housing and Neighborhood Revitalization Responses to Pre-Hearing Questions, DC Office of Planning; ULI.

*Includes approximate Housing Choice Voucher Program (HCVP) and Local Rent Supplement Program recipients. No data available on project-based/sponsor-based HCVP subsidy. Two percent of HCVP recipients do not have geographic data or are not located in a ward boundary. DCHA 2018 Oversight report has different, approximate total households that benefit from the HCVP. The Oversight report notes that DCHA manages more than "approximately 10,000 households" with HCVP and "over 11,000 households." This table conservatively uses 10,000 total households in the HCVP.

Map taken from ULI's Affordable Housing Washington, D.C. report. July 7-13, 2019.

It's also worth noting that this highly segregated pattern of subsidized housing development may actually be in [violation of the federal Fair Housing Act](#).

ULI's recommendations and next steps

After studying the issue, the ULI panel had many recommendations for Rock Creek West, which generally fell into three buckets:

- **Create more housing:** Notably, the panel calls for allowing for additional density near transit stations and busy commercial corridors, such as Wisconsin Avenue, Connecticut Avenue, and MacArthur Boulevard. Other suggestions include process improvements for applicants trying to build accessory apartments, building more housing on government-owned sites, and more.

- **Streamline and improve the development process:** The panel called for creating more Small Area Plans, which would get community input on change up front rather than allowing community fights for each separate new development. Other recommendations included legal reforms to development-related litigation and reducing parking requirements.
- **Gain community support:** Finally, the panel emphasized the importance of “messaging, education, and promotion...to galvanize support for the additional housing in RCW.” Ideas include a marketing and education campaign and engaging the area’s faith community for housing partnerships.

These are all progressive and logical policy recommendations. But, to reiterate Baca’s [post](#), lack of policy ideas has never been the obstacle to building more housing in exclusive areas like Rock Creek West. Instead, our leaders have made political choices to channel most development elsewhere in the city. That the mayor may finally be standing up to these inequitable choices is huge progress.

Of course, the executive branch alone cannot make these changes; many of them fall under the purview of the DC Council. While the mayor’s office, through the Office of Planning, submits the first drafts of amendments to the Comprehensive Plan, it’s up to the council to vote on and adopt them.

This discussion is especially timely given [recent debates](#) over whether to prioritize affordable housing versus the physical and visual character of new development in [recently-proposed amendments](#) to the Comprehensive Plan. We’ll keep you updated on what the council decides.

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Tagged: [affordable housing](#), [dc](#), [dc council](#), [housing](#), [housing supply](#), [muriel bowser](#), [rock creek](#), [segregation](#), [tony williams](#)

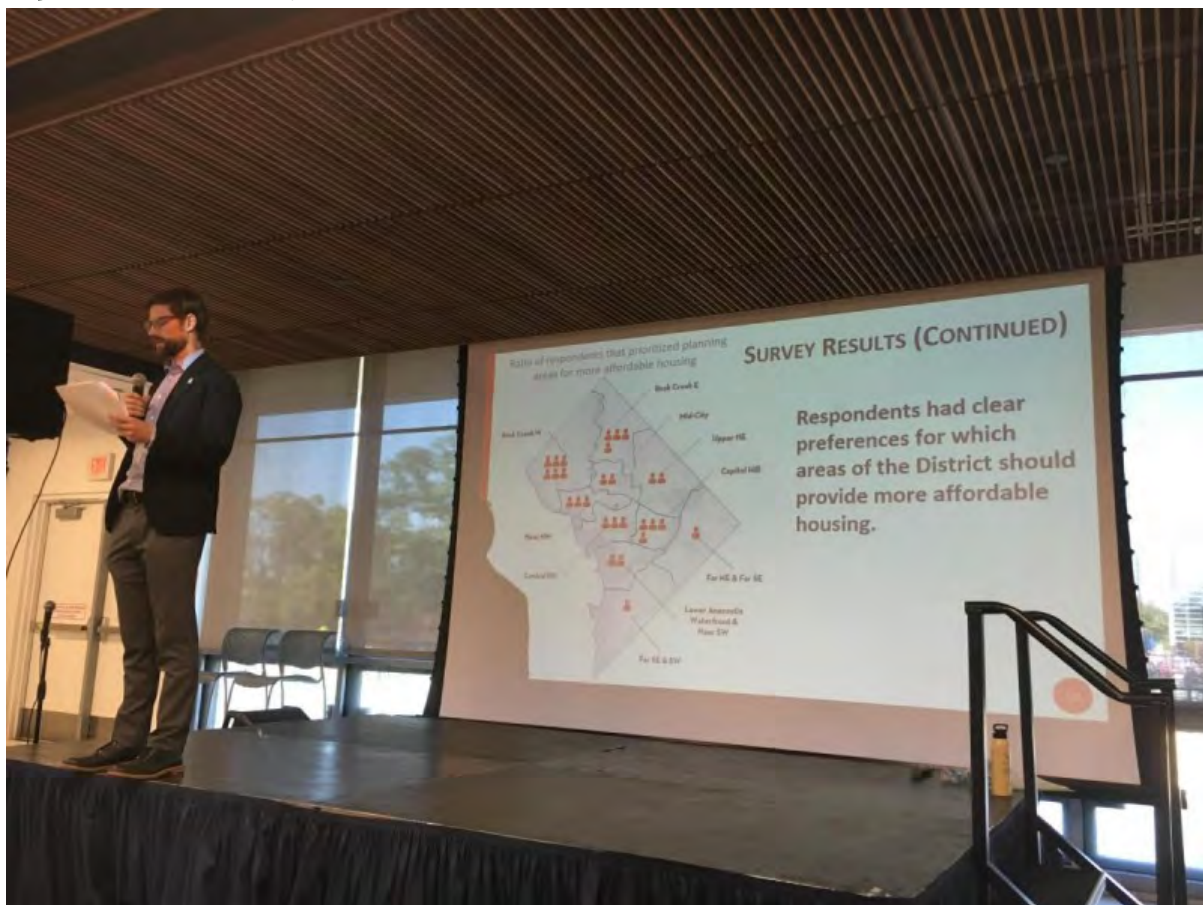


*Brian Goggin is an affordable housing professional living in Shaw.
Any views expressed here are solely his own.*



There should be more subsidized housing in wealthy parts of DC, survey takers say

HOUSING By **Brian Goggin** (Elections Committee, Community Engagement Committee)
September 25, 2019 5



Office of Planning Director Andrew Trueblood speaks about survey results at the Community Conversation on Housing at Ron Brown High School on Saturday, September 21. Image by the author.

Residents think there needs to be more affordable housing west of Rock Creek Park and in other wealthy areas, a new DC survey shows. The

Department of Housing and Community Development (DHCD) and the Office of Planning (OP) released the results of the survey it conducted over the summer to the public at Ron Brown High School this past Saturday, September 21.

The survey is part of a broader effort by DHCD and OP known as the [Housing Framework for Equity and Growth](#), and took months of public outreach, both in person and online. It's an effort to respond to Mayor Muriel Bowser's target to create [36,000 new homes throughout DC](#) by 2025. You can watch a recording of the full event below.



The results show that 60% to 80% of respondents felt strongly that the way subsidized housing is distributed across the city—it's primarily concentrated east of the Anacostia—is unfair. In particular, they felt the wealthiest parts of DC with very little subsidized housing, like those around Rock Creek Park and just east of the US Capitol, aren't pulling their weight.

KEY QUESTIONS WE ASKED

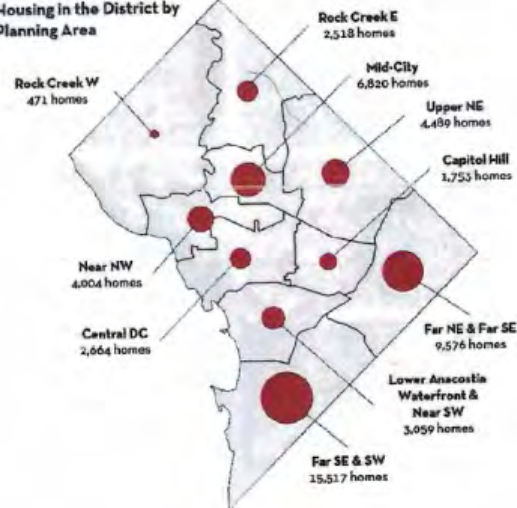
1. How do you feel about the current distribution of affordable housing?

2. How strongly do you feel it should change?

3. Place 3 dots on the map where you would prioritize more affordable housing.

4. Demographic questions.

Distribution of Subsidized Housing in the District by Planning Area



Questions asked in the survey from DHCD and OP.

The above map shows the disparities in the distribution of subsidized housing. As one participant commented to me: “This map is just ridiculous.”

DC has 10 “planning areas,” which are similar to wards but don’t change with each Census. Certain planning areas such as Far SE & SW (which falls approximately where Ward 8 is east of the Anacostia) have more than 15,000 subsidized homes. Others, like Rock Creek West, have less than 500. We’ve previously written about [why this pattern exists, and why it matters](#).

Simply put, wealthy areas don’t allow for much new development at all, let alone subsidized housing. That keeps low-income residents out of high opportunity areas and pushes the growth (and the pressures that can come it) into areas with more permissive zoning.

The city and region are in the midst of a [severe housing crunch](#), so it’s encouraging to see DHCD and OP working so closely together to come up with solutions.

2,763 total number of responses

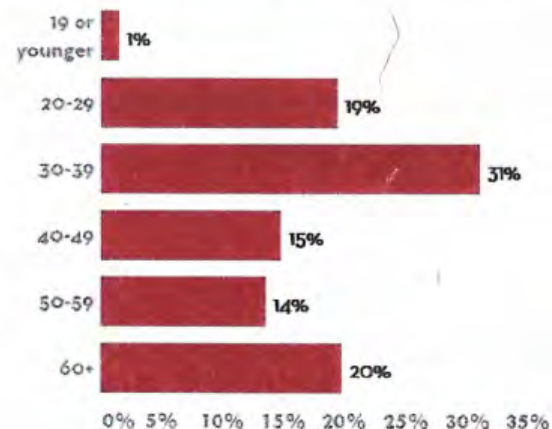
- 941 total in-person responses
- 1,822 total online response

Of survey respondents:

- 41% have lived in the District for 20+ years
- 61% identified as Female, 35% identified as Male
- 45% were Black or African American, 38% White, 8% Hispanic

WHO TOOK OUR SURVEY

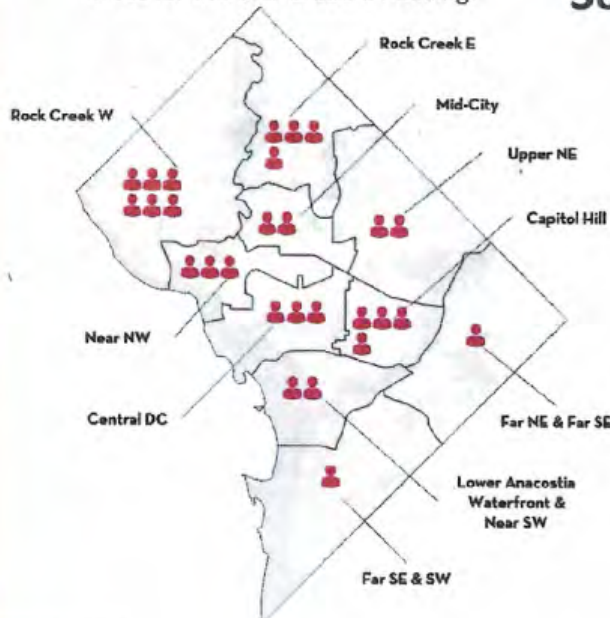
Age distribution of survey respondents



Survey results from DHCD and OP.

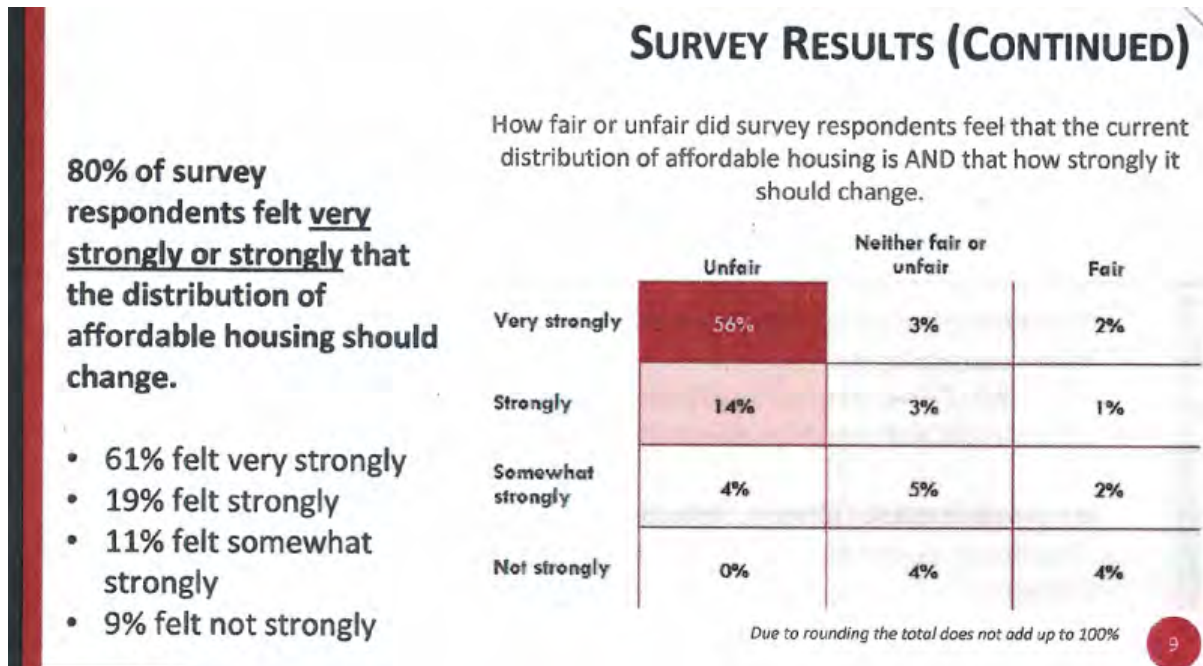
Although the survey was by no means scientific, the diversity and breadth of respondents were impressive. One notable exception is the lack of response from those 19 or younger, who will arguably be the most impacted by where new housing is developed in the near future.

Ratio of respondents that prioritized planning areas for more affordable housing

**SURVEY RESULTS (CONTINUED)**

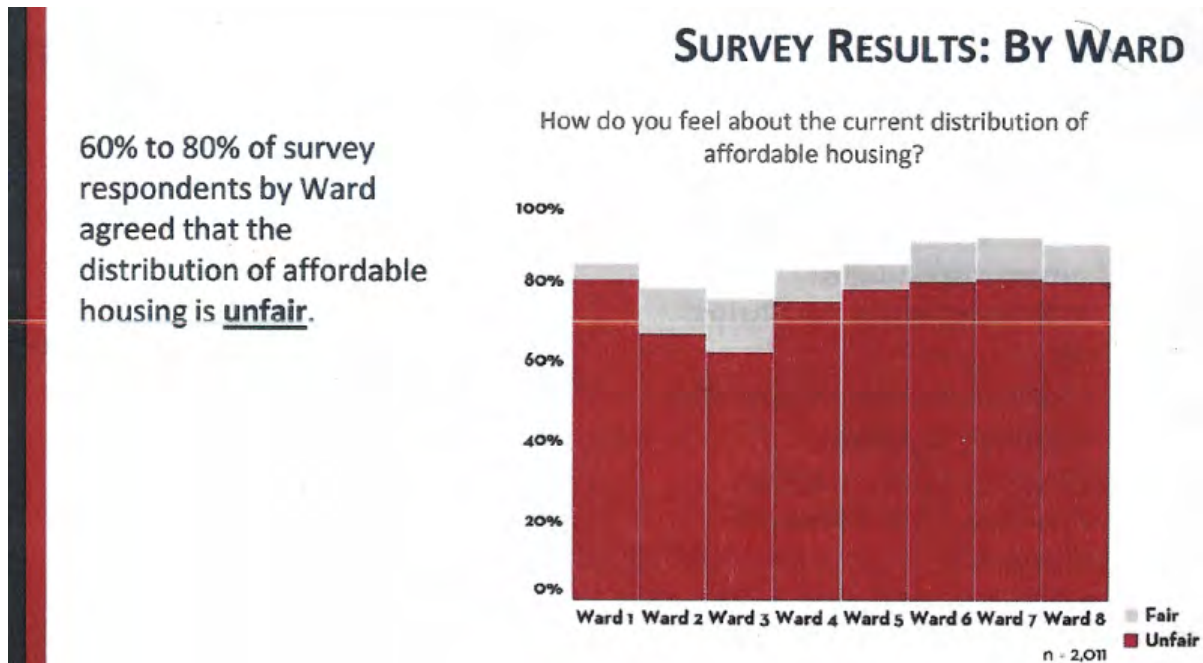
Respondents had clear preferences for which areas of the District should provide more affordable housing.

Survey results from DHCD and OP.



Survey results from DHCD and OP.

Survey respondents showed preferences for building more subsidized housing in wealthier areas, such as west of Rock Creek Park and in Capitol Hill.



Survey results from DHCD and OP.

A majority of survey respondents in each ward agreed that the current distribution of subsidized housing is unfair. However, there wasn't a

consensus from Ward 3 respondents, who live in the area with the least amount of subsidized housing.

These survey results are particularly timely in relation to the city's Comprehensive Plan updates, many of which will come this fall. In particular, there is significant room for improvement in [amendments to the Comprehensive Plan's Framework Element](#), which is up for a vote in the DC Council on October 8.

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Tagged: [affordable housing](#), [andrew trueblood](#), [dc](#), [housing](#), [housing shortage](#), [housing supply](#), [office of planning](#)



Brian Goggin is an affordable housing professional living in Shaw. Any views expressed here are solely his own.



Draft updates to part of DC's comprehensive plan are good news for housing advocates

PLANNING By **Alex Baca** (Housing Program Organizer) October 4, 2019 2



[H Street NE](#) by Ted Eytan licensed under [Creative Commons](#).

DC's Comprehensive Plan sets the course for how the District will grow in the next decade, and the Framework at the beginning sets the tone for the rest of the plan. Right now the District is updating this plan, beginning with the Framework. Housing advocates have been paying close attention to whether the updates will modernize how development works in the District.

On Wednesday evening, Chairman Phil Mendelson's office [released a draft](#) of the Framework element bill. The DC Council will vote on it for the

second and final time next Tuesday, October 8. It has [taken some time to get to this point](#), and things can still change further. Drafts of bills can be released up to noon before the day of a vote.

But the changes, as they stand right now, are—we think—worth the wait.

What was the ultimate fate of Mendelson's addition?

Section 227.2, [you may recall](#), was particularly contested. It was not in the 2006 Comp Plan, but was rather [written anew by the chairman](#). In a convoluted way, the chairman's proposed language could have given the council slightly increased authority over land use. It could have created a scenario in which developers would have come to the council to request amendments to the FLUM or Comp Plan for their projects. This is not currently the case (which we think is a good thing).

Though the section passed without any comment at first reading, zoning commissioner Rob Miller pointed out potential problems with the language and proposed his own amendments. Shortly after, Office of Planning (OP) issued a letter to the chairman with its own proposed language for 227.2.

Miller's, and OP's, concern was with whether the four bullet points in 227.2 would require the zoning commission to evaluate planned unit developments (PUDs) on an entirely new standard, and/or require the zoning commission to gauge a PUD's strict compliance with the Future Land Use Map (FLUM). PUDs are development projects that exceed existing zoning regulations in exchange for public benefits, such as money for local parks or more affordable housing.

But Section 227.2 is vastly improved in the draft. Gone are the offending bullet points, which have been replaced with:

Each land use category identifies representative zoning districts and states that other zoning districts may apply. The Zoning Commission, in selecting a zone district such as through a Planned Unit Development or Zoning Map Amendment, determines if it is not inconsistent with the Comprehensive Plan. In making this

determination for a selected zone district, the Zoning Commission considers and balances the competing and sometimes conflicting aspects of the Comprehensive Plan, including the policies and text; the intent of the Future Land Use Map land use category; and the Future Land Use Map and Generalized Policy Map. Under the Zoning Regulations, a proposed Planned Unit Development should not result in unacceptable project impacts on the surrounding area.

This removes the initially proposed mandate for the zoning commission to gauge a PUD's compatibility with neighborhood character (a completely subjective element), and replaces it with a mandate to determine whether a PUD will result in "unacceptable project impacts on the surrounding area" instead.

What else got changed?

A lot! Most notable to GGWash's worldview are the following:

Instead of stories or feet, Section 227.4 now allows for the use of [floor area ratio](#), which divides the total gross floor area of all buildings on a lot by the area of that lot. This is more greatly in tune with how most people think about density. As the section says, "Using this approach, some aspects of a building may be higher than is characteristic for the land use category, but still consistent with the category's density range. Similarly, density on a portion of a site may be greater, provided the density for the site overall is not inconsistent with the specified range."

One edit that I'm particularly fond of is striking "housing boom" and replacing it with "population boom" in Section 220.5. This explicitly, and correctly, recognizes that housing is expensive because many, many people want to live in DC, not because housing has been built in DC recently.

Likewise, Section 225.5 alters some of the Future Land Use Map descriptions, switching the definition of Neighborhood Conservation Areas from a full-on protectionist vibe to one that acknowledges that "areas with access to opportunities, services, and amenities"—like, say, wealthy neighborhoods like the Rock Creek West and Near Northwest planning

areas—should allow for more people to live in them, while housing in more vulnerable areas should be preserved:

Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities.

Without explicitly saying that affordable housing is the city's greatest priority, the Framework now elevates the issue to a point that it's effectively undeniable. Sections like 220.5 contain language like:

“The preservation of existing affordable housing and the production of new affordable housing, especially for low income and workforce households, are essential to avoid a deepening of racial and economic divides in the city, and must occur city-wide to achieve fair housing objectives. Affordable renter-and owner-occupied housing production and preservation is central to the idea of growing more inclusively, as is the utilization of tools such as public housing, community land trusts, and limited equity cooperatives that help keep the costs of land affordable, particularly in areas with low homeownership rates and those at risk of cost increases due to housing speculation.”

And, there are also major nods toward transportation accessibility and access. Transportation is as much of an affordable housing policy as producing, preserving, and protecting. If you can't get to where you need to go, where you live feels even more fraught, and high transportation costs reduce what people can put toward housing.

The Framework now directly acknowledges that access to transportation in DC, just like access to housing, is often unequal. Section 207.3 says:

Many of those who need transit the most, including the low-income households and those with special needs, do not have equitable access to transportation options. Transit often does not connect District residents to jobs in the suburbs, and it may be expensive or difficult to access.”

What's next?

The final bill will be released before noon next Monday; changes from the language in this draft should be minimal. The second reading and final vote on the Framework element is scheduled for the Committee of the Whole meeting on Tuesday, October 8.

At the bill's first reading, Mendelson committed to working directly with other councilmembers that spoke during that meeting. His office remained committed to that over recess and the past few weeks.

It appears that the majority of topics raised by vocal councilmembers at first reading—Allen on equitable transportation and access; Silverman on land value recapture; Nadeau on affordability, displacement, and single-family zoning—have been worked into the current draft, though there's always the potential for a dais amendment.

It's a reasonable assumption that the Framework bill will pass on October 8. Then, on October 15, Office of Planning will release its neighborhood targets for housing production by planning area, as well as its amendments to all the rest of the sections of the Comp Plan. And then we'll do much of this—the public organizing, the legislative back-and-forth, and hopefully, this time, a little less waiting—all over again.

The upshot

This draft is good, actually. It reflects considerable work on the part of the chairman's office to incorporate feedback from councilmembers and interest groups, and indicates an important shift in how we're talking about housing. It successfully balances many, many competing demands for both

neighborhood preservation and character with new development, which is inherently necessary to building more affordable housing.

GGWash is not the only voice in the chorus of people and organizations concerned with the machinations of the Framework and the Comp Plan. The original Housing Priorities Coalition pulled together nonprofit and for-profit affordable-housing developers, faith groups, activists and advocates, and other interested parties to push for language that favored a commitment to Affirmatively Furthering Fair Housing, and that wasn't so rigid in its exclusivity and preservation of historically privileged neighborhoods.

Likewise, the Grassroots Planning Commission organized around its own set of principles. [Remember that 13-hour hearing?](#) That kind of thing doesn't happen without serious public engagement.

Much of the discourse around the Comp Plan has been laser-focused on whether amendments to the Framework would alleviate or intensify the lawsuits that have dogged planned unit developments over the past few years. That's certainly an important thing to consider: Housing gets more expensive when you don't build enough of it to meet demand, so [slowing down PUDs](#), while perhaps feeling morally correct, doesn't actually prevent gentrification or displacement.

Understandably, there was enormous pressure for changes to the Framework element to shut down the lawsuits. But PUDs have always faced legal challenges, and treating the Framework as a battle between development and preservation, while tempting, is a reduction of what the Comp Plan, as a legal document, can and can't do. It's a distraction from what's actually at stake: Whether our foundational land use text says that all neighborhoods are on the hook for shouldering the impacts of a growing city, or whether it preserves and protects places that have always benefited from preservation and protection of property values.

Overall, I'm confident in saying that this version of the Framework better reflects the present tempo of planning and development discourse. It acknowledges that we *do* need to build, and grow, but that we've done so

unfairly, and that exclusive parts of the city have not taken on the responsibility of housing DC's residents.

Comprehensive plans, by their nature, are wonky and hard to process, but the actors who have invested in DC's Comp Plan have, by and large, been tremendously dedicated to following what's been happening with it. It's heartening to see a draft that reflects both public interest and thorough edits.

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Tagged: [comprehensive plan](#), [dc](#), [housing](#), [phil mendelson](#), [planning](#), [preservation](#), [zoning](#), [zoning update](#)



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We're reading the amendments to DC's Comp Plan. Here's what it says about land use.

PLANNING By [Alex Baca](#) (Housing Program Organizer) October 18, 2019 2



[Dupont Circle and Connecticut Avenue](#) by Mike Maguire licensed under [Creative Commons](#).

On Tuesday, Mayor Muriel Bowser and Office of Planning Director Andrew Trueblood not only released [citywide targets for affordable housing production](#) by neighborhood planning area, but also made public amendments to the rest of the Comprehensive Plan—all 24 chapters of it. The Comp Plan guides how the city will grow in the years to come. The

council recently passed the Framework element of the plan. This is our first look at OP's proposed updates to the rest.

GGWash will be paying particular attention to the land use, housing, and historic preservation sections, as well as the [area elements](#) of the Comp Plan as it's revised. We're slowly and thoughtfully working through the amendments to each section. Here's what we found notable in our first pass at the land use text amendments.

What changed regarding land use?

OP's [summary](#) of its proposed major policy themes to the land use section is broken into four sections: supporting growth; providing housing, particularly affordable housing; improving resilience and equity; and balancing competing demands.

The most considerable amendments, in our view, are within the “supporting growth” category, which OP summarizes as:

- *Shift expectations from purely attracting growth to supporting growth, with clear expectations for future development.*
- *Maximize District assets to effectively utilize land, including consolidating and co-locating similar uses and operations.*
- *Identify transit stations, corridors, large sites, and neighborhoods to accommodate growth.*
- *Re-emphasize that corridors and transit-rich areas can support growth*

A good chunk of OP's amendments reshape the land use chapter to aggressively affirm transit-oriented development by illustrating that it should be a priority in all neighborhoods with access to high-frequency transit. Since the city doesn't actually have a codified transit-oriented development policy, which is standard in lots of other municipalities, this is a good thing.

Though the recently-passed [amendments to the Framework element](#) went a long way to clarifying how [Planned Unit Developments \(PUDs\)](#) should

work and what kind of benefits they should provide, the Land Use element, starting with Section 309.15, tackles this further. It prioritizes PUDs that deliver “public benefits including housing, affordable housing, and affordable commercial space” (page 38 of 72, Land Use).

There is a full, new section that speaks to supporting growth, 303.1 (page 9 of 72, Land Use), in a way that's fair and cognizant of the needs of different demographics. It says:

“Supporting growth through an equity lens provides opportunities for understanding that vulnerable populations and neighborhoods need additional attention to share in the prosperity of the District. Vulnerable and underserved communities suffer from high and rising housing costs, persistent unemployment, worse health than their affluent peers, and potential displacement. There are economic disparities in area throughout the District.

Adding a supporting growth lens places a different emphasis on development guidance and expectations. Growth cannot be ignored, as it is necessary for continued prosperity and revenues to provide for social supports and municipal services. A change in the Future Land Use Map designations can have impacts on the value of the designated and neighboring properties, the capacity of the infrastructure and civic services, as well as the short- and long-term expectations of development. Previous benefits and amenities used to catalyze growth are now necessities for supporting growth: affordable housing, transportation improvements, infrastructure improvements, open space development and maintenance, sustainable and resilient design, and arts and culture.”

A couple of lines about inequitable growth, and how future growth is inevitable, may not be enough to mollify critics who believe DC deliberately courted a white, educated creative class in the late aughts in order to stabilize its tax base at the expense of its longtime residents. And it won't immediately redistribute the wealth that has accrued in DC over the past 15 years, as people—lured by downtown jobs, falling crime rates, better

schools, and proximity to transit and amenities—moved back to the region's core.

But this is light-years better than the 2006 Comp Plan, which welcomed a sort of big-box economic growth in the form of large-parcel redevelopments, while simultaneously sheltering certain neighborhoods from any effects of growth.

Those neighborhoods, largely within the Rock Creek West, Near Northwest, and Near Northeast planning areas, have long held the political and social cultural capital that has allowed them to wall themselves off from any of the changes that accompanied DC's population growth. This power was reflected in the city's foundational land use text.

Specific changes to the land use chapter's language that we're particularly fond of include:

- Deleting “stability” from Section 302.1, and adding “a discussion on supporting growth” to Section 303.1 (page 9 of 72, Land Use): This is the description of the land use section's goal. Removing “stability” from the line “to sustain, restore, or improve the character, and stability, affordability, and equity of neighborhoods in all parts of the city” acknowledges that neighborhoods don't stay the same; this line also adds “affordability, and equity,” reinforcing a shift in the city's principles.
- Deleting Section 306.9 (page 27 of 72, Land Use), which begins with, “To avoid adverse effects on low and moderate density neighborhoods, most transit-oriented development should be accommodated on commercially zoned land.” Low- and moderate-density neighborhoods—which are defined by the Future Land Use Map, and which often have within them a Metro station or a high-frequency bus line—shouldn't be off-limits from transit-oriented development. This, also, is an example of how the text amendments to the Comp Plan link to the FLUM, which isn't a legal document but is given equal weight to the Comp Plan.
- Substantially amending Section 309.10 (page 37 of 72, Land Use) to the following:

309.10 *Policy LU-2.1.5: ~~Conservation of Single-Family Neighborhoods~~ Support*
~~Protect and conserve~~ **Support** the District's established stable, low-density neighborhoods ~~and ensure that their zoning reflects their established low-density character.~~ Carefully manage the development of vacant land ~~and the alteration of existing structures~~ in and ~~adjacent to single-family~~ around neighborhoods in order to ~~protect low-density~~ respect character, housing, affordable housing, civic space, preserve open space, and maintain neighborhood scale. 309.10

- Similarly, discouraging “mansionization” (Section 309.16, page 37 of 72, Land Use), whereby smaller, “naturally affordable” homes are torn down and replaced with larger single-family homes, and replacing “protect single-family homes” with “respect” in Section 309.12 (page 38 of 72, Land Use)

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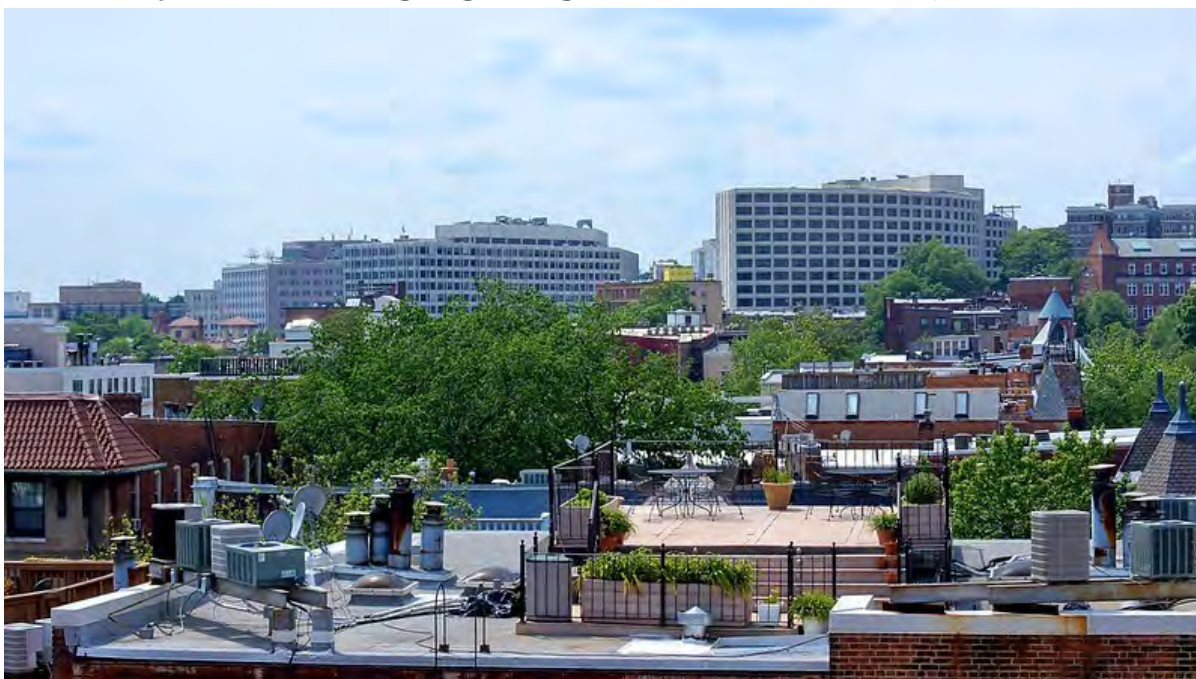


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The Comp Plan guides DC's growth. Here's what proposed updates say about housing.

HOUSING By [Alex Baca](#) (Housing Program Organizer) October 31, 2019 1



[View from U Street](#) by Ted Eytan licensed under [Creative Commons](#).

When Mayor Muriel Bowser and Office of Planning (OP) Director Andrew Trueblood released [citywide targets for affordable housing production](#) by neighborhood planning area, they also made public amendments to the rest of the Comprehensive Plan—all 24 chapters of it. The Comp Plan guides how the city will grow in the years to come.

On October 8, the council [passed the Framework element](#), the intro which charts the direction for the plan. This is our first look at OP's proposed updates to the rest of the document. GGWash will be paying particular

attention to the [land use](#), housing, and historic preservation sections, as well as the [area elements](#) of the Comp Plan as it's revised.

We're working through the amendments to each section. Here's what we found notable in our first pass at the housing text amendments.

What changed regarding housing?

OP struck and added a lot of minor words that, at first glance, don't seem too critical. Wordsmithing might not come off as a substantial alteration until you recall that the 2006 Comp Plan effectively [pushed development into certain areas of the city](#) (ones with lots of vacant lots, which tended to be lower-income), and kept many, many *more* parts of the city off-limits from most new construction (ones with *not* a lot of vacant lots, which tended to be whiter and wealthier).

Undoing that paradigm requires a lot of edits. If OP's amendments are retained in what the council ultimately passes, we think the Comp Plan will be much better off, and much more reflective of how housing has worked in DC.

For example, "the recent housing boom" has been changed to "the recent boom in housing demand," and "encourage the private sector to provide new housing" has been changed to "encourage and/or require the private sector to provide both new market rate and affordable housing" (page 20 of 79). These are tweaks. But they matter a great deal.

There are some entirely new sections, too. We find that these are much more detailed, data-driven, and honest about the dynamics that drive where people live.

While housing is a regional market, it is also a very personal choice tied to family, community, and the unique identity shared by residents living in the District of Columbia and the Nation's capital. The fact that many residents place a priority on maintaining their identity as Washingtonians partially explains why 71 percent of the District's residents moving within the region stay within DC. The

rate of retention is actually the highest for extremely low-income households with 77 percent staying in DC. This is due in part to Washington DC's investment in public transit and affordable housing keeping housing and transportation costs low relative to the rest of the region. However, the same migration data suggests that lower income households tend to move east of the river. In addition, the District struggles to retain moderate income households earning between 80 and 100 percent of the MFI, with only 60 percent of them choosing to stay in the city.

Likewise, OP added this section about supply and demand, which we wholeheartedly agree with:

The supply of housing should grow sufficiently to slow rising costs of market rate rental and for-sale housing. Expanding supply alone will not fulfill all of Washington, DC's housing needs at lower income levels, but it is one important element of the strategy to ensure unmet demand at higher price points does not further hasten the loss of 'naturally occurring' affordable housing.

The mayor's goal for producing 36,000 units of new housing everywhere in the city—not just in certain parts of it—is formally added in Section 501.1, which is revised to say:

The overarching goal for housing is: Develop and maintain new residential units to achieve a total of 360,000 by 2025 that provide a safe, decent, accessible and affordable supply of housing for all current and future residents of throughout all neighborhoods of the District of Columbia. (page 19 of 79)

Other worthwhile additions include:

- A strong acknowledgement that new construction has favored one-bedroom units over multifamily units (though it's necessary to build more smaller units as well [to free up family-sized housing](#); page 14 or 79).

- A nod toward making more housing accessible by requiring that “a substantial number of the new units added are affordable to District residents” (page 17 of 79).
- And an explicit mandate to “encourage development of both market rate and affordable housing in high-cost areas of the city” and “develop new innovative tools and techniques that support affordable housing in these areas” (because “doing so increase costs per unit but provides greater benefits in terms of access to opportunity and outcomes,” page 21 of 79).


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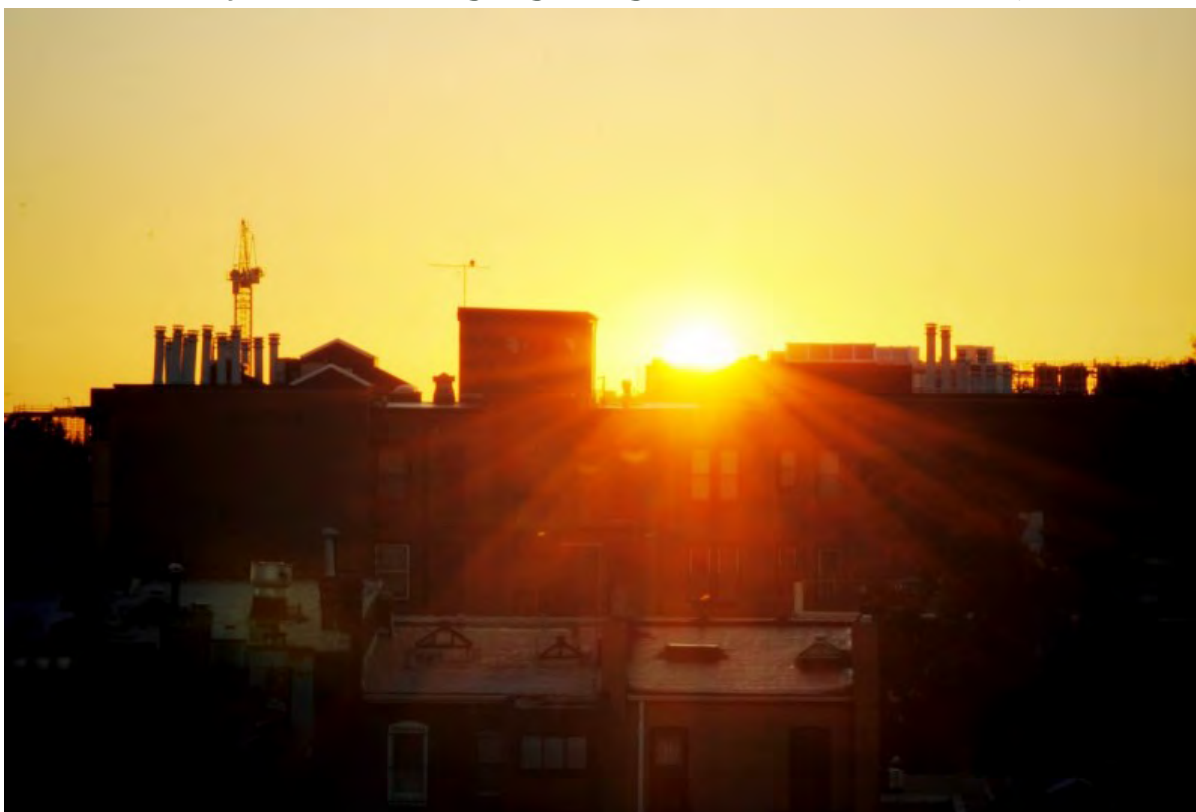


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Updates to DC's Comprehensive Plan fit together housing and preservation

PRESERVATION By [Alex Baca](#) (Housing Program Organizer) November 7, 2019 4



[Sunrise over the city](#) by Erin used with permission.

When DC Mayor Muriel Bowser and Office of Planning (OP) Director Andrew Trueblood released [citywide targets for affordable housing production](#) by neighborhood planning area, they also made public amendments to the rest of the Comprehensive Plan—all 24 chapters of it. The Comp Plan is important because it guides how the city will grow in the years to come.

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We're working through the amendments to each section. Here are four things we found notable in our first pass at the historic preservation text amendments.

What changed regarding historic preservation?

Throughout the chapter, OP's amendments more clearly present the nuts and bolts of preservation in DC.

1. Clarification of roles and responsibilities: What's most interesting is that the interplay between historic preservation and growth, particularly as growth concerns housing, is reflected throughout OP's amendments to the chapter. On the first page, "The Element recognizes historic preservation as an important local government responsibility" is changed to "The Element recognizes historic preservation as a valuable planning tool" (page 1 of 65).

This is also a more honest description of where preservation is situated in the city's governance: under planning, rather than an independent arm. Making this clear is an important set-up for the rest of the section, which states that "Welcoming new growth in the city, while protecting its historic character" and "Expanding the reuse of historic buildings for affordable housing," among other additions to Section 1000.2, are critical historic preservation issues facing the District (page 1 of 65).

The changes also better explain the role of various agents, like the State Historic Preservation Officer and Commission of Fine Arts.

2. A more forward-looking vision: Some sections seem rewritten with the aforementioned framing in mind. This includes Section 1000.6, which now says, "The District's recent growth by 100,000 residents in a single

decade parallels earlier booms during wartime and the Great Depression, when newcomers flocked to the city seeking jobs and opportunity. Each of these spurts led to innovation and expansion, but also the burden of providing adequate housing and services for new residents.”

While statements that effectively amount to, “DC grew once, and it will grow again, and there will be challenges,” aren’t earth-shattering admissions, it’s much more useful for the preservation element to present a forward-looking vision. The 2006 Comp Plan has a *lot* of treacly language describing the city’s then-current state, which isn’t helpful or, really, relevant to a document that’s supposed to provide guidance for future growth. For example, the District’s “mosaic” of neighborhoods is described in the current Comp Plan as:

“Some filled with turreted Victorian rowhouses, some with modest bungalows intermixed with apartments, and others lined block after block with broad turn-of-the-century front porches. Washington’s architecture is an eclectic mix that belies the dignified uniformity of the tourist postcards. And much of the historic city is still intact. This is a prime source of the city’s charm and an inheritance that should make all Washingtonians proud.” (page 30 of 65)

Further, language like “Affirm the importance of local cultural identity and traditions, and recognize the role that cultural recognition plays in supporting civic engagement and community enrichment. Recognize a diversity of culture and identity to support a more equitable understanding of the District’s heritage,” can be read as a direct nod to the rising interest in a kind of [cultural conservation](#)—most notably surfaced by the [Don’t Mute DC protests](#)—that isn’t entirely, or at all, based in physical structures.

3. Acknowledgement of tension between preservation and growth: Statements like, “Preservation standards should be reasonable, and flexible enough in their application to accommodate different circumstances and community needs” and “With thoughtful planning and development, needed growth can occur without degrading historic character” (page 7 of 65), speak to a long-simmering tension between

preservation and development. Advocates tend to fall on sides—preserve neighborhood character, or build!—and hold scarcity mindsets that drive them further into conflict with each other.

It's reasonable to say that DC's preservation regime is much more aggressive than that of many cities, and that it *has* negatively impacted housing affordability. Many, many anti-development fights have involved at least a [nod](#) to historic preservation, perhaps because the process to nominate a building or a neighborhood as historically significant is relatively publicly accessible. Most Advisory Neighborhood Commissioners (ANCs), and hyper-involved residents, can figure it out how to engage with it.

Debates over preservation might loom large at the neighborhood level, rightfully, but they are handily engulfed by projections for DC's, and the region's, [job and population growth](#). So it's appropriate that OP's amendments locks together these two oppositional stances, rather than deferring to one or the other. Lots of new language embodies this dynamic:

Preservation of existing affordable housing is among the District's highest priorities, and many of these units are located in the city's older housing stock, including historic buildings. Historic preservation can help to retain and enhance this building stock as an important resource for the city. At the same time, as older neighborhoods become more attractive to new residents and developers, values rise, generating increases in property taxes. Maintenance and upkeep of these older buildings is necessary, and both taxes and repair costs affect lower income residents most severely. Appropriate flexibility in the application of preservation standards within historic districts can mitigate this problem, but financial assistance programs and incentives are also necessary to keep as much as possible of this building supply affordable” (page 59 of 65).

“While historic preservation has supported the revitalization and enhancement of downtown and many neighborhoods in recent decades, currently the District faces a new challenge of providing

adequate housing for a population that has soared by more than 100,000 people since the 2010 Census. Some of this housing will need to be provided in the city's historic districts, whether existing or new. More study of the relationship between gentrification, historic preservation, and the cost and availability of housing is needed to support an understanding and consensus about how these new needs can best be managed” (page 60 of 65).

4. A mandate to see how historic preservation impacts housing:

There's a great deal of respect granted to the long legacy of preservation in DC, which is a complex and messy thing that, in my experience, works differently here than anywhere else in the country.

When discussing preservation, we should be honest with ourselves, and acknowledge that the legal strings of preservation policies typically look much like economic development. The stated purpose of preservation in the District—much like preservation at the federal level—is to “retain and enhance” historic assets and areas. The output of this is preserving buildings, yes. But the actual process of doing so often depends on the infusion of tax credits to redevelop ailing properties into viable commodities.

Further, preservation in DC, specifically, often acts as a restrictive land-use regulation, given that it's a small city-state. By limiting what can happen by-right in areas designated historic, preservation looks not dissimilar to exclusionary zoning. Fundamentally, our preservation laws and regulations are, literally, *not* designed to preserve affordable housing, keep people in their homes, or bulwark neighborhoods against gentrification.

The coda to all this is another new section, which says, “Examine the effects of historic preservation on housing affordability, as documented in existing studies and through analysis of available District data. Consider the findings of these studies and investigate how to manage preservation tools in ways that support housing affordability” (page 61 of 65). That's as explicit of a mandate as any comprehensive plan can give to move something, like a study, forward.


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Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the



“Gentle” density can save our neighborhoods

ZONING By [Alex Baca \(Brookings\)](#), [Patrick McAnaney \(Brookings\)](#), [Jenny Schuetz \(Brookings\)](#)
December 5, 2019 76



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This article was first [published](#) by the Brookings Institution.

A year ago this month, Minneapolis made [national headlines](#) by adopting a new [comprehensive plan](#) with two objectives: reducing racial segregation and improving housing affordability. Its method for doing so was through zoning—the plan effectively banned single-family-exclusive zoning by

allowing three-family buildings in all residential neighborhoods across the city.

Minneapolis’s plan was a rare rebuke to a trend in American cities going back to the 1940s, in which communities created increasingly strict regulatory barriers to protect low-density neighborhoods. On roughly 75% of land in most cities today, it is illegal to build anything except single-family detached houses. The origins of single-family zoning in America are not benign: Many housing codes used density as a proxy for separating people by income and race.

But as [communities across](#) the US grapple with [worsening housing affordability](#), there is growing interest in how [zoning rules](#) could be relaxed to allow smaller, less expensive homes, as in Minneapolis. Often, the choice is posed as a [trade-off](#) between detached homes with big yards or skyscraping apartment towers. In reality, the housing stock in most communities is much more diverse than these two extremes. While high-rise apartments in strategic locations should be part of the solution, many single-family neighborhoods could easily yield more housing—and more affordable housing—if land use rules allowed “[gentle](#)” increases in density, such as townhomes, two- to four-family homes, and small-scale apartment or condominium buildings.

In this piece, we illustrate how replacing detached single-family homes with “gentle density” could increase the number of homes available and bring down average housing prices in high-cost locations, while retaining the physical scale of the neighborhood. Our numerical example draws on estimates from Washington, DC, but is applicable to other urban areas.

Building more housing on single-family parcels doesn’t require skyscrapers

Washington, DC has several [predominantly single-family neighborhoods](#) close to downtown that would offer perfect opportunities for gentle density. According to [tax assessor data](#), the median lot size for single-family detached homes in the District is 5,460 square feet, compared to 1,600 square feet for rowhouses and 4,100 square feet for four- to six-unit

multifamily buildings. This suggests that most single-family lots could accommodate more housing without purchasing adjacent parcels and combining them.

The homes most attractive for [redevelopment](#) are [older structures](#) that are in poor physical condition and located on relatively large lots in [expensive neighborhoods](#). Let’s visualize some different scenarios for a 4,500 square foot lot, currently occupied by a two-and-a-half-story, 3,000 square foot single-family home. Figure 1 shows sample site plans for the lot as is, redeveloped with three side-by-side townhomes, or redeveloped with a three-story, six-unit condo building.

FIGURE 1

More homes, less yard



Note: These are hypothetical examples created for this analysis. Structure types and building dimensions are typical of homes in Washington, D.C., verified against Computer Assisted Mass Appraisal residential data from opendata.dc.gov.

B Metropolitan Policy Program
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Where land is expensive, building more homes per parcel increases affordability

Adding more homes in single-family neighborhoods makes it possible for more people to move into the neighborhood (and city). Under certain conditions, the new homes will also improve affordability, because the cost of the most expensive factor—land—is spread across more homes. Below is

a simple development pro forma, or cash flow statement, that illustrates the costs of the two redevelopment scenarios.

Based on recent [sales prices](#), an older single-family home on a 4,500 square foot lot in the upper northwest parts of the District could be acquired for around \$1 million. For our analysis, we assume that the redevelopment scenarios will be sold to owner-occupants (although creating more rental housing is a potential benefit of higher-density development). More detail on the assumptions and terms in the pro forma are included in the technical appendix.

TABLE 1

Development costs and sales prices for townhomes and condominiums

	One-family detached	Townhomes	Condo bldg
Acquisition	\$1,000,000	\$1,000,000	\$1,000,000
Construction costs			
Demolition:		\$100,000	\$100,000
Hard cost total		\$1,140,000	\$1,476,000
Construction costs (\$/sq ft)		\$190	\$205
Sq ft of new structure		6,000	7,200
Soft Cost total		\$124,000	\$157,600
Soft costs (% of demo + hard costs)		10%	10%
Financing Costs		\$62,000	\$78,800
Finance costs (% of demo + hard costs)		5%	5%
Developer Fee:		\$181,950	\$210,930
Developer fee (% of total project cost)		7.5%	7.5%
Total development costs		\$2,607,950	\$3,023,330
Construction Interest:		\$172,125	\$199,540
Loan-to-cost		60%	60%
Interest rate (annual)		5.50%	5.50%
Project time (yrs)		2	2
Equity Return:		\$219,068	\$253,960
Equity contribution (% of total dev costs)		40%	40%
Equity IRR		10%	10%
Total cost/resale price:	1,000,000	\$2,999,143	\$3,476,830
Resale price per unit:	1,000,000	\$999,714	\$579,472

Source: Construction costs and financing terms come from Somerset Development Company and DC Department of Housing and Community Development. Cells shaded in gray are assumptions used in intermediate calculations. Definitions and assumptions are explained in the technical appendix.

B Metropolitan Policy Program
at BROOKINGS

Comparing the per-unit sales prices for the three scenarios shows that newly built townhomes would sell for nearly the same price (around \$1 million) as the current single-family detached home. That relies on the assumption that single-family homes that are most attractive for redevelopment are in poor condition; buyers who purchased the home to

live in rather than redevelop would likely incur substantial renovation costs. In the past three years, newly constructed, similarly sized single-family homes in the District sold for an average price of around \$1.5 million, according to tax assessor records.

In the other redevelopment scenario, the per-unit prices for a six-unit condominium building are about 40% lower than for the three townhomes. One important factor is that the land costs (effectively the \$1 million acquisition plus \$100,000 demolition) are divided among six completed homes, rather than three. The second reason the condo prices are lower than townhomes is that each unit is smaller: 1,200 square feet per condo versus 2,000 square feet per townhome (typical sizes in the District for each structure).

Density supports neighborhood retail and a healthier planet

Adding more homes—and thus more neighbors—to low-density neighborhoods can help support local retail businesses that depend heavily on foot traffic, like hardware stores, bakeries, and restaurants. Although dense housing reduces yard space, good landscaping, green roofs, and other design solutions including [sidewalk berms](#) can offset [stormwater runoff](#). Local retail that households can access without driving helps reduce greenhouse gas emissions, the largest driver of climate change and air pollution.

And with good planning, increased density in single-family neighborhoods won't necessarily mean more cars competing for street parking. While our construction costs do not include structured parking, the site plans show that the townhouse scenario could easily accommodate one off-street parking pad per home, and the condo building could include some parking. Moreover, the developer could include deed restrictions that purchasers could not apply for residential parking permits (i.e., purchasers would have to lease garage spaces if they chose to own cars).

More homes equals more affordability and economic opportunity

The redevelopment scenario offers three main lessons for policymakers thinking about how to improve housing affordability.

First, it is possible to add more homes in single-family neighborhoods while keeping buildings at similar scale. When viewed from the street, three adjacent townhomes or six small condos can be constructed at approximately the same height and mass as existing single-family homes.

Second, allowing smaller homes that use less land is an important way to improve affordability. Where land is expensive, adding more homes on a given parcel reduces housing costs for each household. Gentle density also enables better matching between the size of one’s house and the size of one’s household; Washington, DC has seen rapid growth of one- or two-person households, many of whom would prefer to live in small apartments. Where these are not available, they end up sharing single-family homes or apartments with multiple households to reduce costs. Building more small homes—including accessible flats for older adults—would free up the existing single-family stock for people who need larger homes, including families with children and multigenerational households.

Third, diversifying the housing stock in exclusive neighborhoods creates better access to [economic opportunity](#). The reason land is expensive in these neighborhoods is because they are located near job centers and transportation hubs, and offer amenities such as excellent public schools and low crime. Lowering housing prices from \$1 million to \$570,000—and adding five new homes for each existing home—would substantially expand the number of families who could afford high opportunity neighborhoods. Put another way, gentle density is a relatively easy way to democratize our cities.

Apartments are homes, not an “invasion”

Despite the benefits to residents and neighborhoods, rowhouses and multifamily buildings are illegal to build on nearly three-quarters of the District’s land. Single-family-only zoning means that a builder must seek special permission to construct compact housing, a process that ultimately makes it more expensive. Washington, DC’s zoning code says that the

purpose of low-density zoning is to “protect [single-family] areas from [invasion](#) by denser types of residential development.” But that “protection” entrenches economic and racial segregation.

The District needs more housing, especially low-cost housing. [Removing barriers](#) to townhomes, two- to four-family homes, and small-scale multifamily buildings in every part of the city should be part of the solution. It’s time for the District to legalize gentle density.

Sarah Crump provided excellent research assistance.

Technical appendix:

Hard costs of construction include materials and labor. Because both projects are under five stories, we assume wood-frame construction, averaging \$205 per square foot. Soft costs include design, insurance, permitting fees, and costs incurred for environmental reviews and other regulatory compliance. Larger and more complex projects generally have higher soft costs; here we are assuming projects do not require rezoning, variances, or other regulatory barriers.

Developers can be paid in a variety of ways. Because development projects generally do not create positive cash flows until construction is completed, developers often receive a development fee during the process, as well as any residual profits after the project has been completed, lenders have been repaid, and equity investors have received their returns.

Unlike mortgage loans that households use to purchase homes, construction loans are usually interest-only during the development process (principal is repaid upon project completion, when the finished housing is sold). Loan-to-cost ratios for construction loans are lower than loan-to-value ratios for purchase of existing buildings, because construction projects are higher risk.

The repayment structure and required rate of return for equity investors varies considerably based on the size and risk of the project. In this example, we assume equity investors require a 10% internal rate of return

(IRR) and provide 40% of the project development costs. Over the past 20 years, publicly traded Real Estate Investment Trusts (REITs) have earned about 13% average annual returns. The cash flows to the equity investors are calculated as follows:

where $IRR = 10\%$ and $t = \text{two years}$.

Sale prices for redeveloped units are calculated as the per-unit cost, holding the developer fee and equity returns constant. This represents the lowest possible price that developers could charge, not necessarily the market price that would maximize profits.

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Tagged: [affordable housing](#), [dc](#), [density](#), [housing](#), [minnesota](#), [zoning](#)



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Patrick McAnaney is a Project Manager at Somerset Development Company, which specializes in development and preservation of affordable housing.



Jenny Schuetz is a Fellow at the Brookings Institution's Metropolitan Policy Program. Her research focuses on housing markets and urban amenities. Jenny has a PhD in Public Policy from Harvard University, a Master's in City Planning at MIT, and a BA in economics from UVA.



Historic housing policies segregated DC and hurt black residents. How do we do better now?

PLANNING By **Brian Goggin** (Elections Committee, Community Engagement Committee)
December 11, 2019 8



*Willow Lung-Amam, Don Edwards, and Neil Flanagan discuss inequitable land use and housing policies at Woodrow Wilson High School on Saturday, December 7.
Image by the author.*

The District has a history of inequitable land use and housing policies that have resulted in patterns of segregation that persist to this day. As the District seeks to update its Comprehensive Plan, a planning document which lays out how the city will develop in the years to come, it seeks to address these wrongs.

Racist federal and local housing policies in the 20th century laid the foundation for the racial and economic segregation in American cities today. These policies include segregated public housing, racial housing covenants, government-backed mortgages that were off-limits to African Americans, and redlining, or designating black neighborhoods as off-limits to lending. In one notable example, District and federal officials forced a thriving African American community [out of Fort Reno Park](#).

While many racist policies ended with the 1968 Fair Housing Act, the damage was already done. By the time many of these same benefits were allowed for African Americans, price appreciation ensured that the nicest neighborhoods were too expensive for them. The result has not only been segregated cities, but also a significant wealth gap between white and black America that is largely attributable to historical differences in homeownership.

As the Office of Planning works to update DC's Comprehensive Plan, it's soliciting feedback on how to do it right. The agency capped a month-long feedback tour with a discussion at Woodrow Wilson High School on December 7. Panelists explained ongoing barriers, as well as possible solutions to inequitable policies in DC. You can watch the entire event below:



Panelists Willow Lung-Amam, Associate Professor of Urban Planning at the University of Maryland, sat down with Don Edwards, CEO of Justice & Sustainability Associates, and Neil Flanagan, a local writer and architect with Maginniss + del Ninno Architects, to unpack the District's history of inequitable policies, and how we can craft new ones to promote a more equitable future.

Zoning codes have been used as a tool of segregation

[DC's original zoning codes](#) were often applied “to reinforce the covenants and restrictions of real estate, of single-family developments built by... segregationist developers” and to protect DC's wealthiest areas, notably west of Rock Creek Park, said Flanagan.

Although many racist policies, like restrictive covenants or race-based mortgage insurance, were deemed unlawful by the late 1960s, restrictive zoning has since kept the wealthiest parts of DC economically out of reach for low-income residents. Approximately [23% of DC's land area](#), and [80% in Rock Creek West](#), is restricted to detached single-family homes. That pushes the pressures of growth into only a few areas of the city, which can lead to displacement.

Detached single-family housing remains an [extremely expensive form](#) of housing in a city where land is so expensive. Therefore, it's very difficult for black and other households that did not benefit from 20th century housing wealth to buy into these communities. This has preserved an intentionally segregated pattern of development we experience to the present day.

This history continues to impact current residents. At Saturday's event, David Williams, Policy Director at Opportunity Insights, presented research that shows how low-income children that grow up in the wealthiest parts of DC—west of Rock Creek Park—have, on average, much higher incomes in adulthood than those who grew up in poorer neighborhoods.

How do we fix the problem?

Policies that can help reverse segregation in DC include rent control, inclusionary zoning, accessory apartments (also known as Accessory Dwelling Units or ADUs), and eliminating zoning that only allows single-family homes and not denser housing types like duplexes or apartment buildings, said Lung-Amam.

Lung-Amam advocated for “banning single-family zoning, something that has been commonplace in zoning since it was enacted in the 1920 but...is by its very nature exclusionary, and is not helping communities achieve the goals of integration.”

Besides being the right thing to do, fostering diverse neighborhoods can lead to economic benefits. Segregated neighborhoods, on the other hand, harm economic mobility, David Williams, Policy Director for Opportunity Insights said.

Mayor Muriel Bowser’s target to add 36,000 new housing units—including 12,000 dedicated affordable units—by 2025 across the city will help, said Department of Housing and Community Development (DHCD) Director Polly Donaldson and Office of Planning Director Andrew Trueblood, who also spoke at the event. If wealthy neighborhoods build affordable housing, this will allow people of various incomes to live there and help break down these ongoing patterns of exclusion.

The Bowser administration has established [goals](#) to equitably distribute this new housing throughout the city. In order to accomplish these goals, the Office of Planning has announced updates to DC’s Comprehensive Plan, which include changes to allow for more housing along key transit corridors like Connecticut Avenue and Wisconsin Avenue.

The public has until December 20 to weigh in on the Comprehensive Plan updates, while ANCs have until January 31 to [give comments](#). You can learn more about these and other initiatives at housing.dc.gov.

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Tagged: [comprehensive plan](#), [dc](#), [equity](#), [government](#), [history](#), [housing](#), [office of planning](#), [planning](#), [race](#), [segregation](#), [zoning](#)



*Brian Goggin is an affordable housing professional living in Shaw.
Any views expressed here are solely his own.*



Tell DC what you think of its Comp Plan

PLANNING ACTION By [Alex Baca](#) (Housing Program Organizer) January 7, 2020 1



[DC's Comp Plan touches every neighborhoods in the District.](#) by Ted Eytan licensed under Creative Commons.

The DC Office of Planning is making proposed amendments to the District's 2006 [Comprehensive Plan](#), a robust document which is basically a long term road map for how we interact with the city, from [housing](#) to transportation, and [land use](#).

And everyone gets a shot to weigh in. You, as residents of the District, now have until Friday, Jan.10, to provide public comment. The deadline was extended from Dec. 20, 2019.

What does this mean?

This means you get to tell the Office of Planning whatever you want to say about the Comp Plan. As an individual, your participation in this process is whatever you want it to be. You can send extensive comments, or you can just tell the Office of Planning that you want, perhaps, the entire northwest quadrant of the city to be designated as high-density mixed use. Up to you!

In all seriousness, if you're interested in writing a comment in the next few days—and we certainly encourage you to—it can be technical, if you're comfortable with the particulars of the Comp Plan and the Future Land Use Map, or it can be as simple as saying that you support Office of Planning's proposed amendments.

This also means that your Advisory Neighborhood Commissioners have until Feb. 14 to write resolutions, vote on them, and submit them to the Office of Planning. You can also email your ANC commissioner and tell them what you think they should do.

If you're an ANC commissioner, you've already probably gotten some information from the Office of Planning about how you should handle this process, and likely have in mind what you think you and your fellow commissioners will do.

So, while the public only has until this Friday to submit comments, ANCs have an additional four weeks beyond that to hear what their constituents have to say, and draft and pass resolutions accordingly.

Here's what you can do:

1. Send an email to [REDACTED] with your thoughts about the Comp Plan.
2. CC your ANC commissioners, your councilmember, and the at-large councilmembers, including Chairman Phil Mendelson, on that email. You can look up what ANC you're in [here](#), and check here to find your commissioner's email address. If you're so inclined, cc me at [REDACTED]

3. There's a form embedded below. You should fill it out if you support the Office of Planning's amendments, *and* if you would like the amendments to the Comp Plan and the Future Land Use Maps (FLUM) to go further in adding greater density, especially in affluent parts of the city and especially around high-frequency transit lines.

Sign Up!

Here's what we said about the Comp Plan?

For what it's worth, we wrote about amendments to the [housing](#), [land use](#), and [historic preservation](#) elements. We also formally submitted comments as GGWash, which you can read [here](#), and as part of the Housing Priorities Coalition, which you can read [here](#).

The highlights of these comments are:

- We think OP did a great job with its amendments, and we support them.
- We also think that the Comp Plan should, via the Future Land Use Map, allow for greater density in all parts of the city, but most especially in planning areas—Rock Creek West, Near Northwest, and Capitol Hill—that have not produced their fair share of, (particularly affordable) housing. A specific change that could begin to induce this is to amend the FLUM so that those planning areas are, at minimum, categorized as moderate-density mixed use.
- We really like the OP's amendments to the Land Use element, most especially changes to Section 309.10, which state that the District's "established" neighborhoods should be "supported" rather than conserved. This language and similar amendments—all of which we think OP should retain—bolster the city's initiative to build more housing in planning areas that have not produced their fair share of housing, or "established" neighborhoods.
- We'd like to see the addition of more language that commits both the Housing and Land Use elements to Affirmatively Furthering Fair Housing principles. AFFH is a federal rule that advances the goals of

the Fair Housing Act by requiring that the US and its municipalities take “meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” The Trump administration has consistently sought to weaken this Obama-era rule, so local commitment to the same ideals and actions is [more important than ever](#).

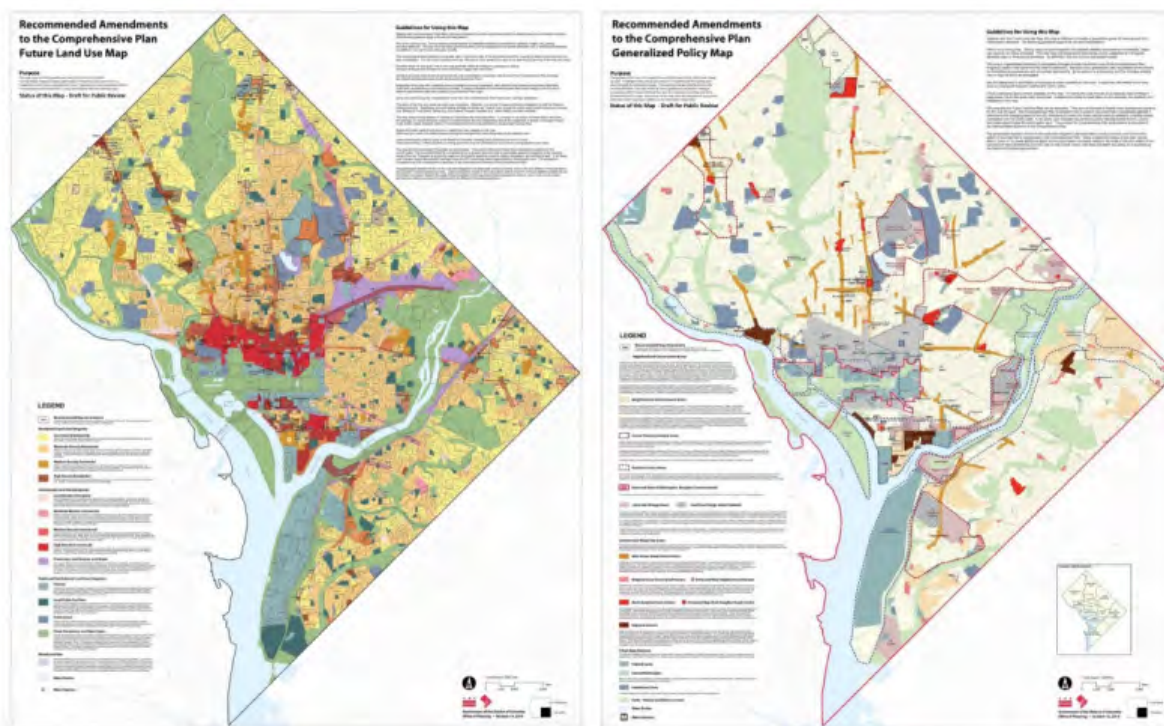
- The Comp Plan shouldn’t say anything about minimum lot sizes or setbacks, either in OP’s amendments or future revisions. Minimum lot sizes and setback requirements are often used to stymie the construction of denser, smaller housing by mandating that the lots be bigger than necessary, or that the buildings have lots of space around them.
- We suggest the addition of language that eliminates minimum parking requirements, or the deletion of language that requires parking. Not building parking can save significant costs in building housing. The District should, in particular, discourage parking requirements in federal facilities planning, and *not* subsidize parking through tax increment financing deals or other, similar economic development deals.

If it’s helpful, you should feel free to borrow language from our comments when you’re writing your own. But feel free to be as technical or as broad as you’d like. Even saying something like, “I support more affordable, denser housing in wealthy parts of the city,” is useful.

Tell me more about this form, and why isn’t GGWash setting up a click-to-send action alert for this?

First: There is a *lot* to the Comp Plan, and its various sections do different things. It has a set of [citywide elements](#) that address big-picture concepts like land use, housing, historic preservation, or transportation. It has [area elements](#), which address the built form of the city’s 10 planning areas.

There’s the [Future Land Use Map](#), which shows how and what can be built in a given area in the future, and the [Generalized Policy Map](#), which shows which parts of the city are slated for future planning efforts.



Images of the Future Land Use Map and General Policy Map from the DC Office of Planning.

I summarized above what we think are the most urgent changes that the OP should make to its amendments before it sends a legislative package to the council. But there's so much more that we could say—far more than could fit in a form letter.

We know that GGWash readers are fairly high-information, and probably have more points to make than what we're prioritizing. If that sounds like you, send the OP an email at [REDACTED] (and CC your ANC commissioner, and your councilmembers, and the at-large councilmembers! And me, if you don't [REDACTED])

Secondly: We *could* have set up an action alert that would have directed a bunch of generic emails to the Office of Planning, or to the council (even though the Comp Plan isn't in front of the council yet). But it's harder to get emails to individual ANC commissioners, and OP is leaning heavily on ANC resolutions to guide changes to its amendments. Put simply, there's not an easy way to automate the most meaningful feedback.

That's because the most meaningful and reliable way to make administrators and elected officials feel like there is positive public

sentiment for the things you want to see is to *be* that positive public sentiment. Petitions and action alerts have an important role in advocacy, but there's nothing as valuable as numerous personal emails. And—for all the reasons stated above—feedback on the Comp Plan is best delivered to OP, ANCs, and the council in your own voice.

But we understand that you're busy, and don't have tons of time to devote to wrapping your head around technical documents. So we're asking you to fill out the form below.

It won't send an email on your behalf to someone's inbox, like a typical action alert. And, because there are so many vagaries to the Comp Plan, we're not setting it up as a petition.

But it will let us know who you are, which is important: Down the line, as the council works its way through public feedback on OP's amendments, we want to be able to reliably demonstrate to your elected representatives that they have constituents who want a more accessible, inclusive—and denser—District.

Filling out the form indicates that you're willing to be counted as supporting what we've said about the Comp Plan here, and willing to be connected to your ANC commissioner and councilmember. I'd also like to be able to contact you directly if you have a stated interest in this.

Thank you!

Sign Up!

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Tagged: [anc](#), [comprehensive plan](#), [dc](#), [development](#), [housing](#), [land use](#), [office of planning](#), [planning](#), [preservation](#), [zoning](#)

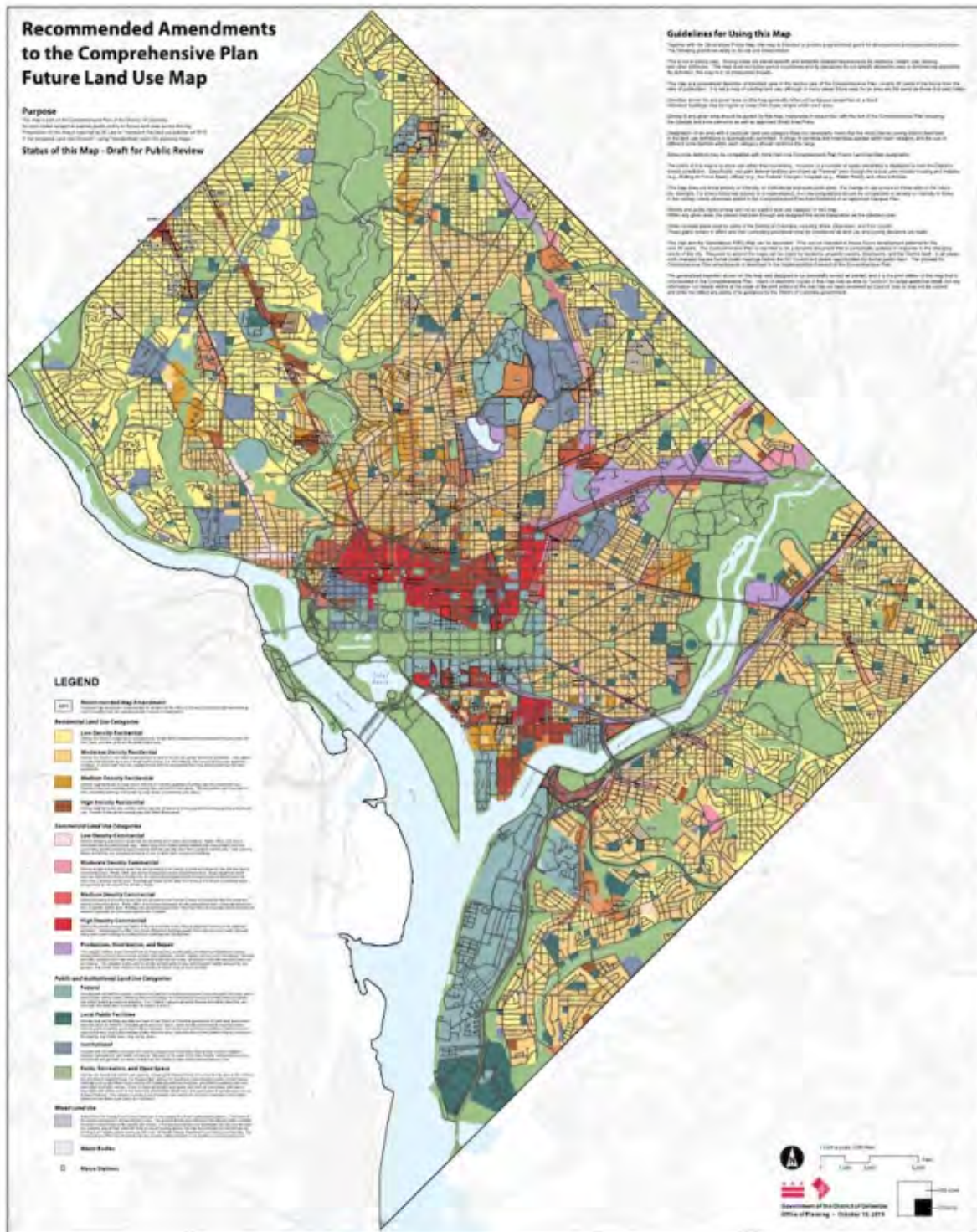


Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.



DC's Comp Plan comes down to a lot of maps. Here's why this one matters.

PLANNING By **Alex Baca** (Housing Program Organizer) January 8, 2020  5



The entire Future Land Use Map from DC's Office of Planning of the [FLUM Image](#) by DC's Office of Planning.

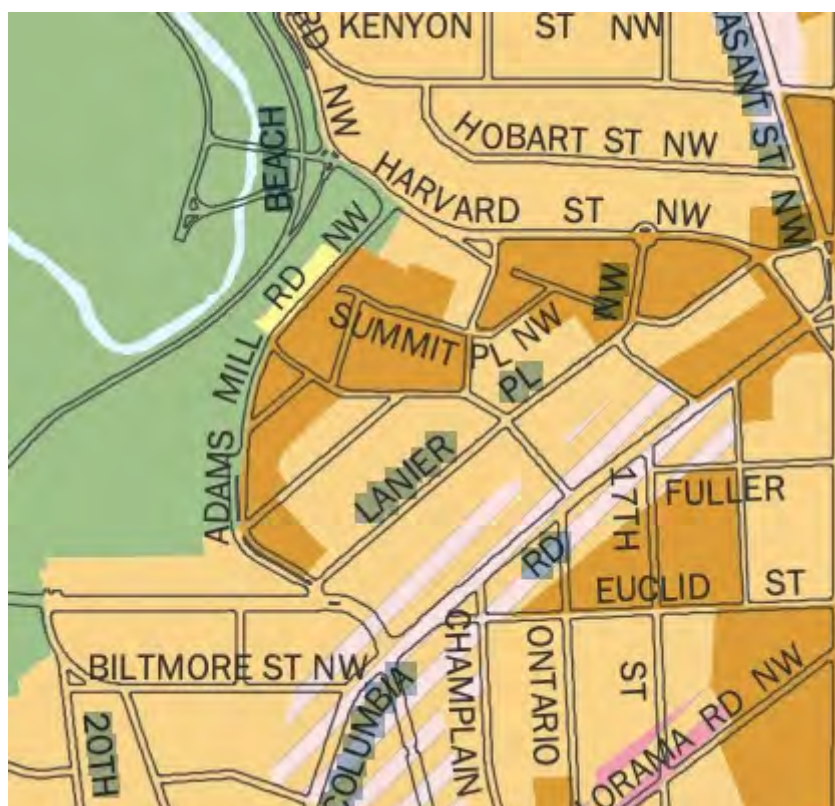
When DC Mayor Muriel Bowser and Office of Planning (OP) Director Andrew Trueblood released [citywide targets for affordable housing production](#) by neighborhood planning area, they also made public amendments to the rest of the Comprehensive Plan—all 24 chapters of it.

The Comp Plan is important because it guides how the city will grow in the years to come.

On October 8, the council [passed the Framework element](#), the intro which charts the direction for the plan. This is our first look at OP's proposed updates to the rest of the document. GGWash will be paying particular attention to the [land use](#), [housing](#), and historic preservation sections, as well as the [area elements](#) of the Comp Plan as it's revised.

Throughout October and November of last year, we posted our takes on the land use, housing, and historic preservation elements. GGWash also submitted review comments to the Office of Planning, which you can read in full [here](#), and signed onto review comments submitted by the Housing Priorities Coalition, which you can read [here](#). OP has extended the timeline for public review and ANC resolutions on the Comp Plan to Jan. 10 and Feb. 14, respectively; you can read more about how to be involved with that [here](#).

Our comments to OP were largely focused on the intent, purpose, and format of the Future Land Use Map. We'll get to what we said about the FLUM in a minute, but first, a refresher.



Lanier Heights' [FLUM](#) designation [Image](#) by DC Office of Planning.

What's the Future Land Use Map?

The Future Land Use Map—as stated on the map itself—is defined as “part of the Comprehensive Plan of the District of Columbia. Its color-coded categories express public policy on future land uses across the city. Preparation of this map is required by DC Law to ‘represent the land use policies set forth in the proposed Land Use Element,’ using ‘standardized colors for planning review.’”

David Whitehead, our former housing program organizer, wrote a [great primer](#) about the FLUM, and the Generalized Policy Map (GMP), back in 2016, when the process of amending the Comp Plan was just getting started:

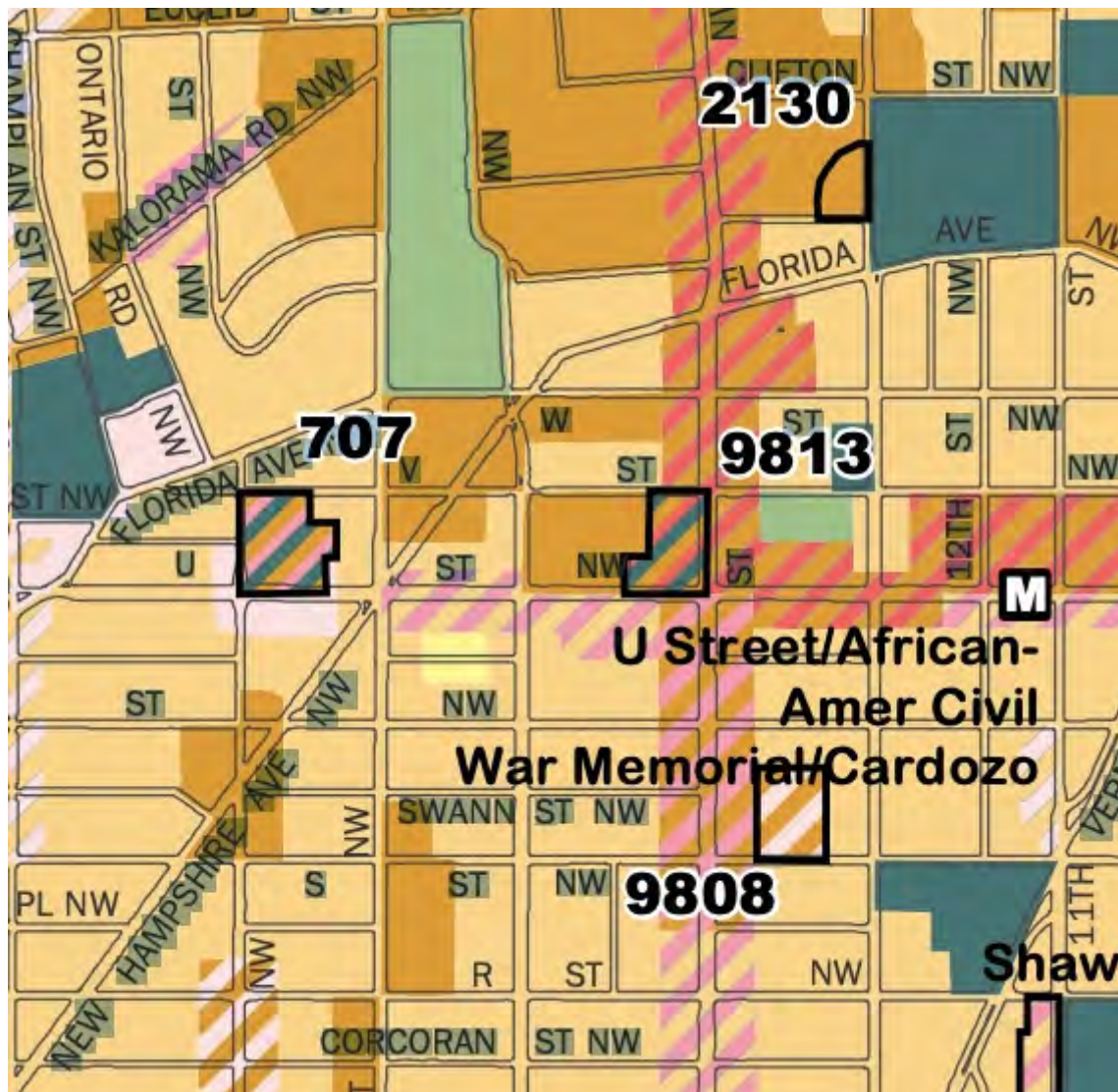
“It colors blocks or parts of blocks with various broad land use categories, like “moderate density residential,” “high density commercial,” “federal government,” etc. Each of those categories are given specific descriptions in the legend, even as specific as including numbers of stories.

The colors represent a combination of what land use currently exists on the ground, and what planners predict for the future. In the end, when a governing body in DC is asked to interpret policies embedded in the various chapters of the Comp Plan, that body is supposed to refer back to the FLUM to clarify and guide their interpretation.”

The FLUM shows how dense parts of the city can be at maximum in the future, using those categories (“moderate density residential,” “high density commercial”). The FLUM [is not a zoning map](#), and zoning can further restrict density below what the FLUM allows—because the FLUM is supposed to represent the future, not the present.

That space between what's permitted by zoning and what's allowed by the FLUM is where, and how, Planned Unit Developments (PUDs) happen. In exchange for public benefits, PUDs allow projects that are more dense than what's legal under existing zoning to go forward, up to the density allowed

by the FLUM. This is a common practice of discretionary development that happens in many municipalities; this sort of [interplay](#) between zoning codes and comp plans in the United States is a legacy left by 1920s-era progressive reformers via the Standard State Zoning Enabling Act. You can read more about PUDs [here](#), and [here](#).



"Upflumming" designations for 17th and U streets and 14th and U streets [Image](#) by DC Office of Planning.

Just let the FLUM live

It's important that the FLUM be a FLUM, and the zoning code be a zoning code. They're not the same document, and they aren't updated at the same time (frankly, we didn't spend the full decade between 2006 and 2016 updating D.C.'s zoning code to act as if it's the same as the FLUM). They have fully different purposes: The zoning map shows what's legally allowed

at present, and the FLUM says how far—or, really how dense—you can go in the future. But, in our opinion, D.C.'s FLUM looks a bit more like a zoning map than it should.

In David's 2016 post, he wrote:

“Does this sound like a zoning map? I can see why you'd think so, but in fact the language in the Comp Plan clearly states that this is NOT a zoning map. Instead, it is supposed to translate the land use policies in the Comp Plan text to a map, and act as a guiding document for the zoning commission when zoning changes are proposed.”

We wrote something virtually identical in our comments to OP on its most recent amendments Comp Plan, which include amendments to the FLUM:

“We are thrilled to see OP's amendments to the FLUM change some areas, like Connecticut and Wisconsin avenues, from a lower-density to a higher-density category—they have, if you will, been “upflummed.” Any revision to the FLUM is more than we expected at the beginning of the Comp Plan amendment process, in 2017. Barring any amendments to the 2006 FLUM, the FLUM wouldn't be a *Future* Land Use Map but, rather, simply, a map reflecting the current state of things, which would be contrary to its purpose.

That said, while OP's proposed amendments create a more forward-looking FLUM than the 2006 version, we feel that it is still functionally closer to a zoning map than a planning map. We also feel that OP's amendments are more fine-grained than is appropriate, or necessary, for something that ostensibly exists to address “public policy on future land uses across the city.””

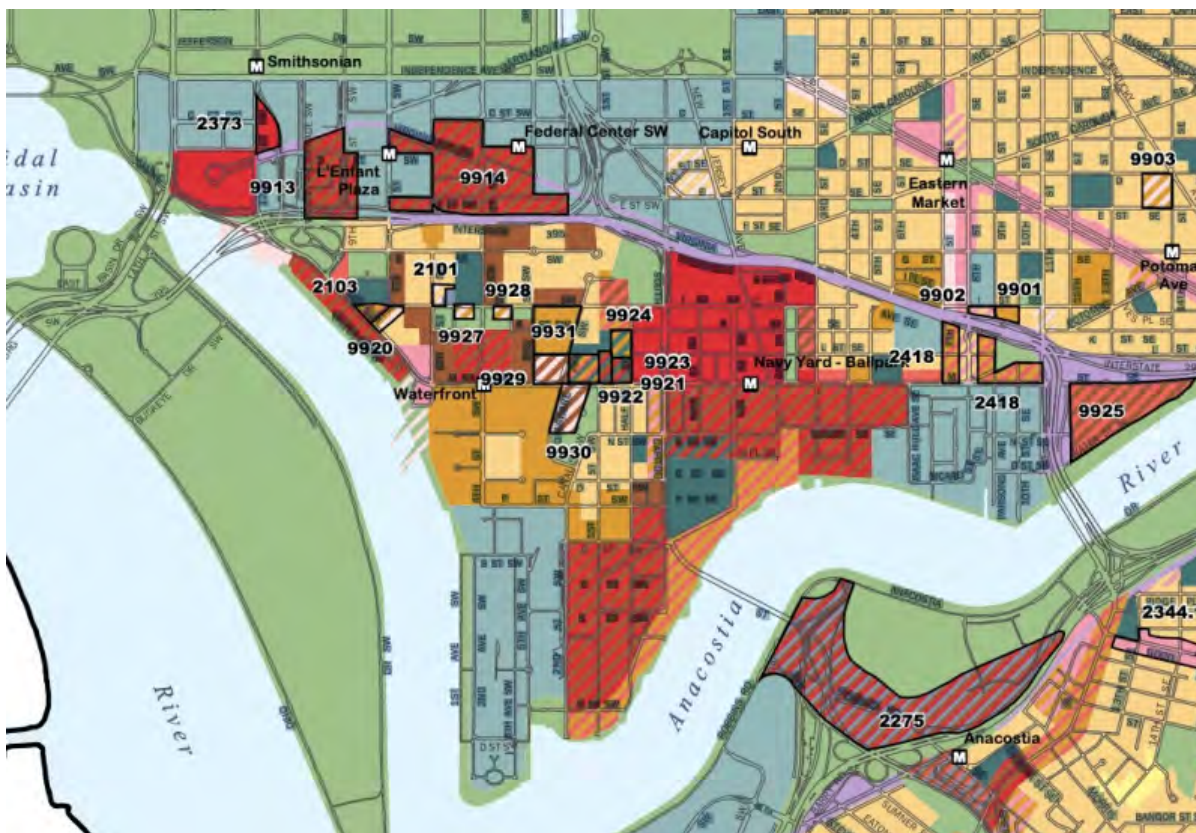
Amendments to some areas carry out the above practice to such an extent that their representation on the FLUM looks more like a checkerboard of competing priorities than a unified neighborhood—for example, Southwest, along Wisconsin Avenue, Mount Vernon into Shaw, and Lanier Heights.

Some examples of where OP's amendments are more zoning-like than FLUM-like are on single parcels or otherwise very small areas, like 17th and Park Road (which has been changed from medium-density residential to medium-density mixed use, presumably to bring the parcel into compliance with the actual current use, which is mixed-use, not solely residential).

The Reeves Center at 14th and U streets NW is “upflummed” from medium-density mixed use to high-density mixed use, including public facilities, and the Metropolitan Police Department station at 17th and U streets NW is changed from public-facilities to medium-density mixed-use. These are separate blocks but are literally three blocks from each other. They're close enough that it doesn't make sense to have varying FLUM designations for the blocks in between. If medium-density mixed-use at minimum is good enough for 14th and U and 17th and U, it's probably good enough for 15th and 16th streets, too.

Overall, OP's amendments areas carry out the above practice to such an extent that many neighborhoods' representations on the FLUM looks more like a checkerboard of competing priorities than a unified neighborhood—for example, Southwest, along Wisconsin Avenue, Mount Vernon into Shaw, and Lanier Heights, within which FLUM designations vary wildly.

Certain parts of the city that have historically used legal mechanisms to resist development, like definitions from the FLUM, are still too-low density in their classifications to meaningfully allow for more housing, or more affordable housing. Lanier Heights, for example, alternates between moderate- and medium-density residential, in the checkerboarding fashion described above. Though Lanier Heights residents [won an exceptional downzoning](#) of their neighborhood in 2017, the FLUM—because it's not a zoning map—should account for potential future land use; regardless of Lanier Heights' zoning designation, its potential future density should be the same, and similarly higher, across the board.



When FLUM designations more strongly resemble zoning categories, the map looks like a checkerboard. [Image](#) by DC Office of Planning.

Why upflumming matters

We're pleased to see OP revising the FLUM, and are particularly fond of OP's proposal to increase the potential future density of upper Wisconsin Avenue and Connecticut Avenue.

Mayor Muriel Bowser wants to add 36,000 units of new housing by 2025, wants 12,000 of them to be affordable, and wants them to mostly go in planning areas like Rock Creek West, Near Northwest, and Capitol Hill, which have seen the least amount of affordable housing built. This cannot happen without increasing the potential future density of these neighborhoods. If they remain untouched, our development patterns will continue as they have: More vulnerable places will see more new stuff, and affluent neighborhoods will be off-limits. This isn't fair, and we know it: It exacerbates segregation and inequality on a spatial scale. We're already there.

The remedy to this is to much more broadly and uniformly upflum the whole city. Ideally, the lowest baseline—or, the minimum density and use allowed—in any given place in the city (outside of parks, recreation, and open space) would be moderate-density mixed-use. This eliminates the incentive to speculate on land's future value by bumping everyone up to a uniform, higher standard, so that there isn't such great variation across the board. Alternately—and, for what it's worth, I, personally, prefer this approach—the density of each planning area could be progressively bumped up to this baseline, such that affluent, amenity-rich planning areas are upflummed first.

Fundamentally, no neighborhoods should be allowed to opt out, especially because, outside of its parcel-specific amendments to the FLUM, OP appears to be making an otherwise good-faith effort to plan at the scale of planning areas, of which there are 10 in the city, rather than individual neighborhoods. McLean Gardens was initially slated for an upflumming; that's off the table now. That's a poor precedent.

Why aren't you talking about project-specific FLUM changes?

Bisnow [covered how the FLUM changes could benefit certain developments](#) when OP's amendments were released in October.

We, of course, think it's great that, for example, the part of the city that includes the McMillan sand filtration site is getting upflummed. But we are more interested in a FLUM that reflects how the city *should* work in the future—which is why this post is about how we should progressively arrive at a FLUM that is much more uniformly dense across the board.

Parcel-specific upflummings look more like parcel-specific zoning changes rather than broad-based reforms that can smooth out some of the uneven, and unfair, development that the city has seen.

How do I look at all of this stuff?

Everything lives on plandc.dc.gov. Scroll down: The links to most of what is relevant are in the bottom left-hand corner.

The full PDF of the amended 2006 Comp Plan—the document in which you can see OP's redlines, which are amendments—is [here](#). Summaries of OP's changes to each section are [here](#). The current and proposed Future Land Use Maps and Generalized Policy Maps are [here](#).

You can see OP's recommendations on amendments submitted during the 2017 open call [here](#). The Housing Equity report with affordable housing targets, which isn't part of the Comp Plan, is [here](#).

How can I get involved?

The Office of Planning has extended the comment period for the Comp Plan. The public now has until Jan. 10, 2020 (that's this Friday) to review what OP put out, and you can email your thoughts to [REDACTED]. Advisory Neighborhood Commissions have until Feb. 14, 2020 to pass and submit resolutions. Read more about how to get involved [here](#).

Keep in mind that whatever you, or your ANC, submits to the Office of Planning will be reviewed by the Office of Planning. But, just like the Framework, the rest of the Comp Plan is a piece of legislation that's voted on by the council. So the council will take it up, presumably this year, though we don't yet know when. There will be a public hearing, then a first and second reading; second reading doubles as the final vote.

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Tagged: [dc](#), [planning](#)



Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.



What if DC were all single-family houses?

ZONING ANALYSIS By [Alex Baca](#) (Housing Program Organizer), [Tracy Hadden Loh](#) (Board of Directors), [Jenny Schuetz](#) (Guest Contributor) February 26, 2020 17



[Houses in Takoma](#) by Hembo Pagi licensed under [Creative Commons](#).

American urbanists are starting to [realize](#) there's a problem with [single-family-exclusive zoning](#). But is it a problem in DC? For a thought experiment, let's turn it around: what if all residential land in the District allowed nothing but single-family homes?

For this post, we're using "single-family zoning" to refer to laws allowing nothing but single-family *detached* homes to be built in a certain place. Such laws mean that, in order to build literally anything other than a single-family house, you have to seek permission.

In DC, [laws](#) limit the number of multi-family homes that can be built. Making it illegal to build duplexes, rowhouses, and apartments in parts of the District means that we have fewer homes here than we might otherwise. This makes housing more expensive: There's less of it when there clearly needs to be more—[particularly studios and one-bedrooms](#)—to [meet the needs](#) of both longtime residents and newcomers.

To understand the inefficiencies inherent in single-family zoning, we engaged in the following thought experiment: What if the entire city (or, at least, all of the residential areas) were zoned only for single-family detached homes?

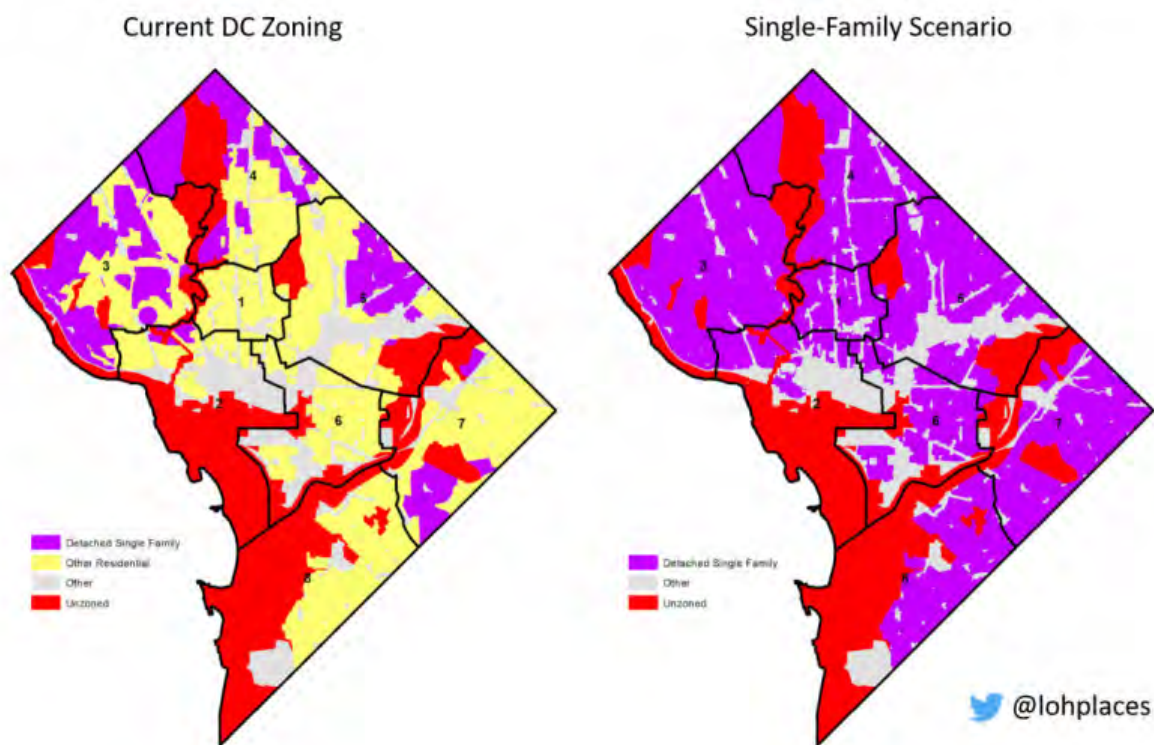


Image by the author.

DC has two types of single-family detached house zones: R-1-A, for larger lots, and R-1-B, for smaller ones. Only 5% of residential land in the District is zoned R-1-A compared to 26% R-1-B. Plus, "detached houses on

moderately sized lots” practically means separated single-family homes with little yards. That, we think, is a reasonable description of what occupies most people’s imaginations when they think of the sorts of neighborhoods that, some argue, need to be defended against encroaching density.

Besides R-1-A (detached houses on large lots) and R-1-B (detached houses on moderately sized lots), DC has two other single-family house zones: R-2 (semi-detached houses, where pairs of homes share one wall but aren’t in rows) or R-3 (attached rowhouses). Most row houses in DC aren’t R-3 but RF (“residential flats”), which allow two units per house, but a few areas including much of Georgetown is R-3. We chose R-1-B for this analysis because it’s a fair and interesting benchmark.

The minimum lot size for R-1-B is 5,000 square feet. In a *very* simplistic analysis (that in reality would involve re-platting all the residential land in the city and evicting institutional land uses like the Naval Observatory), DC contains just over 1 billion square feet of land zoned residential, so dividing that number by 5,000 square feet gives space for 211,323 R-1-B homes. The 2013–2018 American Community Survey five-year estimate for the number of housing units in the District is 319,579. So if we only housed people in R-1-B-type housing, we’d lose about a third of the homes here.

Roughly 31% of residential land in the city is designated R-1-A or -B, including (for example) most of the AU Park, Kalorama Heights, and Woodridge neighborhoods. Those neighborhoods, of course, have duplexes and apartment buildings in them. But should you wish to build a new one — it doesn’t matter if it’s a duplex or an eight-story condo building—you must ask for special permission from the Board of Zoning Adjustment or the Zoning Commission.

Banning structures other than single-family detached houses from 31% of the District’s residential land brings consequences. Multifamily housing allows more people to live on a given piece of land than a single-family house does. And the footprint of a single-family house is often considerably larger than the dwelling itself, because other regulations define the smallest size a lot can be and how close the structure can be to the road.

When we mandate low-density, single-family, detached homes in places where lots of people want to live — or where lots of people *could* live so that they could more easily access those jobs and amenities — it becomes more expensive to live here. It's bad for the climate, too, and it's at odds with the [District's](#) and the [region's](#) stated sustainability and housing goals.

Let's look at this by ward

It's also interesting to think about this on a ward-by-ward basis. All of the R-1-A land in the District is in Ward 3 and the westernmost edges of Ward 4, with the exception of a really tiny piece of Embassy Row in Ward 2. But 16% of the residential land in Ward 4 is R-1-A, and 10% in Ward 3, so our R-1-B scenario is actually an *upzone* of those wards.

For every other ward in DC, zoning all residential land R-1-B is a substantial downzone. If we only housed people on R-1-B, we'd lose the beloved rowhouses of neighborhoods like Capitol Hill and Petworth, the stately apartments and coops lining Connecticut Avenue in Northwest, the glass-and-steel high-rises of Southwest, and the garden apartments of Congress Heights.

	Square feet	Zoned R-1-A	Zoned R-1-B	Zoned residential	How many R-1-B houses
Ward 1	70,696,445			54,113,416	10,823
Ward 2	242,109,498	646,953	5,170,052	51,386,721	10,277
Ward 3	304,841,116	22,104,591	107,718,792	231,611,736	46,322
Ward 4	250,958,728	28,760,468	72,527,989	176,884,799	35,377
Ward 5	289,663,864		53,497,648	177,668,864	35,534
Ward 6	172,920,633			82,785,071	16,557
Ward 7	245,611,890		36,747,883	160,889,215	32,178
Ward 8	333,312,329			121,273,590	24,255
DC	1,910,114,503	51,512,011	275,662,364	1,056,613,411	211,323

So what did we learn?

Suppressing multifamily housing doesn't mean curbing renters in a neighborhood, or density for that matter. It simply means, in many cases, that families will compete for existing housing stock with unrelated individuals who have organized themselves into group quarters because of a lack of single-family-style alternatives. This only exacerbates housing affordability challenges for families.

This exercise illustrates [the value of “gentle density”](#). We wrote recently, “[Removing barriers](#) to townhomes, two- to four-family homes, and small-scale multifamily buildings in every part of the city” would help considerably in meeting the District's housing needs.

Much of the debate around development in DC is about upzoning to the highest-intensity, mixed-use zoning categories. What if we tried letting 1,000 duplexes, townhomes, and low-rise apartment buildings bloom?

Just as we imagined removing these types of homes and, in doing so, lost a third of our housing inventory, allowing these “[missing middle](#)” housing types on 31% of the residential land in the District could dramatically boost the number of places for people to live. Density is critical to that equation; single-family zoning, like R-1-B, makes it impossible to build more, smaller homes at a lower cost.

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Tagged: [dc](#), [housing](#), [planning](#), [single-family zoning](#), [zoning](#)



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Mayor Bowser sent amendments to DC's Comp Plan to the council. Here's what you need to know.

PLANNING By [Alex Baca](#) (Housing Program Organizer) April 24, 2020 1



[The Shaw neighborhood in DC](#) by Ted Eytan licensed under [Creative Commons](#).

On Thursday, DC Mayor Muriel Bowser sent the full set of her administration's final Comprehensive Plan amendments to the council. Office of Planning officials had previously stated that they would have amendments to the Comp Plan ready by mid-April, so the city has [met its own deadline](#).

The package includes OP's [final amendments to the document](#) and the Future Land Use Map, as well as a [staff report](#) and copies of [public review](#)

[comments](#) and [ANC resolutions](#). You can access everything on planddc.dc.gov (scroll down to the bottom right for links to all of the above).

As you've maybe, possibly [read on GGWash before](#), this cycle of amending the Comp Plan started during Bowser's first term, under then-planning director Eric Shaw. After nearly two years; many, many hours of public discussion, including a monster hearing; Shaw's departure from OP, which is now headed by Andrew Trueblood; and a [very long rest](#) at the council, the council voted unanimously in favor of an amended Framework element of the Comprehensive Plan in October 2019.

The majority of lawsuits against new developments in DC rested on text from the "old" Framework, as well as definitions and designations on the Future Land Use Map. Those lawsuits stalled the delivery of several thousand housing units, which, regardless of whether you believe that new construction makes a place more affordable or not, is not something that any mayor of any American city in the late aughts would be in favor of. Coincidentally, the Comp Plan was opened for amendments in 2017, and OP and, subsequently, the council, took up the Framework specifically.

The amended Framework's language favors development, recognizes that development is essential to making housing more affordable, *and* requires the city to consider the implications of development, including displacement, on District residents. [Yes, of course, we like it.](#)

But the Framework isn't the only part of the Comp Plan, and the process of amending the Comp Plan didn't end when the Framework passed. In addition to the Framework, there are [11 citywide elements and 10 area elements](#), the [FLUM](#), and the [Generalized Policy Map](#).

This is a very fun and easy-to-read document, which I love very much and find very compelling. Just kidding! Actually, I'm not kidding. OP released its *proposed* amendments to the existing Comp Plan last October; I read through and wrote about the proposed amendments to the [housing](#), [land use](#), and [historic preservation](#) sections throughout the fall and winter.

GGWash [submitted comments](#) on those proposed amendments by the deadline for public comments in January. We also signed onto [comments submitted by the Housing Priorities Coalition](#). A good number of GGWash readers sent in [comments](#)—[if you did, I can't thank you enough](#). And Advisory Neighborhood Commissions had until Feb. 14 to submit their [resolutions](#).

OP modified its proposed amendments based on that public input. A final version of OP's amendments is what the mayor [sent to the council](#).

What's next?

The council will take up the Comp Plan at, um, some point. It was already questionable whether the council would hold a hearing for it before or after the budget, which is typically released in April, or before or after summer recess, which starts in June. Covid-19 has totally screwed up that timeline, as well as DC's fiscal resources. Understandably, the council is likely to be focused on getting a functional budget passed, rather than line-editing close to a thousand pages of land-use wonkery.

But at some point, there will be another hearing, and councilmembers will be able to meddle with the text based on what they believe, and what they hear from constituents. There will, of course, be pressure to meet the mayor's stated goal of [36,000 new units of housing by 2025](#) (which researchers from Howard University and the District's Office of Revenue [recently concluded](#) could "save an additional \$1,932 in housing costs in 2025 relative to the counterfactual of a much slower annual increase in the housing supply").

And, since comprehensive plans are guiding documents, many of the themes that are addressed in the Comp Plan will have an particular relevance now that we are looking at a downturn.

Chief among those themes are resiliency, which is more than just natural disasters, and equity. OP released a "crosswalk" analysis of [both those](#) themes, which identify how they are situated throughout all chapters of the Comp Plan. Also of interest right now is how the Comp Plan describes

economic development, which has not historically been executed in a way that accounts for the racial, economic, and geographic disparities in access and wealth both in the US and in the District specifically.

Actions that the city takes, especially with regard to land use, development, and housing, cannot conflict with the Comp Plan. So while the Comp Plan can't really *do* anything on its own, because it's not a self-executing document, what it says matters a great deal to whether we hamstring future policy, or not. That's even more intense now that the most conventional way of addressing a contentious issue—paying for it with a line item in a budget—is out of reach.

So, as always, it's important that you contact your councilmember right away to say what you'd like to see in the Comp Plan text, as well as the Future Land Use Map (you can read about why the FLUM matters on its own [here](#)).

Feel free to take cues from things that we've written previously; we've, for several years, [focused](#) on asking OP and the council to eliminate language in the Comp Plan that protects historically privileged parts of the city from new development. We also believe the proven link between building more places for people to live, which [requires](#) some low-density areas to accommodate some higher-density new construction, and more modest rents and home prices. Finally, we think that the city should explicitly acknowledge what in its past land-use policies has forced people out, restricted their access, or otherwise caused harm, and redress that to the extent that it can in a document like the Comp Plan.

Or, just write what you feel. Email early, and often.

Also released by OP yesterday was a [report on single-family zoning](#) in the District. This report [was required by an amendment](#) made to the text of the Framework bill by Ward 1 Councilmember Brianne Nadeau, which said:

Upon submission of amendments to the Land Use Element of the Comprehensive Plan, the Office of Planning shall provide to the Council additional guidance on the following:

1. *Options for increasing the variety of housing types in areas zoned for single-family detached and semi-detached housing; and*
2. *The implications on equity and affordability of allowing small multifamily buildings in all residential zones*

I have not yet read everything that OP has put out, but I'll be writing about it as I do, and will also be working on what we'll ask the council to add or subtract from OP's amendments. In the meantime, you can read Alex Koma's [thorough story](#) for the *Washington Business Journal*.

We'll share with you how we're taking action soon. In the meantime, feel free to email your councilmember, as well as Chairman Phil Mendelson and at-large councilmembers Anita Bonds, David Grosso, Elissa Silverman, and Robert White, to let them know your thoughts, and suggest that they and their staff read [OP's report on single-family zoning](#) in full.

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Tagged: [affordable housing](#), [comprehensive plan](#), [maps](#), [office of planning](#), [planning](#)



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Can DC build a better Comp Plan process? An Office of Planning report hints at “yes.”

PLANNING By **Alex Baca** (Housing Program Organizer) May 6, 2020



[Shaw neighborhood in DC](#) by Ted Eytan licensed under [Creative Commons](#).

Within the Comp Plan package that DC Mayor Muriel Bowser recently sent to the DC council is [a report from Office of Planning staff](#). It contains some interesting tidbits about what’s come out of OP’s outreach efforts over the past year, as well as some remarks on how our comprehensive planning process, and documents, could work better.

While it’s true that the Comp Plan “establishes a context and sets broad goals to inform public decision-making and fine-grained planning efforts”

(pg. 1), the most recent edition, which was released in 2006, runs over with florid language that glorifies some parts of the city, and is quite contemptuous of others.

I’ve also found DC’s Comp Plan to be very editorial, very detailed, and very subject to discretion and individual interpretation. Compared to other comprehensive planning documents used by other jurisdictions, the definitions of certain land-use categories and descriptions of density are inconsistent or unclear. This leads to muddled interpretations, both by the public and by agencies like the zoning commission that are supposed to take direction from the document.

In OP’s staff report, there’s a short section on the history of comprehensive planning in the District that offers the most reasonable explanation I’ve seen for why this is so. The District’s first federally dictated Comp Plan was instituted in 1950; the first post-Home Rule Comp Plan was written in 1984. After that, new sections, like the land use element and ward-level plans, were added sporadically. By the time 2006 rolled around, the District — which had finally crawled out of a long slog of population decline and onerous federal oversight — was ready to go comp-plan crazy.

We’re still disorganized in our comp-planning cycles. Minneapolis’ recent comprehensive plan overhaul, which legalized triplexes citywide, is deserving of all the [accolades](#) that it received. But behind that impressive policy change is a longstanding regional practice of regular comprehensive planning: The regional governing body there, the Metropolitan Council, requires cities, townships, and counties in its seven-county area to routinely submit comp plans, per its [Metropolitan Land Planning Act](#).

As a result, Minneapolis planners, politicians, and residents know what to expect when comp-plan-revision season rolls around, and have greater fluency in what comp plans can and can’t do. Closer to home, Virginia [mandates the contents](#) of county comp plans, giving greater guidance for what should or shouldn’t be included.

The OP staff report hints that DC’s scattershot comp planning is unmoored from any sort of timeline and doesn’t come with a clear scope. The process

that started in 2016 was an amendment cycle that was ostensibly intended to bring the 2006 Comp Plan, which was lightly edited in 2011 for “technical corrections and a limited number of policy updates” (pg. 2), in line with contemporary planning standards, and update it with data that correctly accounted for 2016 DC, not 2006 DC.

But the Comp Plan ended up spurring so much discourse about the state of the city, about whether it was affordable, and about whether longtime residents felt at home as visible markers of DC’s population growth — large-scale redevelopments like the Wharf, and businesses that seemed tailored to young newcomers with disposable incomes — emerged.

OP accepted an enormous amount of public feedback, and by the time the council took up the administration’s amendments ([to only the Framework element](#), not even the full plan!) in 2019, the various factions that emerged, including GGWash, treated the Comp Plan as a referendum on the city’s identity rather than a straightforward planning document.

I think this is in part because — despite a popular narrative of government overreach, giveaways to developers, and fates forced upon neighborhoods — most cities, including DC, don’t really have much centralized planning happening at all. The Comp Plan was a big, obvious process in which people could get involved, and it became a battle.

Lots of people, rightfully, felt like they had something to fight for, or fight to preserve. Ultimately, most of us who participated in the Comp Plan process, from long-time public meeting attendees to people who emailed their ANC for the first time, experienced it as a full rewrite, even though it was just an amendment cycle.

The staff report hints at ways in which comprehensive planning could be smoothed out in the future (p. 8):

- *Scope the plan with accessibility and inclusivity. Consider reducing the detail and length to make the document more accessible to a broader audience.*

- *Consider the optimal process to both facilitate long-term planning while allowing for much-needed, more nimble updating.*
- *Evaluate the maps needed, including the granularity of FLUM and GPM to distinguish them from parcel-level zoning maps.*

A proposed 2025 Comp Plan gives DC time to envision a new way to do things

It also says that the next Comprehensive Plan rewrite should be completed by 2025, which...yikes? But, actually, not yikes!

There is a huge opportunity to standardize how the District does comp planning, starting with the fact that there is *literally no mandate for the next Comp Plan to be completed by 2025*, but it probably should be done by then anyway, because a whole bunch more stuff is going to change by then!!!!

I’ve been keeping a wishlist of Comp Plan administrative reforms that I think would give the process some anchors and make it more predictable, such as:

- Mandate that the city fully rewrite the Comp Plan every 10 years
- Mandate that outreach for the Comp Plan not exceed certain time periods, such as 12 months
- Mandate that the council pass the Comp Plan within a certain time period of receiving a legislative package from OP, such as 90 days
- Mandate that the zoning code be updated within a certain time period following the passage of a rewritten Comp Plan, such as two years
- Mandate an amendment cycle, or time frames at which the Comp Plan can be amended, or actions that would trigger a Comp Plan text or map amendment
- More flexibly incorporate amendments to area elements

Office of Planning could just conform to these things by setting its own internal standards, but that’s not a legal mandate, and may not survive an administrative turnover. I don’t think it’s necessary to amend the Home

Rule Act for this, either. The council is probably the most effective body for attaching these sorts of requirements to comp planning, and it would be prudent of councilmembers to include reforms around how comprehensive planning is conducted in the District when they vote to pass this version.

Of course, even with a council mandate for OP to conduct planning in this fashion, there’s no guarantee that it will actually happen. Better still would be to include in any such legislation a reduction or hold on OP’s budget allocation unless it successfully stays on schedule.

It would also be great to see the council acknowledge what OP has in its third recommendation: that the FLUM is not a zoning map. It’s really easy to conflate the two, and conflate their purposes, which is bad! [We’ve written a lot](#) about why the FLUM can and should function differently from a zoning map, but, tl;dr, the FLUM should illustrate the potential future density and use categories of broad areas of the city, while the zoning map should provide guidance for what individual parcels can be. If the FLUM functions more like a zoning map, it’s doing a bad job. And it’s redundant.

Other dazzling details

There’s some more fun stuff in the staff report:

- Following OP’s draft amendments to the rest of the Comp Plan, released on Oct. 15, 2019, over 1,000 public comments and 33 official ANC resolutions, with around 1,500 comments, were submitted (p. 7); about 3,100 residents and stakeholders engaged with the “DC Values” outreach campaign OP held throughout the city (p. 3)
- OP provided “88 days for the public and 123 days for ANCs. This time frame represents the longest period of feedback provided for a draft Comprehensive Plan” (p. 4)
- “Overall, 78% of the feedback was integrated, supported, or acknowledged in the Mayor’s proposal. (p.7)
- “The updates to the Future Land Use Map between the Oct. 15 draft and the Mayor’s proposal created an additional 2.3% of land use capacity on less than 1% of land area (535 acres)” (p. 7)

- A nod to statehood: “Finally, the updated GPM incorporates the boundary for the Proposed State of Washington, Douglass Commonwealth, which encompasses all of the District of Columbia, except an area around the Monumental Core that will remain a federal government enclave” (p. 6)

Overall, there’s a lot of potential for making the Comp Plan more accessible and easier to deal with. The most effective way to ensure that this actually happens would be for the council to require the city to more routinely overhaul the document, so that residents — and ANCs, whose feedback was considered with great weight—know what to expect, and when. And a greater public understanding of what comp plans are generally, and what they can do for the District specifically, might lead to a more proactive culture of planning and, subsequently, more constructive input.

There’s an obvious appetite for more centralized planning that’s sensitive toward redistribution. The most exciting thing in the staff report, to me, is that 78% of people wrote in to say that they generally supported Office of Planning’s vision. That’s impressive starting point, and bodes well for both more types of housing in neighborhoods where residents have historically resisted them, and a better culture of regular, organized, evidence-based planning.

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Tagged: [comprehensive plan](#), [dc](#), [maps](#), [office of planning](#), [planning](#)



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Here's how you can weigh in to make sure the Comp Plan will help, not hurt, housing production in DC

PLANNING OUR ADVOCACY By [Alex Baca](#) (Housing Program Organizer) October 8, 2020 1



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Amending DC's 2006 Comprehensive Plan, the District's foundational land use text, has been ongoing since 2016. The DC Council unanimously passed a revised Framework element, which sets the tone for the rest of the document, last October ([we loved it!](#)), but the Framework is only the first chapter of a 1,500-page doorstep.

However! A public hearing on 24 additional elements [is scheduled](#) for November 12 and 13, following public outreach and feedback solicitation by the Office of Planning in late 2019 through early 2020.

The Nov. 12 hearing isn't exactly the light at the end of the tunnel. But it *should* be the beginning of the Comp Plan's last chapter. (Not the actual last chapter. [That's the implementation element](#). Haha.) Depending on the kind of feedback the council receives between now and the closure of the hearing record in November, the Comp Plan could pass as soon as the end of the year.

Want more density? In affluent neighborhoods? We need your help.

GGWash has identified three specific things we want to ask the council for during the hearing and markup process, which will be led by Chairman Phil Mendelson. [Those things are:](#)

1. Pass Office of Planning's amendments, with which we fully agree, intact by the end of 2020
2. Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
3. Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

You can read more about why these are the specific things we are asking for below.

But, first: We need you to [sign up to testify](#) (or plan to submit written testimony before the hearing record closes, typically two weeks after a hearing date). We will not be setting up a click-to-send form letter. Instead, because personal emails to councilmembers actually get the job done, we

need you to write your elected officials frequently to say what you want them to do with the Comp Plan.

We, of course, recommend that you base your asks on our asks, above. You should send direct, personal, affirmative, and thoughtful emails to Chairman Phil Mendelson, asking for the Comp Plan to be passed by the end of the year with OP's amendments intact, at

[REDACTED]

For good measure, you should email your ward councilmember (you can check which ward you live in, [here](#)), as well as the at-large councilmembers

([REDACTED] [REDACTED] [REDACTED]

and [REDACTED] If you are comfortable, please cc me,

[REDACTED] It's always amazing to see the positive things you have to say about your neighborhood, and it helps me stay in touch with you so that I can keep you posted on what's going on.

If an email isn't doable for you, we totally understand. In that case, you can sign onto a petition with our asks [here](#).

If you're subscribed to GGWash's advocacy emails, you'll receive reminders from me about all this! As always, you can reach out to me directly at

[REDACTED] I would love to work with you, your ANC, your COVID pod, your Zoom-based civic association, whatever, to get comments about the Comp Plan submitted before the record closes (typically two weeks after a hearing date, so, presumably, Nov. 26).

Why does this matter?

GGWash has been [advocating](#) for a better Comp Plan [since](#) the 2006 plan was opened for amendments in 2016. (You can see all our posts [here](#).) To us, "better" [has meant](#) the [removal](#) of [language](#) that allows exclusive neighborhoods — which, in DC, includes those in the Rock Creek West, Near Northwest, and Capitol Hill planning areas — to be "preserved," while others ([such as those with lots of vacant lots](#)) are considered fair game for any and all development.

This is uneven, unfair, and exacerbates the sense that development is exploitative and intended specifically to wipe out longtime District residents. In many places, it has. Wealthy, mostly white residents and the neighborhoods they live in [have not assisted](#) with [meeting the needs](#) of the District's growing population.

The revised Framework element [allows](#) for a shift in this paradigm, by prioritizing affordable housing and anti-displacement measures while encouraging fairly distributed new growth and development. Other changes to the 2006 Framework, made by the Office of Planning and then by the council, diluted some of the most egregiously exclusionary language.

OP's amendments to the rest of the Comp Plan continue this line of thinking; [we wrote about](#) their proposed amendments after they were [released in October 2019](#) (OP's [final version](#), [released in April 2020](#), has [slight changes and updates](#), particularly related to coronavirus recovery, but aren't notable). [Changes to the land use section](#), in particular, strike language we consider problematic, and open the door for a Comp Plan that could, in the future, enable a zoning regime more accommodating of smaller, denser homes.

Because that's the thing about comprehensive plans: [They aren't self-executing documents](#). The Comp Plan is not an opportunity to eliminate single-family zoning, *but* the point isn't to change zoning through the Comp Plan. Just the same, amendments to the Comp Plan won't inherently make housing more affordable, or stop displacement, or create more family-sized units. But policies that could do those things have to flow down from what's allowed from the Comp Plan.

So, the pathway to eliminating exclusionary land use practices in the District is to change the Comp Plan enough that future proposals don't conflict with it. We feel that OP's amendments are a good foundation for that ongoing work.

Why these asks for the Comp Plan?

Our primary ask to the council for what we want them to do with the Comp Plan — pass OP's amendments intact by the end of 2020 — is grounded in the above context. If other DC residents, or organizations, want lots of amendments to the Comp Plan, we're fine with them, as long as they don't reduce any of the density increases proposed in the Future Land Use Map.

Amendments to the 2006 Comp Plan have been ongoing since 2016. We are amending the plan in sections, with *years* in between, with no clear guidance for how public input should work. The last time the Comp Plan was rewritten in full was in 2006, and even good amendments to a bad and outdated plan can't compensate for the fact that it's...bad, and outdated. While we respect Chairman Mendelson's desire to give each piece of the process its full due in front of the body that's in charge of it, a four-year slog is not appropriate when the Comp Plan isn't a self-executing document but, rather, one that other policies can't conflict with. It's important to be thorough, but another amendment cycle like this one would be a disaster.

Ultimately, the Comp Plan should be passed by the end of the year, and the only way that's going to happen is if the public feedback before, during, and after the hearing is mostly similar. If some people are asking for the Comp Plan to be sent back to the Office of Planning, and some people are asking councilmembers to reject or rewrite OP's amendments, and some people are yelling PASS IT incoherently on Twitter (something I'm sometimes guilty of), then Chairman Mendelson is likely to say that Office of Planning's amendments are too controversial, and require more of his time, which he will likely not be able to devote any of until spring 2021.

But if an overwhelming number of comments prioritize the passage of the Comp Plan this year, with OP's amendments intact (because they're very good!), there's a chance that that might happen. Procedural reforms, like what we proposed in this post, are more valuable than a vastly rearranged Comp Plan, so it's important to ask for them, too.

That's up to you. You can tell your elected officials that! ([And sign our petition, right now.](#))

I hear from many GGWash readers and supporters that they'd love to see a YIMBY-like effort to participate in the District. For a number of reasons, which I hope to explain in future posts, our organizing principle is not to push on individual projects, and our advocacy, to the extent that it embodies a yes-in-my-backyard style, has been intensively focused on the Comp Plan because YIMBY policies—such as by-right affordability, bonus density in exchange for more affordable housing, or zoning reform—can't exist unless the Comp Plan allows for them.

Getting the Comp Plan passed by the end of 2020 with OP's amendments intact, alongside legislation that lays the groundwork for a better Comp Plan planning process, is a good-government initiative. What's more YIMBY than that?

Continue the conversation about urbanism in the Washington region and support GGWash's news and advocacy when you [join the GGWash Neighborhood!](#)

Tagged: [affordable housing](#), [comprehensive plan](#), [housing](#), [housing supply](#), [phil mendelson](#), [planning](#)



Alex Baca is the Housing Program Organizer at GGWash. Previously the engagement director of the Coalition for Smarter Growth and the general manager of Cuyahoga County's bikesharing system, she has also worked in journalism, bike advocacy, architecture, construction, and transportation in DC, San Francisco, and Cleveland. She has written about all of the above for CityLab, Slate, Vox, Washington City Paper, and other publications.

Emails sent to GGwash supporters

Hi {{FirstName or 'there'}},

Happy Friday! Thank you so much to all of you who have jumped into [our Comp Plan advocacy](#). I sent an email last week to encourage GGWash supporters (like you!) to take action, and about 1,500 people opened it! So far, 110 people have [signed our petition](#) asking the council to pass Office of Planning's amendments to the Comp Plan intact by the end of 2020, and I know a number of you have sent personal emails. All of this is...really cool! And I love it when you CC me ([REDACTED]) on your emails to elected officials.

Here are a bunch of things you can do to make sure the District builds more housing and more affordable housing, especially in the [affluent parts of the city](#), like along Connecticut and Wisconsin avenues:

- Read more about what we're doing with regard to the Comp Plan [here](#).
- [Sign that petition](#).
- Email Chairman Phil Mendelson at [REDACTED] to tell him you'd like to see Office of Planning's amendments to the Comp Plan passed intact by the end of 2020 (cc [your councilmember](#), and me!).
- [Sign up to testify](#) on the Comp Plan [legislation](#) at the Nov. 12 and 13 hearing, or plan to submit written testimony before the record closes on Dec. 3.
- [Come to a testimony training](#) we're co-hosting next Tues., Oct. 27 at 4 p.m.!
- Learn about the last twenty (20!) years of comprehensive planning in the District at [this Georgetown University panel](#), also next Tuesday (but at 9 a.m.).

I know that's a lot, but the Comp Plan so far, including the revised Framework element, are reflective of your dedication to civic engagement throughout this really, really long process. GGWash's priorities—including more housing, more affordable housing, fairly distributed housing, anti-displacement measures, and de-emphasizing the protection of wealthy, historically white neighborhoods—have made their way into OP's amendments. Now, the council needs to adopt them. I hope this is our final push, so please, please jump in where you can.

There's also a significant opportunity to influence the future of transportation planning in the District by filling out DDOT's [MoveDC survey](#). I know that surveys can feel onerous and unimportant, but when DDOT is reading responses, I definitely want them to be reading comments written by GGWash supporters! This is a rewrite of the existing MoveDC plan (read our new writer/editor Libby Solomon's piece about it [here](#)), and it is so important to say that people deserve more space than cars. So, [please fill this out before Nov. 9](#), and circulate it as widely as possible. If you have questions, DDOT is hosting telephone office hours next Tuesday and Wednesday. Details [here](#).

Lastly, on behalf our whole staff, I want to update you on what's going on at GGWash. In July, our founder, David Alpert, announced he would be moving on after over 12 incredible years leading our publication, which over the past decade has grown into the organization that I'm so proud to work for today. As of this week, David has [formally stepped back](#), and my wonderful, talented colleague, Caitlin Rogger, previously our policy director, is serving as our interim executive director. I am so grateful to David for his dedication to urbanism in the DC region, and so excited for Caitlin to lead us into the next phase of our leadership transition. You can read more about what's happening [here](#).

Additionally, our [fundraising campaign](#) is continuing through the end of the year. You've likely received emails from Kate Jentoft-Herr, our community and program coordinator, urging you to [support us](#) if at all possible. For those who have contributed, I can't thank you enough. GGWash's staff is its greatest resource, and your donation makes sure we have, well, stable jobs either writing about urbanism, working alongside you to make the District and the region more accessible, affordable, and fair, or...both!

Writing emails like this one is such a pleasure for me, because I really, really love getting people engaged with the city that they live in. I'm lucky to work for GGWash, and to work with you. I'm always available to talk, particularly about our policy areas, and hope to speak with you soon, especially if you have questions about the Comp Plan, MoveDC, and how you can participate.

Thank you,
Alex

Alex Baca
Housing Program Organizer
Greater Greater Washington
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Hi {{FirstName or 'there'}},

Chairman Phil Mendelson is holding hearings on Office of Planning's amendments to the [remaining sections of the 2006 Comprehensive Plan](#) on Nov. 12 and 13. [You can—and should!—sign up to testify here.](#) And, sign our petition [here](#)!

We've been working on the Comp Plan since 2016 and need your help to make sure it's passed ASAP.

[Here's what](#) GGWash is asking councilmembers to do before, during, and after the Nov. 12 hearing:

- Pass Office of Planning's amendments, with which we fully agree, intact by the end of 2020
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further “upflum” are either maintained or expanded; and as long as they do not uphold the “protect” and “conserve” language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Here's how you can get involved:

- [Sign our petition!](#)
- [Sign up to testify](#) at the Nov. 12 hearing, or plan to submit written testimony. ([And sign up for a testimony training](#) that we're co-hosting on Oct. 27!)
- Email Chairman Phil Mendelson ([\[REDACTED\]](#) your councilmember (look them up [here](#)—scroll down), and the at-large councilmembers to ask for the above directly, in your own voice. Speaking directly to your elected representatives about what you care about in your neighborhood makes an even greater difference than signing a petition.

You can read GGWash's coverage of the past four years of Comp Plan work [here](#). (Need a primer? [We've got a few.](#)) You can read more about our plans for Comp Plan advocacy through the end of the year [here](#).

If you have any questions, please email me! I'd love to talk with you about the intricacies of the Comp Plan and help you with your testimony, your emails to councilmembers, or whatever you need.

Thank you,
Alex

Alex Baca
Housing Program Organizer
Greater Greater Washington
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P.S. We've been really busy lately at GGWash, and not just with the Comp Plan! Check out our [recently released endorsements](#) for the [2020 general election](#), [including Advisory Neighborhood Commissioners](#), the [at-large council seats](#), and in [Ward 2](#). If you're looking for ways to speak up on transportation, we're encouraging everyone to [fill out DDOT's MoveDC survey](#) before it closes on Nov. 10.

And, if you enjoy our work, [please consider supporting us](#): We're running a [fundraising campaign](#) through the end of the year, and really appreciate any amount you're able to [contribute](#). I know that there are so many people, causes, and organizations that need your support right now, but anything you can share enables me, and my incredible coworkers, to better advocate, with you, for

more housing and better public transit—things that will, tangibly, make the District and our region more equitable, sustainable, fair, and accessible to all.

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Resending the below message for 20009 residents who are on the Ward 2 side!

--

Hi!

You're receiving this email because Greater Greater Washington's database has revealed to me that your ZIP code is within with Ward 2*.

As a GGWash reader and supporter, you may be interested in attending Ward 2 council [Ward 2 Councilmember Brooke Pinto's open house on the Comprehensive Plan tonight, Thursday, Nov. 19, at 6:30 p.m.](#)

While the Office of Planning has already proposed some changes to the [Future Land Use Map](#) in its [amendments](#), councilmembers have the opportunity to make further changes, so both CMs are structuring these events as opportunities to testify about what their constituents specifically want to see changed, if anything, in their wards.

To attend CM Pinto's session, sign up [here](#).

This is a great opportunity to state your support for, say, more density—or whatever your heart may desire—in particular places in your ward. Last week's Committee of the Whole hearing was better suited to general commentary, so if you do attend, bring your best ideas for places where you'd like actual land-use designations on the FLUM to change or be supported.

You can watch recordings of the hearing [here](#) and [here](#), and can [submit written testimony to the Committee of the Whole](#) before Dec. 3, when the record will close—I highly, highly suggest doing so, and am here to help if you want someone to read over what you might want to send in.

If you haven't yet signed [Greater Greater Washington's Comp Plan petition](#), please do! And if you can't [make it tonight](#), but want to comment specifically on what's going on with Ward 1, send your thoughts to [REDACTED] and [REDACTED]

If you have any questions, email me at [REDACTED]

Thank you,
Alex

Alex Baca
Housing Program Organizer
Greater Greater Washington
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*You can confirm the ward you live in [here](#)—wards and ZIPs don't fully correspond, alas—and if you've moved or otherwise changed [your address](#), please update it for us [here](#) so that you don't receive emails that aren't relevant to where you live! You may have received a similar email from me earlier this week if you have a 20001 ZIP code, which is split between wards 1, 2, and 6; if you live in Ward 1, I hope you were able to attend [Councilmember Nadeau's open house](#).

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Hi! Hello! Happy Monday!

[Today is the last day to sign up to testify in person](#) (via Zoom) on amendments to the Comprehensive Zoning Ordinance heard by the DC Council this Thursday and Friday. To do so, **email [REDACTED] before 5 p.m. today and say that you'd like to be added to the witness list!** [REDACTED] re. [Here's](#) what we're asking for—feel free to borrow [our language](#)—and here are some testimony tips.

I expect that this will be a long slog of a hearing. It's already planned across two days. So, let me know if you've signed up, and I'll do my best to ping you when it's close to your time to testify on Thursday or Friday. If you need help, or want me to review what you've written, just email me at [REDACTED] and I'd be happy to assist.

I'm still working on my own testimony, but looking forward to letting councilmembers know why I support more housing in the District, particularly in Rock Creek West, Near Northwest, and Capitol Hill. This chart, from Office of Planning's [Housing Framework for Equity and Growth report](#), is completely maddening, to me:

Appendix 2. 2018 Dedicated Affordable Housing Supply & 2025 Production Goals

Planning Area	2018 Affordable Housing Supply	2025 Affordable Housing Production Goals	2025 Total Affordable Housing Supply
Rock Creek West	470	1,990	2,460
Rock Creek East	2,650	1,500	4,150
Capitol Hill	1,820	1,400	3,220
Upper Northeast	4,520	1,350	5,870
Near Northwest	4,010	1,250	5,260
Far Southeast & Southwest	15,760	1,120	16,880
Central Washington	2,890	1,040	3,930
Mid-City	6,960	1,010	7,970
Lower Anacostia, Waterfront & Near Southwest	3,190	850	4,040
Far Northeast & Southeast	9,690	490	10,180
Total	51,960	12,000	63,960

Anyway! The record for Comp Plan testimony will be open until Dec. 3, so if you're not able to testify verbally, definitely plan to submit something in writing to [REDACTED] before then. Again, let me know if you have any questions.

And, lastly, the comment period for [MoveDC](#) has been extended to Nov. 14. If you haven't yet [filled out DDOT's survey](#), please do so. MoveDC is [a long-range planning document](#), and thorough comments on its survey in favor of more frequent, reliable public transportation are the best shot we've got to ensure that the District builds safer streets and funds non-car ways of moving around.

This Monday, out of any, might not feel like the right time to get moving on local policy. There's a lot to celebrate, and even more to work on, at the national level, and I understand that may be where your focus is right now. But accountability starts at home! The Comp Plan and MoveDC are foundational, priority-setting plans, so it's critical that you provide input while the opportunity to do so is available. So, [sign up to testify](#), and [fill out that survey](#)!

Thank you,
Alex

Alex Baca

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P.S. There are a few ward-level events popping up around the Comp Plan hearing. If you live in Ward 1, 3, or 6, these are good spaces in which to listen to what councilmembers are thinking, and to speak up about what you want to see. (If you don't live in these wards, no need to attend; email your councilmember directly! Check your ward [here](#).) I would recommend, if you want specific density increases in your neighborhood, saying so at these meetings in addition to saying so in your testimony.

- Cleveland Park Smart Growth's with Ward 3 Councilmember Mary Cheh is **tonight at 6:30 p.m.** (sign up [here](#))
- Ward 1 Councilmember Brianne Nadeau is hosting one on **Nov. 16 at 6:30 p.m.** (sign up [here](#))
- Ward 6 Councilmember Charles Allen is hosting one on **Nov. 17 at 6:30 p.m.** (information [here](#))

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If you believe you received this message in error or wish to no longer receive email from us, please
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Hi {{FirstName}},

I totally understand if your head is still in national-news territory (I'm exhaling deeply, and thinking hard about my own role, and GGWash's, in holding our elected officials accountable going forward), but I wanted to briefly interrupt, as politely as possible, to thank you for signing [GGWash's Comp Plan petition](#). You're receiving this email because you put your name down in support of the following:

- Pass Office of Planning's amendments, with which we fully agree, intact by the end of 2020
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

As you've no doubt heard from me a *lot*, the Comp Plan is super-important to GGWash, the organization: We've been working on it since it was opened for amendments in 2016. It's super-important to me, Alex, the person, too: I sincerely believe that we need to build more housing, and more affordable housing, particularly in affluent neighborhoods. The Office of Planning's amendments aren't perfect, but they start to realign the District's planning paradigm to [evenly distribute housing](#)—rather than to protect "[character,](#)" [wealth,](#) and [exclusivity](#)", particularly in majority-white neighborhoods.

You + more than 160 people have signed the petition so far, and I've heard from a number of those 160 that they plan to testify during the hearing on the Comprehensive Plan Amendment Act of 2020 on Nov. 12 and 13. If you've signed up, disregard this email. But if you haven't, well...**the last day to sign up to testify "in person" (via Zoom) is this coming Monday, Nov. 9, and I really, really urge you to do so if you** [sign up here](#). If you can't, no worries—just plan to submit written testimony to [REDACTED] before the record closes on Dec. 3.

If all of this sounds totally foreign, watch the [testimony training](#) that GGWash cohosted last week with our partners in the Housing Priorities Coalition, and check out some testimony tips [here](#). Your testimony can be really short, and you can simply reiterate [our talking points](#), above, in your own words. It's pretty easy, and fun!

If you've got any questions about how all of this works, email me at [REDACTED] I'm happy to review anything you've written, help you sign up, or whatever you need. [REDACTED] me a note, anyway, if you decide to sign up. I've sent a lot of emails getting organized for the Comp Plan, and it's always such a pleasure to hear from GGWash's supporters. I'll be sending a couple more messages leading up to the hearing to remind you, so thanks for bearing with me in your inbox.

Thank you and take care,
Alex

Alex Baca

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Hi {{First_Name}}!

You're receiving this email because Greater Greater Washington's database has revealed to me that you live in the 20001, 20009, or 20010 ZIP code, which means that you are probably a Ward 1 resident (you can confirm the ward you live in [here](#)—wards and ZIPs don't fully correspond, alas—and if you've moved or otherwise changed [your address](#), please update it for us [here](#) so that you don't receive emails that aren't relevant to where you live!).

All that's to say that, as a GGWash reader and supporter, you may be interested in [the open house that Ward 1 Councilmember Brianne Nadeau is hosting tonight to discuss how her constituents can benefit from the Comp Plan at 6:30 p.m. Register at \[tinyurl.com/Ward1DC\]\(https://tinyurl.com/Ward1DC\).](#)

If you're able, I encourage you to attend to learn more about the [Comp Plan](#) generally, [the Mid-City element](#) (which encompasses Ward 1) specifically, and what the councilmember is interested in regarding land use in Ward 1. If you want to see more housing in your neighborhood, the Comp Plan needs to be amended to enable it—but the opportunity for public comment will end when the council record closes on Dec. 3. While the Office of Planning has already proposed some changes to the [Future Land Use Map](#) in Ward 1 in its [amendments](#), councilmembers have the opportunity to make further changes. If you're a resident, tonight's your chance to ask for increased residential density on specific parcels in Ward 1, or whatever your heart might desire.

I am super-sorry for the late notice; I'm still processing last week's two-day Comp Plan hearing, at which a number of you testified (for which I am extremely thankful). You can watch recordings of the hearing [here](#) and [here](#), and can [submit written testimony to the Committee of the Whole](#) before Dec. 3, when the record will close—I highly, highly suggest doing so, and am here to help if you want someone to read over what you might want to send in.

If you haven't yet signed [Greater Greater Washington's Comp Plan petition](#), please do! And if you can't [make it tonight](#), but want to comment specifically on what's going on with Ward 1, send your thoughts to [REDACTED]

If you have any questions, email me at [REDACTED]

Thank you,
Alex

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Hi!

You're receiving this email because Greater Greater Washington's database has revealed to me that your ZIP code is within with Ward 2 or Ward 6*.

As a GGWash reader and supporter who lives in either, you may be interested in attending **open houses on the [Comprehensive Plan](#) held by [Ward 6 Councilmember Charles Allen \(tonight at 6:30 p.m.\)](#) and [Ward 2 Councilmember Brooke Pinto \(this Thursday, Nov. 19, at 6:30 p.m.\)](#)**

While the Office of Planning has already proposed some changes to the [Future Land Use Map](#) in its [amendments](#), councilmembers have the opportunity to make further changes, so both CMs are structuring these events as opportunities to testify about what their constituents specifically want to see changed, if anything, in their wards.

To attend CM Allen's session, email Chris Laskowski ([REDACTED]) with the subject line "Ward 6 Comp Plan Sign-Up." To attend CM Pinto's session, sign up [here](#). Both councilmembers have asked attendees to sign up in advance and plan for a two-minute testimony. (If you live in Ward 2, don't go to the Ward 6 event, and vice-versa! Obviously!)

This is a great opportunity to state your support for, say, more density—or whatever your heart may desire—in particular places in your ward. Last week's Committee of the Whole hearing was better suited to general commentary, so if you do attend these events, bring your best ideas for places where you'd like actual land-use designations on the FLUM to change or be supported.

I do apologize for the late notice, especially to Ward 6 constituents; I'm still processing last week's two-day Comp Plan hearing, at which a number of you testified (for which I am extremely thankful). You can watch recordings of the hearing [here](#) and [here](#), and can [submit written testimony to the Committee of the Whole](#) before Dec. 3, when the record will close—I highly, highly suggest doing so, even in addition to open houses, and am here to help if you want someone to read over what you might want to send in.

If you haven't yet signed [Greater Greater Washington's Comp Plan petition](#), please do! And if you can't [make it tonight](#), but want to comment specifically on what's going on with Ward 1, send your thoughts [REDACTED] and [REDACTED] (Ward 2), or [REDACTED] and [REDACTED] (Ward 6).

If you have any questions, email me at [REDACTED]

Thank you,
Alex

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Hi {{FirstName or 'there'}},

Happy Sunday! Besides [cooking a ton of fun stuff for Thanksgiving](#), I've spent the past few days rereading* *The Color of Law* in preparation for Greater Greater Washington's discussion of it tomorrow night. You're signed up to attend, which is why you're receiving this email. I'm really looking forward to the event and wanted to send along some additional details and materials to get you prepared.

A few logistical notes:

- **You'll receive a Zoom link tomorrow!!**
- We're planning on what I hope will be a casual, constructive, and fun talk about the book, **starting at 5:30 p.m.**
- Office of Planning staffers Faith Broderick and Heba ElGawish will be joining us, and I'm super-excited for them to share their expertise as practicing planners on what it takes to begin to remedy the sorts of legally codified injustices that Rothstein identifies in *The Color of Law*.
- I'll be moderating the discussion, so come with questions, thoughts, and ideas. We will run this as a Zoom call, not a panel, to keep it intimate, and not talk at you *too* much. I will keep attendees muted, so prepare to use the "raise hand" function or put questions in the chat so I can call on you or bring up your thoughts.
- After about 45 minutes of group discussion with Faith and Heba—or, if it's really rollicking, perhaps a little longer—we'll move into breakout rooms, which GGWash staff, including me, will be in and out of.
- We will record the group discussion and post the video, with a recap, on ggwash.org on Tuesday. (We will not record the breakout groups.)

There is absolutely zero expectation that you will have read all of the book by tomorrow night. Maybe you've read it previously, or have a good sense of what it's about (racial segregation, Supreme Court cases, the federal government, neighborhoods, etc.) That's great! But: Book discussions are the most fun, in my experience, when people are really wrangling with the text that's being discussed. There is seriously no pressure to be an expert in *The Color of Law* before tomorrow night, but...if the book's a bit fuzzy for you (it was for me, for sure), then here are some things to check out:

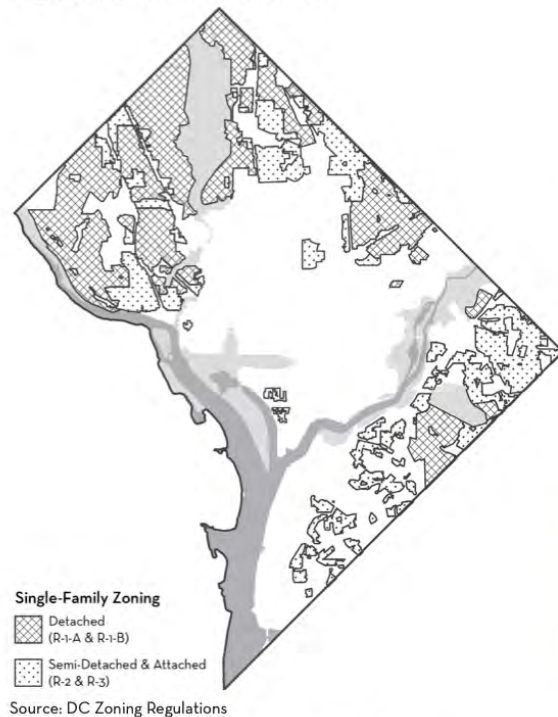
- [Segregated By Design](#) is a short film that visually explains much of Rothstein's book.
- Prologue DC's [Mapping Segregation](#) project is a collection of research and writing on where racially restricted covenants were instituted in DC. As Rothstein writes, though racial covenants were enacted by private citizens, the federal government, even after *Shelley v. Kraemer*, which banned court enforcement of restrictive covenants, [enabled them](#): In one instance, in Chicago in 1949, Federal Housing Administration officials insisted that "an interracial community was a bad risk" that the FHA could not insure (that's on page 57).
- [A \(52-minute! Put it on while you're making lunch!\) lecture by Rothstein about his work](#)
- [A \(much shorter! eight-minute!\) edited video of many Rothstein talks organized by the book's chapters](#)
- [This transcript](#) of Rothstein discussing *The Color of Law*
- [Many, many existing discussions about the book](#)
- This [wonderfully comprehensive collection](#) of interviews, lists of policies referenced, and other questions regarding *The Color of Law*

GGWash has also published some really great articles about *The Color of Law* and local examples of *de jure* segregation:

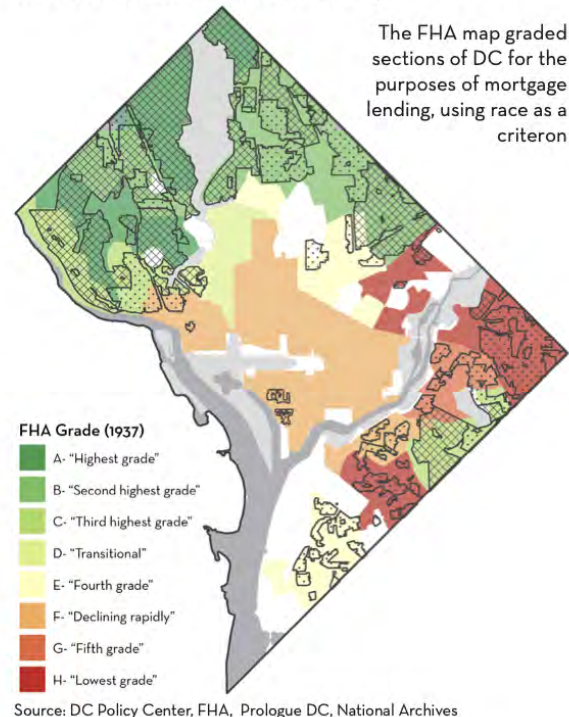
- [Richard Rothstein lays out the reality of government-mandated segregation in "Color of Law"](#)
- [US cities were segregated by design. This video shows how we're still affected.](#)
- [These maps show how public housing was manipulated to segregate DC](#)
- [One man zoned huge swaths of the DC region for sprawl, cars, and exclusion](#)

- We haven't written about it yet (I've been really busy!), but the Office of Planning's report about the [impact of single-family housing on the District overall](#) is well worth looking over; it was required by the legislation passed by the Council approving the Framework element last October, which GGWash worked on closely (and of which I am extremely proud). These maps (on page 18) are quite striking:

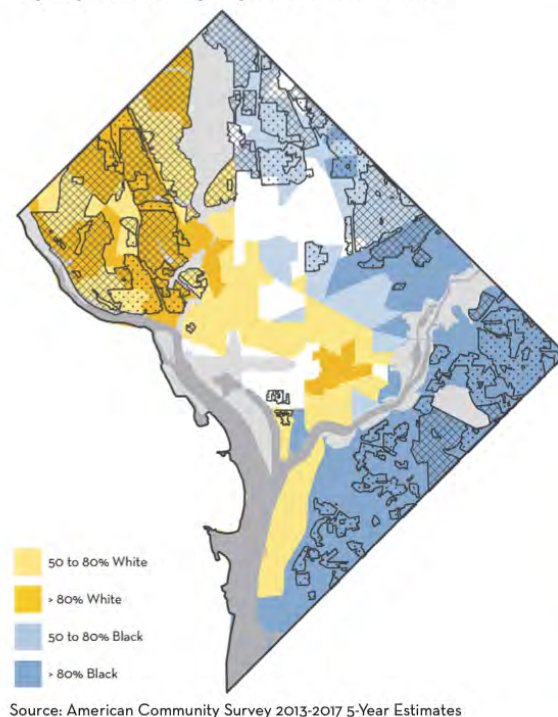
Figure 9.
Single Family Zoning in the District



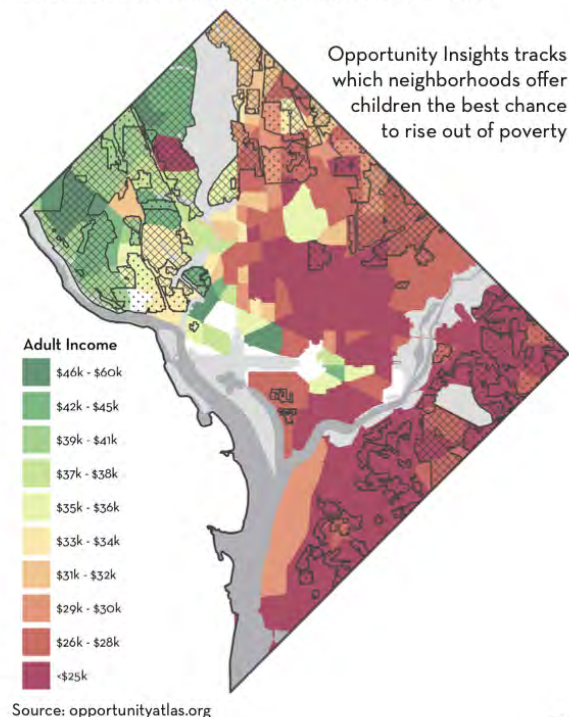
1937 Federal Housing Administration Map



Majority White & Majority Black Census Tracts



Adult Income for Children in Low-Income Households



Obviously, there is so much to say about *The Color of Law*. We are not going to be able to tackle all of it, and I'm hoping to really focus our conversation on the relationship between *de jure* segregation and what's doable with the District's Comprehensive Plan, amendments to which are currently being considered by the DC Council after close to four years of public debate. As you likely know, the Comp Plan is the District's foundational land use text, and a great deal of GWash's advocacy (and most of my job, for the past year and a half) has been devoted to working on it. With a zoning-code rewrite functionally off the table—our first zoning rewrite since 1950 was completed in 2016, after a decade of debate—amending the Comp Plan, and pushing for the 2006 plan to be fully rewritten as soon as possible, is the only real viable opportunity we have right now to make some changes to the District's existing land-use regime. If you're on GWash's main email list, you likely already received an email from me tonight about the Comp Plan, urging you to send in a comment before the hearing record closes this Thursday, Dec. 3—because it's really important, and it's on me to get you to [participate](#) in public processes like amending the Comp Plan! We'll talk more about that tomorrow night; if you'd like to send in a comment, follow the instructions [here](#), and cc me, [REDACTED] please! And don't hesitate to let me know if you need any help.

With all that, I look forward to hanging out with you tomorrow after work, doing one of my favorite things: talking about a well-written, interesting book that's really relevant to where I live and what I do.

See you then,
Alex

Alex Baca
Housing Program Organizer
Greater Greater Washington
[Join our Neighborhood.](#)

*While I always think that I'm going to be most in love with Rothstein's third chapter, "Racial Zoning," because of, you know, what I work on at GWash, it's really his skillful demonstration of how the federal government segregated places that weren't segregated *until* there was a federal presence or action that sticks with me. While that's obviously the theme of the whole dang book, it's most directly described in the earlier chapters. This, on page 37, is an elegant and infuriating summation of a deliberate federal screwover of public housing and its residents: "New federal and local regulations set forth strict upper-income limits for families in public housing. ... This policy change, mostly complete by the 1960s, ensured that integrated public housing would cease to be possible. ... The federal government had required public housing to be made available only to families who needed substantial subsidies, while the same government declined to provide sufficient subsidies to make public housing a decent place to live."

This is easily extrapolated to the private market, which, through both overt and tacit encouragement of segregationist practices like blockbusting, covenants, and tax writeoffs, exploited and ghettoized Black buyers. This ad, which I found browsing archives of the *Washington Star*, is a direct result of that:



{{Disclaimer}}

Greater Greater Washington
1275 K Street NW
Washington, DC 20005
United States

If you believe you received this message in error or wish to no longer receive email from us, please
(Unsubscribing is not supported in previews).

Extemporaneous testimony



Nov. 13, 2019

Testimony for Rental Housing Act Extension Amendment Act, B23-0433

Alex Baca, Greater Greater Washington

Good afternoon. Thank you for the opportunity to testify in support of the Rental Housing Act Extension Amendment Act of 2019.

My name is Alex Baca, and I am the housing program organizer for Greater Greater Washington. GGWash is a volunteer-driven, nonprofit media and advocacy organization that works for more sustainable, accessible, and fair transportation, housing, and land use in the DC region.

Most people are most familiar with our blog, where, for nearly 12 years, we've written about such issues. Our housing program, which I lead, is focused on DC specifically, and has three main goals: to increase housing supply as our city's population continues to grow; to integrate neighborhoods that have historically manipulated laws and policies to exclude certain types of buildings, which is often a proxy for racial and economic segregation; and to promote a form of economic development that's equitable, redistributive, and fair.

For what it's worth, I live in a rent-stabilized apartment. This gives me the confidence that I will be able to, in the future, reside in DC, which means paying taxes, voting, and otherwise participating civically, both personally and professionally. Without rent stabilization, I would lack this certainty.

Opponents of rent control argue that it may mean that fewer apartment homes get built. And it is tempting to say that rent control not only suppresses supply, it suppresses mobility, by keeping people in housing situations that are not a good fit for them. And there is, of course, the canard that people who don't *really* need rent stabilization, because they can, I guess, afford a landlord gouging their rent, are sucking up the limited number of protected units that exist. These are, indeed, *possible* outcomes of any given rent-control policy.

But some things aren't just possibilities. There are many, many *certainities* about how housing works in DC currently. And what is certain is that today, right now, apartment construction is [illegal in about 75 percent](#) of the District. What is certain is that rents today, right now, are high enough that many developers would love to build (and many landlords would love to rent) new

apartments in more places, were it allowed. What is certain is that the District's current approach to housing and land use, which is characterized by zoning regulations that mandate the type of homes, the size of the lots they sit on, and how much parking they require, *already limits* housing supply. Segregationist land-use policies, not rent control, are housing supply's foremost enemy.

We're reasonably versed in the research that claims otherwise. The [splashiest and most recent work on this](#), by Rebecca Diamond and Timothy McQuade, finds both tremendous benefits from rent control (such as that, in San Francisco, rent control increased renters' probability of staying at their address by 20 percent), and also costs: Namely, that fewer apartments got built because of rent control.

Diamond and McQuade's empirical work is strong, and their data is fascinating. But their paper is unrealistic. It does not operate with a holistic understanding of the many policies that shape the wide and vast landscape of housing, and so it is unfortunate that it has become a foundation for anti-rent stabilization posturing.

Lashing out against rent stabilization takes valuable energy away from a much more constructive mission: adding supply, particularly in affluent, high-opportunity parts of the city like Rock Creek West, Near Northwest, and Capitol Hill. There, we have allowed a valorization of "community character"—and our 2006 Comprehensive Plan is [largely responsible for this](#)—to stop development, resulting in a warped and unfair distribution of the housing that *does* get built here.

In a climate where displacement of longtime residents due to rising rents is a chief concern, the 20-percent increase in probability that renters stay in their apartments found by Diamond and McQuade looks less like a population suffering from limited mobility, and more like one that is better able to enjoy the positives, like more amenities and reduced crime, that come with the upscaling of neighborhoods.

Additional research comes from Massachusetts, which eliminated its rent control in the 1990s. Three MIT economists [studied](#) this episode and, in part, found that rent control was effective in preventing gentrification in the communities it covered. Rent control helps stave off displacement for individual households, and a collection of more stable households in a particular neighborhood means that that place itself is stabilized by rent control.

Further, rent stabilization also functions as a consumer protection, which is a necessary feature in a market where supply is low; the District's rental vacancy rate is currently at about 5 percent, which puts tenants in a precarious position, with fewer options than they would have were vacancy rates higher.

Right now, DC has a regime that doesn't really protect tenants or produce housing: Rent control doesn't cover as many renters as it could, and zoning and preservation policies halt the

construction of more homes. So, as we work on getting more places to live built, [because we build far less than we used to](#), we're pleased to see a rising discussion of how the Rental Housing Extension Act might be not just passed, but expanded to protect more people. We are in favor of the loophole closures proposed by the Reclaim Rent Control coalition. Additionally, we feel strongly that current rent-stabilization requirements should apply to more buildings, and that tenants should only incur one rent increase per year.

GGWash advocates for the kind of high-level systems change that is hard to see; our futzing around with land-use documents leaves much to be desired from those looking for an immediate solution to housing that they can't afford right at this moment. But rent stabilization—barring an influx of housing supply that we are currently not on track to receive—is, at this point in time, an essential component of DC's suite of housing policies.

Rent stabilization is not at odds with Greater Greater Washington's goals overall, or the goals of our housing program specifically. We support rent stabilization *because* we support increasing housing supply. We are under no illusion that there is one way to “solve” housing. So build more of it, preserve what we've got, put more money into our affordable-housing programs, give people more money, comply with the Fair Housing Act, get more data about all of it, and protect consumers—*all* consumers, not just the ones that qualify—from exploitation. Any conflict between housing policies is a construct driven by a needless scarcity mindset. A more expansive Rental Housing Act is critical to protecting people, preserving homes, and producing housing for all. Thank you.



Jan. 28, 2020

Performance Oversight Hearing
Committee on Housing & Neighborhood Revitalization
Testimony: Greater Greater Washington

Good morning, Councilmember Bonds and the Committee on Housing & Neighborhood Revitalization,

My name is Alex Baca, and I thank you for the opportunity to testify today, on behalf of Greater Greater Washington, for performance oversight of the Department of Housing and Community Development and the Housing Production Trust Fund. GGWash is a volunteer-driven, nonprofit media and policy organization; we advocate for more affordable and accessible housing and transportation and an inclusive, diverse, growing D.C. region.

GGWash applauds DHCD's commitment to Mayor Bowser's goal of 36,000 new units of housing built in DC by 2025. We are highly supportive of "#36Kx2025," and agree with the Mayor that 12,000 of those units, at least, should be affordable; advocacy that furthers this is a major goal of GGWash's housing program, which I run. We believe DHCD is the agency most critical to ensuring that a third of these new units are affordable, and we've been glad to see DHCD and Director Donaldson embrace this initiative. Still, there's a lot to do to ensure that it actually happens.

We would like to see the Housing Production Trust Fund fully oriented toward meeting, or exceeding, the goal of 12,000 new affordable units. DC has the most robust housing trust fund in the country, and we are proud to work in a city that has demonstrated such a thorough commitment to affordable housing in its budget. But, given the scale of the crisis, the council should increase the HPTF's allowance in the 2021 budget. The mayor has suggested that ["we could be doing at least \\$250 \[million\]"](#) with HPTF. We agree that seems like a fine *minimum* at which the HPTF should be funded.

As you know, the Deputy Mayor's Office for Planning and Economic Development, the DC Housing Authority, and DHCD each touch housing production in the District. Given DMPED's wide scope on citywide economic development, and DCHA's essentiality to vulnerable residents and transformation plan for its aging properties, DHCD's role in creating affordable housing,

particularly through the HPTF, is more important now than ever. DHCD should be funding and managing production of housing for those who earn 30 to 50 percent of the area median income.

Further, HPTF funding should be more efficiently allocated. We should heed the findings of the [May 2019 auditor's report](#), which showed that DHCD awarded HPTF dollars to lower-scoring projects that proposed to provide fewer units of affordable housing. There may be good reasons, from time to time, to go against an agency's ranking system for funding allocation. Maybe the ranking system itself is flawed, and needs to better account for the realities of developing affordable housing. But the lack of available affordable housing—which DHCD has direct control over—is dire, and there is no justification for flaunting scoring when the result is fewer affordable units built, if affordable-housing production is the goal. We hope that the Council will continue to carefully scrutinize how DHCD is spending HPTF dollars.

Lastly, we would like to see a stated commitment to affirmatively furthering fair housing principles from DHCD. AFFH is a federal rule that advances the goals of the Fair Housing Act by requiring that the US and its municipalities take “meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

In 2019, GGWash submitted [comments](#) during the agency's outreach process for its analysis of impediments to fair housing. We said then:

The current presidential administration is [actively rolling back civil-rights regulations generally](#) and [refusing to investigate housing discrimination specifically](#). It is more important than ever that DHCD, alongside the mayor's office and Office of Planning, dedicate their efforts and staff time to funding, preserving, and creating better, stronger policy around affordable housing, special-needs housing, homelessness, homeownership, and community development and public service activities, whether those policies and programs are locally or federally funded. And it is critical that this work is conducted fairly and in a fashion that accounts, and redresses, systemic discrimination and denial of access particular to D.C. [Without a federal commitment](#) to affirmatively furthering fair housing, only DHCD can ensure housing in D.C. assessed to address patterns of integration and segregation, racially or ethnically concentrated areas of poverty; disparities in access to opportunity; and disproportionate housing needs.

...But an issue larger than the city's budget, and thus an issue that budgets cannot address alone, is *where* housing is built, or where people can afford to live. Regardless of the rate at which housing and homelessness programs are funded, and regardless of whether that funding is local or federal, the city will be complicit in furthering the place-based inequities—longer commute times, worse access to amenities and services—that its poorer residents, and residents of color, already face if programs and

developments are confined to only certain parts of the District. DHCD should ensure, by complying with the Fair Housing Act and the Affirmatively Furthering Fair Housing rule, that any production of housing, or the distribution of resources devoted to bringing housing within greater reach of people, is not constrained by particular geographies.

We stand by this comment, and have asked for a similar commitment from Office of Planning in its amendments to the Comprehensive Plan. Increasing the density of the city's affluent neighborhoods, where affordable-housing production has historically been scant, is achievable through changes to the Future Land Use Map, which we have supported, and is essential to keeping the District's distribution of affordable housing in line with AFFH principles.

GGWash believes that the District should produce more housing, preserve existing housing, and protect residents, whether they've spent their lives here or just arrived. A well-functioning Department of Housing and Community Development and a Housing Production Trust Fund that contains enough money to develop the new affordable housing that we need is essential to each one of these actions. We would like to see DHCD execute the mayor's vision for more housing, and more affordable housing, in a transparent, honest, efficient, thoughtful, and fair manner.

Thank you.



Feb. 25, 2020

Performance Oversight Hearing
Committee of the Whole
Testimony: Greater Greater Washington

Good afternoon,

My name is Alex Baca, and I thank you for the opportunity to testify today, on behalf of Greater Greater Washington, for performance oversight of the Office of Planning. GGWash is a volunteer-driven, nonprofit media and policy organization; we advocate for more affordable and accessible housing and transportation and an inclusive, diverse, growing DC region.

First, GGWash applauds the Office of Planning's commitment to Mayor Bowser's goal of 36,000 new units of housing built in DC by 2025. We are highly supportive of "#36Kx2025," and agree with the Mayor that 12,000 of those units, at least, should be affordable; advocacy that furthers this is a major goal of GGWash's housing program, which I run.

The Office of Planning, through its Housing Framework for Equity and Growth and its "continuing conversations" on housing, has done a tremendous job of shaping the discourse surrounding the 36,000-unit goal to elucidate how racial and economic segregation has been furthered by American urban-planning practices. We're glad to see that that narrative has been looped into OP's amendments to the Comprehensive Plan.

Unless we allow dense, diverse housing types in all parts of the city, all other measures to make housing more affordable, like rent stabilization and inclusionary zoning, will fall short. To provide enough housing for District residents, we need to build it, and no part of the city should be let off the hook from welcoming more neighbors. So, we fully support OP's amendments to the Comprehensive Plan, which we think are—correctly—oriented toward allowing more homes in low-density neighborhoods.

Our suggestions for the Comp Plan are only additive. We would like to see a Future Land Use Map that is much more representative of *future* land uses, with the goal of meeting District residents' housing needs in a fair, equitable, and accessible way. That means an even greater increase in density across the board, including in affluent, largely single-family neighborhoods,

than the “upflumming” that’s currently on the table. Even in OP’s proposed amendments, the FLUM is so fine-grained as to look more like a zoning map. Though the FLUM and the zoning code are linked, they each serve different purposes, and we should treat them as such rather than near-replicas of each other.

We also want to note we feel that OP’s period of public input for amendments to the Comp Plan was the correct length. An ever-extending period of public input, like what we saw beginning in 2006 with the zoning-code update, would not have been appropriate to bring the Comp Plan to match the current realities of development in the District. The Comp Plan probably deserves a full rewrite, but we understand that we are in an amendment cycle. Given that, we urge the Council to pass an amended Comp Plan by the end of 2020.

In the next year, we hope that the Office of Planning will plan around citywide systems, particularly civic infrastructure like schools, parks, and libraries and storage and maintenance for municipal vehicles. We’d also like to see more neighborhood planning. OP completed 27 neighborhood-scale plans from 2002 to 2009 (almost half in 2008), but only 15 from 2010 to 2017. Of those, 24 of the 27 plans done in the 2000s were official Small Area Plans or the like, which go to the council, while only six of 15 in the 2010s were. Most of the 2010s-era plans are smaller in scope as well.

To that end, we are enthusiastic about OP’s intentions for a more strategic analysis of the area around North Capitol and Irving streets, which has been largely neglected by formal planning processes. The future of the hospitals, garden apartments, the Armed Forces Retirement Home, and Catholic University land should match the values that OP has expressed throughout its Comp Plan amendments.

Finally, given that the current federal administration has abandoned the responsibility of enforcing the Fair Housing Act, we ask that OP continue to commit to affirmatively furthering fair housing principles, which include “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”

Overall, we’ve been pleased with OP’s performance over the past year. Director Trueblood and his staff are enthusiastic and committed to progressive planning in the District. Their work on the Comp Plan, Housing Framework for Equity and Growth, and willingness to propose new policies like IZ+ is a welcome shift for an agency that has sometimes been more reactive than proactive. We appreciate the office’s focus on the impact that planning has had on racial and economic equity, and are heartened to see its staff put time and effort toward redressing the harms of segregation and spatial inequity in housing.

We hope that the Council supports OP’s work, most notably by passing an amended Comprehensive Plan by the end of 2020.



The Washington, DC region is great >> and it can be greater.

June 18, 2020

Testimony to Committee of the Whole

Re: Office of Planning budget

Alex Baca, Greater Greater Washington

Good afternoon. My name is Alex Baca and I am testifying on behalf of Greater Greater Washington. We are asking for the restoration of the Office of Planning's budget to \$14.4 million, and an increase in its contracting budget so that OP can conduct more neighborhood planning.

There is a clear demand for "more planning." Though the various factions that regularly tussle over development politics are often cast as hopelessly at odds, both pro-growth entities and development skeptics have said something to the effect of, "It would be great to know more about what we can expect to happen here." Particular areas of interest are identified in OP's amendments to the Generalized Policy Map, including Capital Crossroads and Wisconsin Avenue.

The Council, too, has, made similar requests. When you and your colleagues, Chairman Mendelson, unanimously passed the Framework element of the Comprehensive Plan last year, it was with language that gave the Council greater authority over the approval of small area plans. In order to more greatly oversee small area plans, more small area plans need to come to fruition in the first place. They cost about \$200,000 each. Without the creation of such plans, it will be impossible to implement the stated development goals of the revised Comprehensive Plan once it is finalized by the Council.

We fully support the Office of Planning's work and the mayor's goal of 36,000 new units of housing by 2025. The District needs considerably more housing, especially at price points that middle-class, working-class, and under-resourced Washingtonians can afford. We know that legible and thoughtful neighborhood-scale plans are a necessary precondition for support for more housing. We urge you to remain consistent with your own stated preferences, and continue to foster OP's much-welcome shift from a reactive stance to a proactive one, by funding more small area planning.

We should always be mindful of how we arrange our built environment. Professional planning shapes where we live, go to school, work, worship, run errands, and hang out with our friends and family. We should plan our neighborhoods so that all are safe, not just some. Right now, cities across the county are, rightfully, hypersensitive to what happens in their public spaces; to who's able to access private space without violence; and to how planning can either further justice, or exacerbate economic and racial inequality.

One potential source of funds is the Mayor's Office of Talent and Appointments, which is often a landing pad for political allies, or, perhaps, increasing taxes on residents who earn over \$350,000 a year, which 83 percent of District residents support. If those options are too much to stomach, the Council could, of course, look to the Metropolitan Police Department's budget.

Thank you.



Alex Baca <[REDACTED]>

b23-736 testimony

6 messages

Alex Baca <[REDACTED]>

Tue, Dec 1, 2020 at 5:58 PM

To: [REDACTED]

Bcc: "Meni, David (Council)" <[REDACTED]>

Hi Chairman, Julia,

I'm sending my personal-capacity comment on the Comp Plan, as a resident and not a GGWash staffer, to you today.

I do support the asks that Greater Greater Washington is [promoting](#) as an organization (obviously, because I wrote them), for the Comp Plan generally:

- Pass Office of Planning's amendments, with which we fully agree, as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

Please also see below my (too) detailed comment to CM Nadeau, with specific requests for Ward 1, where I live.

In addition to reiterating GGWash's asks, I would like to note that I understand that markup will not happen until next year, and just hope that amendments to the Comp Plan can be passed before the next budget season. I know it is nearly impossible to ask for the speedy handling of a 1,500-page document, and so I hope that this is the last time that the Comp Plan and its amendments are 1,500 pages—but we need to fully rewrite it to really bring it down.

In addition to my Ward 1 asks, I'd add that I'd be glad to see density increases through the FLUM to, in particular, publicly owned parcels, to allow for the maximum potential construction of new housing in projects in which the District is involved.

I hold the view that it is impossible to mitigate high housing prices here without building more in all parts of the city, especially where there has been little construction in the past. I was actually in the process of selling the home that I owned in Cleveland, OH, in the leadup to the Nov. 12 hearing, and thought extensively about the zoning variances granted to nearby high-density projects (Ohio City and Detroit-Shoreway, in Cleveland, are the equivalent of, say, Logan Circle, or Mount Pleasant, or Capitol Hill, 30 or 40 or 50 years ago, respectively). How I feel about them isn't germane; ultimately, I only owned the parcel on which my house sat, and I found it helpful to not worry myself with what was happening beyond those boundaries, which I could not reliably control without a great deal of dedication and effort. It allowed me to lead a richer life.

I hope to be able to buy something in D.C., though I must say I prefer renting to owning. Either as a resident or a homeowner, though, I suspect I diverge from many when I say that I don't believe that any resident is entitled to protection from changes to the built environment in their neighborhoods, and that I don't expect the neighborhood I move to to permanently conform to the land-use patterns in practice upon my arrival.

But, simultaneously, I'd like to affirm some of the Grassroots Planning Commission's [housing justice priorities](#), particularly strengthened language around affordable housing and public housing in particular. I am of the view that strengthening such language will not make affordable housing more abundant or public housing better-managed and more widespread, and prefer to dedicate my own efforts to affordable and public housing to the budget and legislation. But, I think there is a good deal of value of indicating them as priorities, even in the land use and housing sections, if only as a continuation of the spirit of the Framework.

While I do not agree with the call for greater community input, and do not believe more process is a fix for the displacement of longtime Washingtonians, asks for greater community involvement—which were prevalent during both days of the hearing—actually square up with GGWash's for increased density. PUDs are, functionally, the only process for community input on new development, and PUDs are only worth pursuing if the potential additional density balances out the risks of engagement on a specific project. Additionally, it is important to me to avoid the rush of speculation that only a

handful of "upflummed" parcels will drive, and it's possible to do that by allowing a good deal of high-density designations across the District, particularly on public land.

Lastly, I would like to request that sections 310.12 through 310.15 of the land use element be left intact, and am happy to discuss my reasoning for this further if necessary. If no one registers discontent with this section, and I hope they don't—because, in my interpretation, it could allow for a zoning change to encourage more modestly scaled homes as infill, which we sorely need—then just put me down as very much in favor of its passage.

I want to thank you both for your continued work on the Comp Plan. I would be interested in land use even outside of my job, and would be participating in this process regardless of my career, because I care about it. I know we have disagreed from time to time, and often our interactions have been a little more frictive than I would like, but I do hope you know that I have an enormous respect for your leadership on such an unwieldy text.

Thank you,
Alex

----- Forwarded message -----

From: Alex Baca <[REDACTED]>
Date: Tue, Dec 1, 2020 at 4:03 PM
Subject: b23-736 comment
To: Brianne Nadeau <[REDACTED]>
Cc: Meni, David (Council) <[REDACTED]>

Hi CM Nadeau,

I wanted to write to you about the Comp Plan, as a Ward 1 resident, before the record closes on Dec. 3.

With regard to the Comp Plan as a whole, I support the asks that Greater Greater Washington is promoting as an organization (obviously, because I wrote them):

- Pass Office of Planning's amendments, with which we fully agree, as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

But, in addition, as a Ward 1 resident, I support as much density as you can feasibly add in the Future Land Use Map, particularly on publicly owned sites. For example, there is an enormous opportunity with the Reeves Center's redevelopment to add as much capital-A-affordable, subsidized, below-market-rate housing, because the land is publicly owned. But 2000 14th Street's current FLUM designation is medium-density residential/commercial.

I think a high-density designation is appropriate not just for a redevelopment project at 14th and U streets, but for lots of places within the ward. I think many people, myself included, experience much of Ward 1 as "high density," even though Ward 1/Mid-City is nearly uniformly designated moderate- to medium-density on the FLUM.

Part of that is historical. I've lived in Ward 1 for most of my adult life, mostly in buildings that are too dense to be allowed by either the FLUM or current zoning:

- 2112 New Hampshire Avenue: I was an ANC 1B constituent when I lived here! It's zoned RA-4 ("predominantly medium- to high-density residential") and flummed medium-density residential ("mid-rise (4-7 stories) apartment buildings"). It's 10 stories, which exceeds its FLUM designation.
- 1744 Lamont Street: This is zoned RF-1 ("row houses on small lots within which no more than 2 dwelling units are permitted") and flummed moderate-density residential ("row house neighborhoods as well as...low-rise garden apartment complexes. Also applies to areas characterized by a mix of single-family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some older inner city neighborhoods with this designation there may also be existing multi-story apartments"). It's an attached rowhome that was converted to a triplex, which exceeds its zoning designation.
- 3420 16th Street: This is zoned RA-4 ("predominantly medium- to high-density residential") and flummed moderate-density residential (see above definition). It's a six-story building, so it just ekes in to conforming with both zoning and the FLUM. CM Allen lived in this building when he first moved to DC!
- 3115 Mount Pleasant Street: This is zoned MU-4 ("moderate-density mixed use...") and flummed low-density commercial + moderate-density residential (see above). It is four stories, not including the basement floor, where I

live. While the moderate-density residential FLUM category does allow for existing multi-story apartments, I suspect a proposal to build the same building I live in today, as well as 3420 16th Street, in the same spot might trigger litigation.

Although I pulled my punches on it this time around, I do think that the District should eliminate detached single-family zoning. And I mean eliminate: I do not think R-1-A or R-1-B (or R-2) should be in the zoning code, not least because of the negative environmental impacts caused by large lots and one-family residences. Rowhomes (R-3) should be our least-dense new construction going forward. The Comp Plan does need to change to allow for a total overhaul of the zoning code, though that's not doable at this point: I realized too late that the definitions of the land use categories should have been more radically revised in the Framework. I'd like to tackle that during the next rewrite, which I will do all in my tiny little capacity to make happen by 2025, as suggested in Office of Planning's [staff report](#).

What *would* be doable right now is to encourage the "missing middle"/"gentle density"/four-to-seven-story sorts of buildings in Ward 1 is to change moderate-density residential designations to medium-density residential, at least, and high-density where it makes sense (I think "everywhere," but I understand that may be viewed as accelerationist). This would, of course, be only the slightest encouragement, because the FLUM does not change zoning unless there's a conflict. But I think it would matter!

Lastly, I want to staunch displacement and live in a racially and economically integrated city. It is of course wonderful for me that much of what's come online in the past decade caters to me directly. I would be lying if I said my vague discomfort with "new D.C.," which is partly an honest dislike and partly an aesthetic and and political stance, outweighs my enjoyment of bars and restaurants and bike lanes and bougie exercise classes. But I am better for living in an integrated city where people who want to live can afford to do so. Though I think this is morally right, it's also a self-centered ask. I *like* living near people who aren't like me. If I have kids, I'd like their world and their relationships to be more expansive and more complex and more representative than the one I grew up in, in the very white and very wealthy Severna Park, Md., whose residents intentionally kept out people who weren't white, and weren't wealthy, in part through its built form. Anything denser than a single-family home is illegal there.

I believe that rectifying that requires more development, which requires a greater allowance of density, so that there is more housing, which is a large component to making housing cheaper overall. No neighborhood is "full," even if it is "full" according to current land-use designations, and, though I totally get it, it is laughable to me that homeowners frequently tout that where they bought should always be what it was when they did.* I have benefited from where I live shifting and evolving; it is a privilege to say that change isn't a loss. More people should have that privilege, and fewer people should weaponize the law to hold onto the status quo, which is what causes so many to experience change as a loss.

The amendments to the Comp Plan go a long way to fixing that by simply allowing for *more* in the future. I am happy to pay more in taxes out of my \$65,000-a-year salary. But we've also developed D.C. with a scarcity mindset, and with a priority to protecting homeowners' wealth, that stems from our land-use regulations. Changing those regulations is free.

Of course, there's a great deal more work to do once this process is complete. I am grateful for your leadership on the Council on land use, but also glad to be represented by someone who works on concrete policies and funds that aren't actually influenced by the Comp Plan, such as rent control, ERAP, and DCHA reform.

Thank you,
Alex

*Please do whatever is in your power to build Bruce Monroe expeditiously. I remember when the old school was demolished and the temporary park installed. I also remember that it was never certain that it would be redeveloped into a school. The specious arguments around it are gaslighting me (we [reported](#) on this quite a bit when I was at *City Paper*) and driving me crazy.

P.S. This is a little less germane to all of the above, and is mostly for David, who I know is working on this directly: I want to emphasize the third GGWash ask, for an amendment to create better procedures around comprehensive planning. I am familiar with the current DC Code section on comprehensive planning. It's quite bad. It doesn't explain when comp planning should happen, how it works, and what people can expect when they get involved. My at-work argument for this ask is that, as a professional advocate, it is nearly impossible to hold agencies accountable, or organize people to hold agencies accountable, to standards that are nonsensical.

My personal argument for this is that I can't quit the Comp Plan if I wanted to, and a good amount of my social life—which I enjoy!—involves talking with my friends about how development in their neighborhood works. This is some of the most powerful, and most fun, "advocacy work" that I do: It normalizes land-use wonkery by making it personal and relevant. I want my friends to know what to expect when a big land-use planning process comes up, and, right now, the fact they they—high-information, highly educated people—struggle with that indicates to me that the process of planning needs better protocols if outreach around it, especially to people who *aren't* as privileged as we are, is expected to be more extensive.

--
Alex Baca
[REDACTED] | @alex Baca

--
Alex Baca
[REDACTED] | @alex Baca

Alex Baca <[REDACTED]> Tue, Dec 1, 2020 at 6:05 PM
To: [REDACTED]
[REDACTED] "White, Robert (Council)" <[REDACTED]>

Hi CMs Bonds, Grosso, Silverman, and White, and Nate, Heather, Maya, and Katie,

Please see below for my personal written testimony on the Comprehensive Plan to, in order of appearance, the chairman's office, and CM Nadeau's office.

I am sending this as Alex Baca, District resident in Ward 1 (not Alex Baca, Greater Greater Washington staffer). I did want you to have these, for your reference, before the record closes on Dec. 3. I've written you all from time to time about housing-related issues, and while it's my job to work on the Comp Plan, I also care a great deal about it personally.

Thank you, as always, for your time, and your commitment to making D.C. more affordable.

[Quoted text hidden]

Alex Baca <[REDACTED]> Tue, Dec 1, 2020 at 11:17 PM

To: Alex Baca <[REDACTED]>
Bcc: Aaron Landry <aaron@s4xton.com>, Julie Lawson <[REDACTED]>
[REDACTED] Brianne Eby <[REDACTED]> Alex Lopez
[REDACTED] Marc Tomik <[REDACTED]> Sabrina Valenti
[REDACTED] Christopher Mathews <[REDACTED]>
[REDACTED] patrick mcmahon <[REDACTED]> Anthony T.
Nigrelli" <[REDACTED]> Keith Ivey <[REDACTED]> regina arlotto
[REDACTED] Nick Sementelli
[REDACTED] JI Swiderski <[REDACTED]> Pat Walsh <[REDACTED]> Kate
Jentoft-Herr <[REDACTED]> Aimee Custis <[REDACTED]>
[REDACTED] Rudi Riet <[REDACTED]> Garrett Hennigan <[REDACTED]>
[REDACTED] Tony Goodman <[REDACTED]> Josh Kramer <[REDACTED]>
[REDACTED] Nathan Graham <[REDACTED]> Tucker Cholvin
[REDACTED] Jaime Fearer <[REDACTED]> Megan McCarty
[REDACTED] George Fagan
[REDACTED] Sanjida Rangwala <[REDACTED]>
Aaron Brown <[REDACTED]> Chris Slatt <[REDACTED]>
[REDACTED] Elaine Clisham <[REDACTED]>
[REDACTED] Jon Geeting <[REDACTED]>
[REDACTED] Jordan Schreiber <[REDACTED]> Samuel Sklar
[REDACTED] Jason H <[REDACTED]> Devin Brady
[REDACTED] Thomas <[REDACTED]> Dan Winston <[REDACTED]>
[REDACTED] Eve Zhurbinskiy <[REDACTED]> Josiah Stevenson <[REDACTED]>
Christina Znidarsic <[REDACTED]> Katherine Ahern <[REDACTED]>
[REDACTED] Jason Graber <[REDACTED]> Will Handsfield <[REDACTED]> Kerry M
[REDACTED] Benjamin Freed <[REDACTED]> Alan Zilberman
[REDACTED]

Hi friends,

I have worked on amendments to the 2006 Comprehensive Plan as, like, my job for over two years, and have been involved with it as a civically engaged gremlin since the process began in 2016. Changing language in the Comp Plan is one of the only ways to increase density, which is necessary to building more housing, in D.C., particularly in affluent areas.

The public-input period for amendments to the remaining chapters (the Framework was completed last October) is closing on Dec. 3. Many of you have already sent in comments, and it has brought me a lot of joy to see what you've said and also chat with you about it.

If you want to submit a comment, you can email [REDACTED] with the subject line "B23-736 Testimony" before 5 p.m. on Thursday. Please cc my work email address, [REDACTED] if you do! GWash has a [set of asks](#), which you can gank if you are in need of testimony content. They are:

- Pass Office of Planning's amendments, with which we fully agree, intact as soon as possible
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

You should also [sign our petition](#)! But, as always, the most powerful thing you can do is write an email in your own words. It's best to keep it brief, though I tend not to do so in my own emails, which you can see below—I'm forwarding what I sent to my councilmember, Brianne Nadeau, which I then forwarded to Chairman Mendelson with additional comments. Though GWash and I have the same opinions from time to time, there's a lot of things that I wanted to say as a resident.

Let me know if I can help at all.

<3,
ab

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

From: [Alex Baca](#)
To: [Koster, Julia \(Council\)](#); [Mendelson, Phil \(COUNCIL\)](#); [Committee of the Whole \(Council\)](#)
Subject: greater greater washington b23-763 testimony followup
Date: Thursday, November 12, 2020 5:36:27 PM

Hi Chairman Mendelson and Julia,

First, thank you both so much for your work today. The hearing went very smoothly—I think I watched all but about a half hour—and I'm very impressed it wrapped before 6 p.m.

I wanted to add some comments in clarification to my testimony today.

With regard to passing OP's amendments intact, I appreciated the opportunity to expand on what I cut from my testimony time, which is that we are highly supportive of more expansive amendments as long as they augment, not chip away at or fully reverse, what OP has proposed. Julia, I think I sent GGWash's asks in writing in September, but maybe I didn't! They are:

- Pass Office of Planning's amendments, with which we fully agree, intact by the end of 2020
- Support other amendments as long as they increase, not suppress, the construction of more housing citywide and especially in affluent neighborhoods; as long as amendments that further "upflum" are either maintained or expanded; and as long as they do not uphold the "protect" and "conserve" language prevalent in the 2006 land use element
- Add language to the bill text that creates better Comp Plan procedures and encourages OP to begin to rewrite the 2006 plan by 2022

We have about [170 signatures](#) on a petition in support of the above. I really don't want "pass OP's amendments intact" to be taken as in conflict with requests for amendments that are more expansive (such as Douglass Community Land Trust, Shiloh Baptist Church, Xi Omega AKA, and Howard University's requests for specific FLUM changes that would enable a greater density of uses—you, uh, really stacked them on that last panel!), or better clarify the Comp Plan's role in governing land uses (such as many of the education advocates who testified on charter school collocation, something that GGWash doesn't at all have a position on).

I do not at all expect the Council to pass any of OP's amendments without scrutinizing them. Our ask is not for the Council, or your office, to rubber-stamp OP's amendments. Rather, I hope the Council will use this as an opportunity to make the plan and the FLUM as supportive as possible of the things the District has identified as a priority—such as affordable housing, which either requires lots of public funding or lots of density so as to cross-subsidize units—until a full rewrite can happen. We *do* oppose asks asking for lesser density, and would not support amendments doing so.

Relatedly, I still don't fully understand what is a minor change versus a major change, and in the spirit of this being an amendment cycle rather than a full rewrite, I did not want to marshal people to ask for considerable interventions in the text. Therefore, "pass OP's amendments intact," with the above caveat of "as long as amendments are either maintained or expanded; and as long as they do not uphold the 'protect' and 'conserve' language prevalent in the 2006 land use element," is our ask.

With regard to the procedural reform that I mentioned, I am of course familiar with the

existing DC Code on comprehensive planning procedures. I don't think that they are very good. I absolutely understand that the Council cannot force the Mayor's office to do much when it comes to submitting anything on time, and GGWash is not asking for some kind of divine intervention. But, it is *way* easier to organize people around clear requirements, and, right now, even though we're an amendment cycle, some people think we're rewriting the Comp Plan, or that this is something that happens every five years.

Clear regulations on when the Comp Plan is rewritten and amended are really critical for members of the public, and the organizations who work on this stuff, to hold agencies like OP accountable. If accountability for DC agencies primarily happens through oversight, I hope that in the future, when I testify on that, and organize people around it, I can either affirm OP for doing its job well, or castigate it for drawing out the process, on the basis of clear procedures for comprehensive planning. That's not possible with the current code.

Please take this as a comment for the record! I will be sending more things your way before Dec. 3, including a summary and analysis of our petition and the comments and questions that have come my way.

Thank you,
Alex

--

Alex Baca
Housing Program Organizer
[REDACTED] / (410) [REDACTED] / she, they
[Join our neighborhood.](#)

November 12, 2020

Ellen McCarthy

Good morning, Chairman Mendelson and members of the Council. My name is Ellen McCarthy. I have been a resident of upper Northwest for more than 30 years, and have been a city planner for more than 40 years, including several years as Director or Deputy Director of the DC Office of Planning. I am a member of Ward 3 Vision, and the Housing Priorities Coalition, and, though I am not testifying for either of those groups, I would like to associate myself with their testimony and recommendations.

Let me cut to the chase, since 3 minutes is a very short time. I support OP's proposed Amendments to the Comprehensive Plan, and urge you and the Council to adopt the plan in this Council term, before the end of 2020.

Today I'd like to focus on two areas in my section of DC: upper Connecticut and Wisconsin Avenues.

1. Both arterials have substantial amounts of vacant or seriously underutilized land, which could accommodate substantial amounts of new housing, especially high to mid-rise, mixed-use multifamily residential buildings along the Avenues. Such new housing could provide street vitality, customers for retailers who are barely hanging on, and a chance to provide affordable units in a high-opportunity neighborhood with good transit, parks, libraries, schools and grocery stores, for our children and those who live in areas without access to such amenities.
2. The proposed Amendments to the Future Land Use Maps for both areas call for increased land use intensity, conditioned upon the completion of area plans which would guide any rezoning that would follow the adoption of the FLUM.
3. Such plans would address important concerns such as how to transition from potential higher-density, mixed-use, multifamily buildings along the Avenues to the lower density housing behind them and whether there is a need for increased infrastructure investment to accommodate new growth, including new public schools and recreation opportunities. Part of such a plan would be to identify tools to construct additional affordable housing, to increase access to these high opportunity neighborhoods. Councilmember Cheh specifically included funds in the OP budget to begin that planning work.
4. There is in fact already a proposal before the Zoning Commission to require that any increased density granted through an upzoning would require a substantial increase in the percentage of inclusionary zoning units to be provided. The small area plans could also identify community benefits or amenities desired by residents or meeting citywide

needs that could be provided by any developers who seek to increase density through planned unit developments.

5. A particularly dire situation is Friendship Heights. The area was a lively shopping district; now, former anchor Lord and Taylor has declared bankruptcy, Mazza Gallerie was sold at auction for \$38M to the firm which had lent its owner \$67M, Chevy Chase Pavilion has apparently unsuccessfully tried to reposition its vacant retail space as medical offices. Losses from real estate and sales taxes could easily top \$10M per year.
6. Although the current situation is bleak, Friendship Heights has great potential to reinvent itself as a major residential-based mixed use center, especially on the DC side, surrounded by walkable attractive and desirable places to live, work and be entertained. This model already exists on the Montgomery County side of the location. DC could have a reborn retail center with more than a thousand new residential units, a substantial percentage of which could be affordable, creating over \$2B of new development, and hundreds of new jobs.
7. To accomplish this, we need the proposed FLUM amendments to be adopted by the Council, with one change – WMATA needs to redevelop their bus garage, and the current location, occupying prime space along Wisconsin Avenue is not workable nor the best use of the site. WMATA submitted a request to OP to add a stripe for “Local Public Facilities” to the Lord and Taylor site on the FLUM, which OP has not included in the proposed amendments. Such a change in the FLUM would provide more flexibility to locate the bus garage to a more appropriate location.
8. The small area plan for the area should identify a location for a great neighborhood open space, along with residential, retail and potential office locations to create a vibrant, 24 hour neighborhood center, with a spot for the bus garage which will preserve our excellent transit access, but not adversely affect neighboring residents.
9. Ward 3 has less than 1% of the affordable housing units in the city. Adopt the Comp Plan amendments so we can do our share, and also reduce gentrification pressures on other city neighborhoods.

Additional observations:

1. It is clear that there is not an equitable distribution across the city of wealth, opportunity, social determinants of health, educational quality, personal security and other indicators of quality of life. There are substantial amounts of vacant or seriously underutilized land along upper Wisconsin and Connecticut Avenues. Professor Raj Chetty and the Opportunity Insights project at Harvard University have documented persuasively the importance of providing access to high opportunity neighborhoods in

improving the life prospects of low-income children and families. Areas like Chevy Chase DC and Tenleytown are those types of high opportunity neighborhoods.

2. A key element to achieving a more inclusive city is to improve the amount and distribution of affordable housing in high-opportunity neighborhoods, like upper Northwest.
3. The policies articulated in the Office of Planning's Comprehensive Plan amendments, particularly the proposed increases in land use intensity contained in the Future Land Use Maps, as conditioned in the Generalized Land Use Policy Maps, are essential for creating more high opportunity neighborhoods throughout the city. The Future Land Use Map (or FLUM) proposes increases in land use intensity along those corridors; however, the Comp Plan Policy Map which accompanies the FLUM indicates that both those corridors are "Planning Areas", meaning that, before any changes are made in the zoning to be consistent with the "up-FLUMming", there must be plans created which will address important concerns such as how to transition from potential higher-density, mixed-use, multifamily buildings along the Avenues to the lower density housing behind them and whether there is a need for increased infrastructure investment to accommodate new growth, including new public schools and recreation opportunities.
4. In particular, the FLUM changes, taken together with the recommendations for more detailed Planning Areas for upper Wisconsin and Connecticut Avenues, are not only appropriate, but totally necessary.
5. Various economic analyses of the outlook for small businesses, of the kind that make neighborhoods livable and desirable, are showing that the prospects are dim, partly due to the so-called "retail apocalypse" that began even before the pandemic, and particularly now that the impacts of the pandemic are being more widely felt. In my little stretch of Chevy Chase DC, there are at least 6 businesses which have closed recently. Bringing more residents to the corridor would provide additional customers and street vitality.
10. Friendship Heights provides a compelling opportunity to improve the city's financial condition, provide affordable, transit-accessible housing and create a great "place". Think about the amount of vacant and underutilized space: the so-called "Homeplate" lot between Mazza Gallerie and Lord & Taylor, the parking lot and rusty parking structure behind L&T, the huge surface lot immediately adjacent to the Jennifer Street Metro entrance currently used just to store buses. The former used car lot soon to be returned to vacancy when PEPCO finishes refurbishing its substation. No city can afford to waste such potential. What a contrast to the Maryland side of the boundary – tall apartment buildings with ground floor retail, a park and community center, office buildings providing daytime customers for the restaurants and shops, in addition to the residents.

Policy Map



Comprehensive Plan Policy

Future Planning Analysis Areas



Resilience Focus Areas



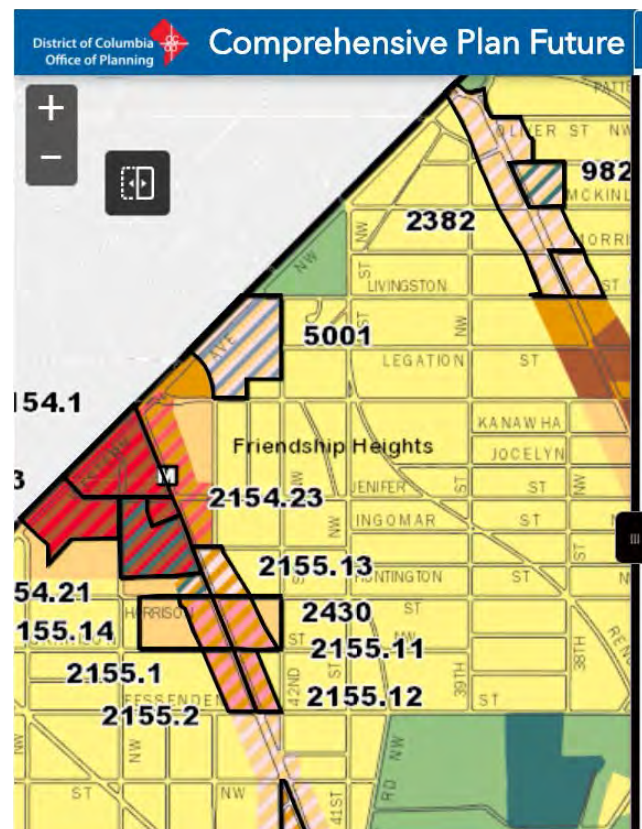
Enhanced/New Multi-Neighborhood Center



Enhanced/New Neighborhood Center



Future Land Use Map



**Committee of the Whole, Public Hearing on Bill 23-736,
the “Comprehensive Plan Amendment Act of 2020”**

Good morning, Chair Mendelson and members of the Committee. My name is Garrett Hennigan. I am speaking to you today as a public witness, a 7 year Ward 5 resident, and a lifelong Washingtonian. I am here to ask the Council to adopt the Office of Planning’s amendments, to support allowing greater housing density throughout DC, and to approve the Comp Plan by the end of 2020.

I love this city, its people, and its energy. It is exciting to see our population growing and Statehood closer than ever. But we cannot avoid the reality that DC’s prosperity is coming at a grave cost to Black communities, communities of color, and our most vulnerable residents who face rising housing costs, displacement, and rapid change in their neighborhoods. I firmly believe that OP’s amendments to the Comp Plan are critical tools to address these disparities in housing and economic opportunity.

Since you will hear from experts better equipped to talk details, I wanted to share a recent conversation. Last month, visiting with my parents outside their Chevy Chase DC home where my brother and I grew up, my mom was catching me up on neighborhood news. A house down the block recently finished a year-long rebuild and had an open house. This newly refurbished, 4 bedroom house on a small corner lot is advertised at a staggering \$1.65 million. An unimaginable price compared to what my upper middle class parents paid for their home in the 80’s.

She was shocked. Is this what it takes to move into this neighborhood now? How, she asked, could anyone but the most wealthy ever move here to take advantage of the neighborhood’s local schools, fantastic parks, reliable transit, grocery stores, and all the other opportunities that I had growing up there? They could not. I could not. Chevy Chase needs more housing options that people can afford. Without them, she said, the neighborhood and its demographics could never change.

Looking around, she was not worried about having more neighbors or larger buildings or any of the other objections people raise in opposition to density. Instead, she was struck by the brazen unfairness of our city’s housing policy that hoards resources and opportunity for the wealthy, then restricts those neighborhoods to the most expensive and inefficient kind of housing: single family homes. She would gladly accept a duplex next door to prevent displacement somewhere else.

This anecdote is playing out all over the city, making housing deeply unaffordable for most people in far too many neighborhoods and it is rapidly changing the demographics and culture of this city. The Council cannot afford to draw out this process. We need more housing at all affordability levels now, and this Comp Plan update is the tool to do it.

Please say yes to increasing housing options and making our city more equitable by passing the Comp Plan intact in 2020. Thank you.



Ward3Vision Support for the Comprehensive Plan Amendments

Ward3Vision is a group of residents who are working to make our neighborhoods even better urban places – more walkable, sustainable, and vibrant. We want a D.C. that grows in ways that are environmentally and socially responsible, positive, and equitable, enhancing our neighborhoods and the vitality of our commercial corridors.

Ward 3 Vision strongly urges the Council of the District of Columbia to swiftly adopt the update to the [Comprehensive Plan](#) as submitted by the Office of Planning (OP). After [four years of extensive public engagement](#) this update furthers the goals of equity, inclusiveness and sustainability in how growth in the District of Columbia will occur. These amendments allow for implementation of the goals set forth in the [Housing Framework For Equity and Growth](#) as well as the stated aims of both the [Council](#) and [Mayor](#) to address our current housing crisis by producing 1,990 affordable units in Rock Creek West by 2025.

Current Circumstances Create an Urgency to Proceed

The timely adoption of these measures is critically important to the District in this time of public health, economic crises and urgent demands for social justice, all of which call for swift action to meet our shared social equity goals. [Land use](#) is not the only driver of inequality, but it is such a significant one that gives urgency to the District's efforts to change its approach to land use in affluent areas, including Rock Creek West. These revisions will help guide the District on a sustainable and equitable path to recovery adjusting how and where the District should grow and increasing housing affordability and diversity in our high opportunity neighborhoods and mixed-use transit corridors. To accomplish these goals the Comprehensive Plan amendments include changes to the [Future Land Use Map](#) (FLUM), [Generalized Policy Map](#), [Rock Creek West Area Element](#) and [Housing Element](#) that are consistent with Ward3Vision's mission to create a more walkable, sustainable and vibrant community. The amendments will encourage new housing options for residents of Ward 3 and elsewhere. It will also create opportunities for more affordable housing, through mechanisms like Inclusionary Zoning (IZ).

The Comprehensive Plan¹ is a long-term document that not only addresses how the District will grow, but how it can become more resilient beyond any particular era or

economic cycle, as laid out in the [COVID-19 Crosswalk](#). The disparity in the impact of the pandemic on communities of color highlights the interrelationships between the social, economic, and housing elements of the plan and underscores the urgency of its implementation. The importance of the underlying principles -- equity, opportunity and prosperity -- are heightened by the pandemic. This crisis has disproportionately affected less prosperous sectors of the city. The inadequate housing stock, especially affordable housing, and resultant crowding in many neighborhoods is something that the Comprehensive Plan amendments begin to address.

The COVID 19 crisis thus makes it more important to proceed now with adopting the proposed changes to the Comprehensive Plan and is not an excuse for delay.² Such suggestions for inaction are merely calls for maintaining the *status quo*.

The Changes are Modest Reforms

The proposed changes to the FLUM and other parts of the Comprehensive Plan in the Rock Creek West area element are modest reforms and far from radical revisions. They are nonetheless significant, creating higher intensity land use in Ward 3 at Metro and along transit and commercial corridors including Wisconsin, Connecticut and Massachusetts Avenues. These changes to the FLUM support modest increases in Residential and Commercial density in Woodley Park, Cleveland Park, Van Ness and Tenleytown. At Friendship Heights the changes better match land use on the Maryland side, allowing flexibility for redevelopment of the Friendship Heights bus garage. All these changes support the location of jobs and new homes near transit.

Other changes support higher intensity mixed use designations along neighborhood retail corridors such as Cathedral Commons, the Spring Valley Shopping Center, Chevy Chase and Forest Hills along Connecticut Avenue, all adjacent to bus lines that provide frequent service.³ These changes could allow for a significant number of new homes and increased housing options mixed with commercial space to be built in some of the most [exclusive and affluent areas](#) in the District. Notably, this potential development in Ward 3 can occur with little if any displacement of low-cost housing.

¹ We also urge that, in the future, comprehensive planning efforts should be done at regularly scheduled intervals that are legally prescribed, incorporating new data and continuing to guide development in a

² See, [Letter from Committee of 100](#) to Chairman Mendelson and the DC Council, May 15, 2020. ³ Chevy Chase with L1/2 & E4/6, Forest Hills L1/L2 & M4, Wisconsin Ave 30N+S/31/33/96/H4, Mass Ave with N4/6 and the AU Shuttle.

Given the changing face of retail, many shops have suffered economically and will only thrive if there is sufficient foot-traffic from an increased number of local residents. Greater diversity of residents (age, income, race) will also support a more varied choice of commercial establishments adding vibrancy to our neighborhoods.

timely manner. This should include well defined parameters to start and end dates for comprehensive rewrites of both the Comprehensive Plan and Zoning Code as well as a time limit for legislative approval. The full list of amendments recommended for up-FLUMing can be viewed on this [interactive map](#) and further comments on individual proposals can be found in the [Appendix](#).

The [Generalized Policy Map](#) reinforces that the revisions are modest changes to land use designations with only two amendments within Rock Creek West, one on land owned by Howard University Law School and the other at the Lisner-Louise-Dickson-Hurt Home.³ Almost all the other proposed changes for Rock Creek West are slated to occur on the 13% of land already zoned for multi-family housing. Only two minor modifications to Residential Low Density designations in Rock Creek West are proposed and they are now covered by surface parking and unimproved land between Garrison and Harrison Streets within a block of Wisconsin Ave.

The Rock Creek West Area Element Needs to be Updated

Ward3Vision lauds the proposed changes to the [Rock Creek West Area Element](#) that strips much of the exclusionary language from existing Comprehensive Plan and highlights the racial, social, and economic inequities that are reflected in income and home prices. We believe that the proposed changes to the Comprehensive Plan, Zoning, and Housing Policies will start to resolve these entrenched problems.

We would welcome more technical fixes throughout the document, particularly regarding the details of affordable housing, bicycle and pedestrian improvements, deemphasizing “Level of Service” for vehicular traffic and highlighting the struggles that local businesses face.

³ Exceptions to this are two Institutional Land Use changes for Howard University with amendment 2352 & amendment 9969 at the Lisner Home that facilitate the expansion of residential density at the Howard site and a small increase in commercial uses at the Lisner site.

While we do not agree with all of the assertions in this portion of the document, it is a major improvement over previous iterations and should be approved, so that it can be implemented.

Update of the Housing Element Is Particularly Important

Ward3Vision supports the update to the [Housing Element](#) of the Comprehensive Plan which describes the importance of housing to neighborhood quality and the importance of increasing housing opportunities for all segments of the population throughout DC.

The District remains attractive to higher-income households, so there is a low inventory of homes which puts upward pressure on rents and home prices, resulting in a greater number of lower-income households facing rising housing costs. Ward3Vision believes greater public action is needed to fulfill the vision of an equitable and inclusive District. In

order to meet the demand for a wide range of housing types, it will be critical to increase the overall production of both market rate and affordable housing to take pressure off the limited supply of existing housing and serve a greater range of household incomes.

In addition to the policies outlined in the Housing Element, Ward3Vision supports many of the proposals laid out in OP's ["Single Family Zoning"](#) report, especially the use of the "gentle density" design approach to create "missing middle" development in residential zones. A crucial first step in the process is for the Council to approve OP's amendments to the Comprehensive Plan which designate a targeted increase in the allowable density in Rock Creek West.

Recommendations in Housing Element Applicable to Rock Creek West

The addition of housing in Ward 3 has the potential to provide more affordable housing as well as market rate. To build out to the additional densities proposed will likely require the full menu of the District's land use tools (especially expanded IZ⁴ and both federal and local funding) to achieve the goal of producing 1,990 units of additional affordable housing in Rock Creek West by 2025.

Ward3Vision would like to highlight several policies in the Housing Element as important to implementing these goals:

⁴ Ward3Vision also conceptually supports the ["Inclusionary Zoning Plus"](#) proposal from OP that is being advanced as a way to encourage a significantly more development of affordable housing in Rock Creek West.

- Production incentives (Policy H-1.1.2) encourage regulatory and tax incentives that promote housing production, with an emphasis on high-cost areas (H-1.1.8) for both market rate and affordable housing with “innovative tools and techniques”.
- Housing Affordability of Public-Owned Sites (H-1.2.1) could be used to great effect in Rock Creek West on publicly owned sites in Tenleytown and Chevy Chase, as well as at UDC or the many other sites owned by DC government in Rock Creek West. We believe publicly owned property such as the Chevy Chase Community Center and Library should be studied for co-development opportunities that would produce significant amounts of affordable housing as well as enhanced community amenity.
- Policy H-1.2.7 encourages zoning incentives through density bonuses for market rate developers to provide a “substantial amount of affordable housing above and beyond any underlying requirement”.
- Action H-1.2.E which calls for greater Inclusionary Zoning (IZ) requirements when “zoning actions” permit more density. We believe that any upzoning consistent with upFLUMing in the Comp Plan revisions be subject to enhanced Inclusionary

Zoning (IZ) requirements to maximize the provision of affordable units and provide for an equitable benefit from public action.

- Action H-1.2.H, which prioritizes incentives and financing tools in areas lacking affordable housing (less than 15% of housing stock) in accordance with goals to affirmatively further Fair Housing.
- Action H-1.3.A, which focuses on production and retention of larger units in multifamily housing, and
- Action H-1.5.D, which supports the study of whether recent changes already made to zoning are enough to support ADU construction. ADUs can produce moderately priced units in single-family and duplex areas of Rock Creek West.

Conclusion

While not perfect, we believe that these amendments to the Comprehensive Plan are a critical step in the right direction for DC as a whole and Ward 3 in particular. OP’s amendments propose the first loosening of exclusionary land use restrictions of significant scale in Rock Creek West since the [introduction of zoning](#) in the District of Columbia.⁵ They advance walkability and sustainability by allowing more transit-oriented

⁵ As Richard Rothstein documents in *The Color of Law*, segregation was not *de facto* -- the result of chance

development. They chip away at the exclusionary zoning regime that has made Rock Creek West neighborhoods the most expensive in the District, and in turn, [exacerbated income and racial segregation](#) citywide. The comprehensive plan amendments provide an excellent foundation for the beginning of changes needed to make the city more affordable and equitable.⁶

For these reasons, we implore the Council to move this legislation forward without delay.

Appendix: Support of FLUM Proposed Changes

Cleveland Park: Amendment 2123

The Office of Planning has proposed an increase to the density of the Cleveland Park commercial strip on Connecticut Avenue. The current FLUM designation is Low Density Commercial and is zoned NC-3 for low density mixed use. The proposed new FLUM designation is mixed Moderate Density Commercial/High Density Residential. The zone contains five moderate density historic apartment buildings, but single-story commercial is the predominant building type. The zone is immediately surrounded by varying levels of residential density: low, moderate, medium and high, and the surrounding zones include R-1-A, R-1-B, R-2, RA-1, RA-2, RA-4, and R-5-A (PUD). Adjacent to the area are tall residential buildings such as the Broadmoor and Kennedy-Warren (each 9 stories), Woodley Park Towers (7 stories), and Quebec House (13 stories).

or income stratification – but rather was *de jure* – brought about by policies, regulations, and laws at the state and federal level which intentionally segregated society by race and provided fewer amenities to communities of color. DC has its own history of zoning, Model Cities, and other programs which wiped out black neighborhoods, such as the original Reno (now part of Tenleytown), and created white enclaves.

⁶ Other DC ordinances and regulations will need to be built on this foundation to reach the goals of providing more affordable housing and breaking down barriers to enable racial integration. These include, but not limited to: further expansion of the IZ regulations, voucher programs, rent control rules, single-family zoning legislation, and affordable housing financing programs (including the Housing Production Trust Fund and federal low-income housing tax credits).

The area is a prime candidate for new housing as it sits atop the Cleveland Park Metro station and is served by both north/south and east/west bus lines. It is walkable to shops and services, restaurants, the post office, schools, parks, and the branch library. To both the east and west, the area is buffered by alleys and parking lots, and to the north and south by streets, across which lie higher density zones.

Woodley Park: Amendment 9822 + Wardman Park Marriott Site

The Office of Planning has proposed an increase to the density of the Woodley park commercial strip on Connecticut Avenue and Calvert Street (Amendment 9822). The current FLUM designation is Low Density Commercial and is zoned NC-4 and NC-5 for low density mixed use. The proposed new FLUM designation is mixed Low Density Commercial/High Density Residential. The zone contains just a smattering of residential units, with the predominant building type low density commercial. The area is immediately surrounded by varying levels of residential density including the RF-1, RA-2 and RA-4 zones. Adjacent to the area are taller residential and hotel buildings including the Omni Shoreham, the Wardman Marriott and seven and nine story apartment buildings.

The area is well suited for more mixed-use density as it includes the Woodley Park Metro station and is served by north/south and east/west bus lines and connects bike lanes from the northwest to downtown. It is walkable to shops and services, restaurants, schools, parks and downtown. The area is buffered from adjacent zones by alleys and streets. While not included in OP's recommendations, we believe adding Low Density Commercial striping to the High Density Residential area that covers the Wardman Park Marriott site on the FLUM would be an improvement. Any future residential development here would be enhanced by the inclusion of neighborhood serving first-floor retail that could allow for a grocery store, for example, which Woodley Park does not have.

Van Ness and Connecticut Ave.

The Future Land Use Map (FLUM) recommendations from OP would allow more housing along the Connecticut Avenue corridor at several locations. The addition of housing in these areas as described below also offer the potential for more affordable housing as well. The additional densities called for may allow for the full menu of the City's land use tools, such as Inclusionary Zoning (IZ) and finance tools such as the Housing Production Trust Fund (HPTF), to be used. The areas recommended for up-FLUMing include the following (see FLUM map for details: <https://plandc.dc.gov/page/future-land-use-mapand-generalized-policy-map>)

Van Ness (2352.1, 2352.2, 180 and 1690). This area is also on both sides of Connecticut Avenue from approximately Upton Street north to Albemarle. A significant portion of the land is related to Howard University (east of Connecticut Ave and south of UDC) and UDC (mostly on the west side of Connecticut Ave) and the remainder of Connecticut Avenue up to Albemarle. Land use changes add residential uses at Low, Medium and High densities.

Forest Hills (5013). This area is also on both sides of Connecticut Avenue from 36th Street to Nebraska Avenue. Land use changes from Commercial Low Density to Commercial Medium Density and Residential Medium Density.

Chevy Chase (2238, 2382 and 9821). This area runs on both sides of Connecticut Avenue from Livingston Street to Chevy Chase Circle and includes the Public Library & Community Center. Land use changes include adding residential uses of Moderate densities

Each of these areas could provide both more housing and affordable housing, especially if developments come in at a scale to use the full range of the city's land use and finance tools.

Amendment 26: 5000 & 5100 blocks of Connecticut Ave. (between Fessenden and Nebraska):

Increased FLUM density designation from moderate or low to medium residential and commercial. The height that this change would allow is consistent with existing apartment buildings in the adjoining blocks. This area is on a major commercial and transit corridor, with bus service, a bike share station, and within walking distance to two metro stations. It has the potential to accommodate additional needed housing, including multi-family housing that would offer more housing options. Such development would support existing and added retail and restaurants. This will benefit the neighborhood, making it more vibrant and walkable. Currently, there are three gas stations located there and several empty commercial spaces. We believe that changing the FLUM in this manner will encourage better and more diverse commercial use of this area.

Wisconsin Avenue: Macomb to Upton

The amendments covering Cathedral Commons and McLean Gardens/City Ridge codify what has occurred and provide for infill density. Therefore:

Ward 3 Vision supports FLUM amendment 2803 which increases the density at the Cathedral Commons area from low density commercial to medium density residential and moderate density commercial. This amendment recognizes the changes that have taken place over the past decade and provides an opportunity for still more infill development at the site over time. Since the Cathedral Commons development has reinvigorated the Cleveland Park-Wisconsin Avenue commercial district and provided some mixed-use residential development, Ward 3 Vision agrees with this change on a well-served bus corridor that will allow further solidification of the area as a retail/commercial hub in its community.

Likewise Ward 3 Vision supports FLUM amendment 9814 which will achieve a similar purpose, building upon the initial City Ridge and McLean Gardens developments and ensuring further opportunities for new residents to live in the area. It changes the land use designation from moderate density residential to medium density residential and moderate density commercial.

Wisconsin Avenue: Upton to Western

Ward3Vision supports the proposed amendments to the FLUM to increase the density along Wisconsin Ave in the blocks immediately to the north and south of the Tenleytown metro stop. For the most part, the area is currently commercial uses (both retail and office with some residential flats above), institutional (AU Law School), public facilities (library, middle and high schools), religious and parkland with a large condominium building constructed above a historic commercial structure (Cityline Condominiums). We concur with all the FLUM recommendations put forth in the February 2020 [resolution by ANC 3E](#), yet do not make the amendments contingent on production of a small area plan. In addition, we support OP's amendment regarding parcels to the south of Tenley Circle, tracking #'s 2795 and 9823, to be mixed use commercial medium density and residential high density. Although not proposed earlier, we also support up-FLUMming the site of St. Anne's school to be medium density residential.

This concentration of development along the transit corridor is an ideal setting for increased density of both residential and commercial construction because it is already buffered from small-scaled single-family dwelling. In particular, the east side of Wisconsin between Albemarle and Brandywine has been designated as both commercial and residential high density which we concur is appropriate for the above stated reasons. We appreciate the designation of the entire Wisconsin Ave. corridor from Western Ave. to Massachusetts Ave. as a "Future Planning Analysis Area." We believe a more detailed analysis of potential land use and associated zoning categories would provide greater confidence for significant redevelopment of larger areas.



Hearing on the Comprehensive Plan (B23-736)

Thursday, November 12, 2020

Good morning Chairman Mendelson and Council members—

My name is Susan Kimmel and I am the chair of the Ward3Vision Steering Committee. We support smart growth, including walkable and inclusive neighborhoods. I want to voice our support of the proposed legislation to amend the Comprehensive Plan for the first time since 2011 and urge the Council to take swift action and vote it into law before the end of the year. The current pandemic increased the urgency because it has shown a spotlight on the inequalities across the city and we as residents of Ward 3 support the Comprehensive Plan amendments which will begin to redress exclusionary zoning and provide more affordable housing.

As Chairman Mendelson pointed out in a recent meeting, the Comprehensive Plan is aspirational. It paints a picture of how we want to see the city grow over the next 20 years. The proposed legislation includes hundreds of pages and multitudes of provisions but the main themes are clear: We want a city that is more inclusive, equitable, affordable, walkable, with community amenities; we want a city that is environmentally sustainable, and resilient to natural or man-made disasters including public health pandemics. The Office of Planning has done a terrific job proposing measures which advance these goals District-wide.

I would like to concentrate on land use, equity and affordable housing. Article after article point out that exclusionary zoning and other land use restrictions (such as historic preservation) drive up housing prices and rents. San Francisco is the poster child of exclusionary practices leading to extreme housing shortages, homelessness, exorbitant housing costs forcing outward migration and consequently longer commutes, more sprawl and environmental degradation. By contrast, Minneapolis and Portland have recently implemented more inclusionary zoning which allows up to three units to be located on land that had previously been zoned exclusively for single-family. There are lessons to be learned from each example.

The Office of Planning has taken a very wise middle course by recommending changes to the Future Land-Use Map which would allow parcels along major transit corridors to

be rezoned for higher density. As the Chairman has pointed out, this is not a mandate – there is no obligation to rezone. This is not self-actualizing – the rezoning doesn’t happen automatically; each site would require approval by the Zoning Commission. But it is legally binding -- zoning cannot be inconsistent with the Comprehensive Plan and more specifically the land use designation in the FLUM. More intense development will enable better use of scarce urban space for more housing and more residents are needed to support more and better retail and other amenities. It is worth noting that OP’s proposal for Expanded Inclusionary Zoning will capture much of the increase in value from upzoning by requiring higher levels of affordable housing than would otherwise be required.

Ward3Vision applauds OP for lowering the walls of exclusionary zoning in Rock Creek West. By enabling modest increases in allowable density for residential use, more housing can be constructed along transit corridors. This increase in the housing supply will, over time, help reduce the upward pressure on rents throughout the District. And with inclusionary zoning requirements, it will enable the construction of more affordable housing. Expanded IZ will enable an even greater number -- up to 20% of the units.

Though we recognize that IZ units alone will not solve the affordable housing crisis, it is a beginning. Other programs, such as use of city-owned land, are additional tools proposed in the comp plan. Even then, the Comp Plan changes are necessary. For example, the proposed changes to the FLUM are needed to support an imaginative co-development of the Chevy Chase DC Community Center and Library with new affordable housing. But this is a chance to chip away at historic barriers and bring about change.

I don’t want to harp on them, but there have been several missed opportunities along Wisconsin Ave.: mixed use of the Tenleytown library site with residential above and shared public facilities with Janney elementary school; Georgetown Day School’s proposed mixed-use building between Davenport and 42nd St.; and a proposal for a modest, new residential building to replace the existing Fox News building. If the proposed FLUM had been in place, each of these sites would provide even more housing choices for singles and families, as well as contributing to the vitality of one of the Main Streets that make the District so livable and attractive in the first place..

Several years ago, when Ward3Vision conducted a charrette of the Tenleytown Metro station area, residents envisioned re-development of the block where the Whole Foods is located and imagined more homes mixed with shops and restaurants, perhaps some offices, and even recreational uses such as a skating rink. Charrette participants – our neighbors -- noted that the buffer provided by the schools and Fort Reno parkland, and the area’s role as a transportation hub, provided the opportunity for a much more exciting and vibrant neighborhood center than what is there now. Let’s pass this amended plan now so this kind of urban life can thrive.

As you know, there are now a number of projects across the District that are on hold waiting for passage of the Comp Plan before they can move through the review process with the Zoning Commission). Other developers are holding back projects awaiting the Council's action on the Comp Plan. Continued uncertainty has had a chilling effect on the construction of more affordable housing. As we have learned from the past, delay leads to missed opportunities.

We appreciate the opportunity to testify and we understand that the Council is currently reviewing these proposed amendments, but it is important to note that OP has been through a thorough and impressively robust public engagement process. After over 4 years of discussion, hundreds of public meetings, thousands of amendments, and dialog with the ANC's, all the issues you are considering now have been vetted and for the most part endorsed by ANCs throughout the District. Public review and comment is baked into the amendments before you. Now is the time for action.

Ward3vision urges the Council to approve OP's proposed legislation immediately.

From: [Bob Ward](#)
To: [Committee of the Whole \(Council\)](#)
Cc: [Mendelson, Phil \(COUNCIL\)](#); [Bonds, Anita \(Council\)](#); [Grosso, David \(Council\)](#); [Silverman, Elissa \(Council\)](#); [White, Robert \(Council\)](#); [Cheh, Mary \(COUNCIL\)](#)
Subject: CPSG Comp Plan Testimony
Date: Tuesday, November 10, 2020 9:58:50 PM
Attachments: [CPSG FLUM Letter.pdf](#)

Dear Chairman Mendelson,

Attached is the written testimony from the Cleveland Park Smart Growth Steering Committee supporting the proposed amendments to the Comprehensive Plan, with special emphasis on FLUM Amendment 2123 in Cleveland Park and the Future Planning Analysis Areas in Rock Creek West. We urge swift passage of the Plan.

Respectfully,

Bob Ward, Chair
CPSG Steering Committee
cpsmartgrowth.com



CLEVELAND PARK
SMART GROWTH

November 10, 2020

The Honorable Phil Mendelson
Chairman, Council of the District of Columbia
1350 Pennsylvania Avenue, NW, Suite 504
Washington, DC 20004

Dear Chairman Mendelson:

The Steering Committee of Cleveland Park Smart Growth endorses the proposal by the Office of Planning to increase the density of the commercial area on Connecticut Avenue between Porter and Macomb Streets on the Future Land Use Map from Low Density Commercial to a mix of Moderate Density Commercial and High Density Residential (amendment 2123), and asks the Council to approve this change to the Comprehensive Plan.

Our steering committee also supports passing the amendments to the Generalized Policy Map creating two Future Planning Analysis Areas in the Rock Creek West Area along Wisconsin and Connecticut Avenues, especially where they include areas of Cleveland Park. We invite future focused planning to increase housing for a range of incomes along our transit corridors and to develop design guidelines, especially in the commercial area of our historic district, so that growth is both allowed and is architecturally compatible.

We have also reviewed the proposed Amendments to the Rock Creek West Element, the Housing Element, the Land Use Element, the Transportation Element and the Historic Preservation Element, and support the passage of these proposals. We believe the changes are forward-looking and envision growth that helps both the District and our area achieve key public policy goals while retaining protections for what we love about our city and neighborhood.

Last night we held an event for 92 area residents where we heard from Councilmember Cheh and representatives from the Office of Planning and the Historic Preservation Office. The meeting confirmed what many of us believed, which is this: wholesale maximum development of the commercial area in Cleveland Park is not likely given the constraints of our historic district. We should therefore allow the possibility of greater density and leave it to future plans from property owners and a robust community engagement to consider proposals that both add density and fit the context of the neighborhood's architecture.

There are many reasons why allowing the potential of high density residential and moderate density commercial in the Cleveland Park commercial area is a public policy we all should support. We have outlined several of these below.

Revitalization

A benefit that is self-evident is the positive **economic impact** a greater density of residents and daytime foot traffic at the commercial area would have. As noted in the submission of amendment 2123, “The density that would once have sustained a vibrant neighborhood-serving commercial corridor no longer carries the same economic throughput for our brick and mortar stores.” It was also noted that businesses that closed in 2017, like Ripple and NamViet, said that customer traffic to their stores was down substantially. Adding more customers is not a cure-all to the neighborhood’s retail slump. However, the opportunity for place-making and the new managed Main Street, coupled with the prospect of respectful development increase the potential for revitalization significantly.

Sustainability

High density boosts our efforts to combat **climate change**. Transportation is the single greatest contributor to carbon emissions in the United States. Adding housing virtually anywhere in D.C. for someone who works in D.C. or in nearby Metro-accessible areas, at any price point, is green. Living close to work, rather than in the suburbs, reduces vehicle miles traveled. Putting housing at a transit nexus like the Cleveland Park commercial area is *extremely green*. Locating housing where people can live car-free or car-lite is the best public policy, as people can walk to transit, shopping and entertainment.

Equity in Growth

There is an **equity** benefit in adding more housing here. Since 2000, growth in other parts of the city has added pressure of displacement on low-income residents. Adding housing in Cleveland Park, where the amenities of good schools, parks, libraries and shops are in walking distance, is an issue of equity. The plan to update the Inclusionary Zoning requirements would come into play in our neighborhood, as would the encouragement of PUDs and the prioritization of affordable housing outlined in the Framework Element. Ward 3, Cleveland Park included, has a history of exclusion and now has a responsibility to share in the growth of our inclusive city.

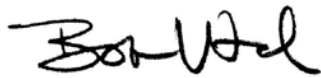
Design Review

The entirety of the commercial area is included in the Cleveland Park Historic District. That will continue to be the case if the change to the FLUM is approved by the Council. The DC Historic Preservation Act requires any substantial physical changes, be they alterations or additions to contributing resources, or infill development, be reviewed by the Historic Preservation Review Board for design compatibility with the commercial area of the historic district. Developments proposed in 2019 at 3432 and 3400 Connecticut Ave are among the first significant commercial

area changes since the historic district was formed over thirty years ago. Both were subjected to review and revision by the Historic Preservation office and HPRB, as would any future development.

For these reasons, we respectfully ask that the council approve the Mayor's proposed amendments to the Comprehensive Plan as quickly as possible. We are happy to discuss this with you and any Council Member or staff. Thank you for what you do for our City!

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Ward", with a stylized, cursive script.

Bob Ward
Chair, Steering Committee, CPSG

cc: Hon. Mary Cheh
Hon. Anita Bonds
Hon. David Grosso
Hon. Elissa Silverman
Hon. Robert White, Jr.

About CPSG

Cleveland Park Smart Growth is a community association of over 500 Cleveland Park area residents who share an interest in promoting, sharing and discussing urbanist and smart growth issues in Washington D.C. with an emphasis on Cleveland Park. Our mission is to advance policies in Cleveland Park to ensure an economically vibrant, environmentally sustainable, walkable and socially inclusive neighborhood. We do this through educating, organizing and advocating. Learn more at cpsmartgrowth.com.

From: [Bob Ward](#)
To: [Committee of the Whole \(Council\)](#)
Cc: [Mendelson, Phil \(COUNCIL\)](#); [Bonds, Anita \(Council\)](#); [Grosso, David \(Council\)](#); [Silverman, Elissa \(Council\)](#); [White, Robert \(Council\)](#); [Cheh, Mary \(COUNCIL\)](#); [REDACTED]
Subject: Re: CPSG Comp Plan Testimony
Date: Thursday, November 12, 2020 10:49:44 PM

Chairman Mendelson and Members of the Council,

I would like to respond to comments made by Commissioner Nancy MacWood (ANC 3C09) at today's hearing. In her testimony, commenting on the proposed changes to the FLUM at the Cleveland Park Metro (#2123), which would change the FLUM from Low Density Commercial to a mix of Moderate Density Commercial and High Density Residential, Commissioner MacWood stated, *"I can't find any other low density area where this dramatic change is proposed. No other metro station area is proposed to jump three density levels, in fact, I can't find any that would increase more than one level. The only metro station area outside of downtown where high density is proposed is at Ward 5's Rhode Island Metro Station, which is surrounded by industrial land, and is already designated for medium density."*

These statements are not accurate. Every Metro station in Ward 3 is proposed to be striped High Density Residential, including both which are located within ANC 3C.

In addition to the Cleveland Park Metro, there is a FLUM change at the Woodley Park Metro (#9822) that adds High Density Residential to Low Density Commercial.

Just up Connecticut Avenue at the Van Ness Metro Station (#180), High Density Residential is being added to Moderate Density Commercial.

At the Tenleytown Metro (#2155.9 and #9976) and the Friendship Heights Metro (#2154.1, #2154.21, #2154.3), High Density Residential is being added.

Commissioner MacWood also raises concern about the changing of the type of commercial area Cleveland Park would now be considered, saying, *"The Office of Planning has also changed the designation of the Connecticut Avenue commercial area in Cleveland Park from Neighborhood Serving Area to a Main Street Area. The former designation describes the small town, neighborhood serving character of the area."*

The Framework Element, which Council approved last year, made that change in commercial area nomenclature. 'Main Street Mixed Use Areas' are the most local of the five named commercial area types.

Commissioner MacWood has had since October 15, 2019 to offer a resolution at her ANC to bring these concerns to the residents and a vote among her fellow commissioners. Thirty-four of the forty ANCs in the District provided comments on the Plan proposals in the extended time period allotted by OP last winter, including all other ANCs in Ward 3. ANC 3C remained silent then and has remained silent since, with no resolutions offered or considered by the Commission or by the 3C Planning & Zoning Committee which Commissioner MacWood chairs. At minimum, that process would have at least sorted out the facts.

There is broad public support for these changes in Cleveland Park, especially among the

people who live in the buildings along and just off Connecticut Avenue. ANC 3F, where many residents in its southern SMDs use the Cleveland Park commercial area as their primary shopping destinations, passed a resolution in support of FLUM Amendment 2123.

As I noted in my testimony this morning, I ask that you approve the Plan, especially as it relates to the FLUM changes in Ward 3 and specifically FLUM Amendment 2123.

Thank you,

Bob Ward, Chair
Cleveland Park Smart Growth Steering Committee

On Tue, Nov 10, 2020 at 9:58 PM Bob Ward <[REDACTED]> wrote:

>

> Dear Chairman Mendelson,

>

> Attached is the written testimony from the Cleveland Park Smart Growth Steering Committee supporting the proposed amendments to the Comprehensive Plan, with special emphasis on FLUM Amendment 2123 in Cleveland Park and the Future Planning Analysis Areas in Rock Creek West. We urge swift passage of the Plan.

>

> Respectfully,

>

> Bob Ward, Chair

> CPSG Steering Committee

> cpsmartgrowth.com

Name: Corey Holman, ANC Commissioner 6B06
Bill: Bill B23-736, Comprehensive Plan Amendment Act of 2020
Date: November 12, 2020

Good morning Chairperson Mendelson and _____.

My name is Corey Holman, commissioner for SMD 6B06 and chair of ANC 6B's Planning and Zoning Committee. Though I am speaking as an individual today and my spoken and written testimony does not officially reflect the views of individual commissioners, I will note that ANC 6B submitted a formal resolution requesting passage of Bill B23-736 this council period and supporting the text and map changes made that directly impact our ANC.

For the last three-plus years, ANC 6B has participated in the process that has led to today. Commissioners and neighbors have spent untold hours discussing the current plan, suggesting changes, reviewing OP feedback, and on and on and on. In February, ANC 6B submitted our final comments to OP. Some of our suggested text and map changes were rejected. Some were accepted. All were addressed by OP both in writing and in followup meetings. Never before have I seen the amount and earnestness of opportunity given by an executive agency. This bill is ready and has been ready to move forward and I encourage you to markup and pass it as soon as possible.

I'll point out a couple of smaller items in my SMD that could be affected by unnecessary delay in adoption of this bill

- 1) The bill changes the FLUM and GPM for the "temporary" Southeast Boulevard stub. In next year's capital budget, DDOT is planning to include a request to spend federal highway dollars to widen this temporary road. We will of course oppose this funding and encourage you to as well, but it's important that opposition is based on inconsistency with the guiding land use document for the city as well as transportation and environmental guidance.
- 2) At some point soon, the City Administrator will advance a plan to move the MPD heliport next to Boathouse Row in my SMD. There is PDR-zoned land nearby there that is proposed to be changed to high density residential FLUM. And adjacent to that is a just approved PUD that desperately needed design guidelines from OP. The Comp Plan seeks to stop this haphazard planning and land use, including the area as a Planning Focus Area in the GPM.

Thank you and your and Council staff for creating these opportunities for discussion. You will hear a lot today and tomorrow. I wanted to make you aware of our experiences as an ANC through this process and stress that the Comp Plan changes affect not just zoning in Ward 3, but the entire city in ways large and small.

"We have to keep moving forward." Campaigning a couple years ago for ANC Commissioner, back when it was safe to mingle with new people, I remember speaking with someone who'd grown up on U Street. I only moved to the neighborhood in 2011. In just a few years, my beloved community had transformed -- many buildings towered over rowhouses; luxury apartments replaced a hot dog store. The process, I knew, had been ongoing for decades before I arrived.

I asked my neighbor, who'd been around for so many ups and downs, what she thought of all the change. Some called it gentrification. I won't forget her response: "We have to keep moving forward."

And that, I believe, is what we are called to do today. As we revise the District's Comprehensive Plan, we have a once-in-a-decade opportunity to decide how we will keep moving forward.

We must move forward to even greater inclusion, sustainability, and opportunity for all.

As ANC Commissioner, I am privileged to represent the area around 14th and U St NW. I truly believe that it is our nation's greatest neighborhood. I think most residents of DC would make the same claim. We live in a great city. People want to be here. But that means we must plan intentionally for the future we want to create.

I chaired ANC 1B's Comprehensive Plan Task Force, and we submitted detailed comments. Thank you for taking them into consideration. I am here today, not representing the Commission, to emphasize a simple point: we should pass the Comp. Plan with the Office of Planning's amendments intact.

In speaking with dozens of community members, across many public meetings we hosted, I heard many views. One thing I didn't hear was, we shouldn't revise this document -- or we should just hope things remain exactly as they are.

Perhaps that's because some of the city's most wonderful projects are right in my neighborhood. Portner Flats integrates affordable and market-rate housing along U Street. The renovated Grimke School will house an expanded African-American Civil War Museum, anchoring the cultural corridor envisioned by the Duke Plan.

The Comp. Plan must enable more of these projects, everywhere. It's a statement of principle: neighborhoods that have seen limited new development should grow, increasing in density to welcome new residents and businesses. We can't allow some neighborhoods to be "preserved" while others are the sole recipient of an international influx of capital. That approach risks destroying what makes our communities so great in the first place. And it impacts longtime District residents the most.

Let's invert our priorities. Focus on preserving and creating affordable housing. Grow our city - but especially in the wealthiest areas.

There will be ample opportunities for future public engagement, on individual projects. But we can leave that for the future. Now is the time to heed my neighbor's words. Keep moving DC forward. With OP's amendments, we will move towards the vibrant and inclusive future that our city deserves.


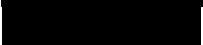
From: [Adam Kent](#)
To: [Committee of the Whole \(Council\)](#)
Subject: LISC Testimony for B23-736 Comprehensive Plan
Date: Wednesday, November 11, 2020 12:09:35 PM
Attachments: [Comprehensive Plan Amendment Act of 2020 LISC Testimony Nov2020.pdf](#)

Hi-

Please see LISC's testimony for tomorrow's hearing attached.

Thanks,
Adam

Adam Kent, Deputy Director
LISC DC | Local Initiatives Support Corporation

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@LISC_DC
www.lisc.org/dc

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Committee of the Whole
Bill B23-736 – Comprehensive Plan Amendment Act of 2020
November 12, 2020

Adam Kent
Local Initiatives Support Corporation
1825 K Street NW, Suite 1100
Washington, DC 20006



Dear Chairman Mendelson, Members of the Committee, and Staff of the Committee:

My name is Adam Kent and I am a Ward 1 resident and the Deputy Director of the DC office of the Local Initiatives Support Corporation (LISC). **I am here today to urge the Council to approve and enact the Comprehensive Plan Amendment Act in 2020.**

LISC is a national community development organization, with a flagship office in DC. Established in 1982, LISC works every day to help create healthy and resilient DC neighborhoods that are good places for low-and moderate-income families to live, work, raise children, and conduct business.

During our nearly 40 years in DC, we have seen our city change dramatically, going from a city beset by population loss and disinvestment to one that has become one of the most desirable places to live, with the growth to match. In some very meaningful ways, this change has benefited the residents living in some of the communities where we work: crime has dropped significantly; neighborhood parks, recreation centers, libraries, health clinics, and schools are new, frequently used, and state-of-the-art; commercial corridors are more vibrant.

However, over this same time period, we have witnessed an extreme loss in affordable housing, coupled with increased displacement pressures on many DC residents – particularly Black residents and residents of color, who have disproportionately borne the brunt of our city's inequitable growth. **We believe that this type of inequitable change is not inevitable.** It is, in part, a function of market forces acting within structures established by DC's current Comprehensive Plan.

To address these dramatic inequities, DC needs an updated Comprehensive Plan that accurately reflects our city's priorities for achieving greater racial equity and access to opportunity, housing affordability, public health, and resiliency. **We believe that the amendments considered by the Council today represent a critical step in that direction.**

The proposed amendments seek to combat the pernicious effects of past and current planning on Black and Brown residents that have contributed to dramatic wealth, health, and housing disparities we see today. The amendments make specific and long-overdue steps to address the legacy of redlining and racial segregation by prioritizing the expansion of housing opportunities to all areas of DC, while also elevating anti-displacement principles such as one-for-one replacement and build first. In addition, amendments throughout the various Elements of the Comprehensive Plan – from Land Use to Arts and Culture – specifically elevate policies and actions focused on more equitable outcomes.

The amendments presented by the Office of Planning represent four years of work where proposed changes were rigorously reviewed, refined, and improved upon by many DC residents with varying perspectives and needs. Because of this unprecedented level of engagement, this document does not contain many surprises. Instead, it honors and expands upon the Framework Element that the Council has already adopted.

We acknowledge and support the Council's desire to review and affirm that the amendments reflect the community's values and will achieve our priorities across the District. We are confident this can be done in a timely fashion because the community has done so much work for so long already to submit a Comprehensive Plan worthy of adoption.

We hope the Council will treat review and adoption of the Comprehensive Plan as it deserves – as a time-sensitive priority to help thousands of District residents, employers, nonprofits, and other stakeholders succeed and have more sustainable opportunities to live, work, and grow. The time is now to move forward with the Comprehensive Plan.

Thank you for the opportunity to testify.



CNHED

Coalition for Nonprofit Housing and Economic Development

**Testimony of Scott Bruton, Vice President, Housing Policy
Coalition for Nonprofit Housing and Economic Development**

Committee of the Whole

Public Hearing on

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Good morning Chairman Mendelson and members of the Committee. My name is Scott Bruton. I am the Vice President for Housing Policy at the Coalition for Nonprofit Housing and Economic Development (CNHED). The Coalition’s 170 member organizations fund, finance, produce, preserve, and provide affordable housing and neighborhood-based economic development in the District of Columbia.

I am testifying today in favor of the passage of the Comprehensive Plan Amendment Act of 2020 (B23-736).

CNHED is a member of the Housing Priorities Coalition. Our coalition comprises advocates, policy analysts, and affordable housing developers who believe the updated Comp Plan is integral to addressing racial inequities in the District and prioritizes housing, health, and economic equity in our plans for recovering from the worst public health crisis in the past 100 years. We encourage the Council to pass this bill as soon as possible.

The existing Comp Plan is outdated and does not provide the long-term vision we need to address the District’s significant racial disparities in housing, health, and economic opportunity. At the heart of the updated Comp Plan are provisions to increase housing options across the District, including creating more affordable homes in currently exclusive neighborhoods. The plan also includes policies and actions for COVID-19 response and recovery.

The Comp Plan update is a key step toward addressing a legacy of redlining, racial segregation, and other discriminatory practices that have led to today’s disparities in wealth, health outcomes, and housing security for so many residents of color. The District has significant shortfalls in housing affordable to households earning 50 percent of Median Family Income and below.¹ Severe housing cost burdens are faced by very-low income District households, who

¹ Doni Crawford, “Affordable Housing: All Residents, Especially Longtime Black and Brown Native DC Residents, Have a Safe and Affordable Place to Call Home.” (DC Fiscal Policy Institute. February 2020).



CNHED

Coalition for Nonprofit Housing and Economic Development

are most likely to represent communities of color. The Comp Plan sets affordable housing goals for each part of the District to expand options for where low-income households can choose to live, shop, go to school, and work. It provides clearer guidance to the Zoning Commission, in response to recent court decisions that have stalled needed new housing, and prioritizes affordable housing creation and preservation and the prevention of displacement of residents from their communities.

The Comp Plan update is a necessary precondition for producing more affordable housing, particularly in high opportunity areas. When paired with the Office of Planning's proposed changes to strengthen Inclusionary Zoning requirements for zoning map amendments, the Comp Plan update--particularly the revised Future Land Use Map and Generalized Policy Map--will add significant development capacity to these neighborhoods, thereby providing opportunities for creating both new primarily affordable housing projects, as well as primarily market-rate projects with significant affordable components. Without the update, and given existing restrictions in the Comp Plan maps, such projects will not be possible.

Beyond this critical bill, we are eager to work with the community, ANCs, other stakeholders, and you to fully revamp the Comp Plan beginning next year.

Thank you for the opportunity to testify.



**TESTIMONY SUBMITTED TO THE
DC COUNCIL: COMMITTEE OF THE WHOLE**

**Regarding B23-736
“Comprehensive Plan Amendment Act of 2020”**

November 12, 2020
via Virtual Platform

Submitted by Melissa Bondi
Mid-Atlantic State & Local Policy Director
Enterprise Community Partners

Chairman Mendelson and members of the Council:

Thank you for scheduling this hearing, and for the opportunity to provide testimony today. My name is Melissa Bondi, and I am the Mid-Atlantic State and Local Policy Director for Enterprise Community Partners.

As you may know, Enterprise brings together nationwide expertise, partners, policy leadership, and investment to multiply the impact of local affordable housing development. For more than 35 years, we have delivered the capital, developed the programs, and advocated for policies needed to create and preserve well-designed homes that people can afford in inclusive and connected communities.

In the District of Columbia, Enterprise has helped to create or preserve 14,000 homes, generating more than \$580M in tax revenue, and creating more than \$950M in wages for workers. We have invested more than \$780M in support, through Low-Income Housing Tax Credit and New Markets Tax Credit projects; the HUD Section 4 capacity building grants for community-serving nonprofit organizations, and many other Loan Fund, equity, and grant investments.

As a dynamic partner to the District, we are committed to the health and prosperity of all residents and neighborhoods, for the long haul. With these facts in mind, we respectfully submit these positions for your consideration today.

Enterprise recommends that the Council approve and enact the Comprehensive Plan Amendment Act as soon as the Council calendar allows.

We are just one of the participants in the Comp Plan public process over the past four years, who submitted collectively thousands of comments on various parts of the Plan. The Act reflects a diversity of viewpoints, while still reading as a far more unified blueprint than the 2006 version we operate under today. Because of this level of engagement and deliberation, this document does not contain many surprises.

The District's longtime core values remain intact. It is easy to trace the principles of the Framework elements the Council adopted last year within the chapters of the Act. Still, the Act is a landmark document, with a clear, modernized approach to planning and coordinating across policy priorities and chapters.

The 2006 version that still guides us today could not have foreseen some of our current conditions and needs. The Act can be a model for other communities that want to evolve systems while also reinforcing fundamental, equitable and people-centered values.

The Act meets our expectations in 2020 to be explicit and direct about the use of land use and planning tools to achieve meaningful, measurable progress toward racial equity, increasing housing affordability, and supporting an improved quality of life and sustainability for District residents. This is fundamental to our urging for its adoption as soon as possible.

In no category is this evolution more apparent than on the topic of racial equity. The proposed Comprehensive Plan is a fundamental part of the District's commitment to address its legacy of racial inequity. The Plan touches so many parts of our systems, investments, and intentions regarding the District's present and future paths.

The 2020 Act offers updated, superior value to the District compared to the 2006 version now in place. The Act acknowledges the consequences of past and current planning on Black and Brown residents, including:

- wealth disparities
- health outcomes
- housing insecurity

It works clearly and intentionally to reverse redlining, racial segregation, and other discriminatory practices. Further, the Act contains provisions to increase housing options across the District, including in geographic areas are rich in amenities, and have been historically deficient in providing new committed housing affordable units.

The Act establishes goals to provide more housing affordability for District residents in neighborhoods fully across the city. It addresses the need for substantially greater housing for residents making up to 50% MFI, and protections from displacement, through preservation and increased affordable housing supply.

We know that severe housing cost burdens remain reality for thousands of very-low income District households. We also know that these households are most likely to be Black, Latinx, and other non-white residents.

Data is clear on the impact of the coronavirus pandemic, which has disproportionately sickened and killed Black and Latinx residents, cost their jobs, and threatened or removed housing stability. The District needs the Plan to guide development of holistic and cross-cutting tools to address the city's planning response, its economic recovery, and building clear paths toward closing the gaps that perpetuate inequities in our systems under its purview.

We support the Council's desire to review and affirm that the Comp Plan reflects the community's values and will achieve our priorities across the District. We are confident this can be done in a timely fashion because so many members of the community have done so much work already to contribute to a Plan worthy of adoption.

We hope the Council will treat review and adoption of the Comp Plan as it deserves - as a time-sensitive priority to help thousands of District residents, employers, nonprofits, and other stakeholders succeed and have more sustainable opportunities to live, work, and grow. The time is now to move forward with the Comprehensive Plan, so it can guide our decisions, choices, and investments.

We look forward to working together with you and our partners to pursue the goals and to implement the provisions of the amended Comprehensive Plan as soon as possible, to support an even greater inclusive, equitable, and sustainable District of Columbia.

Should you have any questions, please contact:

Melissa Bondi, Mid-Atlantic State & Local Policy Director

[REDACTED]

[REDACTED] direct dial

Thank you again for the opportunity to share our views. On behalf of Enterprise Community Partners, we appreciate your consideration.



Written Testimony submitted by Stephanie Liotta-Atkinson
Executive Vice President, MidCity Financial Corporation

Submitted to the Committee of the Whole

Phil Mendelson, Chair

In Support of Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”



Dear Chair Mendelson, members of the Committee of the Whole, and staff:

I write to express my support for Bill 23-736, the “Comprehensive Plan Amendment Act of 2020.” I urge the Council to adopt the legislation, as submitted, in the 2020 Council period.

I am Executive Vice President of MidCity Financial Corporation. MidCity owns and develops multifamily housing in the Mid-Atlantic region, including 1,200 apartment units in the District of Columbia. A substantial portion of MidCity’s portfolio is affordable housing. MidCity also has three active development projects in the city that will ultimately deliver over 2,100 units of housing – a significant portion of which will be affordable units.

I commend the Office of Planning and the Mayor’s Office for the process they led to update the Comprehensive Plan, which involved extensive multi-year community feedback. Through this process, the legislation as submitted satisfies many important priorities, and provides agencies with important guidance around land use, housing, economic development, workforce development, environmental protection, historic preservation, transportation, and equity.

DC’s Economic Trajectory & Competitiveness

For all elements of the Comprehensive Plan, the Council should consider the effects on the District’s economic development trajectory and competitiveness within the region. The cost of regulations and policies that are enacted in a vacuum has consequences for the city’s real estate and job markets. Increased commercial property and transfer and recordation taxes, Universal Paid Leave, and the city’s far-reaching clean energy law all negatively influence growth and affordability. The District’s zoning and permitting processes are so bureaucratically complex and time consuming that it adds substantial cost to development, which is passed on to consumers.

Housing Chapter Comments

With respect to the Housing Chapter, it is important to again note that it is unnecessarily costly and difficult to develop housing in the District. This, in turn, makes the District one of the most expensive jurisdictions to buy or rent housing. The Comprehensive Plan can help the market meet housing demand and increase affordability by encouraging production incentives and reducing regulatory burdens.

As recommended by the DC Building Industry Association, the Council should insert a concept into the Comprehensive Plan (or through independent legislation) requiring a housing affordability impact statement prior to the passage or implementation of any new statute, regulation or policy. This “affordable housing impact statement” would assess the effect of a measure on the production of affordable housing, just as a fiscal impact statement is required for any Council legislation. In



this manner, the city can evaluate the impact of any proposal on the market's ability to produce and manage housing.

Subsection 503.4 of the Housing Chapter addresses production incentives. I recommend that that section be amended to include a specific list of discretionary incentives and relief measures that agencies can rely upon in the review and permitting process to make housing production easier and less costly, which will in turn increase supply and affordability. In Subsection 503.4, the Committee should consider adding text that states:

“The following and other incentives may be appropriate to facilitate development: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, fee waivers, tax credits and abatements, and other financing tools.”

Language of this nature would encourage the use of a broad array of tools to make development more efficient in meeting housing production goals and giving agencies more flexibility to facilitate housing production.

The Housing Chapter also focuses on the preservation of housing. Subsection 509.1 of the bill states that: “Preservation of housing in the District-especially affordable housing-is perhaps an even higher priority than increasing housing supply...” This statement goes a step too far. Much naturally occurring affordable housing is functionally obsolete in terms of design, efficiency, accessibility, health and safety measures, parking and other modern standards and amenities. In many cases, new development is a superior option. This subsection should be modified to balance the replacement of older and potentially obsolete, housing with newer and higher quality housing that includes affordable housing as consistent with inclusionary zoning mandates.

The legislation goes further:

NEW Policy H-1.2.10

Redevelopment of Existing Subsidized and “Naturally Occurring” Affordable Housing. Encourage and incentivize build-first, one-for-one, on-site, and in-kind replacement of affordable units, including larger family sized units. In addition, encourage and incentivize relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial assistance to ensure long-term affordability when projects meet these criteria.

A new section states:



510.4a Text Box: Principles for the Redevelopment of Existing Affordable Housing

Text Box: Principles for the Redevelopment of Existing Affordable Housing

Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that, in addition to the affordability controls expiring, the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. Furthermore, the neighborhoods, the surrounding land uses, and the needs of Washington, DC have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies that are critical to Washington, DC's growth as an inclusive District, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;**
- Advance mixed-income neighborhoods with both market rate and affordable housing;**
- Implement one-for-one replacement of affordable units;**
- Provide family-sized housing, including multigenerational families;**
- Build affordable units first to minimize displacement and maximize the return of residents to their community; and**
- Include tenants' rights of return and comprehensive relocation plans for tenants prior to redevelopment. 510.4a**

These policies, if included in the legislation, should be restricted to *publicly owned* housing. A privately owned apartment building that was utilized for 30 or 40 years as affordable housing cannot be expected to be permanently affordable beyond the expiration of affordability covenants on the property. A private owner should be permitted to redevelop the property in a manner consistent with all other privately held sites (subject to inclusionary zoning), regardless of whether there was affordable housing on the site prior to redevelopment. Indeed, private owners and investors were induced to enter decades-long affordability covenants expressly with the long-term redevelopment opportunity in mind as a return on the original return-constrained investment.

Moreover, without a Section 8 contract or other source of significant subsidy, these policies may place unfinanceable constraints on certain properties; even with project-based subsidies these financing sources place covenants and other long-term restrictions on private property. Disparately burdening certain privately-held sites may render them undevelopable, subject them to long-term conditions that other similarly-situated properties are not subject to, and may expose the District to litigation. The Comprehensive Plan must grapple with market realities such as this. The way to do that is to prioritize the production of new mixed-income housing across the city, utilizing the city's inclusionary zoning requirements and driving down costs by allowing the flexibility described earlier.



Future Land Use Map Comments

My final comment is on the future land use map (FLUM). I strongly support the proposed FLUM in the legislation. I do not believe the Committee should amend the map as submitted. If the Committee does decide to amend the FLUM, it should be in service of enhancing density and flexibility around transit sites, major corridors, main streets, and sites that allow infill opportunities.

Thank you for the opportunity to provide testimony on Bill 23-736. Again, I urge the Council to adopt the legislation in the 2020 Council period. I am happy to answer any questions the Committee may have.



14th St. Uptown Business Association

Taalib-Din A. Uqdah, President / Executive Director
[REDACTED]

PUBLIC TESTIMONY

OF

TAALIB-DIN UQDAH, EXECUTIVE DIRECTOR

obo/ **14th Street Uptown Business Association**

5401-14th Street, NW
Washington, DC 20011
[REDACTED]

BEFORE

COUNCIL OF THE DISTRICT OF COLUMBIA

1350 Pennsylvania Avenue, NW, Washington, DC 20004

COMMITTEE OF THE WHOLE

Chairman Phil Mendelson

**BILL 23-736 – THE “COMPREHENSIVE PLAN AMENDMENT
ACT OF 2020”**

ON

Thursday, November 12, 2020 at 10:00AM

Live Via Zoom Video Conference

Thank you Mr. Chair and members of the Committee of the Whole. My name is Taalib-Din Uqdah, founder and executive director of the 14th St. Uptown Business Association (1-4 UBA). We represent 13 owners and entities of 32 commercial properties, located in the 4600-4700 blocks of 14th St., between Buchanan and Decatur – across from the Northern Division Bus Garage.

1-4 UBA supports the Comprehensive Plan Amendment Act of 2020, but with serious issues of inequity, integrity and fairness that we want the Mayor and current director of OP to address and honor. OP's director needs to keep and maintain the position of his agency's two previous directors and affect the zoning map change in our two blocks and the mayor's office needs to recommit itself to its affordable housing policy and not allow WMATA to redevelop a 4.5-acre site back into a diesel-fueled bus garage in a residential community, where there are alternatives.

In 2009, over the objections of OP and DMPED, 1-4 UBA, with the help of (then) Councilmember Muriel Bowser, was successful in having 14th St., from Spring Rd. to Longfellow, declared a Target Area that eventually led to a "Great Streets" designation and the creation of a Revitalization Small Area Plan for 14th St., approved by the Council in 2012.

Components of that plan, dubbed Node 2, recognized then that continuing a low density classification for our 32 commercially-zoned properties, was counterproductive to our city's revitalization efforts; that the key to our success could be found in a more moderate density classification – MU-4 – and we all agreed. The upgrade was more appropriate in both land use and zoning and that our two-blocks could remain competitive with other corridors along Kennedy St., 14th St. and the redevelopment of WMATA's Northern Division Bus Garage, but today that's not the case.

The Comp Plan's land use map reflects the moderate density classification we fought for – and that's good – we thank them for that, but now OP is waffling on affecting the change in the zoning map classification we need to move forward; it's now saying they can't see the justification for it. They can justify doing it for the McMillan Reservoir or Walter Reed projects, but can't find that same justification for a cadre of black and minority-owned commercial property owners like myself; not even after promising for over a decade to do so; there's no honor in that.

We ask that this Committee recognize our continuing efforts to improve our city and help the Mayor's office and OP to find the justification it needs to honor its commitment to the city and us. We thank you for this opportunity to testify before you today and would be glad to answer any concerns or questions you may have; thank you.

#



4000 Cathedral Ave., NW – Apt. 221B

Washington, DC 20016

Ph/Fax: [REDACTED]

E-mail: [REDACTED]

**Testimony on
B23-0736, the Comprehensive Plan Amendment Act of 2020
Thursday, November 12, 2020**

I am Meg Maguire, a resident of Ward 3. Thank you for the opportunity to testify on *Myths and Mirage of the Comprehensive Plan Rewrite*.

Enumerating the myriad mythologies driving these amendments is beyond the scope of my brief remarks, but here are three:

Myth #1: Citizens who file pesky land use lawsuits are to blame for lack of affordable housing and must be disempowered so that unfettered development can proceed. Really?? The Court of Appeals did not fault citizens for bringing these suits; rather, it rebuked the Zoning Commission for failure to justify project approvals. Yet the Office of Planning seeks a radical shift of power from residents to the Mayor and the unelected Zoning Commission by wholesale up-zoning throughout the city and by

Emasculating the verbs!

protect – a meaningful verb -- becomes *respect* (an attitude)

retain becomes *encourage*

ensure = *should*

must = *should*

shall = *should*

The city will be so busy respecting, encouraging and should-i-fying that city officials – especially the Zoning Commission – will be able to rubberstamp whatever development it wishes.

A vote for these amendments is a vote to disempower the residents of the District of Columbia to have any meaningful role in planning.

Myth #2: The amendments will produce the affordable housing the city needs.

In fact, the goal of 36,000 new units -- only a fraction of which are for those who need it most -- is dependent on massive market rate developments for trickle-down affordability benefits. The Council can transform housing mirage into housing reality by adopting the *Housing Justice Priorities for the DC Comprehensive Plan* that the DC Grassroots Planning Coalition will submit during this hearing.

Myth #3: Digital billboards in Designated Entertainment Areas will enliven and animate our city.

Buried deep within the Historic Preservation Element -- where it does not belong -- is a provision that will overturn the city's model law prohibiting construction of new billboards:

Policy HP-1.6.5: Commercial Signage is full of holes. Continuing to allow billboards in so-called "Designated Entertainment Areas" will open a floodgate of industry-sponsored sales pitches that billboards enhance economic vitality, a claim that has been refuted by the sad experience of cities around the world where no one wants or needs these light blasts when they are trying to work or sleep, mocking the benefits of much-needed mixed-use development. *Digital billboards belong inside ballparks, not in the public realm.*

Remember the Evans saga? The protests of Gallery Place apartment owners and office tenants who despised the direct and bounced billboard light they had to endure? And the long, drawn-out court order requiring Digi Media (now Lumen 8) to remove most of its illegally erected signs? These are but signs of more trouble to come.

Joni Mitchell said it all:

**Don't it always seem to go
That you don't know what you've got
Till it's gone...**

Yellow Taxi, 1970

Thank you.

DC GRASSROOTS PLANNING COALITION

HOUSING JUSTICE PRIORITIES

FOR THE DC COMPREHENSIVE PLAN

In the midst of an ongoing housing crisis that has led to the displacement of tens of thousands of predominantly Black DC residents, the DC Grassroots Planning Coalition (DCGPC) and partner organizations call on the DC Council to strengthen the city's Comprehensive Plan by adding policies and actions that fortify existing affordable housing programs and require community-led equitable development strategies that further racial equity.

THE COMPREHENSIVE PLAN AMENDMENT PROCESS MUST BE CONDUCTED IN COMPLIANCE WITH DC LAW. The Comprehensive Plan is DC law and a 20-year planning document.[1] The Comp Plan requires the Mayor to submit reports to DC Council[2] at least once every 4 years on the District government's progress in implementing Elements of the Plan, the Plan's Action items, and the key projected implementation activities by land use policy over the succeeding 5 years.[3] Additionally, the Mayor shall submit amendments every 4 years for Council consideration and the amendments "shall be accompanied by an environmental assessment of the proposed amendments." [4] Notwithstanding the law, the Mayor initiated a full rewrite of the entire Plan with almost 1,000 pages of edits and substantial changes to the Future Land Use and Generalized Policy Maps, and did so without progress reports on the impact of current Elements, environmental assessment of proposed amendments, or in-depth community participation in every phase of the Plan's development.

Therefore, the Coalition asks that DC Council:

1. Ensure that all Ward level amendments as well as changes to the Future Land Use and Generalized Maps proposed by the Mayor's Office of Planning are examined and discussed with affected Ward-level residents at well-publicized, open and participatory roundtables led by the Ward Councilmembers;
2. Ensure that all proposed amendments to the Citywide Elements are examined and discussed at well-publicized, open and participatory Council roundtables held by the relevant Council Committee. (For example, the Housing Element should be reviewed at a public roundtable held by the Committee on Housing and Neighborhood Revitalization and the Committee on Human Services);
3. Ensure compliance with Comprehensive Plan law and regulations, as referenced above, before considering and voting on the substantial changes proposed by the Mayor. No Council vote should be taken without knowing in detail the impacts of the current Elements and their Action items on housing, land use, economic development, and all other facets of social, economic, and physical development influenced by the Comprehensive Plan.[5]

THE COMPREHENSIVE PLAN MUST PROACTIVELY ADDRESS DC'S HOUSING CRISIS BY STRENGTHENING THE FOLLOWING POLICIES:

RENT CONTROL:^[6] Rent control, also known as rent stabilization, is a popular affordable housing program. Rent control does not subsidize housing providers or tenants; rather, the program limits rent increases by tying them to increases in the Consumer Price Index (CPI).^[7] The Housing Element of the Comprehensive Plan must articulate the goals of: (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing.

PUBLIC HOUSING: The Comprehensive Plan, as amended, must continue the District's commitment to public housing. This means that Comp Plan amendments must require action on maintenance, preservation, and redevelopment of existing public housing and the building of additional public housing to accommodate the District's 51,000 extremely low-income renter households^[8] (31% of all renter households and at or below 30% MFI) who can afford at most just over \$900 monthly rent.^[9]

Accordingly, the Housing Element must include the following policies and goals: (1) fully fund repair and renovation of deteriorating public housing units; (2) require 1-for-1 replacement of public housing units and more when increasing site density, with no loss of family size multi-bedroom units; (3) ensure no new barriers to residents' return and true affordability based on the HUD standard of 30% of income for housing expenses; (4) use a mandatory build first model to prevent displacement, strengthen anti-discrimination enforcement during periods of relocation, and cover residents' relocation and return costs; (5) create an enforceable right of return of displaced public housing residents; (6) reinstate the goal to create a minimum of 1,000 new, additional public housing units over the next ten years;^[10] (7) retain public ownership and control of publicly owned housing and developments; (8) mandate that public housing resident-led organizations share decision making authority in all phases of redeveloping public housing; (9) incorporate community development strategies that improve the economic condition of residents such as equity for and home ownership by public housing residents, land trusts, cooperatives, and worker-owned businesses; and (10) remove barriers to the ability of returning citizens to live in public housing.

SUBSIDIZED HOUSING: Housing DC's low wage workers, seniors, people with disabilities and other low-income households must be recognized as those with the need for increasing housing capacity overall. To do so requires expanding the Local Rent Supplement Program (LRSP) -which provides ongoing rental subsidies to make housing affordable to extremely low-income families - with the aim of realizing the 2006 Comprehensive Housing Strategy Task Force goal

of 14,600 locally funded rental subsidies in the District by 2020.[11] Additionally, the District must purchase expiring Section 8 projects to maintain operating subsidies. Transfer of expiring Section 8 projects should be made only to developers who agree to lifetime affordability requirements. The District must continue real property tax abatements as an incentive to preserve expiring project-based Section 8 facilities. Funding must be increased for the Housing Production Trust Fund, the main source of funding for the Tenant Opportunity to Purchase Act (TOPA) and District Opportunity to Purchase Act (DOPA) programs, which must provide opportunities to tenants and tenant associations to own and manage their housing units. The District must adopt the policy that affordable housing created and preserved with public financing be protected by lifetime affordability restrictions and monitored to prevent transfer to non-qualifying households while still allowing residents to build equity which can result in concrete wealth growth.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

Equitable development is defined as development in which low wealth Black and brown communities and other working class communities fully participate from the beginning to ensure that the infrastructure and services they determine to be needed for their communities to grow and prosper are foremost features of the development.[17] Community Economic Development (CED) recognizes that neighborhood investment begins with investing in the capacity of low income residents to own, manage, maintain, and ultimately replicate the development process, leading to a significant shift in economic condition and overall power. To date, the development projects receiving generous taxpayer subsidies and assistance have primarily benefited new and wealthier residents while failing to adequately respond to the basic human needs of existing

markets and residents with “the false promise of trickle-down benefits that justify orienting development around the needs of well-heeled populations.”[18]

Accordingly, the Comprehensive Plan must adopt a new Community-Led Equitable Development model that mandates full participation by long-term community members with a record of community involvement. The process must start with organizing residents around engagement in small area community development plans as a principal measure of expression of community preferences. The Comprehensive Plan must expressly endorse providing significant equity to existing community members, particularly public housing residents, allowing them to withstand displacement and improve their economic standing. To support racially equitable development, the Comprehensive Plan must endorse shared equity models of homeownership such as community land trusts, deed-restricted housing programs, and limited equity housing cooperatives as they balance preservation of affordability with wealth creation.[19]

As the guiding document for development in the city, it is critical that the amended Comprehensive Plan reflect the realities and priorities that we face in the District. The issues of racial inequity must be tackled head-on in specific, actionable Comprehensive Plan priorities.

These priorities are endorsed by:

Empower DC
Washington Legal Clinic for the Homeless
People Power Action
People for Fairness Coalition
DC Federation of Civic Associations
NCBL-DC Unhoused Collective
Plymouth Congregational UCC Board of Social Action
Committee of 100 on the Federal City
Us Helping Us, People Into Living
DC Statehood Green Party
Washington Teachers Union
SW DC Action
Southwest Voice: The People's Paper
Serve Your City/Ward 6 Mutual Aid
Dupont East Civic Action Association
Dupont Circle Citizens Association
Ryan Linehan, Commissioner ANC 5D01
Ra Amin, Commissioner ANC 5B04
Janice Ferebee, Commissioner ANC 2F08
Tiffani Johnson, Commissioner ANC 4B06
Renee Bowser, Commissioner ANC 4Do2

[1] DC Code §1-306.01 (2020).

[2] DC Council shall schedule a public hearing on the Mayor's progress report and following review issue findings to the Mayor and a copy of the public testimony. Id. at §1-306.04(b).

[3] DC Code §1-306.04(b), (c) (2020).

[4] DC Code §1-306.04(d) (2020).

[5] DC Code §1-306.01(b) (2020).

[6] The Rental Housing Act of 1985, DC Code §§42-3501.01-3502.24 (2020) was enacted to cover 5-unit and larger residential properties whose permits to build issued by 1975. Yesim Taylor, History of Rent Control in the District of Columbia, D.C. Policy Center, April 1, 2020 at 2. Rent control was legislated to protect low- and moderate-income tenants from the erosion of their income from increased housing costs and protect the existing supply of rental housing from conversion to other uses. DC Code §42-3501.02(1), (3) (2020). Purposes.

[7] DC Code §42-3502.08 (2020) Increases above base rent.

[8] Housing Needs by State 2020/District of Columbia, National Low Income Housing Coalition, (<https://nlihc.org/housing-needs-by-state>)

[9] Out of Reach 2020, District of Columbia, National Low Income Housing Coalition, July, 2020, (<https://reports.nlihc.org/oor/district-columbia>)

[10] 506.17 Action H-1.4.E: Additional Public Housing in current Comprehensive Plan Housing Element is removed in Office of Planning's proposed April, 2020 amendments submitted to DC Council.

[11] Homes for an Inclusive City, A Comprehensive Housing Strategy for Washington, D.C., Executive Summary, DC Government-Brookings Institute, June 13, 2006 at 8. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf) The 2006 Housing Strategy stated that DC "should directly assist an additional 14,600 extremely low-income renter households by adopting a local rent supplement program." The LRSP was set forth as a supplement to the goal of 55,000 additional units by 2020, including at least 19,000 affordable units. Id.

[12] Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time (PIT) Count of Homeless Persons, June 10, 2020, Metropolitan Washington Council of Governments, (<https://www.mwcog.org/documents/2020/06/10/homelessness-in-metropolitan-washington-results-and-a-nalysis-from-the-annual-point-in-time-pit-count-of-homeless-persons-featured-publications-homelessness/>) There were 6380 residents identified as experiencing homelessness as of the January, 2020 point in time (PIT) street count.

[13] District of Columbia Interagency Council on Homelessness, Homeward DC Strategic Plan 2015-2020, DC, 2015.

[14] Id. at 31 and Table 11: System Conversion-Annual Projections for Single Adult System Inventory shows the change in inventory needed to get to a right-sized system. Given that Homeward DC earmarks production of 6000 housing units targeted specifically for the unhoused and those on the brink of homelessness and the 2006 Homes for An Inclusive City called for 19,000 affordable units by 2020, Homes for an Inclusive City A Comprehensive

Housing Strategy for Washington D.C., Comprehensive Housing Strategy Task Force, 2006 at 3. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf), the Mayor's goal to produce 12,000 affordable housing units (up to 80% MFI) by 2025, contained in DCHCD, DCOP, Housing Equity Report: Creating Goals for Areas of Our City, October, 2019, (https://housing.dc.gov/sites/default/files/dc/sites/housingdc/page_content/attachments/Housing%20Equity%20Report%2010-15-19.pdf), marks a significant reduction in previous affordable housing goals, is wholly inadequate, and must be increased.

[15] Office of Revenue Analysis, DC Economic and Revenue Trends: December, 2019 OCFO, Dec., 2019 at 9 (As of November 15, 2019, there were nearly 10,000 vacant residential units in DC). (https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_December%202019.pdf)

[16] B23-0038, March 11, 2020.

[17] See generally Carlton Eley, Planning for Equitable Development: Social Equity by Design, American Planning Association, March/April 2017. (<http://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-03-04.pdf>)

[18] Id. at 2.

[19] Evidence Matters, Shared Equity Models Offer Sustainable Homeownership, PD&R, U.S. Dept. of HUD, Fall, 2012. (<https://www.huduser.gov/portal/periodicals/em/fall12/highlight3.html>)

From: [Parisa Norouzi](#)
To: [Committee of the Whole \(Council\)](#); [Mendelson, Phil \(COUNCIL\)](#); [McDuffie, Kenyan \(Council\)](#); [White, Sr., Trayon \(Council\)](#); [Pinto, Brooke \(Council\)](#); [Bonds, Anita \(Council\)](#); [Silverman, Elissa \(Council\)](#); [Cheh, Mary \(COUNCIL\)](#); [Todd, Brandon \(Council\)](#); [Gray, Vincent \(Council\)](#); [Grosso, David \(Council\)](#); [White, Robert \(Council\)](#); [Allen, Charles \(Council\)](#)
Cc: [Dcgpsteering](#)
Subject: Comp Plan Housing Justice Priorities
Date: Thursday, November 12, 2020 11:54:48 AM
Attachments: [COMP PLAN HOUSING JUSTICE PRIORITIES.pdf](#)

Dear all,

During today's hearing on the Comp Plan, you will hear witnesses reference the Housing Justice Priorities of the DC Grassroots Planning Coalition – the document is attached.

Thank you,
Parisa

Parisa B. Norouzi
Executive Director
Empower DC
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Washington, DC 20009
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@EmpowerDC III www.EmpowerDC.org

"We who believe in freedom cannot rest until it comes."

- Ella Jo Baker

Suggested Changes to OP's Comprehensive Plan Housing Element Amendments (4/19)

DCGPC Blueline for Rent Control

Attachment to Andrea Rosen's Testimony on B23-0736, 11/13/20

Key:

Consider	OP's deletions
<u>Develop</u>	OP's additions
Improve	DCGPC's deletions of OP text
<u>Stabilize</u>	DCGPC's additions

500.5e By contrast, “market rate” housing is defined as housing with rents or sales prices that are allowed to change with market conditions, including increased demand. Some market rate housing may be naturally occurring affordable ~~housing that to~~ moderate and some low-income households can afford. However, the supply of naturally occurring affordable units can be unstable due to potential pressure from both sides. With too little demand, decreasing rents are may be insufficient to cover maintenance and the units may fall into a state of disrepair and become vacant and underused. With too much demand, rents may be raised frequently and/or steeply, or the units are may be rehabbed into higher cost units. Rent-controlled apartments ~~are counted as~~ occupy a special position between “market rate” ~~“market rate”~~ and affordable units because while there are no occupancy restrictions by income, rents do not freely respond to market conditions. The District’s rent control law stipulates that rents on market rate apartments built prior to 1975 may rise only as fast as the Consumer Price Index (CPI) for older adults and tenants with disabilities and the CPI plus two percent for everyone else.500.5e

500.47 ~~The city’s~~ Washington, DC’s housing stock is varied in type and size, with developments since 2006 shifting the makeup of the District’s housing. Table Figure 5.12 shows the number of units by type, year built, size, and vacancy rate and how these have changed over 17 years. The figure shows that owner/renter rates have fluctuated. In addition, Figure 5.2 shows that, despite a modest increase in the number of detached/attached single-family homes, which represent 75 percent of large units (three or more bedrooms), a shift toward multi-family units has been consistent. The shift is also visible in Figure 5.3 New Housing Units Authorized: 2000-2017.

Washington, DC’s housing stock is becoming both older and newer as pre-1939 buildings are being preserved and remodeled to have more units while post-World War II buildings are more often torn down and the sites redeveloped to add new, modern apartment buildings. The latter trend has contributed to the erosion of the District’s rent-stabilized housing stock. The rent-stabilization program covers only rental units permitted before 1976, and their number has been significantly reduced by demolition and replacement, and gut renovations, as well as by conversions from rental to condominium/cooperative ownership. Although the government has not yet done a definitive count of the number of rent-controlled units that exist, the Urban Institute estimated in 2015 that the number of rent-controlled units numbered 91,386 in 2014, down from 130,000 in 1985, when the modern rent-stabilization law was enacted.

Of the ~~city's 248,000~~ **281,000** occupied housing units in ~~2000~~ **2017**, ~~41~~ **42** percent were owner-occupied, and ~~59~~ **58** percent were renter-occupied. ~~Forty~~ **Thirty-seven** percent of the housing units in the ~~city~~ **District** are single-family units, and over ~~35~~ **34** percent of the housing stock was built before 1940. 500.47

500.69 ~~In the eight years since~~ Since the Comprehensive Plan was ~~last amended~~ **adopted in 2006**, ~~there has been a tremendous and ongoing~~ **the** increase in housing demand ~~and costs has been ongoing, affecting homeowners and renters alike. Demand and costs have been~~ driven by a national recession and recovery, demographic shifts, low interest rates, regional economic growth, falling crime rates, renewed confidence in District government, and improvements in public services. Rising costs have accelerated since the recovery began in 2010, with the median sales price of single-family homes increasing 7.3 percent per year, condominiums increasing 2.8 percent per yearⁱ, and average rents increasing 2.9 percent per year between 2000 and 2017.ⁱⁱ Part of the increase in sales price is attributable to declining interest rates, which went from eight percent to below four percent between 2000 and 2017. Declining interest rates enabled a 37 percent increase in home buying purchasing power and contributed to rising prices.ⁱⁱⁱ ~~The increase in demand has propelled a steep upward spiral an increase in housing costs, impacting affecting renters and homeowners alike. With higher prices came greater down payment and mortgage requirements, making it more difficult for renters to transition to homeownership. The actual reduction of the number of rent-controlled units, and the effective loss of stabilization through exploitation of loopholes in the rent-stabilization law have contributed to the District's profound loss of affordability to the 58 percent of households that rent homes.~~ 500.69

500.16 Rents have also risen, making it more difficult for many to afford to live in the District. Between 2006 and 2017, at 3.4 percent per year, rents in Washington, DC rose faster than the MFI of the region, which grew by only 1.8 percent per year. Much of the increase in rents was due to new amenity-rich buildings that attracted higher income households to the District. However, even rents in buildings built prior to 2006 rose at a rate of 2.7 percent per year.^{vii} As a result, between 2006 and 2017, nearly 18,300 fewer units affordable were available to households earning equal to or less than 60 percent of the MFI (See Figure 5.10 Change in Supply of Rental Units by Affordability). There are many reasons in addition to rising rents for the overall reduction in the number of lower cost units, including demolition of older buildings and conversion to condominiums, which would have removed thousands of rent-controlled units from the affordable portfolio. 500.16

Action H-1.1.B: Annual Housing Reports and Monitoring Efforts

~~Consider development of~~ **Develop** an ~~A~~ annual "State of ~~DC~~ **the District** Housing Report"², which improves the quality of information on which to make housing policy decisions, ~~and/or~~ a Housing Oversight Board ~~comprised~~ **composed** of residents, for-profit, and non-profit developers that reports each year on the effectiveness and outcomes of the District's housing programs. **Include information on trends and needs, such as the availability and affordability of units by income, tenure, building type, number of bedrooms; and production patterns and capacity by Planning Area and other characteristics. Incorporate data collected by the Office of the Tenant Advocate on rent stabilized units. The report should also include a framework for evaluating progress toward measurable goals.**

510.3d Addressing Displacement in Washington, DC

Washington, DC has one of the strongest sets of anti-displacement programs in the country, which includes rent control, eviction protection, Tenant Opportunity to Purchase Act (TOPA), District Opportunity to Purchase Act (DOPA), locally subsidized rents, tax assessment caps, and tax credits for low-income and older homeowners. For District residents to fully realize the benefits of these programs, rent control, which has lost an 40,000-50,000 units since 1985 (Urban Institute, 2011, 2015[♥]) must be expanded; and DOPA must be funded. 510.3d

504.28 Action H-1.2.H: Priority of Affordable Housing Goals

Prioritize public investment in the new construction of, or conversion to, affordable housing in Planning Areas with high housing costs and few affordable housing options. Operating from data to be collected by the Office of Tenant Advocate, exclude units covered by the rent-stabilization program from any conversion programs to avoid cannibalizing existing affordability and displacing one group to accommodate another. Consider land use, zoning, and financial incentives where the supply of affordable units is below a minimum of 15 percent of all units within each area. 504.28

~~509.5~~ 510.5 Policy H-2.1.1: ~~Protecting~~ Conserving Affordable Rental Housing

Recognize the importance of preserving rental housing affordability to the well-being of the District of Columbia and the diversity of its neighborhoods. Undertake programs to ~~protect~~ **preserve** the supply of subsidized rental units, **rent-controlled units**, and low-cost market rate units, **with an emphasis on preserving affordable units in high-cost or rapidly changing neighborhoods, where the opportunity for new affordable units is limited.** ~~509.5~~ 510.5

~~509.10~~ 510.10 Policy H-2.1.6: Rent Control

Maintain, **expand, and strengthen** rent control as a tool for ~~moderating~~ **preserving** the affordability of ~~older~~ rental properties and protecting ~~long-term~~ residents, especially ~~the elderly~~ **older adults, low-income households, and those with disabilities, from unpredictable and destabilizing rent increases.** In ~~considering~~ **acting on** future refinements improvements to the rent control program, the District should ~~be careful to determine~~ **focus primarily on** whether the proposed changes **will improve advance equity** effectiveness, fairness, **adherence to building codes**, and affordability, ~~without discouraging maintenance~~ and **encourage** preservation of rental **stabilized** housing units. **Rent control must not be restructured as a subsidized housing program, and units subject to rent stabilization should not be commandeered to fulfill the city's myriad affordable housing obligations.** ~~509.10~~ 510.10

510.18 Action H-2.1.F: Affordable Housing Preservation Unit

[♥] The Urban Institute estimated in 2011 that 79,145 rent-controlled units remained in DC. Their 2015 study estimated 91,386 units were rent controlled. [Tatian and Williams, *A Rent Control Report for the District of Columbia*, June 17, 2011. <https://www.urban.org/research/publication/rent-control-report-district-columbia> and Tatian et al, *Affordable Housing Needs Assessment for the District of Columbia, Phase II*, May 2015. <https://www.urban.org/research/publication/affordable-housing-needs-assessment-district-columbia>]

Establish and maintain a division within District government to systematically and proactively work with tenants, owners of affordable housing, investors, their representatives, and others associated with real estate and housing advocacy in Washington, DC to establish relationships and gather intelligence to preserve affordable housing and expand future opportunities by converting naturally affordable unassisted units, [excluding units covered by the rent-stabilization program](#), to long-term dedicated affordable housing. 510.18

518.19 Action H-4.3.D: Aging in Community

Establish programs to facilitate low-income older renters aging in place. Examples include tenant-based vouchers or other rental assistance to older adults on fixed incomes or funds for renovation of multi-unit buildings, individual apartments, and single-family homes to create appropriate housing options for older adults to age in community. [The rent-control program facilitates renters aging in place; expansion of that program benefits any resident who needs to control housing costs, including those who may eventually be on fixed incomes.](#) 518.19

Testimony in Opposition to
B23-0736: “Comprehensive Plan Amendment Act of 2020
Andrea Rosen, Ward 4 resident
November 13, 2020

I’m a native Washingtonian living in Rock Creek West and a member of the DC Grassroots Planning Coalition (DCGPC), although I speak for myself. Thank you Chairman Mendelson for holding these hearings so residents can provide feedback about the Office of Planning’s wide-ranging and profound alterations to the Comprehensive Plan.

What’s Envisioned for My Neighborhood?

Before the full Council votes on Bill 23-736, Ward Councilmembers must familiarize themselves with what OP has in mind for their Wards (via the Maps, and Land Use and Area Elements) – in order to then engage with their constituents about these changes, at properly noticed, well-publicized, participatory meetings. I’m well aware that OP held Ward-level meetings and conducted surveys, etc., but these were scripted, top-down affairs heavy on *Smart Growth™ = Affordable Housing* talking points, and nonexistent on community-specific detail. The only informative engagement around changes to the Future Land Use Map (FLUM), **ground zero** of OP’s amendments, was done at roundtables held by the DCGPC last Fall in each planning area of the city. Which means communities have been circumvented with regard to input – even though ***the changes to zone definitions already passed in the Framework, text changes proposed in the body of the Plan, and changes to the Maps, harm residents’ ability to leverage benefits through Planned Unit Developments (PUDs).***

Orwellian Amendments

Language matters, and in its amendments, the Office of Planning has replaced what little proscriptive language exists in the current Plan with precatory language. It has manipulated the language to at once give the Zoning Commission free reign **and** eliminate all solid footing by which residents can appeal Zoning approvals. This is a 180-degree flip from what most witnesses asked for when they testified before the Committee of the Whole about the Framework in March 2018.

Despite its PR, OP betrays its lack of seriousness about meeting the needs of housing-burdened residents and the un-housed when it removes all specificity in the Plan regarding levels of affordability, from public housing to workforce housing, treating affordability as a monolith. This is important because the Framework makes “affordable housing” pre-eminent among goals, so sweeping aside competing interests can be justified even for projects that provide only a small amount of tiny units for households earning 80 percent Area Median Family Income, well above DC’s median.

Except in Rock Creek East (Ward 4), references to neighborhood character are banished, never mind that people all over DC cherish their own neighborhoods and the character of other neighborhoods, too — there’s a reason that many residents proclaim love for this city, and that people with means like Greater Greater Washington’s founder, David Alpert, live in Historic Districts. OP ensures that the built environment, containing our personal and the larger culture’s histories, is to be “respected” only until the front-loader rips it to shreds.

The Plan's reporting obligations, by which Council could exercise oversight if they were observed, have been scratched. Nods to exploring the use of alternative financing structures for affordable housing, like land trusts and limited-equity co-ops, have been archived. Anything that doesn't fit the "just build it" narrative is expunged.

Up-FLUMING: Density For Everything That Ails Us

Increasing density is portrayed as the only mechanism to attain affordability and is thus offered as the rationale for changes running through the Plan. Yet we don't see affordability resulting from the significant amount of new, denser construction on the ground, despite the fact that some of it is uninhabited (see The Wharf at night), and housing providers report they have so many vacancies, they're offering two months' free rent to entice tenants.

OP has it backwards, for as Jane Jacobs observed in *The Death and Life of the Great American City*, neighborhoods need to retain old building stock to ensure that there are affordable homes and commercial spaces, since **new construction is always more expensive**. Indeed the very up-FLUMing of land immediately raises its market value. The real purpose of the increases in density proposed through amendments to the FLUM is to enable new construction affordable to the deep-pocketed, with a smidgeon of affordability required by Inclusionary Zoning. Big new projects displace people and individually owned small businesses, and they cannot afford to return. Current residents are supposed to take solace from the fact that their homes and neighborhoods are being rendered **into** something else, very likely **for** someone else, in the name of equity — although there is no language to guarantee equity. The dynamic reminds me of the 1960s fight against "White Men's Highways Through Black Men's Homes." "Equitable" is Greater Greater Washington's new "affordable," which itself was the new "green."

Moreover, up-FLUMing is not the result of actual planning — let alone **community-led** planning (which is desirable in a democracy). Serving on the Comprehensive Plan Task Force of Chevy Chase's ANC 3/4G last winter, I learned that the Office of Planning up-FLUMed the blocks just south of Chevy Chase Circle along upper Connecticut Avenue in response to requests for more density submitted by property owners for particular blocks and lots. Here and there, OP at its discretion smoothed out the mapping to include intervening lots in the up-FLUMING. However, when asked why they ignored similar blocks just south of the up-FLUM'd stretch, OP replied that no one had submitted requests for more density on those blocks. No thought was given to the fate of the small businesses that inhabit the existing mostly two-story buildings, and the facts that the area is a successful Main Street as is and an exemplary gateway to the District.

Meanwhile, across town in Ivy City, OP granted ProFish's request to up-FLUM the historic Crummell School site as well as two adjoining properties from Production & Technical Employment (PROTECH) to mixed-use Residential Medium Density & PROTECH. When ProFish makes good on those FLUM changes, the development will encompass an entire city block, towering above two- and three-story buildings typical in the community.¹ Approval of these FLUM changes will have the effect of cutting the community and ANC out of any

¹ The Crummell School site has never been "surplused" and disposed of, nor has it gone through the Historic Preservation Review Board (HPRB) or Zoning processes. Perhaps the developer was waiting to up-FLUM first.

chance of negotiating community benefits, including additional affordability beyond what IZ requires. If the administration were serious about pressing the development industry for greater affordability, it would down-FLUM all over the city, thereby exerting pressure on developers to provide significantly more affordability for greater density.

Another rationale for up-FLUMing with a broad brush is that more housing is needed to accommodate the continuous influx of new residents. But statistics published by the Office of the Chief Financial Officer (OCFO) show in-migration has declined every year since 2012, with the result that net growth in the adult population was under 400 in 2019. Change-of-address notices filed with the Post Office between February and July 2020 indicate a net 15,000 people departed the city, almost three times as many moves out of DC as during the same period in 2019.² Perhaps these were temporary pandemic-triggered moves, but maybe we have yet to see the swell of out-migration when more people realize that working from home means home can be anywhere.

I'm not a planner, but it seems that when it comes to meeting the range of affordable housing needs, actual planning would (1) take stock of what size units are needed for households at various income levels, and (2) craft a nuanced plan for fulfilling those needs. The city would start with its portfolio of land and use alternate financing structures to develop housing for residents with lower incomes. But the amended Comp Plan de-prioritizes affordable housing by making it incidental to market projects and puts the responsibility for the whole effort in the hands of private enterprise. Deeply affordable housing, i.e., public housing, won't be touched by the market--and is hardly touched by the Plan.

COVID19 – Probably Not the Last Pandemic

Before the Council gives license to developers, through the Comp Plan's Land Use Element and Maps, to rebuild the city, it should give much greater thought to the repercussions from the COVID19 pandemic than OP has done in its amended Plan. Studios and one-bedroom apartments are the unit sizes of choice for new development, but their inhabitants have found them much less desirable during the pandemic than when they could spend hours at cafes, restaurants, and bars. Parents find schooling children while working from home requires additional space. Homes with outdoor space has never seemed so necessary by those fortunate to live in them. (Who would live in a micro-unit under ground now?)

The journal *Nature* just published a study that used mobility data tracked between March and May through the cell phones of 98 million Americans living in 57,000 census tracts in ten metro areas, including Washington, to determine what locales contributed most significantly to COVID19 infections. According to the *Washington Post's* coverage of the study,

The study discerned another pattern: Lower-income people, many of them essential workers, were less able to reduce their mobility during shutdowns and more likely to be exposed to crowded venues. Within low-income neighborhoods, with higher percentages of residents who are people of color, more people would be infected, which mirrors real-life patterns of transmission.

This study suggested a grocery store would be twice as dangerous for a person in a low-income neighborhood as a person in a high-income one. The authors hypothesized that

² "A Net 15,000 People Moved Out of DC During the First Part of 2020," *Washingtonian*, October 13, 2020

this was because those stores had nearly 60 percent more visitors per square foot per hour, and they shopped there longer on average.³

Have OP's amendments addressed the downside of density and the serious consequences of allowing neighborhoods to continue resource-poor? Or the importance of access to open green space for all residents, particularly those living in dense environments?

Rent Stabilization

The Housing Element of the Comprehensive Plan must articulate the goals of (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing. I attach a "blue line" of changes that the DC Grassroots Planning Coalition recommends for strengthening the rent control language in the Plan.

Whither Single-Family Zoning?

OP commissioned a study of the effectiveness of eliminating single-family zoning in DC for achieving affordable housing, an as-yet unproven tactic embraced by Minneapolis and Oregon. In its RF-1 districts, DC offers a wealth of examples of such redevelopment already. Two follow.



Single-family home at 4309 Kansas Ave, NW (Petworth) in 2018; 4309-4311 Kansas Ave., NW, in November 2020

The lots at 4309/4311 Kansas Avenue are zoned RF-1, which limits dwelling units to two, unless the structure existed prior to 1958, in which case more than two are allowed. The 5-bedroom, 3-bath single-family home at 4309 was built in 1897. It sold in 2018 for \$899,900. A four-unit condominium replaced the single-family home in 2020. Sotheby's recently held open houses for two units, each with 3-bedroom, 2.5 baths, listed at \$850,000 and \$925,000.

³ "These venues are high-risk areas for spreading the coronavirus, model suggests," *Washington Post*, 11/10/20



Who wore it better? 930 Madison St., NW (variously called Brightwood Park and 16th Street Heights) in 2004 and 2020

930 Madison St., NW, built in 1908, was a 3-bedroom, 1-bath single-family home until its sale in 2016 for \$256,500. It was subsequently remade into a two-unit condominium. The units, each with four bedrooms, 3.5 baths, sold for \$759,000 and \$695,000 (reduced) this Fall.

Unlike when people buy houses to live in, developers who inserts themselves in the turnover of land does so for the purpose of extracting profit (so-called highest best use). Consequently, prices go up.



Comments for Comprehensive Plan Update

Land use element

Clarifying the Extent of the Need for Affordable Housing and Establishing the Affordable Housing Crisis as a Critical Land Use Issue Facing the District of Columbia (SOURCE: memorandum to office of planning re comprehensive plan).

The Comprehensive plan does not appropriately contextualize the extent of the affordable housing crisis in the District. To convey the extent of the issue and to highlight the interplay with equity and economic development, the following data points are suggested for inclusion in the amended Comprehensive Plan:

- Availability of units that are affordable to households at various income levels compared to the number of households at each of those income levels currently living in the District;
- Estimated loss of affordable housing during the last 10 years, including projections for future losses based on the rate at which units are lost for different income levels; and
- Number, demographics, and distribution (across all 8 wards) of households that are rent-burdened (including those that are severely rent-burdened).

Taken together, these data points begin to convey the scope of the problem and also flag the complex interplay between affordable housing, economic development, land use and equity. By highlighting the disparate racial, spatial and economic impact of the crisis, the Comp Plan can begin to offer a framework for addressing the affordable housing crisis from an economic empowerment and equitable development perspective as well a housing supply side perspective.

Proposed language: 300 OVERVIEW 300

300.1 The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, preservation, and land use compatibility issues. The Element describes the balancing of priorities that must take place in order to range of considerations involved in accommodating a multiplicity of land uses within the boundaries of the District of Columbia Washington, DC. 300.1

300.2 The critical land use issues facing the District of Columbia are addressed in this element. These include:

- *Promoting neighborhood conservation*
- *Providing adequate housing, particularly affordable housing*
- *Conserving, Creating and maintaining successful inclusive neighborhoods, accessibility, and diversity, while allowing new growth*
- *Strengthening Downtown*
- *Enhancing neighborhood commercial districts and centers*
- *Balancing competing demands for finite land resources*

- *Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open space*
- *Promoting transit-accessible, sustainable development*
- *Improving resilience*
- *Siting challenging land uses 300.2*

300.3 More than any other part of the Comprehensive Plan, this Element lays out the policies through which the city will accommodate growth and change occur, while conserving and enhancing its neighborhoods, commercial districts, and other areas. Because the Land Use Element integrates, and to some degree balances, the policies and objectives of all the other District Elements, it should be given greater weight than the other elements as competing policies in different elements are balanced. 300.3

300.4 Although the District of Columbia was almost fully developed by 1960, the demand for land for housing and jobs has continued to fuel land use change. The changing needs of the federal government, private industry, and the city's institutions still continually reshape the landscape. on a daily basis. The city's Aging, environmentally-inefficient, and underutilized building stock still requires refurbishment and replacement. The renewed popularity of urbancity living generates the need for more housing and new amenities. 300.4

300.5 Land use changes have the potential to make Washington, DC the city more vibrant, economically healthy, exciting, and even more environmentally sustainable and resilient than it is today. But without proper direction and coordinated public investment, change can also be adverse. The Land Use Element strives for positive outcomes in all parts of the city by setting policies on appropriate uses and densities, and describing how different uses can successfully co-exist. 300.5

NEW The built environment and natural features of the city can protect against the acute shocks and reduce the chronic stresses facing the District; conversely, without proper planning or maintenance, the built environment and natural features can make communities vulnerable to these shocks and stresses. The Land Use Element addresses the provision, protection, and enhancement of physical assets and critical facilities including housing, infrastructure and transportation systems, and its natural, historic, and cultural resources to become a truly resilient city. The vulnerability of buildings, infrastructure, and ecosystems to the adverse effects of climate change is expected to increase due to more days with high temperatures, more flooding caused by heavy rainfall and rising sea levels, and more economic disruption from extreme weather events.

300.6 The Element is divided into several sections. The first section provides basic data on land use and density in the District of Columbia. Subsequent sections of the element present policies and actions, organized under the following major topic headings:

- *Shaping the City*
- *Creating and Maintaining Successful Neighborhoods*

• *Balancing Competing Demands for Land.* 300.6

The definitions of Land Use categories and a description of the Future Land Use Map and Generalized Policies Map may be found in Chapter 2 (Framework Element).

301 LAND USE PROFILE OF THE DISTRICT OF COLUMBIA 301

301.1 The District of Columbia comprises 69 square miles, including approximately eight square miles of water and 61 square miles of land. Land use patterns, illustrated in Map 3.1, reveal an expansive city “core” of about four square miles centered around the open spaces of the federal city. The core is surrounded by an inner ring of moderate to high density residential and mixed use neighborhoods, extending west to Georgetown, north to Columbia Heights and Petworth, east across Capitol Hill, and south to the Anacostia River and Near Southwest. Beyond the inner ring is an outer ring of less dense development, characterized largely by single family housing and garden apartments. The two rings generally correspond to historic development patterns, with most of the inner ring developed prior to 1910 by about 1920 and the outer ring developed after 1910 about 1920. 301.1

301.2 The impact of the city’s transportation network on land use patterns is apparent in Map 3.1. Most of the commercial and higher density development beyond the core of the city hugs radial avenues like Connecticut Avenue NW and Pennsylvania Avenue SE. Most of the District’s industrial development follows the railroad corridors running from Union Station east along New York Avenue and north to Silver Spring. The historic connection between transportation and land use continues to shape the city today, with Metrorail station areas being emerging as the most robust city’s newest activity centers. 301.2

301.3 Map 3.1: Existing Land Use 2005 2017

301.4 Table 3.1: Acres of Existing Land Use by Planning Area, 2005

301.5 Map 3.1 reveals other distinctive land use patterns.

The city’s Open space networks, particularly those along Rock Creek and the Potomac and Anacostia Rivers, are apparent. Large institutional uses—including some 2,000 acres of colleges, universities, hospitals, seminaries, and similar uses across the city are visible. Federal enclaves beyond the core of the city, such as Joint Base Anacostia-Bolling Air Force Base, the St. Elizabeth’s Hospital West Campus, Walter Reed Hospital, and the Armed Forces Retirement Home, appear prominently. Many of the federal and institutional uses are located in areas that are otherwise residential in character. While this creates the potential for land use conflicts, these uses are also important open space buffers, job centers, community anchors, and resources for the surrounding neighborhoods. 301.5

301.6 Table 3.1 indicates the existing acreage in different land uses in each of the city’s ten Planning Areas.

Figure 3.1 shows the location of these Planning Areas. The table shows both similarities and differences between Areas. Both the “inner ring” and “outer ring” neighborhoods generally contain 30 to 40 percent of their land areas in residential uses. On the other hand, residential uses represent less than two percent of Central Washington and less than 10 percent of the Anacostia Waterfront. About 27 percent of the District consists of road rights-of-way, although only about 60% half of this acreage actually consists of the paved streets themselves. For instance, road rights of way constitute 40 percent of Capitol Hill, but most of this land consists of landscaped or bricked front “yards” along streets with exceptionally wide rights-of-way. 301.6

301.7 Despite the significant number of jobs in the city, commercial uses represent less than five percent of the city’s land area, and industrial uses represent just less than one percent. Commercial uses represent about 16 14 percent of the land area in Central Washington, but less than two percent of the land area in Far Southeast/ Southwest. Many of the District’s jobs are associated with federal facilities and institutional uses, which together make up about 13 10 percent of its land area. Institutional lands appear throughout the city, but are especially prevalent in the three Northwest Planning Areas and in Upper Northeast. 301.7

301.8 Maps 3.2 and 3.3 show estimated population and employment density in the city and close-in suburbs as of 20052017. The data is based on the traffic analysis zones used by the Metropolitan Washington Council of Governments for transportation modeling. Map 3.2 again illustrates the “ring” of fairly dense neighborhoods around the city center, and the denser residential development along major corridors like Connecticut Avenue NW and 14th Street NW. It also shows areas of fairly dense development east of the Anacostia River, primarily associated with large low- rise garden apartment complexes in the Far Southeast. On the other hand, areas like Woodridge, Burrville, and Shepherd Park have low population densities, in some cases even lower than the adjacent neighborhoods in suburban Maryland. The contrast is especially stark with the intense residential and commercial development of Silver Spring.301.8

301.9 Map 3.3 shows that employment is highly concentrated in Central Washington. Nearly 60 percent of the city’s jobs are located within this area.

Beyond the city center, other major employment centers include the universities and federal enclaves, the New York Avenue industrial corridor, the West End, the Georgetown waterfront, the Near Southeast/baseball stadium area and several corridors in Upper Northwest. Large concentrations of employment also appear beyond the city limits, in Downtown Bethesda and Silver Spring, Maryland and in Rosslyn, Crystal City, the Pentagon area, and Alexandria, Virginia. 301.9

301.10 Figure 3.1: Planning Areas

301.11 Map 3.2: Population Density

301.12 Map 3.3: Employment Density 2017

302 LAND USE GOAL 302

302.1 The Land Use Goal is:

Ensure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents, institutions, and businesses; to sustain, restore, or improve the character, and stability, affordability, and equity of neighborhoods in all parts of the city; to provide for additional housing and employment opportunities, and to effectively balance the competing demands for land to support a growing population and the many activities that take place within Washington, DC's District boundaries. 302.1

Conclusion and Comment: Section does not accomplish initial recommendation and has failed to respond to displacement in terms of Land Use.

Recommendation: Use comments and suggestions from memorandum created by the Interagency Council on Homelessness and incorporate into plan update specifically addressing displacement in Land Use Element.

Evaluating the Impact of Policies and Actions Advanced Under LU-2 (Creating and Maintaining Successful Neighborhoods) and Appropriately Limiting Those Policies and Actions that Constrain the Development of Affordable Housing

(source:memorandum to office of planning re comprehensive plan).

Neighborhoods and their character are more than the buildings and land use mix in an area; and the District must prioritize people over aesthetics and distinctions in the street/city scape that sets one neighborhood apart from another. As such, this section of the Comprehensive plan needs to be updated to recognize that the significant loss and displacement experienced by native Washingtonians is just as, if not more important than the street/cityscape of the 130 distinct and identifiable neighborhoods in the District.

Putting the people who have been and continue to be displaced at the core of the District's approach to creating and maintaining successful neighborhoods requires the District to evaluate the policies and actions advanced in this section with an affordable housing lens. Particular attention and evaluation needs to be focused on those policies and actions that may constrain the development of affordable housing, especially those related to:

- LU-2.1.4 Rehabilitation before Demolition
- LU-2.1.5 Conservation of Single Family Neighborhoods
- LU-2.1.7 Conservation of Row House Neighborhoods
- LU-2.1.8 Zoning of Low and Moderate Density Neighborhood
- LU-2.1.9 Addition of Floors and Roof Structures to Row Houses and Apartments
- LU-2.1.12 Reuse of Public Buildings

The Comp Plan should be updated to evaluate the cost of prioritizing low and low-medium density residential zoning to create and maintain successful neighborhoods. To the extent that these efforts constrain the development of affordable housing, we have to start accounting for the trade-off between these conservation related efforts and the need for creating affordable housing at a scale that effectively addresses the crisis.

Our expectation is that there is a trade-off because, per the land use profile in the Comp Plan, the majority of DC is zoned low density residential and low-medium density residential (single family detached and single family attached (row houses) accounted for 12.6% and 9.9% of the existing zoning in 2005 compared to low rise apartments and high rise apartments account for only 4.3% and 1.0% of existing zoning in 2005).

Additionally, to the extent that these efforts are determined to undermine the District's ability to address the affordability housing crisis, the Comp Plan must clearly articulate that affordable housing is the priority and offer a framework for balancing these conservation efforts against the affordable housing priority such that the Office of Zoning and the Board of Zoning Adjustments, in their work and decisions, can support and advance the development of affordable housing as an important aspect of creating and maintaining successful neighborhoods.

Proposed language: 308 LU-2 CREATING AND MAINTAINING SUCCESSFUL INCLUSIVE NEIGHBORHOODS 308

308.1 This section of the Land Use Element focuses on land use issues within the District's neighborhoods. It begins with a set of broad policies which state the city's commitment to sustaining neighborhood diversity and protecting enhancing the defining characteristics of each community. This is followed by a discussion of neighborhood appearance, particularly the treatment of abandoned and blighted properties. This section then turns to a discussion of

residential land use compatibility issues, followed by a discussion of neighborhood centers and commercial land use compatibility issues. 308.1

309 LU-2.1 A CITY OF NEIGHBORHOODS 309

309.1 The same effort given to keep Washington's monumental core a symbol of national pride must be given to the city's neighborhoods. After all, Washington, DC's public image of the city is defined as much by the diversity and vibrancy of its communities, local culture, homes, businesses, streets, and neighborhood spaces as it is by its monuments and federal buildings. For Washington's residents, the neighborhoods are the essence of the city's social and physical environment. Strong neighborhoods are key for continued livability in a growing and changing city. Land use policies must ensure that all neighborhoods have adequate access to commercial services, parks, educational and cultural facilities, share in economic mobility, and sufficient and accessible housing opportunities while protecting respecting their rich historic and cultural legacies. 309.1

309.2 Washington has no fewer than 130 distinct and identifiable neighborhoods today. They range from high-density urban mixed use communities like the West End and Mount Vernon Square to quiet, low-density neighborhoods like Crestwood and Spring Valley, providing a wide range of choices for the District's many different types of households. Just as their physical quantities vary, the social and economic characteristics of the city's neighborhoods also vary. In 2001, the DC Office of Planning studied neighborhoods using used a range of social and economic indicators, including to classify neighborhoods as "stable", "transitional", "emerging", or "distressed." These indicators included income, home value and sales, school performance, crime rates, poverty rates, educational attainment, and building permit activity, among others. While much has changed since 2001 including substantial population growth, the emergence of new residential neighborhoods and the revitalization of established neighborhoods, the neighborhood data remain instructive for the purposes of land use policy and should be updated when a new Comprehensive Plan is undertaken. 309.2

309.3 Most Many of the District's recent planning efforts have focused on transitional, emerging, and distressed neighborhoods. Land use strategies for these areas have emphasized the reuse of vacant sites, the refurbishment (or replacement) of abandoned or deteriorating buildings, the removal of illegal land uses, and improvements to the public realm (e.g., streets and public buildings). These strategies have been paired with incentives for the private sector to reinvest in each neighborhood and provide new housing choices and services. A different set of land use strategies has been applied in "stable" neighborhoods, emphasizing commercial enhancement strategies, public space design, neighborhood conservation character, and appropriate infill.

Land use policies in these areas have focused on retaining neighborhood character, mitigating development impacts on services and infrastructure, preventing demolition in historic districts, and improving the connection between zoning and present and desired land uses. 309.3

NEW Other planning efforts have focused on reconnecting neighborhoods divided by large transportation infrastructure such as highways and railyards. Reconnection provides for

strengthening existing neighborhoods and creating new neighborhoods to accommodate the growing population such as in NoMa, Capitol Crossing, and Walter Reed areas. These planning efforts include framework plans to provide design guidance, define and activate the public realm, support neighborhood sustainability and resilience, and identify retail strategies.

NEW Continued growth, competing demands for land, and the desire to manage policy priorities across Washington, DC requires renewed attention to all areas in the city.

309.4 During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities increased stability in its transitional, emerging, and distressed neighborhoods. This does not mean that all neighborhoods should become the same, or that a uniform “formula” for stability should be applied to each community. Rather, it means that each neighborhood should have certain basic assets and amenities (see text box below). These assets and amenities should be protected respected and enhanced where they exist today, and created or restored where they do not. 309.4

309.5 Policy LU-2.1.1: Variety of Neighborhood Types

Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future while encouraging the identification of appropriate sites for new development, and/or adaptive reuse to help accommodate population growth and advance affordability and opportunity. 309.5

309.6 What Makes a Great Neighborhood? 309.6

A successful neighborhood should create a sense of belonging, civic pride, and a collective sense of stewardship and responsibility for the community’s future among all residents. Indeed, a neighborhood’s success must be measured by more than the income of its residents or the size of its homes. Building upon the In 2004, “A Vision for Growing an Inclusive City” identified essential physical qualities that all neighborhoods should share. These included:

- Transportation options for those without a car, including convenient bus service, car sharing, bicycle facilities, and safe access for pedestrians;*
- Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down restaurants;*
- Housing choices, including homes for renters and for owners, and a range of units that meet the different needs of the community;*
- Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature;*
- Quality public services, including police and fire protection, high-quality, safe and modernized schools, health services, and libraries and recreation centers that can be conveniently accessed (though not necessarily located within the neighborhood itself);*

- *Distinctive character and a "sense of place", defined by neighborhood architecture, visual landmarks and vistas, streets, public spaces, and historic places;*
- *Evidence of visible public maintenance and investment—proof that the city "care" about the neighborhood and is responsive to its needs; and*
- *A healthy natural environment, with street trees and greenery, and easy access to the city's open space system.*

The understanding of what makes a great neighborhood has evolved, particularly in terms of addressing social equity, advancing sustainability, and building community resilience to everyday challenges as well as environmental and manmade disasters. Where a resident lives - their neighborhood - remains one of the greatest predictors of individual health and economic outcomes. To achieve inclusive growth, neighborhood success must not only include achieving the desired physical characteristics but also ensuring that every community plays a part in supporting investment and development that advances neighborhood vitality, growth, and economic mobility, and increases access, equity, and where appropriate, jobs. A neighborhood's success must be measured by more than the income of its residents or the size of its homes. A successful neighborhood should create a sense of belonging and civic pride, and a collective sense of stewardship and responsibility for the community's future among all residents.

The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future.

309.7 Policy LU-2.1.2: Neighborhood Revitalization

Facilitate orderly neighborhood revitalization and stabilization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need, except where projects advance equity and opportunity for disadvantaged persons. Use social, economic, and physical indicators such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate as key indicators of need. 309.7

309.8 Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply including affordable units and expand neighborhood commerce with parallel goals to protect respect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to "create successful neighborhoods" in all parts of the city requires an emphasis on conservation conserving units and character in some neighborhoods and revitalization in others although all neighborhoods have a role in helping to meet broader District-wide needs such as affordable housing, public facilities, etc.. 309.8

309.9 Policy LU-2.1.4: Rehabilitation Before Demolition

In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of architecturally or historically significant existing buildings, rather than demolition. 309.9

309.10 Policy LU-2.1.5: Conservation of Single Family Neighborhoods Support

Protect and conserve Support the District's established stable, low density neighborhoods and ensure that their zoning reflects their established low density character. Carefully manage the development of vacant land and the alteration of existing structures in and adjacent to single family around neighborhoods in order to protect low density respect character, housing, affordable housing, civic space, preserve open space, and maintain neighborhood scale. 309.10

309.11 Policy LU-2.1.6: Teardowns and Mansionization

Discourage the replacement of quality homes in good physical condition with new single-family homes that are substantially larger, taller, and bulkier, or more likely to require more energy than the prevailing building stock. 309.11

309.12 Policy LU-2.1.7: Conservation of Row House Neighborhoods Character

Protect Respect the character of row house neighborhoods by requiring the height and scale of structures to be consistent with the existing pattern, considering additional row house neighborhoods for historic district designation, and regulating the subdivision of row houses into multiple dwellings. Upward and outward extension of row houses which compromise their design and scale should be discouraged. 309.12

309.13 Policy LU-2.1.8: Zoning of Low and Moderate Density Neighborhoods

Unless a small area plan, District agency directive or study indicates otherwise, Discourage the rezoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through R-4RF) for multi- family apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood. 309.13

*309.14 Policy LU-2.1.9: Addition of Floors and Roof Structures to Row Houses and Apartments
Alterations to Rowhouses and Apartments*

Generally discourage alterations to buildings that result in a loss of family- sized units increases in residential density resulting from new floors and roof structures (with additional dwelling units) being added to the tops of existing row houses and apartment buildings, particularly where such additions would be architecturally undistinguished and out of character with the other structures on the block. Roof structures should only be permitted if they would not harm the aim to respect the architectural character of the building on which they would be added. or other buildings nearby. 309.14

309.15 Policy LU-2.1.10: Multi-Family Neighborhoods

Maintain the multi-family residential character of the District's Medium- and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, unless those uses would likely provide jobs for nearby residents, and make these areas more attractive, pedestrian-friendly, and transit accessible. 309.15

309.16 Policy LU-2.1.11: Residential Parking Requirements

Ensure that Parking requirements for residential buildings should are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including

proximity to transit), and new technology (including the sharing economy and electric vehicles). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. 309.16

Please refer to the Transportation Element for additional policies and actions related to parking management.

309.17 Policy LU-2.1.12: Reuse of Public Buildings

Rehabilitate vacant or outmoded public and semi-public buildings for continued use. Reuse plans should be compatible with their surroundings, and co-location of uses considered to meet broader District-wide goals. and should limit the introduction of new uses that could adversely affect neighboring communities. Reuse of public buildings should implement small area and framework plans where possible. 309.17

309.18 Policy LU-2.1.13: Flag Lots

Generally discourage the use of “flag lots” (lots with little or no street frontage, accessed by a driveway easement or narrow strip of land and typically located to the rear of another lot) when subdividing residential property. 309.18

319.18a Policy LU-2.1.14: Planned Unit Developments in Neighborhood Commercial Corridors Consider modifying minimum lot size and other filing and procedural (but not height and density) requirements for Planned Unit Developments (PUDs) for neighborhood commercial areas for the purpose of allowing small property owners to participate in projects that encourage high quality developments and provide public benefits. Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits including housing, affordable housing, and affordable commercial space 309.18a

309.19 Action LU-2.1.A: Rowhouse Zoning District

Develop a new row house zoning district or divide the existing R-4 district into R-4-A and R-4-B to better recognize the unique nature of row house neighborhoods and conserve their architectural form (including height, mass, setbacks, and design). Completed – See Implementation Table. 309.19

309.20 Action LU-2.1.B: Amendment of Exterior Wall Definition

Amend the city’s procedures for roof structure review so that the division- on- line wall or party wall of a row house or semi-detached house is treated as an exterior wall for the purposes of applying zoning regulations and height requirements. Completed – See Implementation Table. 309.20

309.21 Action LU-2.1.C: Residential Rezoning

Provide a better match between zoning and existing land uses in the city's residential areas, with a particular focus on:

- a. Blocks of well-established single family and semi-detached homes that are zoned R-3 or higher;*
- b. Blocks that consist primarily of row houses that are zoned R-5-B or higher; and*
- c. Historic districts where the zoning does not match the predominant contributing properties on the block face.*

In all three of these instances, pursue consider rezoning to appropriate densities to protect respect the predominant architectural character and scale of the neighborhood. 309.21

309.22 Action LU-2.1.D: Avoiding "Mansionization"

Consider adjustments to the District's zoning regulations to address the construction of excessively large homes that are out of context with the surrounding neighborhood ("mansionization"). These adjustments might include the use of a sliding scale for maximum lot occupancy (based on lot size), and the application of floor area ratios in single family zone districts to reduce excessive building mass. They could also include creation of a new zoning classification with a larger minimum lot size than the existing R-1-A zone, with standards that more effectively control building expansion and lot division. Obsolete – see Implementation Table. 309.22

NEW Action LU-2.1.E: Study of Neighborhood Indicators

Conduct ongoing review with periodic publication of social and economic neighborhood indicators for the purpose of targeting neighborhood investments, particularly for the purposes of achieving neighborhood diversity and fair housing.

NEW Action LU-2.1.F: Electric Vehicle Supply Equipment

Encourage the siting of electric vehicle supply equipment in curbside public space, multi-dwelling unit garages, commercial facilities, and residential areas, where appropriate.

310 LU-2.2 MAINTAINING COMMUNITY STANDARDS 310

310.1 "Community standards" encompasses a broad range of topics relating to the physical appearance and quality of the city's neighborhoods. The District maintains planning, building, housing, zoning, environmental, tax, and other regulations and codes aimed at protecting public safety and keeping the city's neighborhoods in excellent physical condition. However, instances of neglected and abandoned properties, illegal uses, unpermitted construction, and code violations are still common in many parts of the city. Despite dramatic improvements in code enforcement during recent years and a 50 percent drop in the number of vacant properties since 2000, more effective and responsive enforcement remains one of the most frequently raised planning issues in the District today. 310.1

310.2 Policy LU-2.2.1: Code Enforcement as a Tool for Neighborhood Conservation Stabilization

Recognize the importance of consistent, effective, and comprehensive code enforcement, and enforcement of the higher tax rates applied to vacant, and vacant and blighted property, to the protection enhancement of residential neighborhoods. Housing, building, property tax, and zoning regulations must be strictly applied and enforced in all neighborhoods of the city to prevent deteriorated, unsafe, and unhealthy conditions; reduce illegal activities; maintain the general level of residential uses, densities, and height; provide incentives for rehabilitating property and getting it occupied; and ensure that promptly correct health and safety hazards. are promptly corrected. 310.2

310.3 Policy LU-2.2.2: Appearance of Vacant Lots and Structures

Maintain and enforce District programs (such as “Clean It Or Lien It”) which ensure that keep vacant lots and buildings are kept free of debris, litter, and graffiti. Such sites should be treated in a way that eliminates neighborhood blight, improves visual quality, and enhances public safety. 310.3

310.4 Policy LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings

Reduce the number of vacant and abandoned buildings in the city through renovation, rehabilitation, and where necessary, demolition. Implement programs that encourage the owners of such buildings to sell or renovate them, and apply liens, fines, higher taxes, charges for public clean-up of the property, and other penalties for non-compliant properties. 310.4

310.5 Policy LU-2.2.4: Neighborhood Beautification

Encourage projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements, and public realm enhancement and activation. 310.5

310.6 Policy LU-2.2.5: Enforcement of Approval Conditions

Fully enforce conditions of approval for new development, including design, building, and operating criteria. Ensure that such projects are designed, built, and operated consistently with such conditions, and apply appropriate penalties in the event of non-compliance. 310.6

310.7 Policy LU-2.2.6: Public Stewardship

Support efforts by local Advisory Neighborhood Commissions, citizen/civic associations, garden clubs, homeowner groups, and other organizations to initiate neighborhood improvement and beautification programs. Provide information, guidance, and technical assistance to these groups as appropriate or feasible. 310.7

310.8 Policy LU-2.2.7: Alley ClosingsUse

Discourage the conversion of alleys to private yards or developable land when the alleys are part of the historic fabric of the neighborhood and would otherwise continue to perform their intended functions, such as access to rear garages and service areas for trash collection.

Support the greening of residential alleys where feasible to enhance sustainability and stormwater management. Encourage potential activation of commercial alleys in business

districts through art, programming, and events, where not in conflict with the intended function of the alley network. 310.8

310.9 Action LU-2.2.A: Vacant Building Inventories

Maintain and continuously update data on vacant and abandoned buildings, following up on public reports of vacant buildings in the city, and regularly assess the potential for such buildings to support new uses and activities. This should include periodic assessment of the city's vacant building monitoring and taxation programs and exploring creative ways to deal with vacant properties and long-term vacant sites. Strategically purchase such properties at tax delinquency sales when such properties could be put into use for affordable housing. 310.9

310.10 Action LU-2.2.B: Education and Outreach on Public Space Maintenance

Develop a public outreach campaign on the District's public space regulations (including the use of such space for announcements, campaign signs, and advertising), and resident/District responsibilities for maintenance of public space, including streets, planting strips, sidewalks, and front yards. 310.10

NEW Action LU-2.2.C: Forested Land Preservation

Provide incentives to preserve privately owned forest land and enhance tree canopy, such as through easements, forest mitigation bank programs, or transfer of development rights, and enforce laws preserving special and heritage trees.

311 LU-2.3 RESIDENTIAL LAND USE COMPATIBILITY 311

311.1 Many of Washington's neighborhoods were developed before 1920, when the city adopted its first zoning regulations were applied. As a result, the older neighborhoods tend to have a patchwork pattern of land uses, with business and residential activities sometimes occurring on the same block. While this pattern has created some of the city's most desirable and interesting neighborhoods, it has also introduced the potential for conflict. Certain commercial and industrial uses may generate noise, odor, traffic, litter, and other impacts that affect the quality of life in adjacent residential neighborhoods. Similarly, introducing new residential uses to commercial or industrial areas can make it difficult for established businesses to operate effectively. 311.1

311.2 Land use compatibility is addressed through the District's zoning regulations. The regulations list uses that are permitted as a matter-of-right and those that are permitted with a Special Exception (and in some cases, uses that are prohibited) in each zone. Over the years, a variety of "standards for external effects" have been applied to address the impacts of different activities on adjacent uses. However, the Zoning Regulations have not been comprehensively updated in almost 50 years, and do not address land use compatibility issues as effectively as they might. More effective use of performance standards, buffering and screening requirements, management of "problem" land uses, and the examination of appropriate matter of right uses should be pursued as the Zoning Regulations are redrafted. In 2016 the Zoning Commission adopted a comprehensive update to the Zoning Regulations; the first comprehensive revision in over 50 years. The revised zoning regulations, referred to as ZR16, address land use

compatibility issues, more effective use of performance standards, buffering and screening requirements, updated development and design standards, and new standards for parking and loading. ZR-16 also includes new definitions, new zones, and changes to matter-of-right and special exception uses. ZR16 is an important step in implementing goals for achieving a healthy, vibrant, diverse and environmentally sustainable city. 311.2

311.3 Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas

Maintain zoning regulations and development review procedures that prevent the encroachment of inappropriate commercial uses in residential areas; and (b) limit the scale and extent of non-residential uses that are generally compatible with residential uses, but present the potential for conflicts when they are excessively concentrated or out of scale with the neighborhood. 311.3

311.4 Policy LU-2.3.2: Mitigation of Commercial Development Impacts

Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts on surrounding residential areas. Before commercial development is approved, establish appropriate requirements for traffic transportation demand management and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid such possible adverse effects of the benefits of commercial development in enlivening neighborhoods, generating taxes and creating jobs. 311.4

311.5 Policy LU-2.3.3: Buffering Requirements

Buffer Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. 311.5

311.6 Policy LU-2.3.4: Transitional and Buffer Zone Districts

Maintain mixed use zone districts which serve as transitional or buffer areas between residential and commercial districts, and which also may contain institutional, non-profit, embassy/chancery, and office-type uses. Zoning regulations for these areas (which currently include the SP-1 and SP-2 zones) should enhance neighborhood character and ensure that development is harmonious with its surroundings, consider achieves appropriate height and density transitions in new developments., and protect neighborhood character. 311.6
Churches and other religious institutions are an important part of the fabric of the city's neighborhoods.

311.7 Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents.the District of Columbia. Ensure thatW when such uses are permitted in residential neighborhoods, their y are designed and operation ed in a manner that is should be sensitive to neighborhood issues and neighbors that maintains quality of life. Encourage institutions and

neighborhoods to work proactively to address issues such as traffic transportation and parking, hours of operation, outside use of facilities, and facility expansion. 311.7

311.8 Policy LU-2.3.6: Places of Worship and other Religious Facilities

Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city's neighborhoods. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these facilities' transportation needs, operations, and expansion, so that existing and new religious facilities may be sustained as neighborhood anchors and a source of spiritual guidance for District residents. Recognize also that places of worship or religious assembly, and some other religious facilities or institutions, are accorded important federal constitutional and statutory protections under the First Amendment (U.S. Const. Amend. I) and the Religious Land Use and Institutionalized Persons Act of 2000, approved September 22, 2000 (114 Stat. 803; 42 U.S.C. 2000cc). The missions of many religious institutions involve service to the poor, and institutions offer important services such as providing food banks, meals, clothing, counseling services, shelter and housing. 311.8

311.9 Policy LU-2.3.7: Non-Conforming Institutional Uses

Carefully control and monitor institutional uses that do not conform to the underlying zoning to promote ensure their long-term compatibility. In the event such institutions uses are sold or cease to operate, as institutions, encourage conformance with existing zoning and continued compatibility with the neighborhood. 311.9

311.10 Policy LU-2.3.8: Non-Conforming Commercial and Industrial Uses

Limit Reduce the number of nonconforming uses in residential areas, particularly those uses that generate noise, truck traffic, odors, air and water pollution, and other adverse effects. Consistent with the zoning regulations, limit the expansion of such uses and fully enforce regulations regarding their operation to avoid harmful impacts on their surroundings. 311.10

311.11 Policy LU-2.3.9: Transient Accommodations in Residential Zones

Continue to distinguish between transient uses – such as hotels, bed and breakfasts, and inns – and permanent residential uses such as homes and apartments in the District's Zoning Regulations. The development of new hotels on residentially zoned land should continue to be prohibited, incentives for hotels (such as the existing Hotel Overlay Zone) should continue to be provided on commercially zoned land, and owner occupancy should continue to be required for transient accommodations in residential zones, consistent with applicable laws. Short term housing for persons receiving social services is outside the scope of this policy's prohibition. 311.11

311.11

311.12 Policy LU-2.3.10: Conversion of Housing to Guest Houses and Other Transient Uses

Control the conversion of entire residences to guest houses, bed and breakfast establishments, clinics, and other non-residential or transient uses. Zoning regulations should continue to allow larger bed and breakfasts and small inns within residential zones through the Special Exception process, with care taken to avoid the proliferation of such uses in any one neighborhood. 311.12

Please refer to Policy 2.4.11 of this Element for additional guidance on hotel uses and the need to address their impacts.

311.13 Policy LU-2.3.11: Home Occupations

Maintain appropriate regulations (including licensing requirements) to address the growing trend toward home occupations, accommodating such uses but ensuring that they do not negatively impact hurt residential neighborhoods. 311.13

NEW Policy: Arts and Culture Uses in Neighborhoods

Recognize the importance of low-profile, neighborhood-serving arts and culture as an asset for community preservation and building. Encourage the preservation or expansion of arts and culture in discretionary review of development projects.

Please refer to the Arts and Culture Element for additional guidance.

311.14 Action LU-2.3.A: Zoning Changes to Reduce Land Use Conflicts in Residential Zones

As part of the comprehensive rewrite of the zoning regulations, develop text amendments which:

- a. Expand buffering, screening, and landscaping requirements along the edges between residential and commercial and/or industrial zones;*
- b. More effectively manage the non-residential uses that are permitted as a matter-of-right within commercial and residential zones in order to protect neighborhoods from new uses which generate external impacts;*
- c. Ensure that the height, density, and bulk requirements for commercial districts balance business needs with the need to protect the scale and character of adjacent residential neighborhoods;*
- d. Provide for ground-level retail where appropriate while retaining the residential zoning along major corridors; and*
- e. Ensure that there will not be a proliferation of transient accommodations in any one neighborhood. Completed – See Implementation Table. 311.14*

311.15 Action LU-2.3.B: Analysis of Non-Conforming Uses

Complete an analysis of non-conforming commercial, industrial, and institutional uses in the District's residential areas. Use the findings to identify the need for appropriate actions, such as zoning text or map amendments and relocation assistance for problem uses. 311.15

312 LU-2.4 NEIGHBORHOOD COMMERCIAL DISTRICTS AND CENTERS 312

312.1 Commercial uses and local public facilities are an essential part of the District's neighborhoods. Many of these uses are clustered in well-defined centers that serve as the "heart" of the neighborhood. These areas support diverse business, civic, and social activities. Each center reflects the identity of the neighborhood around it through the shops and establishments it supports and the architecture and scale of its buildings. They are also often

connecting points for public transit lines—in fact, many originated around streetcar stops and continue to be important bus transfer transit points today. 312.1

312.2 Since 2006, the District has experienced significant population growth with the emergence of new neighborhoods and revitalization of existing ones. Growth of commercial centers has favored walkability and a retail mix led by food establishments and neighborhood shopping options. Residential growth has also spurred local commercial growth, buoying the success of more commercial centers, alleviating the District's long standing retail gap. These changes have reshaped the retail landscape. Established retail areas have new competition while new opportunities emerged in underutilized centers. Commercial centers in neighborhoods provide amenities to residents, help to define public life, and provide community anchors and places for social interaction. Many District neighborhoods, particularly those on the east side of the city, lack well-defined centers or have centers that struggle with high vacancies and a limited range of neighborhood-serving businesses. Greater efforts must be made to attract new retail uses to these areas by improving business conditions, upgrading storefronts and the street environment, and improving parking and pedestrian safety and comfort. The location of new public facilities in such locations, and the development of mixed use projects that include upper story housing, can encourage their revival. 312.2

NEW In 2012, OP developed the DC Vibrant Retail Streets Toolkit to help community and business leaders maximize the potential of their commercial centers with a roadmap based on extensive market research. The most important factor for successful commercial districts is support from a management organization such as a business improvement district, Main Street, merchants' association, or other community group. Management organizations present a unified identity and efficiently communicate the center's interests and needs.

NEW The structure of retail space is another important factor. Retail space is most likely to be successful when it is contiguous with other retail spaces, ceilings are at least 12 feet high, storefronts are transparent, and sidewalks are at least 8 feet wide. Each commercial center has its own market position based on numerous factors including the characteristics of the residential and daytime populations; function and composition of nearby centers; and accessibility. The type of retail mix and amount of space that can be supported depends on the center's market position which can change by increasing housing and jobs in or near the center and/or increasing access to the center.

NEW Improving access to neighborhood commercial centers for pedestrians, transit riders, bicyclists, and drivers is an important factor for successful retail. Pedestrian access is the most important accessibility factor for all commercial centers because it is the common thread that connects retail space with patrons using all other modes

NEW Curbside management is another major factor for successful commercial areas. Manage the curbside of streets in commercial centers to promote greater access and turnover for customers. Curbside management may be done through strategies such as adjusting parking prices and time limits. Curbside lanes are used for multiple purposes, including parking, loading, bicycle lanes, and transit movements. All such uses should be carefully considered when

determining how to manage access in each commercial center. Additionally, management organizations should manage off-street parking in commercial centers to promote shared parking among different uses at different times of day and days of the week.

312.3 Even the most successful neighborhood centers in the District must deal with land use conflicts. Excessive concentrations of bars, liquor stores, fast-food outlets, convenience stores, and similar uses are causes of concern in almost every part of the city. Commercial parking demand affects nearby residential streets around many centers. In some locations, commercial and residential rear yards abut one another, causing concerns over rodents, odors, noise, shadows, view obstruction, and other impacts. Effective zoning and buffering requirements are important to address such concerns while accommodating growth, enhancing local amenities, and protect respecting neighborhood character. Zoning overlays have been adopted has been used in some commercial districts to limit the range of allowable uses and reduce the likelihood of external impacts. 312.3

312.4 Of course, not all commercial uses occur in defined centers. Many District thoroughfares are lined with “strip” commercial development, much of it auto- oriented and not particularly focused on residents of the adjacent neighborhoods. Activities such as auto dealerships and repair services, motels, and similar uses, can be important contributors to the District’s economy. Again, zoning regulations should establish where these uses are appropriate and should set buffering and screening requirements and other standards which improve the compatibility of such uses with their surroundings. 312.4

312.5 Policy LU-2.4.1: Promotion of Commercial Centers

Promote the vitality of the District’s commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, accommodate population growth, and sustain the city’s role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and amenities ease of access for nearby residents. 312.5

312.6 Policy LU-2.4.2: Hierarchy of Commercial Centers

Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Activities in each type of center should reflect the center’s its intended role and market area, as defined in the Framework Element. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. 312.6

312.7 Policy LU-2.4.3: Regional Centers

Support and enhance the District’s regional commercial centers to help serve area shopping needs that are not met Downtown. Permit the District’s to establish regional commercial centers, at Georgetown and Friendship Heights, to develop and evolve in ways which are compatible with other land use policies, including those for accommodating population growth and increasing affordable housing, especially along corridors, strengthening commercial vitality, maintaining stable neighborhoods, mitigating

negative environmental impacts, managing parking, and minimizing adverse traffic transportation impacts. Likewise Promote equitable access to regional shopping, encouraging the continued development of the emerging regional centers at Minnesota-Benning and Hechinger Mall in a manner that is consistent with other policies in the Comprehensive Plan.

312.7

312.8 Policy LU-2.4.4: Heights and Densities in Regional Centers

Maintain Promote heights and densities in established and proposed regional centers which are appropriate to the scale and function of development in adjoining communities and which step down transition to adjacent residential areas, and maintain or develop buffer areas for neighborhoods exposed to increased commercial densities. 312.8

312.9 Policy LU-2.4.5: Encouraging Nodal Development

Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of the surrounding residential areas and does not unreasonably impact them. 312.9

312.10 Policy LU-2.4.6: Scale and Design of New Commercial Uses

Develop Ensure that new uses within commercial districts are developed at a height, mass, scale and design that is appropriate for a growing, densifying city, and that is compatible with surrounding areas. 312.10

312.11 Policy LU-2.4.7: Location of Night Clubs and Bars

Provide zoning and alcoholic beverage control laws that discourage the excessive concentration and encourage a mix of ground floor uses in commercial areas creating stronger retail environments and minimizing potential negative effects of liquor licensed establishments (e.g., night clubs and bars) in neighborhood commercial districts and adjacent residential areas. New uses that generate late night activity and large crowds should be located away from low and moderate density residential areas and should instead be concentrated prioritized Downtown, in designated arts or entertainment districts, and in areas where there is a limited residential population nearby. 312.11

312.12 Policy LU-2.4.8: Addressing Commercial Parking Impacts

Ensure that the District’s Zoning regulations should consider the traffic transportation and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery. 312.12

Please refer to the Transportation Element, Section 3.2 for additional policies and actions related to parking.

312.13 Policy LU-2.4.9: High-Impact Commercial Uses

Ensure that the District's zoning regulations Limit the location and proliferation of fast food restaurants, sexually-oriented businesses, late night alcoholic beverage establishments, 24-hour mini-marts and convenience stores, and similar high-impact commercial establishments that generate excessive late night activity, noise, or otherwise affect the quality of life in nearby residential neighborhoods. 312.13

*312.14 Policy LU-2.4.10: Use of Public Space within Commercial Centers
Carefully manage the use of sidewalks and other public spaces within commercial districts to avoid pedestrian obstructions and to provide an attractive and accessible environment for shoppers. Continue to encourage the identification and transition of excess public right of way into temporary or permanent plazas that contribute to social interaction within commercial centers. Where feasible, the development of outdoor sidewalks cafes, flower stands, and similar uses which "animate" the street should be encouraged. Conversely, the enclosure of outdoor sidewalk space with permanent structures should generally be discouraged. 312.14*

*312.15 Policy LU-2.4.11: Hotel Impacts
Manage the impacts of hotels on surrounding areas, particularly in the Near Northwest neighborhoods where large hotels adjoining residential neighborhoods. Provisions to manage truck movement and deliveries, overflow parking, tour bus parking, and other impacts associated with hotel activities should be developed and enforced. 312.15*

Please refer to Policies 2.3.9 and 2.3.10 of this Element for additional guidance on hotel uses within residential neighborhoods.

*312.16 Policy LU-2.4.12: Monitoring of Commercial Impacts
Maintain a range of Monitoring, inspection, and enforcement local planning, building, zoning, transportation, health, alcoholic beverage control, and other District rules and regulations programs for commercial areas to ensure that activities are occurring in accordance with local planning, building, zoning, transportation, health, alcoholic beverage control, and other District rules and regulations. Prompt and effective action should be taken in the event of non-compliance with these rules and regulations is observed. 312.16*

*312.17 Policy LU-2.4.13: Commercial Uses Outside Designated Centers
Recognize that Not all commercial uses can be appropriately sited within designated neighborhood, multi-neighborhood, and regional centers. For example, automobile sales, nurseries, building supply stores, large night clubs, hotels, and similar uses may require highway-oriented locations near parking and major roads. The District should Retain and support such uses and accommodate them on appropriately located sites. 312.17*

*312.18 Action LU-2.4.A: Evaluation of Commercial Zoning
As part of each Small Area Plan, conduct an evaluation of commercially zoned areas to assess the appropriateness of existing zoning designations. This assessment should consider:*

- a. The heights, densities and uses that could occur under existing zoning; and*
- b. The suitability of existing zoning given the location and size of each area,*

the character of adjacent land uses, the relationship to other commercial districts in the vicinity, transportation and parking attributes, proximity to adjacent uses, and the designation on the Future Land Use Map. 312.18

*312.19 Action LU-2.4.B: Zoning Changes to Reduce Land Use Conflicts in Commercial Zones
As part of the comprehensive rewrite of the zoning regulations, consider text amendments that:*

- a. More effectively control the uses which are permitted as a matter-of- right in commercial zones;*
- b. Avoid the excessive concentration of particular uses with the potential for adverse effects, such as convenience stores, fast food establishments, and liquor-licensed establishments; and*
- c. Consider performance standards to reduce potential conflicts between certain incompatible uses Completed – See Implementation Table. 312.19*

312.20 Action LU-2.4.C: Mixed Use District with Housing Emphasis

Develop a new mixed use zoning district, to be applied principally on land that is currently zoned for non-residential uses (or that is now unzoned), which limits commercial development to the ground floor of future uses and requires residential use on any upper stories. Consider the application of this designation to Metrorail stations and corridor streets that may currently have high commercial vacancies or an excess supply of commercial space, including those areas designated as “Main Street Mixed Use Corridors” and commercial centers on the Generalized Policies Map. Completed – See Implementation Table. 312.20

Conclusion and Comment: Office of Planning has failed to include policy and action steps mentioned in Ich memorandum. Proposed language and policy does not provide proper or prescriptive measures to affect or avoid prevent or eliminate displacement. Section does not include impact analysis of displacement as recommended.

Recommendation: Use comments and suggestions from Ich memorandum to

incorporate data sets needed to update this section of land use element.

Developing Group Housing by Right and Confirming the District's Efforts to Promote and Accommodate Group Housing (source: memorandum to office of planning re comprehensive plan).

There are a number of significant priorities captured here. The ICH is interested in determining the status of the following efforts (and recommends that the Comp Plan be updated to reflect the latest developments and findings associated with these efforts):

- LU-3.4.1: Reasonable Accommodation of Group Homes (specifically the effort to ensure that the District's planning, zoning, and housing codes make reasonable accommodation for group homes);
- LU- 3.4.C: Analysis of Group Home Siting Standards (wherein the District would undertake an analysis of the spatial standards currently used to regulate group homes and homeless shelters in the District, and determine if adjustments to these standards are needed to create additional sitting opportunities, particularly in relation to allowing group homes and homeless shelters in Zone Districts CM-1 and CM-2); and
- LU-3.4.D Community Housing Ombudsman (wherein the District would establish an ombudsman position to serve a resource, encouraging educational efforts, enforcement of Fair Housing Act policy, and dispute resolution related to the siting and operations of group homes within the District).

Additionally, this section needs to be updated to reflect the reality that the current process for siting, reviewing and approving group housing creates significant roadblocks in the District's efforts to address the unmet need for emergency, temporary, and permanent supportive housing facilities targeting individuals and families experiencing homelessness.

Providing housing in a group setting should be understood as a creative affordable housing solution in a high cost market area. As such, when the proposed project is in line with the underlying zoning for the location, the project should not be subject to a Special Exception process. In fact, the same principles that are extended to Small Group Housing for the Disabled (under Policy LU-3.4.3) should be applied to all Group Housing, including larger group housing and group housing serving non-disabled populations (LU-3.4.4). Specifically, "zoning requirements for ... homes that are more restrictive than those applying to other residential uses are unlawful and shall not be permitted" (317.10, pg 3-49).

Expanding the ability of the District to provide emergency, temporary and permanent supportive housing facilities by right, is critical for a number of reasons. For one, as a right-to-shelter community, the District must ensure that there is an adequate supply of emergency and temporary housing facilities for individuals and families experiencing a housing crisis. Emergency housing facilities will always be an important part of addressing homelessness.

Housing loss cannot always be prevented, and it is important that we shelter families and individuals in a safe and respectful environment that allows them to quickly stabilize and return to permanent housing.

Existing facilities are very large and old, with aging plumbing, heating, and cooling systems and crumbling infrastructure, and they come with significant annual price tags for maintenance. They are inadequate for a number reasons. Food preparation and preservation space does not exist in most of our shelters. Security and staffing costs are also necessarily high when you have a large number of people living in a relatively small space. Most importantly, however, conditions in the vast majority of the District's shelters are simply unacceptable and offer very little to help reduce the trauma of whatever life events have led individuals and families to shelter.

Best practices show that both individuals and families can be more successful when shelter is provided in smaller, neighborhood-based settings where programming can be tailored to meet the needs of clients and where clients can more readily access services and support networks in the community. For families, we envision facilities that shelter between 25 and 40 households per site, and for single adults, we envision facilities that shelter between 80 and 100 adults per site. We have started the work of transforming the family shelter system by closing DC General and creating short term family housing facilities in all 8 Wards. We will need to transform the individual shelter system in much the same way and build short term housing facilities for individuals across all 8 Wards.

With regard to permanent supportive housing facilities, Homeward DC documents that there is a significant need for permanent supportive housing units to end chronic homelessness in the District. Unfortunately, the last two years of implementation indicates that it is highly unlikely that the market can be incentivized and/or leveraged to meet all of the need. Currently, the District tries to leverage the market by utilizing housing vouchers for the scattered site permanent supportive housing program and also by funding the production of permanent supportive housing units via the Consolidated RFP (including both a set aside requirement for permanent supportive housing and also offering bonus points for projects that create more permanent supportive housing units than required by the set aside). While both those efforts should be touted for their achievements to-date, they also amply demonstrate the limits of the market. Households (both families and individuals) with vouchers are unable to find housing for months, even with the assistance of housing navigators. Additionally, despite the fact that the projects funded by the Consolidated RFP commit to creating more POSH than required by the set-aside, the need far out dwarfs the total units in the pipeline and projected to come online in the near future.

To reiterate, the District is at a juncture where it must evaluate how much of the publicly-owned sites should be dedicated for affordable housing purposes –particularly as public housing opportunities (managed by the District's Housing Authority) and/or group housing opportunities (emergency, temporary and permanent supportive housing facilities) that have the necessary services and supports imbedded onsite.

313.1 This section of the Land Use Element addresses five specific activities that require a greater level of direction than can be covered in the “Neighborhood” policies listed and described in the previous sections. These activities are an essential part of the District of Columbia and are vital to the city’s future. Each of these uses presents a unique set of challenges and land use compatibility issues. They include:

- a. Public Works and Industrial Uses, which are essential to government operations and the local economy, but also create external impacts and face displacement for higher value land uses;*
- b. Institutional Uses, including places of worship and other religious facilities, that seek vacant land or developed properties for expansion, but where expansion is limited because the properties are hemmed in by adjacent neighborhoods;*
- c. Foreign Missions, namely the chanceries and embassies of foreign governments, which seek to locate or expand in some of the city’s most desirable neighborhoods;*
- d. Group Homes, Community Based Residential Facilities, and Supportive Housing, which provide for the essential housing and socialization needs of thousands of District residents but may end up concentrated in particular parts of the city; and*
- e. Federal Facilities, which often operate in immediate proximity to residential neighborhoods, creating the need for sensitive planning as these uses expand, contract, and implement new security measures. 313.1*

314 LU-3.1 PUBLIC WORKS AND INDUSTRIAL PRODUCTION, DISTRIBUTION, AND REPAIR (PDR) LAND USES 314

314.1 Approximately 2,000 333 acres of land in the District of Columbia are zoned for industrial uses. The city’s industrial PDR areas support a variety of uses, many of which are essential to the delivery of municipal services or which are part of the business infrastructure that underpins the local economy. Furthermore, PDR businesses and uses create opportunities for entrepreneurship, creativity and innovation, and higher paying jobs than comparable jobs for similar education attainment in economic sectors like retail and healthcare. It is estimated that nine percent of the employment in the District is in PDR industries. These jobs are often accessible to residents with lower educational attainment and returning citizens. In 2005, the inventory of private industrial floor space in the city was approximately 13 million square feet.

314.1

NEW Washington, DC’s industrial land exists largely because of historical development factors that made certain areas suitable for these uses, or unsuitable for residential and commercial development. Such factors include proximity to rail or water routes needed to transport heavy goods, relative isolation from residential areas, and the effects of noisy or noxious uses and infrastructure. Where these factors remain, PDR facilities are likely to remain an appropriate use of this land. Since much of this land has always been devoted to industrial use, many of the city’s prominent examples of historic industrial architecture are located here. Of the 25 properties identified as potentially significant in the DC State Historic Preservation Office’s 1991-92 historic resources study of District warehouses and workshops, 16 have received historic designation.

314.2 Some of the municipal activities housed on the city's industrial land include trash transfer and hauling, bus storage and maintenance, vehicle impoundment, police and fire training, street repair and cleaning equipment storage, and water and sewer construction services. Private activities on industrial lands include food and beverage services, laundry, printers, concrete and asphalt batching plants, distribution centers, telecommunication facilities, construction contractors and suppliers, and auto salvage yards, to name only a few. The contribution and necessity of these uses to the city's economy is discussed in the Economic Development Element of the Comprehensive Plan. 314.2

314.3 Given the lenient zoning standards within industrial areas (most of which actually favor commercial uses over industrial uses) as well as the market pressure to provide additional residential housing, much of the city's industrial land supply is at risk. While public works and PDR uses may no longer be logical in some areas given their proximity to Metro or residential areas, proactive measures are needed to sustain them elsewhere. In addition, many of the public works uses that take place on industrial land are not optimally organized, resulting in inefficient use of space. Plans to reorganize and consolidate many of these activities have been developed. The repositioning of these resources results in more effective service delivery, added value to nearby properties, provision of amenities for surrounding neighborhoods, and creation of jobs on land freed up for further public or private investment. 314.3

NEW To preserve the District's ability to create, produce, distribute and service goods, it is recommended that the District review the Zoning Code to eliminate uses in PDR zoning that are not related to Production, Distribution, Repair or creative and cultural uses. Hotels, stand-alone commercial uses, stand-alone office, non-technical or trade schools, and residential units are uses that compete for limited land resources and place additional pressure on scarce PDR land. 314.4 In 2005, the District of Columbia commissioned an analysis of industrial land supply and demand to provide a framework for new land use policies (see text box -citation 314.6). In 2014, another industrial land study was released by the District of Columbia, Ward 5 Works: Ward 5 Industrial Land Transformation. This study furthered the findings in 2005 with particular emphasis on the Upper Northeast area where approximately 50% of the District's industrial uses are located. The recommendations of this study these studies are incorporated in the policies and actions below. 314.4

314.5 One of the most important findings of the 2005 industrial land use analysis is that there is was an immediate unmet need of approximately 70 acres for "municipal-industrial" activities. Facility needs range from an MPD Evidence Warehouse to replacement bus garages for WMATA. Several agencies, including the Architect of the Capitol, indicate that their acreage needs will increase even more in the next ten years. At the same time, there is evidence that efficiencies could be achieved through better site layouts and consolidation of some municipal functions, particularly for vehicle fleet maintenance. The findings provide compelling reasons to protect preserve the limited supply of industrial land, and to organize municipal-industrial activities more efficiently. One example of this approach is showcased in the Department of Public Works (DPW) Campus Master Plan, a study conducted as a recommendation from the 2014 Ward 5 Works Industrial Land Transformation Study. The DPW Campus Master Plan aims

to consolidate operations and administrative offices to a new state-of-the-art campus at West Virginia Avenue NE that would transform the current site into a neighborhood asset while efficiently utilizing the District-owned industrial land. 314.5

314.6 TAKING A HARD LOOK AT DC'S INDUSTRIAL LANDS 314.6

The 2005-2006 Industrial Land Use Study classified DC's industrially zoned lands into four categories:

- a. Areas for Retention and Reinforcement have healthy production, distribution, and repair (PDR) uses and have good prospects for hosting such uses in the future.*
- b. Areas for Intensification/Evolution will continue to be desirable for PDR activities but show patterns of underutilization and opportunities for intensified uses. Some non-PDR activities may take place in these areas in the long-term future.*
- c. Areas for Strategic Public Use are needed to accommodate municipal and utility needs.*
- d. Areas for Land Use Change are areas where a move away from PDR uses may be appropriate due to a lack of viable PDR businesses and the desirability of these sites for other uses. In some of these areas, the District may let the market take its course. In others, proactive measures such as rezoning may be in order.*

The District is currently developing developed criteria for evaluating rezoning requests which reflect these typologies and further consider the land use, transportation, and environmental context of each site, its unique characteristics, and its potential need for future municipal purposes. 314.6

314.7 Policy LU-3.1.1: Conservation Preservation of Industrial Land

Recognize the importance of industrial land to the economy of the District of Columbia, specifically its ability to support public works functions, and accommodate production, distribution, and repair (PDR) activities. Ensure that Zoning regulations and land use decisions should continue to preserve protect active and viable PDR land uses, while allowing compatible office and retail uses and development under standards established within CM- and M- zoning. Economic development programs should work to retain and permit such uses. in the future.

314.7

314.8 Policy LU-3.1.2: Redevelopment of Obsolete Industrial Uses

Encourage the redevelopment of outmoded and non-productive industrial sites, such as vacant warehouses and open storage yards, with higher value production, distribution, and repair uses, including public facilities, and other activities, which support the core sectors of the District economy (federal government, hospitality, higher education, etc.). 314.8

314.9 Policy LU-3.1.3: Location of PDR Areas

Accommodate Production, Distribution, and Repair (PDR) uses— including municipal public works facilities—in areas that are well buffered from residential uses (and other sensitive uses such as schools), easily accessed from major roads and railroads, and characterized by existing concentrations of PDR and industrial uses. Such areas are generally designated as “PDR” on the Comprehensive Plan’s Future Land Use Map. 314.9

314.10 Policy LU-3.1.4: Rezoning of Industrial Areas

Allow the rezoning of industrial land for non-industrial purposes only when the land can no longer viably support industrial or PDR activities, or is located such that industry cannot co-exist adequately with adjacent existing uses, or where such rezoning is called for by a master plan aimed at using land more effectively and creating opportunities for affordable housing, people experiencing homelessness, and jobs for DC residents. Examples include land in the immediate vicinity of Metrorail stations, sites within historic districts, and small sites in the midst of stable residential neighborhoods, and District-owned public works properties. In the event such rezoning results in the displacement of active uses, assist these uses in relocating to designated PDR areas. 314.10

314.11 Policy LU-3.1.5: Mitigating Industrial Land Use Impacts

Mitigate the adverse impacts created by industrial uses through a variety of measures, including buffering, site planning and design, strict environmental controls, performance standards, and the use of a range of industrial zones that reflect the varying impacts of different kinds of industrial uses. 314.11

314.12 Policy LU-3.1.6: Siting of Industrial-Type Public Works Facilities

Use performance standards (such as noise, odor, and other environmental controls), minimum distance requirements, and other regulatory and design measures to promote ensure the compatibility of industrial-type public works facilities such as trash transfer stations with surrounding land uses. Improve the physical appearance and screening of such uses and strictly regulate operations to reduce the incidence of land use conflicts, especially with residential uses. 314.12

314.13 Policy LU-3.1.7: Cottage Industries and Makers

Support low-impact “cottage industries” and “home-grown businesses makers” in neighborhood commercial districts and on appropriate industrial lands. Maintain zoning regulations that strictly regulate such uses in residential areas, in order to avoid land use conflicts and negative business-related impacts, while allowing residents to explore low-impact entrepreneurship in or near their homes. 314.13

314.14 Policy LU-3.1.8: Co-Location of Optimizing Municipal Public Works Functions

Improve the performance of existing industrial areas through zoning regulations and city policies which encourage the more efficient use of land, including the co-location of municipal functions (such as fleet maintenance, record storage, and warehousing) on consolidated sites rather than independently managed scattered sites. Strategically manage District-owned land in industrial areas to improve operational capacity, use land effectively, incorporate principles of environmental stewardship and sustainability, create community amenities and job opportunities, and serve as a catalyst for revitalizing nearby neighborhoods. This approach may include the consolidation of public works activities on a smaller number of sites, enabling vacated sites to be repurposed for new job-generating activities. 314.14

See also Infrastructure Element, Section IN-3.2.

314.15 Policy LU-3.1.9: Central Management of Public Works

Promote the central management of municipal public works activities to avoid the displacement of essential government activities and the inefficiencies and increased costs resulting from more distant locations and future land acquisition needs. Consider “land banking” appropriately located District-owned properties and vacant sites to accommodate future municipal space needs. 314.15

314.16 Policy LU-3.1.10: Land Use Efficiency Through Technology

Encourage the more efficient use of PDR land through the application of technologies which reduce acreage requirements for public works. Examples of such applications include the use of diesel-electric hybrid or electric buses (which can be accommodated in multi-level garages), using distributed power generation rather than large centralized facilities, and emphasizing green building technologies to reduce infrastructure needs. 314.16

NEW Policy LU-3.1.11: Infrastructure Adequacy

The adequacy and resiliency of electrical power and other infrastructure serving growing and existing neighborhoods are integral to the success of the land use goal. Utility infrastructure must develop in tandem with proposed developments to support the needs of the community when planning for and approving proposed development or conserving the architectural landscape of neighborhoods. In furtherance of conserving, enhancing, and revitalizing neighborhoods, such measures may include promoting the upgrade of existing infrastructure, supporting new substation construction, installing green building measures, or facilitating underground efforts.

Please see Infrastructure Element for additional policies and actions related to infrastructure adequacy.

314.17 Action LU-3.1.A: Industrial Zoning Use Changes

Provide a new zoning framework for industrial land, including:

- Prohibiting high impact "heavy" industries in the C-MPDR zones to reduce the possibility of land use conflicts;*
- Prohibiting certain civic uses that detract from the industrial character of C-M areas and that could ultimately interfere with business operations;*
- Requiring special exceptions for potentially incompatible large retail uses in the C-M zone to provide more control over such uses without reducing height and bulk standards; Retail uses should not displace existing PDR uses or foreclose opportunities for future PDR uses. Where appropriate, encourage retail or commercial uses that are accessory to PDR uses as a way to activate ground floors.*
- Limiting non-industrial uses in the M zone to avoid encroachment by uses which could impair existing industrial and public works activities (such as trash transfer);*
- Creating an IP (industrial park) district with use and bulk regulations that reflect prevailing activities; and*

- *Creating a Mixed Use district where residential, commercial, and lesser- impact PDR uses are permitted, thereby accommodating live- work space, artisans and studios, and more intensive commercial uses. Once these changes have been made, update zoning as appropriate. pursue the rezoning of selected sites in a manner consistent with the policies of the Comprehensive Plan. The zoning changes should continue to provide the flexibility to shift the mix of uses within historically industrial areas and should not diminish the economic viability of existing industrial activities or the other compatible activities that now occur in PDR areas. 314.17*

314.18 Action LU-3.1.B: Industrial Land Use Compatibility

During the revision of the Zoning Regulations, develop performance standards and buffering guidelines to improve edge conditions where industrial uses abut residential uses, and to address areas where residential uses currently exist within industrially zoned areas.

Completed— See Implementation Table. 314.18

314.19 Action LU-3.1.C: Joint Facility Development

Actively pursue intergovernmental agreements to develop joint facilities for District and federal agencies (such as DPR and National Park ServicePS); District and transit agencies (DPW and WMATA); and multiple public utilities (Pepco and WASA), and multiple District agencies performing different public works functions. 314.19

314.20 Action LU-3.1.D: Inventory of Housing In Industrial Areas

Compile an inventory of existing housing units within industrially zoned areas to identify pockets of residential development that should be rezoned (to mixed use or residential) in order to protect preserve the housing stock. 314.20

NEW Action LU-3.1.D: Department of Public Works Colocation and Campus

Actively pursue funding resources or allocation for the implementation of the West Virginia Avenue Department of Public Works Campus Master Plan study that was conducted by District agencies in 2015.

NEW Action LU-3.1.E: Ward 5 Works Industrial Land Transformation Study Implement the recommendations provided in the Ward 5 Works Industrial Land Transformation Study released in 2014.

315 LU-3.2 INSTITUTIONAL USES 315

315.1 Institutional uses occupy almost 2,300 acres—an area larger than all of the city’s retail, office, and hotel uses combined. These uses include colleges and universities, private schools, childcare facilities, places of worship and other religious facilities, hospitals, private and non-profit organizations, and similar entities. 315.1

315.2 The District is home to about a dozen colleges and universities, enrolling more than 875,000 students. There are also nearly 70 non-local college and university programs that occupy space in the city. The District contains more than a dozen hospitals, some located on the campuses of its universities and others occupying their own campuses or federal enclaves.

Hundreds of non-profit and private institutions also operate within the city, ranging from private schools and seminaries to historic home museums and the headquarters of leading international organizations.

Major institutional uses are shown on Map 3.6. 315.2

315.3 Map 3.6: Colleges, Universities, and Hospitals

315.4 The city's Institutions make an important contribution to the District economy and are an integral part of Washington's landscape and history. The colleges and universities alone spend over \$1.5 billion dollars annually and employ 21,000 29,682 workers. Through partnerships with government and private industry, the city's museums, higher education, and health care institutions provide services and resources to the community that could not possibly be provided by government alone. 315.4

NEW Private institutions are stewards of historic and architecturally distinguished campuses. Several of these campuses are already recognized by historic designations, but other historically-significant campuses are not.

315.5 The growth of private institutions has generated significant concern in many of the city's neighborhoods. These concerns relate both to external impacts such as traffic and parking, and to broader concerns about the character of communities where institutions are concentrated or expanding.

315.5 Please see the Educational Facilities Element for additional policies and actions related to colleges and universities.

315.6 Policy LU-3.2.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by District institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 315.6

315.7 Policy LU-3.2.2: Corporate Citizenship

Support continued "corporate citizenship" among the city's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. Given the large land area occupied by these uses and their prominence in the community, the city's institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the city's physical environment. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of "green building" methods and low impact development, and the adaptive reuse and preservation of historic buildings.

315.7

Please see Economic Development Element for additional policies and actions related to encouraging corporations to support the local economy through hiring and contracting.

315.8 Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations
Plan, design, and manage Ensure that large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities. The Zoning regulations should not permit ensure that the expansion of these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected without commensurate benefits. 315.8

315.9 Action LU-3.2.A: Zoning Actions for Institutional Uses
Complete a study of residential zoning requirements for institutional uses other than colleges and universities. Determine if additional review by the Board of Zoning Adjustment or Zoning Commission should be required in the event of a change in use. Also determine if the user should be removed as an allowable or special exception use, or made subject to additional requirements. (Completed – See Implementation Table) 315.9

315.10 Action LU-3.2.B: Special Exception Requirements for Institutional Housing
Amend the zoning regulations to require a special exception for dormitories, rooming houses, boarding houses, fraternities, sororities, and similar uses in the R-4 zoning district. (Completed – See Implementation Table) 315.10

316 LU-3.3 FOREIGN MISSIONS 316

316.1 There are over 170 169 countries across the globe with foreign missions in the District of Columbia. These missions assist the US government in maintaining positive diplomatic relations with the international community. By international treaty, the US government is obligated to help foreign governments in obtaining suitable facilities for their diplomatic missions. This obligation was reinforced through the Foreign Missions Act of 1982, which established an Office of Foreign Missions within the Department of State and empowered the Secretary of State to set criteria relating to the location of foreign missions in the District. As noted in the text box at left, foreign missions are housed in many different types of buildings, ranging from row houses and mansions to custom-designed office buildings. 316.1

316.2 The number of Foreign Missions in the city is dynamic based on geopolitical events increased 27 percent between 1983 and 2003, in part fueled by the breakup of the Soviet Union. While an increase of this scale is not expected in the near future, some growth is likely. In addition, some of the existing missions are likely to relocate as they outgrow their facilities, respond to increased security requirements, and move beyond their traditional diplomatic functions. The Federal Elements of the Comprehensive Plan indicate that sites for as many as 100 new and relocated chanceries may be needed during the next 25 years. The availability of sites that meet the needs of foreign missions within traditional diplomatic areas is limited and the International Chancery Center on Van Ness Avenue has no available sites remaining. A portion of the Walter Reed campus is planned for chancery use, but Additional areas may be

needed for chancery use and it may be necessary for foreign missions to look beyond traditional diplomatic enclaves. 316.2

316.3 WASHINGTON'S FOREIGN MISSIONS 316.3 3

The facilities that house diplomatic functions in Washington are commonly referred to as embassies. To differentiate the functions that occur in buildings occupied by foreign missions, a variety of designations are used: Chanceries are the principal offices used by a foreign mission; colloquially referred to as embassies. Chancery annexes are used for diplomatic purposes in support of the mission, such as cultural attaches or consular operations. Ambassadors's residences are the official homes of ambassadors or chiefs of missions. Many foreign governments occupy chanceries, chancery annexes, and ambassador's residences in more than one location. In 2004, the federal government indicated there were 483 separate facilities in the city serving these functions. Since 1982, chanceries have been allowed to locate in most of Washington's non-residential zone districts as a matter of right. They are also permitted in the city's higher-density residential and special purpose (SP) zones, and in less dense residential areas covered by a diplomatic overlay district. Historically, the city's chanceries have concentrated in Northwest Washington, particularly along Massachusetts Avenue ("Embassy Row"), and in the adjacent Sheridan-Kalorama and Dupont Circle neighborhoods. There are also 16 chanceries on a large federal site adjacent to the Van Ness/ UDC Metro station, specifically created to meet the demand for foreign missions. 316.3

316.4 The Foreign Missions Act of 1982 established procedures and criteria governing the location, replacement, or expansion of chanceries in the District of Columbia. The Act identifies areas where foreign missions may locate without regulatory review ("matter of right" areas), including all areas zoned commercial, industrial, waterfront, or mixed use. These areas are located in all quadrants of the city, and include large areas south of the National Mall and east of the Anacostia River. The 1982 Act also identifies areas where foreign missions may locate subject to disapproval by the District of Columbia Foreign Missions Board of Zoning Adjustment (FMBZA). These include areas zoned medium-high and high-density residential, special purpose, and areas within a Diplomatic overlay zone. 316.4

316.5 As a result of the analysis accomplished in support of the Foreign Missions Act, a methodology was developed in 1983 to determine the most appropriate areas for foreign missions to locate, subject to FMLA review. The 1983 methodology allows foreign missions to locate in low and moderate density city blocks ("squares") in which one-third or more of the area is used for office, commercial, or other non-residential uses. In some cases, a consequence of the square-by-square determination has been an unanticipated increase in chanceries. 316.5

316.6 In 2003, the National Capital Planning Commission completed a further analysis of chancery siting standards, concluding that zoning regulations and maps could be revised to more compatibly accommodate foreign missions in the future. The Federal Elements of the Comprehensive Plan suggest that new chanceries be encouraged along South Capitol Street, Massachusetts Avenue (within Reservation 13), and the 16th Street corridor, and that a new foreign mission center be developed on the Armed Forces Retirement Home or along South

Capitol Street. Since the time the Federal Elements were adopted, Walter Reed Hospital also has been discussed as a possible site. In 2015, the National Capital Planning Commission (NCPC) updated the Federal Elements of the Comprehensive Plan including the Foreign Missions and International Organization Element. The Foreign Mission Element recognizes “A key challenge with locating chanceries is balancing the need to plan secure locations for diplomatic activities while being sensitive to residential neighborhoods.” The Foreign Mission Element acknowledges the State Department is preparing a master plan for a new foreign mission center to be developed on the former Walter Reed Medical Center site and suggests that new chanceries be encouraged to locate first in areas where their use is considered a matter of right under local zoning. Working with NCPC and the State Department clarified zoning regulations were written regarding applications to locate, replace, or expand a chancery use not otherwise permitted as a matter-of-right. The new zoning standards were adopted as part of the 2016 amendments to the Zoning Regulations. 316.6

316.7 Policy LU-3.3.1: Chancery Encroachment in Low Density Areas

Encourage foreign missions to locate their chancery facilities in areas where adjacent existing and proposed land uses are compatible (e.g., office, commercial, and mixed use), taking special care to respecting protecting the integrity of residential areas. Discourage the location of new chanceries in any area that is essentially a residential use area, to the extent consistent with the Foreign Missions Act. 316.7

316.8 Policy LU-3.3.2: Target Areas for New Chanceries

Encourage the development of new chancery facilities in locations where they would support the District’s neighborhood revitalization and economic development goals, particularly on federal enclaves and in the portion of the city

East of 16th Street NW. Work with the Department of State, the National Capital Planning Commission and other organizations to provide incentives to encourage foreign missions to locate in these areas. 316.8

316.9 Policy LU-3.3.3: Compatibility of New Chanceries

Promote the design and maintenance of chanceries in a manner that respects protects the city’s open space and historic resources, mitigates impacts on nearby properties, is compatible with the scale and character of its surroundings, and enhances Washington’s international image as a city of great architecture and urban design. 316.9

316.10 Action LU-3.3.A: Modifications to the Diplomatic Overlay Zone

Work with the National Capital Planning Commission and Department of State to develop a new methodology to determine appropriate additional chancery development areas; and revise the mapped diplomatic areas, reflecting additional areas where foreign missions may relocate. The methodology and zoning map revisions should avoid concentration of chanceries in low density neighborhoods, to the extent consistent with the Foreign Missions Act. Completed – See Implementation Table. 316.10

316.11 Action LU-3.3.B: Foreign Mission Mapping Improvements

On an ongoing basis, accurately inventory Improve the mapping of foreign mission locations, distinguishing in the city, ensuring that they are accurately inventoried and that chanceries, ambassador's residences, and institutional land uses. are appropriately distinguished. 316.11

316.12 Action LU-3.3.C: New Foreign Missions Center

Support the development of a new foreign missions center on federal land in the District of Columbia. 316.12

317 LU-3.4 GROUP HOUSING 317

317.1 Group housing accommodates District residents with a wide variety of special needs, including persons with physical and mental disabilities, terminal illnesses, foster children, parolees, recovering substance abusers, victims of domestic violence, the elderly, and others. Such homes have become increasingly common due to the closure of large institutions and greater recognition of the social benefits of group living arrangements. Group housing can provide a family-like environment, aid in the development of life skills, and foster the integration of persons with special needs into society. Yet such housing is among the most difficult uses in the city to site due to public concerns about neighborhood impacts. 317.1

317.2 The District's zoning regulations recognize many types of group housing, including adult rehabilitation homes, community residence facilities, emergency shelters, health care facilities, substance abuser homes, youth rehabilitation homes, and youth and youth residential care homes. Other types of group housing also exist. Their impacts are substantially different depending on their size, location, and the population they serve. 317.2

317.3 Recognizing the distinction between the different types of group housing is important because different licensing procedures and zoning requirements apply based on the number and characteristics of residents served. These requirements are guided by the federal Fair Housing Act, particularly 1988 Amendments limiting the degree to which zoning may restrict group home location, placement, and operation. Under federal law, all state and local governments are required to make "reasonable accommodation" to house persons with disabilities. Interpretation of this standard has been the subject of litigation in cities across the country for almost two decades. 317.3

317.4 The District's geographic information system (GIS) includes a partial inventory of group housing in the District; this is shown in Map 3.7. While this is not a complete inventory, it clearly illustrates that such housing is more heavily concentrated in some parts of the city than others. This is the result of a number of factors, including land costs, proximity to supportive services, and the density and character of housing in the city. The District's Zoning Regulations permit most categories of group homes with six residents or less as matter-of-right uses in all residential zones. However, some categories of small group homes—including those for recovering substance abusers and adjudicated felons—are subject to Special Exception requirements from the Board of Zoning Adjustment, as well as distance separation standards. Minimum distance standards also apply to youth residential care and community residence facilities with nine to 15 residents. These standards limit the siting of new group homes within

1,000 feet of existing group homes in single-family zones and within 500 feet in moderate and higher density zones. 317.4

317.5 The licensing, monitoring, and management of group homes also have been raised as community concerns. Similarly, the need to more effectively involve the community in siting decisions, and to provide better notification of siting requests has been raised. Despite zoning standards, there are still concerns about neighborhoods becoming more institutional in character as group homes are established. There are also concerns about fairness and equity, given the fact that some neighborhoods have many group homes while others have none. Resolving this particular dilemma is complicated by the soaring cost of real estate, which tends to shift demand to the most affordable parts of the city. 317.5

317.6 Map 3.7: Locations of Group Homes

317.7 In the coming years, the District will strive to locate group homes in a manner that balances neighborhood concerns while meeting the housing needs of all residents. Additional examination of the District's zoning regulations, improvement of zoning definitions, and clearer siting standards for the different categories of group homes are recommended. Increased coordination between the agencies responsible for licensing and monitoring all community housing facilities should be achieved. Greater community involvement, including advisory committees, good neighbor agreements, and more rigorous monitoring procedures, should be used to improve operations and address land use conflicts. 317.7

317.8 Policy LU-3.4.1: Reasonable Accommodation of Group Homes

Recognize the importance of group homes to providing a positive, healthy environment for many residents of the District of Columbia. Ensure that the District's planning, zoning, and housing codes make reasonable accommodation for group homes without diminishing the character or fundamental qualities of its residential neighborhoods. 317.8

317.9 Policy LU-3.4.2: Promoting More Equitable Distribution

Encourage a more balanced distribution of group housing in the District of Columbia. The concentration of group homes or creation of excessively large group homes in a manner that would threaten the residential character of any one neighborhood should be strictly avoided. Such concentrations are inconsistent with the objective of integrating special needs populations into the larger community. Care should be taken to locate particular special needs populations where they can best receive services and support. 317.9

317.10 Policy LU-3.4.3: Small Group Housing for the Disabled

As required by the federal Fair Housing Act, allow group homes with six or fewer residents (excluding staff or caregivers) serving persons with disabilities in all residential zone districts. Zoning requirements for such homes that are more restrictive than those applying to other residential uses are unlawful and shall not be permitted. 317.10

317.11 Policy LU-3.4.4: Larger Group Housing and Group Housing Serving Non- Disabled Populations

Permit larger group housing (with seven or more residents) and group homes serving non-disabled persons with special needs (including youth and adult rehabilitation homes) in all residential districts, subject to Board of Zoning Adjustment approval and siting standards that discourage excessive concentration and that comply with federal housing laws. The Special Exception process should be used to ensure public notification and involvement and to establish conditions that improve the compatibility of group homes with surrounding uses. Siting standards for such housing shall be contained in the Zoning Regulations. 317.11

317.12 Policy LU-3.4.5: Design Compatibility of Group Homes

Encourage the design and appearance of group homes to be consistent with the character of the surrounding neighborhood and to blend with adjacent residences to the maximum extent possible. 317.12

317.13 Policy LU-3.4.6: Communication on Group Home Operations

Increase coordination and communication between the District, group home operators, and area residents in order to improve operations, address community concerns such as parking and public safety, and more fully integrate group home residents into the community. Consider the use of community advisory boards and task forces to mediate operational and siting issues, including the size of the facility. 317.13

317.14 Policy LU-3.4.7: Licensing and Group Home Code Compliance

Ensure that the permitting, licensing, monitoring, and operation of group homes meets all applicable codes and standards. Improve enforcement programs to ensure compliance and take prompt, effective action in the event of violations. 317.14

317.15 Policy LU-3.4.8: Public Information On Group Housing Needs

Improve public education and information on the need for group housing in the District, and on issues related to their operation and resident needs. 317.15

317.16 Action LU-3.4.A: Clarification of Community Housing Definitions

Clarify the definitions of the various types of community housing in the District, and ensure the consistent use of these definitions in all planning, building, and zoning codes and licensing regulations. 317.16

317.17 Action LU-3.4.B: Information on Group Home Location

Provide easily accessible information on location and occupancy for all licensed group home facilities in the District. Such information should be accessible via the Internet and also should be available in mapped format, with appropriate protections for the privacy rights of the disabled. 317.17

317.18 Action LU-3.4.C: Analysis of Group Home Siting Standards

Conduct an analysis of the spatial standards currently used to regulate group homes and homeless shelters in the District, and determine if adjustments to these standards are needed to create additional sitting opportunities. In addition, consider allowing group homes and homeless shelters in Zone Districts CM-1 and CM-2. 317.18

317.19 Action LU-3.4.D: Community Housing Ombudsman

Establish an ombudsman position within the District of Columbia to serve as a resource for residents, neighborhood organizations and other stakeholders, government, and group home operators. The ombudsman would encourage educational efforts, enforcement of Fair Housing Act policy, and dispute resolution related to the siting and operations of group homes within the District. 317.19

318 LU-3.5 FEDERAL FACILITIES 318

318.1 When streets and highways are subtracted out, about one-third of the land area of the District of Columbia is owned by the federal government. Most of this land is managed by the National Park Service, but a significant amount—more than 2,700 acres—is comprised of federal installations, offices, military bases, and similar uses. This acreage includes nearly 2,000 buildings, with over 95 million square feet of floor space. Federal uses occupy a range of physical settings, from self-contained enclaves like Bolling Air Force Base Joint Base Anacostia-Bolling to grand office buildings in the heart of Downtown Washington. Federal uses operate in all quadrants of the city, often amidst residential neighborhoods. Since they are largely exempt from zoning, coordination and communication are particularly important to ensure land use compatibility. 318.1

318.2 Many of the District's federal uses have unique security requirements and operational needs. This became particularly apparent after 9/11, as streets around the US Capitol were permanently closed and major federal offices and monuments were retrofitted to improve security. Security needs are likely to create further changes to the District's landscape in the future; the recent proposal to ongoing relocation of e thousands of Homeland Security workers to the west campus of St. Elizabeths Hospital is just one example. 318.2

318.3 The size of the federal workforce in the District is projected to increase not expected to grow during the next decade, following more than twenty-five o decades of years of downsizing. The District supports this increase, as well as continued adherence to a 1968 federal policy to maintain 60 percent of the region's federal employees within the District of Columbia. At the same time, the federal government is in the process of transferring several tracts of land to the District, potentially reducing the land area for their expansion. This suggests the need for even greater coordination on the planning and development front. in the future. Several successful joint planning efforts have recently been completed, including plans for the South Capitol Street Corridor, the Southeast Federal Center, Armed Forces Retirement Home, Poplar Point, and the Anacostia WaterfrontWalter Reed Army Medical Center. Efforts like these must continue as the future of the FBI and Labor Department buildingsWalter Reed Army Medical Center, the Armed Forces Retirement Home, RFK Stadium, and other large federal sites is resolved. 318.3

318.4 Major federal activities in the District are shown on Map 3.8. Priorities for the use of these lands are expressed in the Federal Elements of the Comprehensive Plan. The “Federal Workplace” Element of that Plan includes policies to reinforce the preeminence of the monumental core through future siting decisions, give preference to urban and transit-served sites when siting new workplaces, and emphasize the modernization of existing structures before building new structures. The Federal Elements include guidelines on the types of federal functions that are appropriate within the Capitol Complex, the Central Employment Area, federal installations, and other areas within the District of Columbia, as well as elsewhere in the region.

318.4

318.5 Map 3.8: Federal Lands, 2005 2017

318.6 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 planning processes, to guide the use of large federal sites. 318.6

318.7 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, housing, economic development, and environmental quality, and socioeconomic equity goals. Federal land uses should strive to maintain land use compatibility with adjacent neighborhoods. 318.7

318.8 Policy LU-3.5.3: Recognition of Local Planning and Zoning Regulations Encourage the federal government to abide by local planning and zoning regulations to the maximum extent feasible. Where decisions require the input or actions of federal agencies, encourage swift decision-making so as not to delay achievement of local goals. 318.8

318.9 Policy LU-3.5.4: Federal Workplaces and District Goals

Strongly support the implementation of Federal Element policies for federal workplaces calling for transportation demand management, sustainable design, energy conservation, additional workforce housing, and the creation of job opportunities in economically distressed communities within the District of Columbia. 318.9

318.10 Policy LU-3.5.5: Neighborhood Impact of Federal Security Measures Consistent with the Federal Elements, ensure that federal security measures do not impede the District’s commerce and vitality, excessively restrict or impede the use of public space or streets, or impact the health of the existing landscape. Additional street closures are to be avoided to the maximum extent possible. 318.10

318.11 Policy LU-3.5.6: Reducing Exposure to Hazardous Materials

Avoid locating and operating federal facilities that produce hazardous waste or that increase the threat of accidental or terrorist-related release of hazardous materials in heavily populated or environmentally sensitive areas.

318.11 Actions relating to federal facility sites may be found in the Comprehensive Plan Area Elements.

Conclusion and comment: Office of planning has struck out group home provisions outlined in the original memorandum comments. section also does not mention public housing opportunities as recommended also by memorandum to affect displacement. Language does not provide proper or prescriptive measures to accommodate lch goals.

Recommendation: Use comments and suggestions from memorandum created by the interagency council on homelessness and incorporate into plan update specifically addressing land use element recommendations from lch.



Comments for Comprehensive Plan Update

Housing Element Section one-Defining Universal Affordable Housing

Appropriately Defining Affordable Housing:(source memorandum to Office of planning Re comprehensive Plan Update)

The Comp Plan appropriately identifies that there is a significant interest in having a clear definition of affordable housing. The Comp Plan responds to this need by conveying the rents established by various affordable housing programs; which is valuable, but does not quite address the quest for a clear definition of affordable housing.

We recommend a different approach and request that the Comp Plan be updated to provide clarity around

- Rents that are affordable (set at 30% of household income) to households at different income levels[1] as compared to
- Market rate rents for units that accommodate those households as compared to
- Program rents (rents set by the affordable housing programs) that target the different income levels.

This will help audiences understand the differences between market rate rents and rents set by affordable housing programs, which in some instances rely on Area Median Income (AMI) to set rents and may not adequately serve the lowest income households.

[1] Recommended income levels for analysis: 15% AMI, 30% AMI, 60% AMI, 80% AMI, 100% AMI, 120% AMI, 150% AMI and above

CURRENT PROPOSED LANGUAGE: *NEW Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? Housing affordability is a broad measure of whether or not housing is affordable to a range of households. Households that pay more than 30 percent of their income on housing are considered to be ‘burdened’ by housing costs, while those who pay more than 50 percent are ‘severely burdened’. Therefore, housing affordability is the extent to which a broad range of households pay less than 30 percent of their income on housing. An important part of affordability are neighborhood assets that help keep transportation costs low such as reducing the need for car ownership and use. Broad affordability is a function of the overall market supply being able to meet rising demand. New supply can improve affordability by letting new residents move to the city without taking an existing unit, and by allowing existing residents to trade up thereby freeing up an existing unit for someone else to occupy. For instance, 40 percent of new units become occupied by households moving from outside the District, while 51 percent are occupied by households moving from within DC, the remainder are households mixed with both DC and non-DC residents. One of the most common requests made during Comprehensive Plan public meetings was to provide a clear definition of “affordable” housing. Affordable housing is defined as housing in which occupancy is limited to households meeting special income guidelines. The price of this housing is maintained at a level below what the free market would demand using restrictive deeds, and covenants, and financed by grants, mortgage subsidies, vouchers, or other means tied to public financing or tax credits, or through land use tools. Generally, the cost of affordable housing is limited to 30% of a targeted household’s income limit (which varies according to the number of people in the household); different affordable housing programs are “benchmarked”, or targeted to specific income groups based on the Median Family Income (MFI) of an area as annually determined defined by the US Department of Housing and Urban Development. The benchmarked incomes for the Washington Metropolitan Area in 2005 2017 are shown in the table below. The list includes the major housing assistance programs that serve households in each group. In 2005 2017, the areawide median income (AMI) MFI* for a family of four was \$89,300 110,300. For the purposes of the Comprehensive Plan, The terms “extremely low”, “very low”, “low”, and “moderate” income correspond to up to 30%, 50%, 80%, and 120% of that Comprehensive Plan Housing Element October 2019 Draft Amendments Public Review_Draft_H_Oct2019 Page 4 of 79 the MFI amount, respectively. Example: If a single mother of two earned \$7 14 per hour, her annual income would be approximately \$14,560 29,000 and fall within the “extremely low*

income” category. If she spends 30% of her income on housing, she could afford to pay only \$364 728 per month on housing. Finding decent housing or any housing at this price range is a challenge in Washington.

NEW Table 5.1 Sample of Housing Programs, 2017 Income Limits and Main Household Targets

	<i>Income Definition</i>					
<i>Household Size</i>	<i>Extremely low</i>	<i>Very low</i>	<i>Low</i>		<i>Moderate</i>	
	<i>30%</i>	<i>50%</i>	<i>60%</i>	<i>80%</i>	<i>100%</i>	<i>120%</i>
<i>1</i>	<i>\$ 23,150</i>	<i>\$ 38,600</i>	<i>\$ 46,350</i>	<i>\$ 61,750</i>	<i>\$ 77,200</i>	<i>\$ 92,650</i>
<i>2</i>	<i>\$ 26,450</i>	<i>\$ 44,100</i>	<i>\$ 52,950</i>	<i>\$ 70,600</i>	<i>\$ 88,250</i>	<i>\$ 105,900</i>
<i>3</i>	<i>\$ 29,800</i>	<i>\$ 49,650</i>	<i>\$ 59,550</i>	<i>\$ 79,400</i>	<i>\$ 99,250</i>	<i>\$ 119,100</i>
<i>4</i>	<i>\$ 33,100</i>	<i>\$ 55,150</i>	<i>\$ 66,200</i>	<i>\$ 88,250</i>	<i>\$ 110,300</i>	<i>\$ 132,350</i>

Conclusion and comment: context does not adequately define affordable housing. Section does not specify the difference between regional income and district of columbia specific.

Recommendation Comprehensive plan specify Regional vs income levels in each ward specifically.

Section two- Evaluating Impact

1. Estimating the Impact of Policies and Actions Advanced in the Housing Element and the Major Housing Programs in the District (source memorandum to Office of planning Re comprehensive Plan Update)

To course correct in an appropriate manner, we need to understand the outcomes of the major housing programs and the policies and actions advanced in the Comp Plan. As such, we need to determine how many units have been produced by policies and actions, especially those efforts that are tied to unit productions and can be tracked by specific programs and/or agencies (e.g. H-1.24 Housing Affordability on Publicly Owned Sites; H-1.2.7 Density Bonuses for Affordable Housing; and H-1.2.A Inclusionary Zoning).

However, it is not sufficient to determine outcomes. We also need to evaluate these outcomes against

- Cost to the District for funding and/or administering these programs so that we can increase investments to those policies/actions that are cost effective and result in the most number of units for the least amount of District investment; as well as
- Limits (or our best estimate of the capacity) for production of units under these programs so that the District can assess whether we have appropriately maximize these policies/actions.

2. Estimating the Annual Loss of Affordable Housing to Better Understand the Gap between Need and Production/Preservation of Affordable Housing (source memorandum to Office of planning Re comprehensive Plan Update)

Correcting course requires the District to understand the gap between need and production/preservation. An important aspect of that effort is to understand how many affordable units are lost annually. We recommend that the Comp Plan include an estimate of the number of affordable housing units lost annually during the last 10 years, including projections for future losses (based on the rate at which units are lost for different income levels).

Current proposed language 506.5 Callout Box: *The New Communities Initiative* New Communities (NCI) is a promising example of a city-led initiative that has the potential to reduce crime, improve neighborhood schools and health services, and create economic opportunities for public and assisted housing residents. The initiative is a partnership between DC government and the private and nonprofit sectors to produce new housing, reduce violent crime, and create a healthy environment for families in some of the city's most distressed neighborhoods. The initiative is using District local and capital funding sources, tax exempt bonds, low income housing tax credits, federal funds, and private investment to create mixed income housing opportunities in these areas. One-for-one replacement of older publicly assisted housing units with new publicly-assisted units is required to avoid displacement and the net loss of affordable units. In addition, the initiative attempts to use surrounding public and private parcels in order to build the replacement affordable housing first and minimize temporary displacement of residents from their neighborhood. Market rate and workforce housing units are included in each project to cross-subsidize the affordable units and create a mix of incomes and unit types in each project. The New Communities program seeks to advance many of the city's community development and housing goals such as eliminating concentrations of low income and substandard housing and providing public housing residents with affordable replacement housing in the new community as it is redeveloped. Planning for the first new community (Sursum Corda Northwest One) was initiated started in 2004. Over the next five years, The first component completed in 2011 was the new Walker Jones Elementary School, and the first three buildings of replacement housing were completed in 2011, 2013, and 2014. A major portion of the remaining project received pre-development approvals in 2016. In the end, the Northwest One New Community Plan will replace more than 500 units of subsidized housing in this troubled complex will be replaced by neighborhood with a total of 1,500 units of mixed income housing. Three additional communities (Barry Farm, Lincoln Heights/Richardson Dwellings, and Park Morton) were added and are in various stages of completion. Over the next 10 years, a total of 10 mixed-income developments will provide new community amenities such as schools, libraries and recreation centers in each neighborhood. When completed, the four projects within the New Communities Initiative will upgrade 1,500 subsidized affordable units within larger mixed-income communities totaling 5,000-6,000 new units. End Callout Box

506.6 On a much larger scale, the DC Housing Authority has rebuilt entire communities through the federal HOPE VI program, which is now called the Choice Neighborhoods program, replacing deteriorating public housing projects like the Frederick Douglass and Stanton Dwellings with new mixed income neighborhoods like Henson Ridge. More recent sites within the Choice Neighborhoods include Kenilworth/Parkside, which received local planning Comprehensive Plan Housing Element October 2019 Draft Amendments Public Review_Draft_H_Oct2019 Page 41 of 79 approval in 2016. Similar efforts have been proposed through the New Communities Initiative. (see text box). Federal funding is decreasing, not only for these revitalization efforts, but for routine maintenance of public housing as well. This creates an increasingly difficult challenge for public housing's ability to meet the needs of the District's lowest income households. 506.6

Amended language: *Action H-1.4.E: Additional Public Housing Support efforts by the DC Housing Authority's planning goals to use its authority to create 1,000 additional units of for its public housing units by studying the need for additional units and developing strategies to meet the needs of existing units., Use subsidized subsidies by funding from the US Department of Housing and Urban Development under the public housing Annual Contributions Contract (ACC), RAD, and other sources. This action is contingent on the availability of funds for a local rent subsidy to cover the annual operating costs for the new units. 506.17 W*

Callout Box: Principles for the Redevelopment of Existing Affordable Housing NEW
Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that not only are the affordability controls expiring, but the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. In addition, the neighborhoods, the surrounding land uses, and the needs of the city have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies critical to Washington, DC's growth as an inclusive city, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;*
- Advance mixed income neighborhoods with both market rate and affordable housing;*
- One-for-one replacement of affordable units;*
- Provide family-sized housing, including multi-generation families;*
- Build affordable units first to minimize displacement and maximize the return of residents to their community;*
- Include tenants' rights of return and comprehensive relocation plans for tenants prior to the redevelopment.*

NEW Many of these strategies will be difficult to achieve, and some may not be appropriate for an individual redevelopment, but the redevelopment of existing affordable housing should strive to employ as many of these strategies as possible. Critical to achieving the goal of inclusivity and the strategies above are the availability and certainty of the land use and financial incentives necessary to make the projects feasible. End Callout Box

Conclusion and comment: Failed policy, section does not indicate loss of housing stock due to program implementation and does not address net loss of public housing.

Recommendation:

1. Include full analysis of public housing loss due to hope IV and NCI. Develop strategy to recover net loss of public housing units. Identify specifically public housing levels at each program site to determine if one for one replacement has taken place.
2. Include data points narrative and policy/actions showing status of implementation of **Action H-1.4.E: Additional Public Housing** that will ensure net additions to public housing stock. Data points narrative and policy/actions should include real time analysis of unit recovery vs lost.



Comments for Comprehensive Plan Update

Section three-Definition and policies concerning Displacement: ([source Proposed text amendments to comprehensive plan](#)

Language proposed by affected populations and service organizations:

2341 Lori Leibowitz (DC Right to Housing Initiative, Neighborhood Legal Services Program, Bread for the City, Latino Economic Development Center, Empower DC, ONE DC, Legal Aid Society, Legal Counsel for the Elderly, Washington Legal Clinic for the Homeless, Washington Lawyers Committee for Civil Rights, People for Fairness Coalition)

506.10 Continue efforts to transform distressed public and assisted housing projects into viable mixed-income neighborhoods, providing one-for-one replacement within the District of Columbia of any public housing units that are removed. Target such efforts to locations where private sector development interest can be leveraged to assist in revitalization. 0 Change the text of this policy to read: Any efforts to renovate and revitalize distressed public and assisted housing projects must utilize build-first principles and other efforts that prevent displacement, providing one-for-one replacement on-site or in the immediate surrounding area of any public housing units that are removed or re-developed. Where density is more than doubled on a public housing site, replacement units must account for the number of original units plus 50% of the new units. Public housing must be kept in public control (through the DC Housing Authority, Community Land Trust or similar entity), must be kept permanently affordable, and the share of any private entity who assists in the redevelopment must be less than 50%.

Proposed amendment is NOT recommended for Council approval

Existing language is sufficient

No

2. 2366 Lori Leibowitz (DC Right to Housing Initiative, Neighborhood Legal Services Program, Bread for the City, Latino Economic Development Center, Empower DC, ONE DC, Legal Aid Society, Legal Counsel for the Elderly, Washington Legal Clinic for the Homeless, Washington Lawyers Committee for Civil Rights, People for Fairness Coalition)

509.7 Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units. Change text of this policy to read: Maintain programs to prevent displacement resulting from the conversion or renovation of affordable and subsidized rental housing to more costly and/or mixed-income forms of housing. The District must ensure that, when any rental housing, including public housing, that is affordable to those at 80% of AMI and below, is undergoing redevelopment, there is a tenant-approved relocation plan, tenants are allowed to continue their tenancy with minimal disruption, and will have the right to return to their units or an equivalent replacement on the same property. Redevelopment must observe build-first and build in place principles. Resident return criteria must not be more restrictive than those of the housing undergoing redevelopment. Programs offered to tenants must include financial, technical, legal, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units, if they are being converted to ownership units. In order to receive approval from the zoning commission, developers must supply the commission with a plan for avoiding displacement that complies with the principles in this policy.

Proposed amendment is NOT recommended for Council approval

Proposed amendment is inconsistent with completed plans or policy documents or is beyond the scope of the Comprehensive Plan

No

Example of accepted proposed language :

1381 David Whitehead (Greater Greater Washington/DC Housing Priorities)

506.15 Continue the positive momentum toward improving the District's public housing programs, including the effective training of public housing residents in home maintenance skills. In addition, residents should be involved in management and maintenance and the effective renovation, inspection, and re-occupancy of vacant units. Amended text - Action H-1.4.C: DCHA Improvements Continue improving the District's existing public housing and Housing Choice Voucher programs, including DCHA utilization of unspent Local Rent

Supplement funds to ensure much-needed repairs and capital improvements, a higher voucher-utilization rate in Stable and Transitioning neighborhoods, and equitable public housing redevelopment that utilizes one-for-one unit replacement and minimizes displacement through build-first principles

Proposed amendment is recommended for Council approval with modification Proposed amendment is consistent with completed plans or policy documents

Yes

Proposed Language and policy :

NEW Policy H-1.2.11 Inclusive Mixed Income Neighborhoods Support mixed income housing by encouraging affordable housing in high cost areas as well as, encouraging market rate housing in among low income areas while taking steps that build in long term affordability to minimize displacement and achieve a balance of housing opportunities across the city.

Policy H-1.4.4: Public Housing Renovation Public housing is a critical part of meeting the demand for affordable housing and preventing displacement. Continue efforts to transform distressed public and assisted housing projects to create into viable equitable mixed income neighborhoods, providing Minimize displacement and resident moves, and ensure one-for-one replacement within the District of Columbia of any public housing units that are removed, and observe build-first principles where feasible. Target such efforts to locations where private sector development interest can be leveraged to assist in revitalization. 506.10

NEW Action H-2.1.J: Tracking Displacement Track neighborhood change, development and housing costs to identify areas of Washington DC that are experiencing, or likely to experience, displacement pressures. Use the information to improve program Comprehensive Plan Housing Element October 2019 Draft Amendments Public Review_Draft_H_Oct2019 Page 57 of 79 performance and targeting of resources to minimize displacement and help residents stay in their neighborhood.

NEW Callout Box: What is Displacement? NEW Displacement is an issue that many residents and policymakers are concerned about and is a critical challenge when attempting to achieve an equitable city. But it is also not a clearly defined term. It often relates to observation of neighborhood change at a high level, as well as situations in which a household is forced to move from their residence at the individual level. For purposes of clarifying processes and use for the Comprehensive Plan, there are three forms of displacement: physical displacement as households must move when the properties they occupy are redeveloped; economic displacement as housing cost increases in the neighborhood force the household to find other housing options; and cultural displacement as residents lose a sense of belonging or shared identity in their neighborhood due to neighborhood change or growth. While these may relate, they each have different planning responses.

DC NEW How Displacement Affects Washington, The loss of naturally occurring affordable housing units illustrated in Table 5.5 along with the decline of lower income, primarily black, households discussed in the Framework Element indicate Washington, DC has experienced significant displacement in many neighborhoods and across the city. National-level studies suggest that, by some measures, the District is the US city most impacted by both the increasing demand for housing from higher-income households and the decline in the number of lower income households.

NEW Between 2006 and 2017, Washington, DC experienced a decline of more than 15,600 households earning between 30 and 80 percent of the MFI; 9,250 households were homeowners and 6,350 were rental households. Capitol Hill and other NE neighborhoods experienced the greatest decline with a decrease of 5,950 households earning between 30 and 80 percent of the MFI. During this time the data suggests there was a modest increase of extremely low income households citywide; most moved East of the River and to Upper NW / NE where many have ended up paying more than 50 percent of their income on housing. Addressing Displacement in Washington, DC *NEW* Washington, DC has one of the strongest set of anti-displacement programs in the country, which includes rent control, eviction protection, Tenants' Opportunity to Purchase Act, District Opportunity to Purchase Act, locally subsidized rents, tax assessment caps, and finally tax credits for low income and older homeowners.

NEW Yet, protecting vulnerable citizens from the forces that lead to displacement clearly continues to be one of the greatest challenges to growing an equitable and inclusive city. Residents affected by physical displacement are relatively small on an annual basis and can be provided assistance more easily than the significantly larger number and range of households facing economic displacement from rising housing costs caused mainly by a lack of supply. Minimizing the impacts of physical and economic displacement requires balancing the cost-effective approach of preserving mixed-income housing in some locations and expanding housing supply in others through new construction and redevelopment. Achieving such balance will require a greater understanding of neighborhood submarkets, a more sophisticated approach to the allocation of funding, and difficult discussions among community stakeholders regarding approaches to increasing density. Addressing the broader economic displacement goes well beyond the responsibility of any single development. It is incumbent upon the District to strengthen existing policies and develop new ones to counteract and mitigate physical and economic displacement.

NEW The decline in number of low-income homeowners, who are more insulated from rising housing costs, is an indication of cultural displacement. Older lower income households face many life changes or may pass their property on to heirs, leading to a natural turnover in residents and new faces in the neighborhood. Those who stay experience the loss of long-term friends, neighbors and local businesses, and often are confronted by the ever increasing lure from the economic gain of selling. Confronting this form of displacement will require greater neighbor-to-neighbor and broader civic engagement. Housing policy can serve to retain

vulnerable residents, but minimizing the impact of cultural displacement means maintaining community cultural institutions and businesses, creating civic spaces and events that cross-cultural divides and balancing different needs. The efforts must invite all to participate, interact, and grow a common experience and identity. Focusing efforts in this direction as discussed in other elements of the Comprehensive Plan, along with the policies of the Housing Element, will help ensure that as our neighborhoods change and evolve, our neighbors continue to see that there is a place for them in their community and to share in the benefits of living in Washington DC.

NEW Displacement is a citywide issue and all residents have a stake in addressing it, as it affects all – both current and future residents. Policies in the Comprehensive Plan, along with the District’s housing programs and initiatives, will bolster the manner in which all forms of displacement are addressed. NEW In addition to the policies contained in the Housing Element, see also the Arts and Culture Element and the Equity Crosswalk for policies and actions that address cultural displacement. End Callout Box

Action CW-2.8.D

Action CW-2.8.D: Northwest One New Community

Redevelop Northwest One as a mixed income community, including new market rate and subsidized housing, a new school and recreation center, a library and health clinic, and neighborhood-serving retail space. Redevelopment of Northwest One should:

- a. Restore the city street grid through Sursum Corda;*
- b. Emphasize K Street NW as a “main street” that connects the area to NoMaA and the Mount Vernon District; and*
- c. Maximize private sector participation*
- d. One-for-one replacement of affordable units;*
- e. Provide family-sized housing, including multi-generation families;*
- f. Build affordable units first to minimize displacement and maximize the return of residents to their community; and*
- g. Include tenants’ rights of return and comp*

Policy FSS-2.6.3

Policy FSS-2.6.3: Bellevue-Washington Highlands Infill Encourage refurbishment and/or replacement of deteriorating apartment complexes within Bellevue and Washington Highlands. Where buildings are removed, encourage their replacement with mixed income housing, including owner-occupied single-family homes and townhomes as well as new apartments. Every effort shall be made to avoid resident displacement when such actions are taken, and to provide existing residents with opportunities to purchase their units or find suitable housing in the community. 1816.6

Policy NNW-1.1.9

Policy NNW-1.1.9: Affordable Housing Protect the existing stock of affordable housing in the Near Northwest Planning Area, particularly in the Shaw and Logan Circle neighborhoods. Sustain measures to avoid displacement, such as tax relief and rent control, and to encourage the production of new affordable housing throughout the community. by bringing to bear new measures to preserve and to produce affordable housing in a way that advances fair housing goals and minimizes displacement. 2108.10

Action NNW-2.1.J

Action NNW-2.1.J: Expiring Section 8 Contracts Implement the DC Housing Preservation Strike Force recommendations for Develop a strategy to renew all affordable housing the expiring project-based Section 8 contracts within the Shaw area, and beyond, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include, at a minimum, an equivalent number of affordable units, and additional market rate units, and measures to avoid displacement of on-site residents. 2111.22

Policy UNE-1.1.4

Policy UNE-1.1.4: Reinvestment in Assisted Housing Continue to reinvest in Upper Northeast's publicly-assisted housing stock. As public housing complexes are modernized or reconstructed, actions should be taken to minimize displacement and to create homeownership opportunities for current residents. 2408.5

Policy H-3.1.1

Policy H-3.1.1: Increasing Home Ownership Enhance community stability by promoting home ownership and creating opportunities for first-time home buyers in the District. Provide loans, grants, and other District programs in order to raise the District's home ownership rate from its year 2000 2016 figure of 41 39 percent to a year 2015 2025 figure of 44 percent. Increased opportunities for home ownership should not be provided at the expense of the District's rental housing programs, or through the displacement of low income renters. 512.4

714.15 Action ED-3.2.A: Anti-Displacement Strategies

Complete an analysis of alternative regulatory and financial measures to mitigate the impacts of "commercial gentrification" demographic and economic market changes on small and local businesses. Measures to be assessed should include but not be limited to technical assistance, building purchase assistance, income and property tax incentives, historic tax credits, direct financial assistance, commercial land trusts, relocation assistance programs, and zoning strategies such as maximum floor area allowances for particular commercial activities. 714.15

714.11 Policy ED-3.2.6: Commercial Displacement

Avoid Mitigate the risk of displacement of small and local businesses due to rising real estate costs. Consider programs should be developed to offset the impacts of rising operating expenses on small businesses in areas of rapidly rising rents and prices. Also consider enhanced technical support that helps long- standing businesses grow their revenues and thrive in the strengthening retail economy. 714.11

714.12 Policy ED-3.2.7: Assistance to Displaced Businesses

Assist small businesses that are displaced as a result of rising land costs and rents, government action, or new development. Efforts should be made to find locations for such businesses within redeveloping areas, or on other suitable sites within the city. 714.12

Conclusion and comment: Office of planning has failed to include lived experience in Narrative and in policy and action steps. Proposed language and policy comes from organizations and individuals not affected by displacement. The Office of Planning's definition of "displacement" is particularly troubling because it doesn't represent the full scope of what has happened in the District. If we are truly striving towards an "equitable" and "inclusive" city, neglecting to mention that the thousands of residents lost to the effects of gentrification-based displacement are Black is disingenuous and a blatant act of erasure. Speaking on "cultural displacement" is not representative of the thousands of Black families forced out as a result of being priced out of their homes or having their homes snatched from under them due to mortgage scams, taxes, deaths in the family, etc. The loss of "a sense of belonging" is

caused by forcing luxury developments and “mixed-income neighborhoods” on existing communities. To state that DC has “one of the strongest set of anti-displacement programs in the country” is a slap in the face to the thousands of low- and moderate-income Black residents who have been forced to leave their homes to make way for the wealthier class that DC is actively fighting to attract. Maintaining existing communities should be DC’s top priority, not attracting thousands who have no intention of staying. DC has always been transient by nature, but the culture leaves with each new iteration. Language does not provide proper prescriptive and intentional measures to affect, avoid, prevent ,or eliminate displacement, in addition there is no language or policies/actions addressing displacement in Land Use, Far NE/SE, Lower Anacostia Waterfront, Rock Creek East, Rock Creek West elements.

Recommendation: Use comment and ANC review period to gather comments and suggestions from affected families and

individuals to incorporate into plan update. (see examples above)

Section four-Housing Goal Discrepancy

Targeted Distribution of New Affordable Housing Units by Income [504.16, Figure 5.3] Supportive Housing Production Targets (source Summary of Key Items - Comprehensive Plan Housing Element Notes for ICH Housing Solutions Committee Meeting November 18, 2019)

(Action H-4-2.A) – Implement the recommendations of Homeward DC [which] recommended the production of 2,000 permanent supportive housing units for the chronically homeless and 4,000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless.

Total Goal = 36,000 units
Affordable Goal = 12,000 units (33% of total)
Affordability Goal by Income Bands
30% and below AMI Goal = 4,800
units 31-60% AMI Goal = 3,600 units
61-80% AMI Goal = 3,600 units

Proposed Language

516.17 Action H-4.2.CA: Homeless no More Homeward DC Implement the recommendations outlined in Homeward DC: 2015-2020, which updates and expands on “Homeless No More: A Strategy for Ending Homelessness in Washington, DC by 2014.” Among the recommendations are Homeless No More recommended the production of 2,000 permanent supportive housing units for the chronically homeless and 4,000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless. Homeward DC provides additional strategies to expand the number of supportive housing units, transitional housing units, and tenant-based rental assistance. 516.17

Conclusion and comment: Housing goal insufficient to keep in line with Homeward Dc unit planning. Office of Planning should specifically state this and create narrative and overall production and preservation goal in addition to what unit planning in homeward dc suggests. Data policy and action steps should refer to this discrepancy and address the overall need of Homeless vs rent burden and cost burden populains.

Recommendation: Create table showing existing stock before [Homeward Dc](#)'s original publish date. The data should also show net increase and loss as of [homeward Dc progress to date as well as housing stock levels as of comp plan update](#), and estimate net level increase stated in [housing equity report](#) goals plus the units need for Homeward DC.



Comments for Comprehensive Plan Update

Economic Development

Evaluating the Impact of the District's Efforts to Support Neighborhood Business Environment and Increase Access to Employment (source memorandum to office of planning re re comprehensive plan).

Again, we cannot course correct, and ensure that the District is appropriately resourcing the programs that have the largest impact on increasing the income of households, if we do not understand the outcomes of existing programs. The strategies outlined under ED-3 Supporting the Neighborhood Business Environment and ED-4 Increasing Access to Employment are particularly important for understanding the role of Economic Development in addressing the affordable housing crisis. As such, we recommend that the District outline the expected outcome of the policies/actions associated with these efforts. Again, the analysis should demonstrate how many households are estimated to increase their incomes and to what levels, as a result of the District's investments in the major goals, priorities and actions.

Additionally, we need to estimate the limits/capacity of these programs so that we can consider whether we have appropriately maximized our investments in these programs. Related to supporting neighborhood business environments, this includes understanding the impact of targeting/focusing commercial revitalization on "those areas where the critical mass needed to sustain a viable neighborhood commercial center can be achieved." Question for analysis include:

- Can critical mass be achieved in neighborhood commercial centers in Wards that have the greatest unemployment numbers? and
- What kind of policies/actions would best incubate small businesses in Wards with the highest unemployment numbers?

Related to increasing access to employment, the District needs to understand and capture the demand for these services from the perspective of employers and unemployed/underemployed District residents. For example,

- How does the District understand and model the demand for adult education and certification/associate programs amongst residents that are currently unable to access higher

wages? Are these adult and certification/associate programs resourced to meet the demand?

Do these adult and certification/associate programs meet the needs of employers?

- How does the District understand and model the demand for core and growth sector jobs amongst residents who are unemployed and/or under-employed? Do the strategies related to connecting residents to core and growth sector jobs reflect the interest of residents who are unemployed and/or under-employed?

With these evaluations in hand, the District can appropriately course correct to ensure that its programming in these areas, adequately support both employers and unemployed/under-employed residents.

Proposed language: 712 ED-3 Supporting the Neighborhood Business Environment 712

712.1 The distinct characteristics of many of the District's neighborhoods are expressed in their local shopping areas. Neighborhood business districts often reflect the ethnic heritage, building patterns, and architectural and social history of the communities that surround them. They provide places to interact with neighbors, and in many cases, a public domain with active street life and character. 712.1

712.2 From an economic development standpoint, the District's neighborhood shopping areas generate property and sales taxes, provide jobs, and meet local needs for goods and services. The economic health of these areas varies widely across the city. In shopping districts that are thriving, the city will promote: continued patronage, variety among retailers, and high-quality goods and services, while addressing issues such as parking access for suppliers, customers, and employees, and aesthetics.

In shopping districts that are struggling, Washington, DC promotes a more strategic decisions must be made, taking into account the long-term viability of each area. A range of solutions — including phasing out obsolete commercial concentrating retail areas and converting some retail spaces to office or services uses in favor of new uses, like housing such as co-working — may be needed to address chronic challenges such as boarded up storefronts, concerns about public safety, and difficulty competing with stronger commercial districts. a lack of access to financing. 712.2

NEW Small and local businesses have demonstrated strong capacity for anchoring community revitalization, which has been amplified through initiatives, such as Made In DC and DC Main Streets, which have helped propel resurgence in the retail economy. However, many formerly stable retail districts have experienced market position shifts from regional-serving toward neighborhood-serving as retailing has strengthened downtown and expanded eastward since 2006. To address challenges and target opportunities in retail submarkets, the District has conducted a series of studies including the Retail Action Strategy and Vibrant Retail Streets Toolkit in addition to the Great Streets program that provide strategic guidance for the city, retailers and community partners.

713 ED-3.1 Strengthening Retail Districts Neighborhood Commercial Centers 713

713.1 Part of growing an inclusive city involves improving access to basic goods and services for residents in all parts of the city. Currently, some areas of the District lack basic amenities such as grocery stores, hardware stores, drug stores, and dry cleaners. In other parts of the

city, these services exist but they are poorly sited and do not provide a sense of community identity that they could. 713.1

713.2 Recently, Commercial districts such as 14th and U Street NW have re-emerged as walkable shopping areas, with new development reinforcing the traditional pedestrian pattern.

Other commercial districts have not fared as well. This is especially true along long arterial streets, and in neighborhoods where certain commercial uses are in oversupply or are causing problems. The future market feasibility of each commercial area should be evaluated based on a number of factors, including architectural design and character, lot and block patterns, property ownership, surrounding uses, market competition, community support, accessibility, traffic and parking, and the mix of existing businesses. 713.2

713.3 To sustain viable commercial centers, it is essential that the city provide police and fire protection, street and sidewalk maintenance, lighting, sanitation, and code enforcement services necessary to ensure the health and safety of merchants, residents, and shoppers. Transit and parking Transportation accessibility improvements are particularly important to increasing retail districts' customer bases while improving access and minimize neighborhood disruption. The District operates is currently implementing a number of programs with these objectives. For example, the Great Streets initiative is focusing on capital improvements such as street lighting and tree planting a multi-agency commercial revitalization initiative to support existing small businesses, attract new businesses and transform emerging corridors. Additionally, the Restore DC Main Streets program supports is focusing on small business development and through technical support. 713.3

713.4 Ultimately, the success of each neighborhood commercial district will depend on private investment, and cooperation among merchants and property owners, and consumer support. Community development corporations based organizations including Main Streets and business improvement districts can assist through the services they provide and the local business enterprises they support. The government assists city can assist by providing technical assistance, financial incentives, and support to merchant associations, and by coordinating its revitalization programs with those of the private and non-profit sectors. 713.4

See the Framework Element (Generalized Policy Map) for a discussion of the District's commercial centers, including neighborhood centers, multi- neighborhood centers, regional centers, and Main Street mixed use corridors.

See the Land Use Element for a discussion of the District's land use and development policies in neighborhood business districts.

713.5 Policy ED-3.1.1: Neighborhood Commercial Vitality

Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, supporting a strong customer base through residential density, and improving the mix of goods and services available to residents. 713.5

See the Housing Element for a discussion on the District's housing policies.

713.6 Policy ED-3.1.2: Targeting Commercial Revitalization

Continue to target government economic development programs to areas of greatest need, including older business areas with high vacancy rates and commercial centers that inadequately serve surrounding areas. Focus on those areas where the critical mass needed to sustain a viable neighborhood commercial center can be achieved. 713.6

713.7 Policy ED-3.1.3: Commercial District Associations

Encourage business improvement districts, merchant associations, Main Street organizations, and other commercial associations that enhance economic development and commercial revitalization efforts, particularly in underserved and/or rapidly gentrifying neighborhoods.

713.8 Policy ED-3.1.4: Assistance for CDCs Community-Based Development Encourage a network of active and effective community development corporations (CDCs) and similar neighborhood-based economic community development groups organizations. The District should assist CDCs and similar these organizations in acquiring the necessary technical and financial skills to participate in neighborhood revitalization projects. It should integrate the work of such groups into the city's overall planning and economic development initiatives. 713.8

713.9 Policy ED-3.1.5: Leveraging Private Investment Public-Private Partnerships Leverage public resources to attract the expenditure of public funds to produce private sector investments through techniques, including ground leases, design build contracts, maintenance and operations agreements, licensing agreements, and joint development on publicly-owned land and redevelopment in areas considered to be high risks by investors. Support the involvement of local community development corporations in commercial development and revitalization efforts within these areas. 713.9

713.10 Policy ED-3.1.6: Revitalization Planning

Link commercial revitalization strategies to capital budget priorities and larger neighborhood and transportation investment plans, including programs to improve transit to neighborhood centers. 713.10

713.11 Policy ED-3.1.7: Community Equity Investment

Provide opportunities for community equity investment in local economic development projects. This may include methods of business financing that provide District residents with greater opportunities to acquire for equity shares in new development. 713.11

713.11a Policy ED-3.1.8: Neighborhood Retail District Identity and Promotion Brand the distinct character of retail districts through signature promotional events, signage, streetscape, and district gateways., as well as building Additionally, encourage unique retail clusters where appropriate.

713.12 Action ED-3.1.A: Neighborhood Commercial Revitalization

Expand commercial revitalization programs such as tax increment financing, Great Streets, and the District's DC Main Streets program to include additional commercial districts, particularly in the northeast and southeast quadrants of the city. Use the commercial revitalization programs to

increase the stability of small and locally owned businesses by helping them adapt to demographic and market changes. 713.12

*NEW Action ED-3.1.B: Integrating Cultural Events and Neighborhood Commercial Revitalization
Promote the vitality and diversity of the city's neighborhood commercial corridors through heritage and cultural tours, festivals and other events.*

See also The Arts and Culture Element for additional information on placemaking. Action ED-2.2-A on the Retail Action Agenda

714 ED-3.2 Small and Locally-Owned Businesses 714

714.1 Small goods and services businesses are an important part of what makes the District's neighborhood commercial areas work. They provide full and part time employment opportunities for city residents and contribute to the city's tax base. They help sustain the diversity of neighborhood shopping areas, and enable the marketplace to respond to changing business conditions and consumer preferences. It is the city's small business proprietors that have initiated many of the District's commercial revitalization efforts, driven by a desire and commitment to upgrade their businesses, properties, and neighborhoods. 714.1

714.2 Approximately 95 98 percent of the businesses in the District had fewer than 500 50 employees in 2015. While These businesses represented 47 represent just 34 percent of the District's private sector jobs, and they are an essential part of the city's economic base. Sectors with high numbers of small businesses include construction, wholesale trade, retail trade, and food services. In fact, the average retail business in the city has about 10 12 employees and the average food service business has 17 22 employees. 714.2

714.3 The success of small businesses in these sectors and others is particularly important in the city's economically distressed communities. Small businesses in these areas can catalyze neighborhood renewal and provide local jobs. The availability of working capital and other forms of financial and technical assistance is important to promote their success. 714.3

714.4 One of the potential downsides of revitalization is the loss of small businesses as national chains move in the cost of retail space increases beyond what many business models can support in the face of growing demand from new types of businesses, such as fast casual restaurants that generate particularly high- levels of revenue. This can also result in the replacement of basic services with high-end specialty shopping retail and dining that is not affordable to as many residents. The District recognizes that neighborhood shopping areas should evolve in response to changes in consumer tastes and preferences, but it also recognizes the importance of avoiding displacement and economic hardship for the businesses that have anchored our city's shopping areas for years. 714.4

714.5 New programs may be needed to reduce "commercial gentrification" increase opportunities for residents to own businesses in thriving commercial areas. in the future. Measures should include but not be limited to income and property tax incentives, assistance to commercial tenants seeking to purchase their buildings, commercial land trusts (which buy local

commercial space and hold it in perpetuity for the benefit of the community), and relocation assistance programs for displaced business. Zoning strategies, such as limits on the size of businesses or the length of street frontage, and tying zoning relief (variances, etc.) to explicit requirements for the preservation of local serving small businesses should also be considered. Businesses also should be included. There are also federal programs like the HUBZone (Historically Underutilized Business Zone), Small Business Administration Loans that can support local entrepreneurs. Additionally, entrepreneurship training programs can help residents develop successful enterprises that have forward-looking business models that can become the next generation of local businesses that anchor communities. 714.5

NEW Callout Box: Employee Owned and Controlled Businesses

Employee owned and controlled businesses, such as worker cooperatives are one form of small business ownership that produces an array of economic benefits for low-income communities that can effectively reduce economic disparity on a long-term basis. Employee owned and controlled businesses tend to provide higher wages, more opportunities for skill development, greater job stability and better benefits. This type of business is a proven community development practice that can help build economic equity by promoting living wages and reducing income inequality. Promoting employee owned and controlled businesses is an opportunity to build community wealth and support workforce development in concert with other programs to continue building an inclusive city. Connecting prospective employee owned and controlled businesses with small business financing programs can improve the successful creation, implementation and expansion of worker cooperatives.

714.6 Policy ED-3.2.1: Small Business Retention and Growth

Encourage the retention, development, and growth of small and minority businesses through a range of District-sponsored promotion programs, such as Made in DC and 202 Creates as well as through technical and financial assistance programs. 714.6

714.7 Policy ED-3.2.2: Small Business Incubators

Support small business incubators that provide space for lease to small and emerging businesses at low-cost with flexible terms paired with business development advisory services. Provide low-cost rental space ("incubators") for small, home-grown businesses and start-up companies, particularly companies that are responsive to technological and economic innovation in the marketplace. A variety of spaces should be considered for business incubators, including vacant storefronts and surplus public buildings. 714.7

714.8 Policy ED-3.2.3: Access to Capital

Expand access to equity, debt capital including small business loans and lines of credit, long-term debt financing, and small business loans and grants for small and medium-sized businesses to support new and expanded business ventures. These tools should be used to leverage private investment in façade facility improvements, new and expanded business ventures, streetscape improvements, and other outcomes investments that help revitalize commercial districts and generate local jobs. 714.8

714.9 Policy ED-3.2.4: Large Business Partnerships with Major Employers Promote collaborations and partnerships between small businesses and the District's major employers to increase contracts for small and disadvantaged businesses, including federal outsourcing contracts, creating new training opportunities, leveraging corporate social responsibility initiatives, or otherwise collaborating on inclusive economic growth initiatives. 714.9

714.10 Policy ED-3.2.5: Innovation in Emerging Cross-Cutting Industry Clusters Technology Transfer and Innovation

Support ongoing efforts by the District's colleges and universities to promote technology transfer and innovation in emerging fields., and Provide technical and financial assistance to help local entrepreneurs and small businesses with an emphasis on the impact economy, smart cities, professional services innovation, hospitality innovation, security technology as well as data science and analytics. These efforts should include small business "clinics", incubators, and small business course offerings at institutions of higher education. These efforts should emphasize opportunities to serve women minorities and low- income residents. 714.10

714.11 Policy ED-3.2.6: Commercial Displacement

Avoid Mitigate the risk of displacement of small and local businesses due to rising real estate costs. Consider programs should be developed to offset the impacts of rising operating expenses on small businesses in areas of rapidly rising rents and prices. Also consider enhanced technical support that helps long- standing businesses grow their revenues and thrive in the strengthening retail economy. 714.11

714.12 Policy ED-3.2.7: Assistance to Displaced Businesses

Assist small businesses that are displaced as a result of rising land costs and rents, government action, or new development. Efforts should be made to find locations for such businesses within redeveloping areas, or on other suitable sites within the city. 714.12

714.13 Policy ED-3.2.8: LSDBE Certified Business Enterprise Programs

Expand opportunities for local, small, and disadvantaged business enterprises through city programs, incentives, contracting requirements, and other activities. 714.13

714.14 Callout Box: Small and Minority Business 714.14

Minority business enterprises represent an important subset of small businesses in the city. Their growth and expansion remains a particularly high economic development priority. The District has established a Small Business Development One- Stop satellite center in the Department of Employment Services headquarters DC Business Center is a one-stop online center for information, regulatory + and making payments., in partnership with the DC Minority Business Development Center. The DC Business Center along with DSLBD's Center for Entrepreneurial Education and Development provide unified information from key agencies including the Department of Consumer and Regulatory Affairs (DCRA) and the Alcoholic Beverage Regulation Administration (ABRA). The partnership focuses on enhancing the performance and profitability of minority business enterprises and provides an important

resource for minority business recruitment, seminars, business skill enhancement, incubation services, networking events, and pro bono counseling

NEW Policy ED-3.2.8: Employee Owned and Controlled Businesses

Support the creation and advancement of employee owned and controlled businesses. Consider techniques such as public funding to support the formation of cooperatives; prioritizing worker cooperatives in competitive contracting and procurement opportunities; aligning preferences for cooperatives with workforce and economic development initiatives; training partnerships with workforce development programs; and providing technical assistance including financial and legal services.

NEW Policy ED-3.2.9: Local Business Operational Planning

Promote the development of business operational plans to assess and build the capacity of local businesses to prepare for, withstand, operate and recover from identified threats and risks. The intent of business continuity plans is to implement safeguards and procedures that minimize disruptions during and after disasters and to eliminate threats that can jeopardize the financial solvency of the small business.

NEW Policy ED-3.2.10: Small Business Capacity Building

Promote capacity building for small businesses that expand awareness of financial management, strategic planning, inventory management, legal requirements and risk management, and proven marketing techniques. Expanding awareness of these techniques will help small and local businesses grow along with the District's economy.

714.15 Action ED-3.2.A: Anti-Displacement Strategies

Complete an analysis of alternative regulatory and financial measures to mitigate the impacts of "commercial gentrification" demographic and economic market changes on small and local businesses. Measures to be assessed should include but not be limited to technical assistance, building purchase assistance, income and property tax incentives, historic tax credits, direct financial assistance, commercial land trusts, relocation assistance programs, and zoning strategies such as maximum floor area allowances for particular commercial activities. 714.15

714.16 Action ED-3.2.B: Business Incentives

Use a range of financial incentive programs to promote the success of new and existing businesses, including enterprise Historically Underutilized Businesses Zones, the Inclusive Innovation Fund, Certified Business Enterprise minority business set asides, loans, and loan guarantees, low interest revenue bonds, federal tax credits for hiring District residents, and tax increment bond financing. 714.16

714.17 Action ED-3.2.C: Shopsteading Program Temporary Retail

Investigate the feasibility of a shopsteading program that Support temporary retail opportunities that would enable entrepreneurs and small businesses to open a shop in currently vacant or abandoned commercial space at greatly reduced costs. 714.17

714.18 Action ED-3.2.D: Small Business Needs Assessment

Conduct an assessment of small and minority business needs and impact evaluations of existing small business programs in the District. The study should include recommendations to improve existing small business programs and to develop new programs as needed that are performance-based. 714.18

714.19 Action ED-3.2.E: Best Practices Analysis

Analyze what other cities have done to encourage and foster their small business sectors, including the development of business parks and incubators. Use this best practice information to inform District policy. Completed – See Implementation Table 714.19

NEW Action ED-3.2.F: Neighborhood Commercial District Resilience Toolkit Create a toolkit that builds on the Vibrant Retail Streets Toolkit to provide community based economic development organizations tools to navigate changing markets. The toolkit will help organizations identify and leverage public space assets, build market strength, apply creative placemaking, and implement temporary uses.

NEW Action ED-3.2.G: Study Employee Owned and Controlled Businesses Evaluate employee owned and controlled businesses' potential for inclusive economic growth. Research could include identifying successful programs and assessing the feasibility of support for employee owned and controlled businesses through startup funding, technical assistance, and legal support.

**Conclusion and Comment: Section does not have wage and housing cost analysis. Section does not have data sets to show progress thus far and estimated projections of policy/action implementation
Recommendations: include recommendation to analyze impact related to former policies included in section ed-3. Include estimated impact of implementation of Ed-3 policies/actions.**

Policy ED 2.2.1 Chapter 3 INSERT NEW POLICY EXPAND STREET VENDOR OPPORTUNITIES Increase Public Space Sidewalk Vending city-wide in all commercial corridors and especially in Southeast Washington, D.C. This strategy will create business and job opportunities for returning citizens, homeless veterans, unemployed persons, single mothers, at risk youth, and senior citizens on fixed and reduced incomes. Increased street vending opportunities will create an indigenous grassroots business class, that would in time, establish larger retail ventures in District's underserved areas, such as Southeast Washington D.C.

Proposed language New Action ED-2.1.D: Supporting Entrepreneurship Facilitate entrepreneurship including through mentorship, technical assistance, incubators and pro bono partnerships that will help aspiring entrepreneurs access resources and increase the likelihood of establishing a successful small business.

Conclusion and comment: original amendment wording is very prescriptive with the intention of targeting specific communities in the district of columbia. Proposed language is not prescriptive enough to truly measure outcomes

Recommendation: Include original text in Economic development element. If this cannot be achieved include in area elements contained within amendment

Policy ED
2.2.6

D.C. GOVERNMENT OWNED LAND AND BUILDING USE FOR STREET VENDORS, FLEA MARKETS, AND FARMERS'S MARKETS. Provide government owned land to

indigenous District residents for the creation of flea markets and farmers markets. This strategy will allow grassroots entrepreneurs to bring fresh farm produce, general merchandise, and services to underserved areas of the District and allow District citizens to revitalize obsolete commercial areas of the city, especially in southeast D.C.

Proposed language: NEW Policy ED 1.1.4: Promote Local Entrepreneurship Support District residents seeking entrepreneurship opportunities through layered programs including technical assistance, promotion of District products and services, and market development.

Conclusion and Comment: Vaguely accomplishes what was originally proposed by submitter. Changes are too vague could be used for broader policy. Original text is more prescriptive and could be used verbatim in area elements.

Recommendation: return to original wording of amendment and include in area elements specified in the original text.

CHAPTER 7

NEW POLICY UNDER Policy ED 4.2.5

BUSINESS AND LABOR AND GOVERNMENT PARTNERSHIPS TO TRAIN D.C. Citizens AS STREET VENDING, VOCATIONAL SKILLS, AND HOME BASED BUSINESSES,

Create partnerships between District public schools and small business partnerships, to train returning citizens, single mothers, veterans, homeless persons, and unemployed at risk youths as street vendors, produce vendors, home based business owners, landscapers, tailors, journeymen, brick masons, carpenters, and jewelry craftspersons. This strategy will assist the aforementioned groups to be self-sufficient and economically secure to create wealth, buy homes, and generally create new generational legacies.

Proposed language NEW Action ED 1.3.E: Support Emerging Entrepreneurs Through partnerships with private entities or directly, establish a fund or funds to help local entrepreneurs grow investment ready businesses. Emphasize increasing access to capital particularly among lower-income entrepreneurs in emerging fields, such as the impact economy, urban innovation/smart cities, hospitality and professional services innovation, data, security tech.

Conclusion and comment: original amendment text specifically mentions DCPS as a partner to train residents for wealth generation and is specific about population targets. Proposed language is not as specific.

Recommendation: Use original text, original amendment is broad and prescriptive enough to measure outcome by target population and sets a broad policy to create economic independence for underserved residents

Good morning/Afternoon Chairman Mendelson and members of the committee

My name is Reginald Black and I am a native Washingtonian, advocacy director of People for Fairness Coalition, the former Ward 7 resident I currently reside in Ward 4 and am a voting member of the Interagency Council on Homelessness. I appear before you today to express support for some of the concerns raised by my colleagues in the grassroots planning coalition.

I oppose the notion of passing the Comprehensive Plan Amendments as is because the Office of Planning has not taken into account the negative impacts Displacement and gentrification are contributing to the loss of Black populations of low income. During the comment period we also produced comments and a resolution about ending housing instability which are also reflected through our housing justice priorities. Within our justice priorities document we have identified how we can use the Comprehensive Plan to support the unhoused.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

I am a native and I won't just sit and let D.C. be at its worst. I want a city that works for us. This is why I support the housing justice priorities produced by the DC grassroots planning coalition.

I am currently working to end poverty and homelessness. I do what I can to give public oversight to the construction of new housing and want it for all residents especially natives of African descent. That is why we also proposed a definition of universal housing. Housing that is only

charging one third of a person's income no matter where that income falls some of the basis for this idea to me come from the [united nations declaration of human rights signed 1948](#).

Article 17

1. Everyone has the right to own property alone as well as in association with others. 2. No one shall be arbitrarily deprived of his property.

And Article 25

1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control. 2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or out of wedlock, shall enjoy the same social protection.

Emphasize that points that we as a community should be making as we develop in the city and we all want a model international city than we need to take into account those who are the least. Thank you for the opportunity to testify and am happy to answer any questions you may have

ICH Strategic Planning Meeting Comprehensive Plan Comments and Suggestions May 16, 2017

FRAMING:

- 2006 Edition acknowledged the “crisis” in affordable housing...things have not improved
- Median incomes have barely increased in Wards 7 and 8
- Rent burdens by Wards have barely improved, and more often, have gotten worse
- Unemployment has decreased across all Wards, but there is still a high disparity between Wards, particularly in Wards 7 and 8
- Taxes and rental payments through housing solutions (vouchers, rent reasonableness) may inadvertently increase property values and result in higher rents in the area

Comments from Housing Solutions Committee:

- Land Use and Housing Elements
 - Needs to reflect current District housing programs and who those programs are meant to serve
 - Universal housing – what it means, components, how to incorporate in Plan

§ Affordable housing to scale (everyone who needs has an ability to find something affordable)

§ Price point – what are people paying for “affordable” housing (currently benchmarked to AMI for the *area*, as opposed to AMI for the *District*)

· Hiding economic disparities, hides number of residents in 0-30%, 30-50% -- what are the *real* numbers

○ How to model affordable housing – Plan now says 1/3rd of all housing unit production for 80% or less of AMI –

§ What have we produced?

§ How much are we *losing*?

§ How do vouchers impact affordable housing?

○ Creation of higher density/combating NIMBYism

§ Low-and-high rise apartments are 1% of zoned land

§ 40% is single-family. Why should this land be left out?

○ Outsized influence of ANC's. Ward or larger should be the area of focus, *not* immediate neighborhood

○ BZA appeals process – most affordable housing projects are being held up by 1 person appealing

○ Collecting fewer tax dollars on affordable housing (to take into account restricted/non-market rents)

○ Davis-Bacon and First Source are not required by private developers, resulting in cost disparities between affordable and market rate unit development

Overall Break-Out Group Comments:

Economic Development:

Education and Job Training

· Child and adult education, including job training/job-related education/remedial education

· Inclusionary employment

○ Job set-asides (First Source, CBEs, Workforce Improvement Program [WIP], etc)

○ WIOA Plan (included and implemented)

· Supported employment/on-the-job training

○ Training in advance of projects (ex. Ward 8 Works)

○ Training specifically tied to jobs

· Sweat equity/apprentice programs

○ Perhaps as part of a developer's contract?

- Look at what industries are projected for growth and tie to training and education

Increase Job Opportunities

- Job flexibility (hours, work at-home, training opportunities, etc) and/or additional job opportunities in specific categories (such as coding/computers)
 - Not just retail or service jobs
- Ways of attracting jobs to Wards 7 & 8
- Paying living wages
- Increased number of employment co-ops

Neighborhood Additions and Improvements

- Co-location of retail and services with mixed-income housing
- Increased creation of workforce housing
- Increased public housing development

Analyses and Necessary Data

- Analysis of average incomes v. average rent/home prices to ensure that what jobs are paying workers is commensurate with the housing opportunities available
- Analysis of disparities in employment by Ward, race, education/matriculation level, background, nationality, etc
 - DCFPI data
- Analysis of unemployment v. underemployment
- Costs of implementing workforce programs v. incomes derived for clients
 - Look at wages in social services
 - Staff v. clients' incomes

Land Use

Policies

- Housing as a matter of right, regardless of market forces; (i.e., a person lives in the District, there are open/available housing opportunities in the District, therefore a person in need of a house should be able to procure a home)
 - Ensuring availability of affordable housing **MUST** be an **ALL District** strategy
- § Remove adjectives currently in the Comp Plan such as “stable neighborhood”, “emerging or transitional neighborhood”, etc. Should just be “neighborhood”
- § All-District strategy should also focus on smaller areas of the District, whether it is by Ward, by ANC/SMD, Office of Planning neighborhood cluster, or census tract, and ensure that metrics/targets for affordable housing are delivered. (See also

Massachusetts 40b Plan that requires meeting a certain percentage of affordable housing per given cluster)

- Redevelopment of public land (vacant parcels, readapting/redeveloping existing District-owned buildings); use of eminent domain by the District for abandoned or blighted properties for redevelopment into affordable housing.
 - Review of District land disposition rules, regulations, policies
- Model/revise Inclusionary Zoning (IZ) to more closely resemble Montgomery County, Maryland
- Increased use of Community Equity Investments
- Increased employment opportunities through development (whether on-the-job training/apprenticeship programs; creation of commercial opportunities in neighborhoods; etc)
- Increasing relative densities throughout the District to ensure that there are available housing options in each Ward for persons of varying income levels, backgrounds, education levels, etc
 - Don't prevent development of multi-family buildings in areas that are primarily single family, *simply because* that area is "stable" and "low density"
- Ensure that development around transit (Metro, Great Streets, transit corridors) allows higher density
 - All stations should be "on the table" for development consideration – it should *not* only be where (as Plan says now in LU-1.3.2, "where there is the greatest opportunity for infill and growth" as this will further concentrate affordable housing in certain parts of the District)

DATA Points

- Review recent projects with high densities (within last 2-4 years):
 - Number of project completed
 - Number of projects planned/slotted for completion
 - Number of affordable units delivered
 - Acres of developable land lost to recent development v. acres of available/developable land remaining
- Number of overall affordable units created v. number lost
 - Should also consider that the District had more than 60,000 units renting for \$800 or less a decade ago, of which approximately 28,000-32,000 remain.

§ There is still the *need* for not only those lost 30,000 affordable units, but also necessary to determine the need above and beyond – 50,000 units needed? 70,000 needed? And such determination should be used a key metric to ensure that the Plan is performing and meeting the District's needs

- Number of developers who are delivering/slotted to deliver affordable units and how many affordable units have they delivered (specifically)

- Is this level of production on track to meet need, and if not, what level of production is required?
- Placement/locations of residential facilities throughout the District
- Proprietary data sets from developers regarding their rent levels (number of units at \$500 or less, \$500-1,000, \$1,000-1,500, \$1,500-2,000, \$2,000+, etc) and how many units produced at given rental level (both in terms of unit cost and unit size)
- Extrapolate from area job projections what income levels can/will be attained by those workers, and determination of availability of housing that can accommodate those salaries and develop plan to produce additionally-expected housing

Language

- Comp Plan *must* ensure that there is specific language about not only the production of housing generally, but the production of affordable housing specifically. Ideally, should also mirror HUD language re “affirmatively furthering fair housing.” (for ex, Policy LU-1.3.1 re mixed use of Metro stations has NO language at all about needed to address housing around Metro stations, and LU-1.3.3 fails to address renters, instead focusing on senior housing and first-time homebuyers)
- Zoning changes to more clearly reflect mixed-uses, and changing formerly commercially or industrially zoned land to residential where necessary, OR even rezoning residential to commercial/industrial to spur economic development in heavily residential areas (such as some areas East of the River)

I implore you not to just pass these amendments without our priorities for housing justice

Thank you for the opportunity to testify and am happy to answer any questions you may have.

DC GRASSROOTS PLANNING COALITION

HOUSING JUSTICE PRIORITIES

FOR THE DC COMPREHENSIVE PLAN

In the midst of an ongoing housing crisis that has led to the displacement of tens of thousands of predominantly Black DC residents, the DC Grassroots Planning Coalition (DCGPC) and partner organizations call on the DC Council to strengthen the city's Comprehensive Plan by adding policies and actions that fortify existing affordable housing programs and require community-led equitable development strategies that further racial equity.

THE COMPREHENSIVE PLAN AMENDMENT PROCESS MUST BE CONDUCTED IN COMPLIANCE WITH DC LAW. The Comprehensive Plan is DC law and a 20-year planning document.[1] The Comp Plan requires the Mayor to submit reports to DC Council[2] at least once every 4 years on the District government's progress in implementing Elements of the Plan, the Plan's Action items, and the key projected implementation activities by land use policy over the succeeding 5 years.[3] Additionally, the Mayor shall submit amendments every 4 years for Council consideration and the amendments "shall be accompanied by an environmental assessment of the proposed amendments." [4] Notwithstanding the law, the Mayor initiated a full rewrite of the entire Plan with almost 1,000 pages of edits and substantial changes to the Future Land Use and Generalized Policy Maps, and did so without progress reports on the impact of current Elements, environmental assessment of proposed amendments, or in-depth community participation in every phase of the Plan's development.

Therefore, the Coalition asks that DC Council:

1. Ensure that all Ward level amendments as well as changes to the Future Land Use and Generalized Maps proposed by the Mayor's Office of Planning are examined and discussed with affected Ward-level residents at well-publicized, open and participatory roundtables led by the Ward Councilmembers;
2. Ensure that all proposed amendments to the Citywide Elements are examined and discussed at well-publicized, open and participatory Council roundtables held by the relevant Council Committee. (For example, the Housing Element should be reviewed at a public roundtable held by the Committee on Housing and Neighborhood Revitalization and the Committee on Human Services);
3. Ensure compliance with Comprehensive Plan law and regulations, as referenced above, before considering and voting on the substantial changes proposed by the Mayor. No Council vote should be taken without knowing in detail the impacts of the current Elements and their Action items on housing, land use, economic development, and all other facets of social, economic, and physical development influenced by the Comprehensive Plan.[5]

THE COMPREHENSIVE PLAN MUST PROACTIVELY ADDRESS DC'S HOUSING CRISIS BY STRENGTHENING THE FOLLOWING POLICIES:

RENT CONTROL:^[6] Rent control, also known as rent stabilization, is a popular affordable housing program. Rent control does not subsidize housing providers or tenants; rather, the program limits rent increases by tying them to increases in the Consumer Price Index (CPI).^[7] The Housing Element of the Comprehensive Plan must articulate the goals of: (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing.

PUBLIC HOUSING: The Comprehensive Plan, as amended, must continue the District's commitment to public housing. This means that Comp Plan amendments must require action on maintenance, preservation, and redevelopment of existing public housing and the building of additional public housing to accommodate the District's 51,000 extremely low-income renter households^[8] (31% of all renter households and at or below 30% MFI) who can afford at most just over \$900 monthly rent.^[9]

Accordingly, the Housing Element must include the following policies and goals: (1) fully fund repair and renovation of deteriorating public housing units; (2) require 1-for-1 replacement of public housing units and more when increasing site density, with no loss of family size multi-bedroom units; (3) ensure no new barriers to residents' return and true affordability based on the HUD standard of 30% of income for housing expenses; (4) use a mandatory build first model to prevent displacement, strengthen anti-discrimination enforcement during periods of relocation, and cover residents' relocation and return costs; (5) create an enforceable right of return of displaced public housing residents; (6) reinstate the goal to create a minimum of 1,000 new, additional public housing units over the next ten years;^[10] (7) retain public ownership and control of publicly owned housing and developments; (8) mandate that public housing resident-led organizations share decision making authority in all phases of redeveloping public housing; (9) incorporate community development strategies that improve the economic condition of residents such as equity for and home ownership by public housing residents, land trusts, cooperatives, and worker-owned businesses; and (10) remove barriers to the ability of returning citizens to live in public housing.

SUBSIDIZED HOUSING: Housing DC's low wage workers, seniors, people with disabilities and other low-income households must be recognized as those with the need for increasing housing capacity overall. To do so requires expanding the Local Rent Supplement Program (LRSP) -which provides ongoing rental subsidies to make housing affordable to extremely low-income families - with the aim of realizing the 2006 Comprehensive Housing Strategy Task Force goal

of 14,600 locally funded rental subsidies in the District by 2020.[11] Additionally, the District must purchase expiring Section 8 projects to maintain operating subsidies. Transfer of expiring Section 8 projects should be made only to developers who agree to lifetime affordability requirements. The District must continue real property tax abatements as an incentive to preserve expiring project-based Section 8 facilities. Funding must be increased for the Housing Production Trust Fund, the main source of funding for the Tenant Opportunity to Purchase Act (TOPA) and District Opportunity to Purchase Act (DOPA) programs, which must provide opportunities to tenants and tenant associations to own and manage their housing units. The District must adopt the policy that affordable housing created and preserved with public financing be protected by lifetime affordability restrictions and monitored to prevent transfer to non-qualifying households while still allowing residents to build equity which can result in concrete wealth growth.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

Equitable development is defined as development in which low wealth Black and brown communities and other working class communities fully participate from the beginning to ensure that the infrastructure and services they determine to be needed for their communities to grow and prosper are foremost features of the development.[17] Community Economic Development (CED) recognizes that neighborhood investment begins with investing in the capacity of low income residents to own, manage, maintain, and ultimately replicate the development process, leading to a significant shift in economic condition and overall power. To date, the development projects receiving generous taxpayer subsidies and assistance have primarily benefited new and wealthier residents while failing to adequately respond to the basic human needs of existing

markets and residents with “the false promise of trickle-down benefits that justify orienting development around the needs of well-heeled populations.”[18]

Accordingly, the Comprehensive Plan must adopt a new Community-Led Equitable Development model that mandates full participation by long-term community members with a record of community involvement. The process must start with organizing residents around engagement in small area community development plans as a principal measure of expression of community preferences. The Comprehensive Plan must expressly endorse providing significant equity to existing community members, particularly public housing residents, allowing them to withstand displacement and improve their economic standing. To support racially equitable development, the Comprehensive Plan must endorse shared equity models of homeownership such as community land trusts, deed-restricted housing programs, and limited equity housing cooperatives as they balance preservation of affordability with wealth creation.[19]

As the guiding document for development in the city, it is critical that the amended Comprehensive Plan reflect the realities and priorities that we face in the District. The issues of racial inequity must be tackled head-on in specific, actionable Comprehensive Plan priorities.

These priorities are endorsed by:

Empower DC
Washington Legal Clinic for the Homeless
People Power Action
People for Fairness Coalition
DC Federation of Civic Associations
NCBL-DC Unhoused Collective
Plymouth Congregational UCC Board of Social Action
Committee of 100 on the Federal City
Us Helping Us, People Into Living
DC Statehood Green Party
Washington Teachers Union
SW DC Action
Southwest Voice: The People's Paper
Serve Your City/Ward 6 Mutual Aid
Dupont East Civic Action Association
Dupont Circle Citizens Association
Ryan Linehan, Commissioner ANC 5D01
Ra Amin, Commissioner ANC 5B04
Janice Ferebee, Commissioner ANC 2F08
Tiffani Johnson, Commissioner ANC 4B06
Renee Bowser, Commissioner ANC 4Do2

[1] DC Code §1-306.01 (2020).

[2] DC Council shall schedule a public hearing on the Mayor's progress report and following review issue findings to the Mayor and a copy of the public testimony. Id. at §1-306.04(b).

[3] DC Code §1-306.04(b), (c) (2020).

[4] DC Code §1-306.04(d) (2020).

[5] DC Code §1-306.01(b) (2020).

[6] The Rental Housing Act of 1985, DC Code §§42-3501.01-3502.24 (2020) was enacted to cover 5-unit and larger residential properties whose permits to build issued by 1975. Yesim Taylor, History of Rent Control in the District of Columbia, D.C. Policy Center, April 1, 2020 at 2. Rent control was legislated to protect low- and moderate-income tenants from the erosion of their income from increased housing costs and protect the existing supply of rental housing from conversion to other uses. DC Code §42-3501.02(1), (3) (2020). Purposes.

[7] DC Code §42-3502.08 (2020) Increases above base rent.

[8] Housing Needs by State 2020/District of Columbia, National Low Income Housing Coalition, (<https://nlihc.org/housing-needs-by-state>)

[9] Out of Reach 2020, District of Columbia, National Low Income Housing Coalition, July, 2020, (<https://reports.nlihc.org/oor/district-columbia>)

[10] 506.17 Action H-1.4.E: Additional Public Housing in current Comprehensive Plan Housing Element is removed in Office of Planning's proposed April, 2020 amendments submitted to DC Council.

[11] Homes for an Inclusive City, A Comprehensive Housing Strategy for Washington, D.C., Executive Summary, DC Government-Brookings Institute, June 13, 2006 at 8. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf) The 2006 Housing Strategy stated that DC "should directly assist an additional 14,600 extremely low-income renter households by adopting a local rent supplement program." The LRSP was set forth as a supplement to the goal of 55,000 additional units by 2020, including at least 19,000 affordable units. Id.

[12] Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time (PIT) Count of Homeless Persons, June 10, 2020, Metropolitan Washington Council of Governments, (<https://www.mwcog.org/documents/2020/06/10/homelessness-in-metropolitan-washington-results-and-a-analysis-from-the-annual-point-in-time-pit-count-of-homeless-persons-featured-publications-homelessness/>) There were 6380 residents identified as experiencing homelessness as of the January, 2020 point in time (PIT) street count.

[13] District of Columbia Interagency Council on Homelessness, Homeward DC Strategic Plan 2015-2020, DC, 2015.

[14] Id. at 31 and Table 11: System Conversion-Annual Projections for Single Adult System Inventory shows the change in inventory needed to get to a right-sized system. Given that Homeward DC earmarks production of 6000 housing units targeted specifically for the unhoused and those on the brink of homelessness and the 2006 Homes for An Inclusive City called for 19,000 affordable units by 2020, Homes for an Inclusive City A Comprehensive

Housing Strategy for Washington D.C., Comprehensive Housing Strategy Task Force, 2006 at 3. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf), the Mayor's goal to produce 12,000 affordable housing units (up to 80% MFI) by 2025, contained in DCHCD, DCOP, Housing Equity Report: Creating Goals for Areas of Our City, October, 2019, (https://housing.dc.gov/sites/default/files/dc/sites/housingdc/page_content/attachments/Housing%20Equity%20Report%2010-15-19.pdf), marks a significant reduction in previous affordable housing goals, is wholly inadequate, and must be increased.

[15] Office of Revenue Analysis, DC Economic and Revenue Trends: December, 2019 OCFO, Dec., 2019 at 9 (As of November 15, 2019, there were nearly 10,000 vacant residential units in DC). (https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_December%202019.pdf)

[16] B23-0038, March 11, 2020.

[17] See generally Carlton Eley, Planning for Equitable Development: Social Equity by Design, American Planning Association, March/April 2017. (<http://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-03-04.pdf>)

[18] Id. at 2.

[19] Evidence Matters, Shared Equity Models Offer Sustainable Homeownership, PD&R, U.S. Dept. of HUD, Fall, 2012. (<https://www.huduser.gov/portal/periodicals/em/fall12/highlight3.html>)

**Summary of Key Items - Comprehensive Plan Housing Element
Notes for ICH Housing Solutions Committee Meeting
November 18, 2019**

INCOME BANDS AND PROGRAM FUNDING SOURCES

Table 5.1 Sample of Housing Programs, 2017 Income Limits and Main Household Targets

Income	Extremely	Very				
Definition	Low				Moderate	
Household	Percent of Median Family Income					
Size	30%	50%	60%	80%	100%	120%
1	\$ 23,150	\$ 38,600	\$ 46,350	\$ 61,750	\$ 77,200	\$ 92,650
2	\$ 26,450	\$ 44,100	\$ 52,950	\$ 70,600	\$ 88,250	\$ 105,900
3	\$ 29,800	\$ 49,650	\$ 59,550	\$ 79,400	\$ 99,250	\$ 119,100
4	\$ 33,100	\$ 55,150	\$ 66,200	\$ 88,250	\$ 110,300	\$ 132,350
	Historic Home Grant Program					
	Home Purchase Assistance Program					
	HOME, CDBG *					
	Housing Production Trust Fund		Inclusionary Zoning			
	Low-Income Housing Tax Credits					
	Public Housing					

COST BURDEN FOR TENANTS [500.11]

In 2017, more than 20% of the District's households (56,700) were "severely burdened" by their housing costs, which means that they are paying 50%+ of their income for housing. An additional 16% of households (44,600) are "cost burdened", which means they pay more than 30% of their income for housing. [These percentages have gone down since 2004; the data suggests that this is not due to improved affordability but rather the in-migration of wealthier households and the out-migration of lower income households.] The greatest share of the burdened and cost-burdened are the 39,500 rental households at less than 30% MFI.

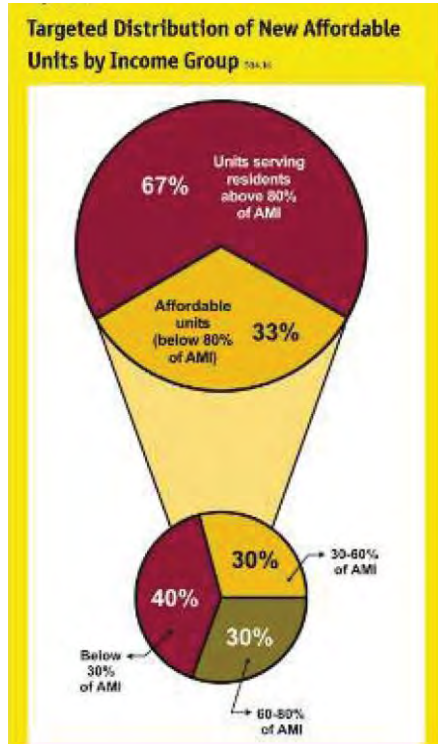
HOUSING PRODUCTION GOALS

Total Housing Goal for All Income Levels

Table 5.4 Total Residential and Affordable Unit Goals: 2018 – 2050

	2018 Base	2020 Estimated	2025 Pipeline	2025 Goal	2030	2050
Total Residential Units	324,300	334,600	360,300		384,200	456,890
2018 - 2025 Total Increase	36,000					
Total Dedicated Affordable	51,960	55,867	59,930	63,960	71,930	96,160
2018 - 2025 Affordable Increase	12,000					
Percent Affordable	16.0%	16.7%	16.6%	17.8%	18.7%	21.0%

Targeted Distribution of New Affordable Housing Units by Income [504.16, Figure 5.3]



Total Goal = 36,000 units
Affordable Goal = 12,000 units (33% of total)

Affordability Goal by Income Bands
30% and below AMI Goal = 4,800 units
31-60% AMI Goal = 3,600 units
61-80% AMI Goal = 3,600 units

Supportive Housing Production Targets (Action H-4-2.A) – Implement the recommendations of Homeward DC [which] recommended the production of 2,000 permanent supportive housing units for the chronically homeless and 4,000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless.

Increasing the Supportive Housing Supply (Policy H-4-2.3) – Increase the supply of permanent supportive housing affordable to extremely low income households in order to reduce the length of shelter stays, free up additional shelter capacity, and provide stable long-term housing for those who are homeless or at risk of homelessness.

OVERALL GOALS ON HOUSING FOR PERSONS WHO ARE HOMELESS

Ending Homelessness (Policy H-4.2.1) – Reduce the incidence of homelessness to rare, brief, and nonrecurring events in the city through homeless prevention efforts, development of permanent subsidized housing for the homeless in all Planning Areas of the city, and actively coordinating mainstream social services for persons who are homeless or at risk of becoming homeless.

Emphasis on Permanent Housing for Special Needs Populations (Policy H-4.1.2) – emphasize permanent housing-first solutions for special-needs populations rather than building more temporary, short-term housing facilities. Permanent housing is generally

more acceptable to communities than transient housing, and also is more conducive to the stability of its occupants.

Coordination of Housing and Support Services (Policy H-4.1.3) – Coordinate the siting of special needs housing with the location of the key services that support the population being housed. The availability of affordable public transportation to reach those services also should be considered.

Neighborhood-Based Homeless Services (Policy H-4.2.2) – Encourage the provision of homeless services through neighborhood based supportive housing and single room occupancy (SRO) units, rather than through institution-like facilities and large-scale emergency shelters. The smaller service model can reduce the likelihood of adverse impacts to surrounding uses, improve community-acceptance, and also support the reintegration of homeless individuals back into the community.

SITE / LOCATION CONSIDERATIONS

Using Large Sites (Policy H.1.1.7) – Accommodate a significant share of the District’s projected housing demand in “new neighborhoods” developed on large sites formerly used for government functions.

Housing Affordability on Publicly Owned Sites (Policy H.1.2.4) – Require that 20-30% of the housing units built on publicly owned sites disposed of for housing, or co-located with local public facilities, and sites being transferred from federal to District jurisdiction are reserved for a range of household incomes including extremely low and low income for rental units and very low and low-income households for ownership units.

Production of Housing in High Cost Areas (Policy H.1.1.8) – Encourage development of both market rate and affordable housing in high cost areas of the city making these areas more inclusive. Develop new innovative tools and techniques that support affordable housing in the areas. Doing so increases costs per unit but provides greater benefits in terms of access to opportunity and outcomes.

Location of Special Needs Housing (515.2) – Given limited budgets, the rising cost of land tends to drive special needs housing to the most affordable areas of the city, which are the very places where these uses already are concentrated. Washington DC is committed to investing in community-based housing options and services that encourage independent living across all Planning Areas.

Integration of Residents with Special Needs (Policy H.4.1.1) - Integrate residents with special needs through housing that includes wrap around supportive services throughout the city rather than segregating them into neighborhoods that already have high concentrations of such housing.

TOOLS TO INCREASE THE AMOUNT OF HOUSING, PARTICULARLY AFFORDABLE UNITS

Density Bonuses for Affordable Housing (Policy H.1.2.7) – Provide zoning incentives to developers proposing to build a substantial amount of affordable housing above and beyond any underlying requirement.

Additional Public Housing (Action H.1.4.E) – Support the D.C. Housing Authority’s planning goals for its public housing units by studying the need for additional units and developing strategies to meet the needs of existing units.

Reducing Barriers to Production (Policies H.1.5.1 through H.1.5.4) – Regulations, Permitting, Construction methods, Financial Incentives.

Long Term Affordability Restrictions (Policy H-2.1.5) – Ensure that affordable housing units that are created or preserved with public financing are protected by long-term affordability restrictions.

PROGRAMS TO EMPHASIZE IN DEVELOPING / INCREASING AFFORDABLE HOUSING FOR INDIVIDUALS AND FAMILIES EXITING HOMELESSNESS

Local Rent Supplement Program (Action H-2.1.B) – Expand the LRSP program for both tenant and new project based support targeted toward public and private held extremely low-income housing for formerly homeless individuals and families. Note that the program the program has been expanded over the past several years from 2,800 households to over 5,700 and a total cost of \$100 million per year. [509.4]

Direct Rental Assistance (Policy H-2.1.7) – Develop and fund programs that provide direct rental subsidies for extremely low-income households (30% MFI and below).

Landlord Recruitment (Action H-4-2.5) – Development and test pilot programs designed to incentivize landlords to house individuals and families exiting homelessness. Test such strategies as damage and default insurance. Evaluate the pilot and make recommendations on maintain and improving an on-going program.



Government of the District of Columbia
Interagency Council on Homelessness

MEMORANDUM TO OFFICE OF PLANNING
RE COMPREHENSIVE PLAN UPDATE

Context

The Office of Planning is amending the DC Comprehensive Plan. While the plan itself recommends an amendment cycle approximately every 4 years, there is also explicit acknowledgement that

The District has seen an accelerated and substantive transformation of its neighborhoods occurring at a faster pace than the Comprehensive Plan's 20-year timeframe. Because of this accelerated timeline, there is an even greater need for conversations with District stakeholders on equitable development and on how the changes taking place in the city can benefit all eight wards. The second Amendment Cycle of the 2006 Comprehensive Plan provides the District another opportunity for these conversations.

In response to the Office of Planning's amendment effort, ICH staff invited Stakeholders and Members to provide their feedback and inform the ICH amendment submission to the Office of Planning at the following forums:

- 4/25 ICH Strategic Planning Committee Meeting
- 5/03 ICH Housing Solutions Committee Meeting
- 5/16 ICH Strategic Planning Committee Meeting (meeting dedicated to the Comp Plan Update)

This memo focuses on the most salient issues and recommendations outlined in those discussions.

Overall Comments

Currently the affordable housing crisis is, more or less, contained in the Housing Element. This memo calls for

- Prioritizing the affordable housing crisis in the Land Use Element as a critical land use issue (if not the most critical land use issue) facing the District, particularly as it pertains to equitable development;
- Using the affordable housing crisis as a lens for balancing competing demands and promoting equitable development, particularly those demands that constrain or otherwise limit the District's abilities to address the affordable housing crisis; and
- Expanding the ability of the District to provide both emergency/temporary housing facilities as well as permanent supportive housing facilities by right, to address the shortfall of affordable housing for individuals and families experiencing housing crisis.

Over the last two years, in the District's effort to implement Homeward DC, market and NIMBY forces have demonstrated amply that the need for emergency, temporary, and permanent supportive housing facilities (for individuals and families experiencing homelessness), cannot be met under the current processes in place for siting, reviewing and approving group housing. It is critical to update zoning and siting requirements so that the District can proactively provide for this unmet need (on District owned property), by right.

Additionally, in the Housing Element, the section on the affordable housing crisis should be expanded so that it can provide guidance on and accurately reflect what the District knows about

- the extent of the need;

- the outcomes of existing programs and efforts; and
- the gap between the outcomes of existing program and the extent of the need;

Given that the major housing programs in the District are directed by, at least, six different entities (Table 5.4, 504.9), it is not reasonable to expect that the strategic planning process of any one these agencies adequately captures, evaluates and comprehensively addresses the affordable housing crisis that the District is facing.

Moreover, there is every indication that the extent of the need far out dwarfs the existing programs and efforts captured in the Housing Element. As such the Housing Element must

- Identify the viable options for course corrections that are appropriate to the major housing programs and then
- Outline the extent of the need that the District must look to resolve the crisis by rethinking and re-balancing our Land Use and Economic Development priorities, policies and actions.

Finally, the Economic Development Element should be explicitly linked to the affordable housing crisis. As written, the current Comp Plan is not clear on how the District's economic development efforts are targeted across the different income groups and how these efforts are expected to reduce the gap between current wages and housing wages (wages that allow households to afford market rent housing). This kind of analysis is critical to prioritizing resources to those actions and strategies that have the most equitable outcomes. As such, we are recommending that the element is updated to convey how many households, at which income levels, and within what timeframes, the District expects to connect to housing wages so that we can forecast both the continued need for affordable housing and the role of economic development in addressing the issue.

In sum, we know that the affordable housing crisis is complicated and nuanced. It will require concerted effort and coordination across agencies, policies and actions. There is no magic bullet that will solve the problem, and there is a lot of uncertainty in our ability to understand and predict the outcomes associated with our policies and actions. However, if, in our planning efforts, we do not make an effort to estimate the outcomes of our policies and actions on affordable housing outcomes, we cannot

- Prioritize resources comprehensively to those activities that promote affordable housing;
- Minimize the impact of policies and actions that work against affordable housing;
- Monitor assumptions related to return on investment and outcomes;
- Understand the limits and shortcomings of the policies and actions advanced in the District; and
- Course correct in a timely manner to ensure we are moving in the right direction.

With this overall framework in mind, we submit the following comments specific to the Land Use, Housing and Economic Development Elements of the Comprehensive Plan.

Comments Specific to the Land Use Element

Clarifying the Extent of the Need for Affordable Housing and Establishing the Affordable Housing Crisis as a Critical Land Use Issue Facing the District of Columbia

The Comprehensive plan does not appropriately contextualize the extent of the affordable housing crisis in the District. To convey the extent of the issue and to highlight the interplay with equity and economic development, the following data points are suggested for inclusion in the amended Comprehensive Plan:

- Availability of units that are affordable to households at various income levels¹ compared to the number of households at each of those income levels currently living in the District;
- Estimated loss of affordable housing during the last 10 years, including projections for future losses based on the rate at which units are lost for different income levels²; and
- Number, demographics, and distribution (across all 8 wards) of households that are rent-burdened (including those that are severely rent-burdened).

Taken together, these data points begin to convey the scope of the problem and also flag the complex interplay between affordable housing, economic development, land use and equity. By highlighting the disparate racial, spatial and economic impact of the crisis, the Comp Plan can begin to offer a framework for addressing the affordable housing crisis from an economic empowerment and equitable development perspective as well a housing supply side perspective.

Updating the Land Use Goal to include Affordable Housing and Integrating Affordable Housing into the Vision for Shaping the City (LU-1) by Outlining the District's Expectations/Benchmarks for the Production of Affordable Housing

As the section that is dedicated to the desired pattern of growth and development in the District, this section needs to emphasize and incorporate affordable housing. Most critically, this section needs to outline what can/should be expected, in terms of affordable housing from:

- **Central Washington** where “approximately 30% of DC’s housing growth and 70% of the job growth will occur within the urban core of the city and adjacent close-in areas along the Anacostia River;”
- **Large Sites** where “about 15% of Washington’s housing growth and 10% of its job growth will take place on ten large sites outside the Central Employment Area;”
- **Station Area and Corridor Planning** which is recognized as opportunity for senior housing and more affordable “starter” housing for first time homebuyers adjacent to Metrorail stations; and
- **Neighborhood Infill Development** on hundreds of small vacant lots across DC, totaling more than 400 acres in 2005. Approximately 50% was zoned for single family homes, 15% for townhomes and rowhomes, and 35 percent for multi-family development.

The District must develop a framework for estimating and maximizing the number of affordable housing produced under each of these strategies, and their associated policies and actions. As a principle, the expectation for these areas (as it relates to the production of affordable housing) must be on par with both the opportunity that these areas represent and the extent of the affordable housing crisis.

Maximizing the development of affordable housing across all 4 major land use strategies should allow the City to create a diverse portfolio of affordable housing opportunities, while appropriately prioritizing locations that are central or accessible. Special care and emphasis should be given to balancing cost efficiency (new construction at scale vs small scattered infill sites) with the recognition that scattered infill sites create opportunities for affordable housing in neighborhoods where larger sites might not be available.

¹ Recommended income levels for analysis: 15% AMI, 30% AMI, 60% AMI, 80% AMI, 100% AMI, 120% AMI, 150% AMI and above

² It is not appropriate to assume that the rates of which affordable housing is lost is equally distributed across the various income groups. It is more likely to be concentrated at the lowest income levels and as such, projections must take into account this likely differential in loss of affordable housing.

Finally, this section should evaluate whether, to achieve outcomes that are on track with the magnitude of the affordable housing crisis:

- Publicly-owned sites should be dedicated for affordable housing purposes —particularly as public housing opportunities (managed by the District’s Housing Authority) and group housing opportunities (emergency, temporary and permanent supportive housing facilities) that have the necessary services and supports imbedded onsite; and
- Relative zoning densities throughout the District should be increased to maximize opportunities for creating affordable housing and ensure that those opportunities are available in both “stable” and “low density” areas as well “transitional”, “emerging” and “distressed neighborhoods.”

Evaluating the Impact of Policies and Actions Advanced Under LU-2 (Creating and Maintaining Successful Neighborhoods) and Appropriately Limiting Those Policies and Actions that Constrain the Development of Affordable Housing

Neighborhoods and their character are more than the buildings and land use mix in an area; and the District must prioritize people over aesthetics and distinctions in the street/city scape that sets one neighborhood apart from another. As such, this section of the Comprehensive plan needs to be updated to recognize that the significant loss and displacement experienced by native Washingtonians is just as, if not more important than the street/city scape of the 130 distinct and identifiable neighborhoods in the District.

Putting the people who have been and continue to be displaced at the core of the District’s approach to creating and maintaining successful neighborhoods requires the District to evaluate the policies and actions advanced in this section with an affordable housing lens. Particular attention and evaluation needs to be focused on those policies and actions that may constrain the development of affordable housing, especially those related to:

- LU-2.1.4 Rehabilitation before Demolition
- LU-2.1.5 Conservation of Single Family Neighborhoods
- LU-2.1.7 Conservation of Row House Neighborhoods
- LU-2.1.8 Zoning of Low and Moderate Density Neighborhood
- LU-2.1.9 Addition of Floors and Roof Structures to Row Houses and Apartments
- LU-2.1.12 Reuse of Public Buildings

The Comp Plan should be updated to evaluate the cost of prioritizing low and low-medium density residential zoning to create and maintain successful neighborhoods. To the extent that these efforts constrain the development of affordable housing, we have to start accounting for the trade-off between these conservation related efforts and the need for creating affordable housing at a scale that effectively addresses the crisis.

Our expectation is that there is a trade-off because, per the land use profile in the Comp Plan, the majority of DC is zoned low density residential and low-medium density residential (single family detached and single family attached (rowhouses) accounted for 12.6% and 9.9% of the existing zoning in 2005 compared to low rise apartments and high rise apartments account for only 4.3% and 1.0% of existing zoning in 2005).

Additionally, to the extent that these efforts are determined to undermine the District’s ability to address the affordability housing crisis, the Comp Plan must clearly articulate that affordable housing is the priority and offer a framework for balancing these conservation efforts against the affordable housing priority such that the Office of Zoning and the Board of Zoning Adjustments, in their work and decisions, can

support and advance the development of affordable housing as an important aspect of creating and maintaining successful neighborhoods.

Developing Group Housing by Right and Confirming the District's Efforts to Promote and Accommodate Group Housing

There are a number of significant priorities captured here. The ICH is interested in determining the status of the following efforts (and recommends that the Comp Plan be updated to reflect the latest developments and findings associated with these efforts):

- LU-3.4.1: Reasonable Accommodation of Group Homes (specifically the effort to ensure that the District's planning, zoning, and housing codes make reasonable accommodation for group homes);
- LU- 3.4.C: Analysis of Group Home Siting Standards (wherein the District would undertake an analysis of the spatial standards currently used to regulate group homes and homeless shelters in the District, and determine if adjustments to these standards are needed to create additional siting opportunities, particularly in relation to allowing group homes and homeless shelters in Zone Districts CM-1 and CM-2); and
- LU-3.4.D Community Housing Ombudsman (wherein the District would establish an ombudsman position to serve as a resource, encouraging educational efforts, enforcement of Fair Housing Act policy, and dispute resolution related to the siting and operations of group homes within the District).

Additionally, this section needs to be updated to reflect the reality that the current process for siting, reviewing and approving group housing creates significant road blocks in the District's efforts to address the unmet need for emergency, temporary, and permanent supportive housing facilities targeting individuals and families experiencing homelessness.

Providing housing in a group setting should be understood as a creative affordable housing solution in a high cost market area. As such, when the proposed project is in line with the underlying zoning for the location, the project should not be subject to a Special Exception process. In fact, the same principles that are extended to Small Group Housing for the Disabled (under Policy LU-3.4.3) should be applied to all Group Housing, including larger group housing and group housing serving non-disabled populations (LU-3.4.4). Specifically, "zoning requirements for ... homes that are more restrictive than those applying to other residential uses are unlawful and shall not be permitted" (317.10, pg 3-49).

Expanding the ability of the District to provide emergency, temporary and permanent supportive housing facilities by right, is critical for a number of reasons. For one, as a right-to-shelter community, the District must ensure that there is an adequate supply of emergency and temporary housing facilities for individuals and families experiencing a housing crisis. Emergency housing facilities will always be an important part of addressing homelessness. Housing loss cannot always be prevented, and it is important that we shelter families and individuals in a safe and respectful environment that allows them to quickly stabilize and return to permanent housing.

Existing facilities are very large and old, with aging plumbing, heating, and cooling systems and crumbling infrastructure, and they come with significant annual price tags for maintenance. They are inadequate for a number of reasons. Food preparation and preservation space does not exist in most of our shelters. Security and staffing costs are also necessarily high when you have a large number of people living in a relatively small space. Most importantly, however, conditions in the vast majority of the District's shelters are simply unacceptable and offer very little to help reduce the trauma of whatever life events have led individuals and families to shelter.

Best practices show that both individuals and families can be more successful when shelter is provided in smaller, neighborhood-based settings where programming can be tailored to meet the needs of clients and where clients can more readily access services and support networks in the community. For families, we envision facilities that shelter between 25 and 40 households per site, and for single adults, we envision facilities that shelter between 80 and 100 adults per site. We have started the work of transforming the family shelter system by closing DC General and creating short term family housing facilities in all 8 Wards. We will need to transform the individual shelter system in much the same way and build short term housing facilities for individuals across all 8 Wards.

With regard to permanent supportive housing facilities, Homeward DC documents that there is a significant need for permanent supportive housing units to end chronic homelessness in the District. Unfortunately, the last two years of implementation indicates that it is highly unlikely that the market can be incentivized and/or leveraged to meet all of the need. Currently, the District tries to leverage the market by utilizing housing vouchers for the scattered site permanent supportive housing program and also by funding the production of permanent supportive housing units via the Consolidated RFP (including both a set aside requirement for permanent supportive housing and also offering bonus points for projects that create more permanent supportive housing units than required by the set aside). While both those efforts should be touted for their achievements to-date, they also amply demonstrate the limits of the market. Households (both families and individuals) with vouchers are unable to find housing for months, even with the assistance of housing navigators. Additionally, despite the fact that the projects funded by the Consolidated RFP commit to creating more PSH than required by the set-aside, the need far out dwarfs the total units in the pipeline and projected to come online in the near future.

To re-iterate, the District is at a juncture where it must evaluate how much of the publicly-owned sites should be dedicated for affordable housing purposes –particularly as public housing opportunities (managed by the District’s Housing Authority) and/or group housing opportunities (emergency, temporary and permanent supportive housing facilities) that have the necessary services and supports imbedded onsite.

Comments Specific to the Housing Element

As indicated in the introduction, the major housing programs in the District are directed by, at least, six different entities (Table 5.4, 504.9). It is likely not reasonable to expect that the strategic planning process of any one these agencies adequately captures, evaluates and comprehensively addresses the affordable housing crisis that the District is facing. In line with this view, the main recommendation for the Housing Element is to expand the section on affordable housing so that it can provide guidance on and accurately reflect what the District know about

- the extent of the need for affordable housing;
- the outcomes of existing programs and efforts; and
- the gap between the outcomes of existing program and the extent of the need.

Moreover, there is every indication that the extent of the need far out dwarfs the existing programs and efforts captured in the Housing Element. As such, the Housing Element must

- Identify the viable options for course corrections that are appropriate to the major housing programs and then
- Outline the extent of the need that the District must look to resolve the crisis by rethinking and re-balancing our Land Use and Economic Development priorities, policies and actions.

Appropriately Defining Affordable Housing

The Comp Plan appropriately identifies that there is a significant interest in having a clear definition of affordable housing. The Comp Plan responds to this need by conveying the rents established by various affordable housing programs; which is valuable, but does not quite address the quest for a clear definition of affordable housing.

We recommend a different approach and request that the Comp Plan be updated to provide clarity around

- Rents that are affordable (set at 30% of household income) to households at different income levels³ as compared to
- Market rate rents for units that accommodate those households as compared to
- Program rents (rents set by the affordable housing programs) that target the different income levels.

This will help audiences understand the differences between market rate rents and rents set by affordable housing programs, which in some instances rely on Area Median Incomes (AMI) to set rents and may not adequately serve the lowest income households.

Estimating the Amount of Affordable Housing Needed

The 2006 Comp Plan recommends that the District produce 19,000 new affordable housing units (one-third of the units produced in the city in the next 15 years) and preserve at least 30,000 existing affordable units. However, there is no way to evaluate whether this would adequately meet the need for affordable housing. We need to contextualize this estimate against the information we have related to need to ensure that the targets set are on par with the extent of the issue. We recommend including information about the availability of units that are affordable to households at various income levels⁴ compared to the number of households at each of those income levels currently living in the District.

Estimating the Impact of Policies and Actions Advanced in the Housing Element and the Major Housing Programs in the District

To course correct in an appropriate manner, we need to understand the outcomes of the major housing programs and the policies and actions advanced in the Comp Plan. As such, we need to determine how many units have been produced by policies and actions, especially those efforts that are tied to unit productions and can be tracked by specific programs and/or agencies (e.g. H-1.24 Housing Affordability on Publicly Owned Sites; H-1.2.7 Density Bonuses for Affordable Housing; and H-1.2.A Inclusionary Zoning).

However, it is not sufficient to determine outcomes. We also need to evaluate these outcomes against

- Cost to the District for funding and/or administering these programs so that we can increase investments to those policies/actions that are cost effective and result in the most number of units for the least amount of District investment; as well as
- Limits (or our best estimate of the capacity) for production of units under these programs so that the District can assess whether we have appropriately maximized these policies/actions.

³ Recommended income levels for analysis: 15% AMI, 30% AMI, 60% AMI, 80% AMI, 100% AMI, 120% AMI, 150% AMI and above

⁴ Recommended income levels for analysis: 15% AMI, 30% AMI, 60% AMI, 80% AMI, 100% AMI, 120% AMI, 150% AMI and above

Estimating the Annual Loss of Affordable Housing to Better Understand the Gap between Need and Production/Preservation of Affordable Housing

Correcting course requires the District to understand the gap between need and production/preservation. An important aspect of that effort is to understand how many affordable units are lost annually. We recommend that the Comp Plan include an estimate of the number of affordable housing units lost annually during the last 10 years, including projections for future losses (based on the rate at which units are lost for different income levels).

Reducing Barriers to Production of Affordable Housing, including Changes to Land Use and Zoning to Promote Greater Density

When assessing the limits or our best estimate of the District's capacity to produce affordable housing units under the policies and actions advanced in the Housing Element, the stakeholders of the ICH have requested the District consider

- Expanding financial incentives to promote affordable housing. For example, developers have indicated that their affordable housing units are assessed and the tax rate is set based on market rate rents. They have recommended and we concur that their tax assessment/ rate take into the rent restrictions into account;
- Limiting the influence of immediate neighbors (i.e. ANC) in the zoning process, as those are the individuals most likely to be proponents of and responding to NIMBY impulses and allowing a larger community (e.g. the Ward as a whole) to weigh in on the import of an affordable housing development; and
- Updating the Board of Zoning Appeals Process so that it cannot be held hostage by parties that are antagonistic to either affordable housing or housing development as a whole⁵.

As already recommended in the Land Use Element, the District must evaluate whether changes to zoning regulations need to be adopted to ensure the production of affordable housing on par with the need. In particular, ICH stakeholders have recommend that relative zoning densities throughout the District should be increased to maximize opportunities for creating affordable housing and ensure that those opportunities are available in both "stable" and "low density" areas as well "transitional", "emerging" and "distressed neighborhoods."

Clearly Defining the Need for Changes in Land Use and the Importance of Economic Development Strategies in Addressing the Affordable Housing Crisis

The current status of affordable housing in 2017 (a full decade since the development of the 2006 Comp Plan) suggests that the affordable housing crisis far out dwarfs the policies and actions available to the major housing programs and agencies in the District. As such, the Housing Element needs to articulate the gap between need and our ability to maximize production/preservation of units. This gap must be linked back to the Land Use Element and the Economic Development Element as these are the two other areas where we can impact the affordable housing crisis.

Comments Specific to the Economic Development Element

As noted in the introduction, it is critical that the Economic Development Element be explicitly linked to the affordable housing crisis. As written, the current Comp Plan is not clear on how the District's economic development efforts are targeted across the different income groups and how these efforts are expected

⁵ See https://www.washingtonpost.com/local/dc-politics/is-this-champion-disrupter-of-dc-development-a-crusader-or-an-extortionist/2017/05/16/64460b88-3279-11e7-9534-00e4656c22aa_story.html?utm_term=.cc0f92398c8f.

to reduce the gap between current wages and housing wages (wages that allow households to afford market rent housing).

This kind of analysis allows us to prioritize resources to those actions and strategies that have the most equitable outcomes. As such, we are recommending that the element is updated to convey how many households, at which income levels, and within what timeframes, the District expects to connect to housing wages so that we can forecast both the continued need for affordable housing and the role of economic development in addressing the issue.

Linking the Affordable Housing Crisis to the District's Economic Development Goals

It is likely important to create a section for addressing issues related to equity, including affordable housing, given that unemployment and income disparities are racially and spatially segregated in the District.

Given the size and scope of the affordable housing crisis, we recommend that the Comp Plan estimate how the District's major economic development goals and expenditures promote the ability of its residents to earn housing wages (wages that allow households to afford market rent housing), particularly for the lowest income households.

For each major program/policy/action, we recommend an accounting of the target beneficiaries of the program/policy/action, their current incomes, and how the program/policy/action is likely to impact the target beneficiaries (i.e. how many households are estimated to increase their incomes and to what levels, as a result of the District's investments in the major goals, priorities and actions).

This section should highlight which sectors pay housing wages and/or have the highest paying entry level jobs as well as an analysis of how the District's economic development policies/action will promote job creation in those sectors to improve incomes.

Outlining and Mitigating for the Racial Implications of the Spatial Distribution of Jobs and the Job Market

Recalling from the Land Use element that Central Washing is expected to account for 70% of the job growth in the district, we need to clearly articulate the relationship between the District's job markets and the Wards that have the highest unemployment rates. If these Wards are defined by a lack of job markets, the Comp Plan needs to highlight the strategies that intentionally link these job markets to people who are spatially segregated from these job markets.

In addition to a concerted effort to create job markets in marginalized Wards, the District should consider and adopt a comprehensive transportation subsidy program that connect the lowest income residents in marginalized Wards to both the District's job markets and the Regional Job Centers. The current policies and actions related to Getting to Work discuss sustained investments in transportation systems and improvements in transit, but stop short of actually assisting the lowest income residents with their transportation expenses. Given changes/updates to WMATA's services and fares since 2006, the Comp Plan should consider how strategies and services to marginalized Wards need to account for the barriers/challenges posed up these updates. A model, similar to the School Transit Subsidy Program⁶, should be considered for the lowest income residents, especially those that are in marginalized Wards (relative to the District's job markets and the regional job centers).

⁶ <https://ddot.dc.gov/page/school-transit-subsidy-program>

Evaluating the Impact of the District's Efforts to Support Neighborhood Business Environment and Increase Access to Employment

Again, we cannot course correct, and ensure that the District is appropriately resourcing the programs that have the largest impact on increasing the income of households, if we do not understand the outcomes of existing programs. The strategies outlined under ED-3 Supporting the Neighborhood Business Environment and ED-4 Increasing Access to Employment are particularly important for understanding the role of Economic Development in addressing the affordable housing crisis. As such, we recommend that the District outline the expected outcome of the policies/actions associated with these efforts. Again, the analysis should demonstrate how many households are estimated to increase their incomes and to what levels, as a result of the District's investments in the major goals, priorities and actions.

Additionally, we need to estimate the limits/capacity of these programs so that we can consider whether we have appropriately maximized our investments in these programs. Related to supporting neighborhood business environments, this includes understanding the impact of targeting/focusing commercial revitalization on "those areas where the critical mass needed to sustain a viable neighborhood commercial center can be achieved." Question for analysis include:

- Can critical mass be achieved in neighborhood commercial centers in Wards that have the greatest unemployment numbers? and
- What kind of policies/actions would best incubate small businesses in Wards with the highest unemployment numbers?

Related to increasing access to employment, the District needs to understand and capture the demand for these services from the perspective of employers and unemployed/underemployed District residents. For example,

- How does the District understand and model the demand for adult education and certification/associate programs amongst residents that are currently unable to access higher wages? Are these adult and certification/associate programs resourced to meet the demand? Do these adult and certification/associate programs meet the needs of employers?
- How does the District understand and model the demand for core and growth sector jobs amongst residents who are unemployed and/or under-employed? Do the strategies related to connecting residents to core and growth sector jobs reflect the interest of residents who are unemployed and/or under-employed?

With these evaluations in hand, the District can appropriately course correct to ensure that its programming in these areas, adequately support both employers and unemployed/under-employed residents.

Comprehensive Plan Resolution to End Homelessness

Land Use Element

Whereas the Office of Planning did not accomplish initial recommendation and has failed to respond to displacement in terms of Land Use.

Be it Resolved to: Use comments and suggestions from memorandum created by the Interagency Council on Homelessness and incorporate into plan update specifically addressing displacement in Land Use Element.

- Availability of units that are affordable to households at various income levels compared to the number of households at each of those income levels currently living in the District;*
- Estimated loss of affordable housing during the last 10 years, including projections for future losses based on the rate at which units are lost for different income levels; and*
- Number, demographics, and distribution (across all 8 wards) of households that are rent-burdened (including those that are severely rent-burdened).*

Whereas the Office of Planning has failed to include policy and action steps mentioned in Ich memorandum. Proposed language and policy does not provide proper or prescriptive measures to affect or avoid prevent or eliminate displacement. Section does not include impact analysis of displacement as recommended.

Be it Resolved to Use comments and suggestions from Ich memorandum to incorporate data sets needed to update this section of land use element.

Putting the people who have been and continue to be displaced at the core of the District's approach to creating and maintaining successful neighborhoods requires the District to evaluate the policies and actions advanced in this section with an affordable housing lens. Particular attention and evaluation needs to be focused

on those policies and actions that may constrain the development of affordable housing, especially those related to:

- *LU-2.1.4 Rehabilitation before Demolition*
- *LU-2.1.5 Conservation of Single Family Neighborhoods*
- *LU-2.1.7 Conservation of Row House Neighborhoods*
- *LU-2.1.8 Zoning of Low and Moderate Density Neighborhood*
- *LU-2.1.9 Addition of Floors and Roof Structures to Row Houses and Apartments*
- *LU-2.1.12 Reuse of Public Buildings*

Whereas the Office of planning has struck out group home provisions outlined in the original memorandum comments. Section also does not mention public housing opportunities as recommended also by memorandum to affect displacement. Language does not provide proper or prescriptive measures to accommodate Ich goals.

Be it Resolved to Use comments and suggestions from memorandum created by the interagency council on homelessness and incorporate into plan update specifically addressing land use element recommendations from Ich.

The ICH is interested in determining the status of the following efforts (and recommends that the Comp Plan be updated to reflect the latest developments and findings associated with these efforts):

- *LU-3.4.1: Reasonable Accommodation of Group Homes (specifically the effort to ensure that the District's planning, zoning, and housing codes make reasonable accommodation for group homes);*
- *LU- 3.4.C: Analysis of Group Home Siting Standards (wherein the District would undertake an analysis of the spatial standards currently used to regulate group homes and homeless shelters in the District, and determine if adjustments to these standards are needed to create additional sitting opportunities, particularly in relation to allowing group homes and homeless shelters in Zone Districts CM-1 and CM-2); and*
- *LU-3.4. D Community Housing Ombudsman (wherein the District would establish an ombudsman position to serve a resource, encouraging*

educational efforts, enforcement of Fair Housing Act policy, and dispute resolution related to the siting and operations of group homes within the District).

Additionally, this section needs to be updated to reflect the reality that the current process for siting, reviewing and approving group housing creates significant roadblocks in the District's efforts to address the unmet need for emergency, temporary, and permanent supportive housing facilities targeting individuals and families experiencing homelessness.

the District is at a juncture where it must evaluate how much of the publicly-owned sites should be dedicated for affordable housing purposes – particularly as public housing opportunities (managed by the District's Housing Authority) and/or group housing opportunities (emergency, temporary and permanent supportive housing facilities) that have the necessary services and supports imbedded onsite.

Housing Element:

Whereas the Office of Planning's context does not adequately define affordable housing. Section does not specify the difference between regional income and district of Columbia specific.

Be it Resolved that the Comprehensive plan specify Regional vs income levels in each ward specifically.

Whereas the Office of Planning has not documented a widely known Failed policy, section does not indicate loss of housing stock due to program implementation and does not address net loss of public housing.

Be It Resolved the office of planning:

- 1. Include full analysis of public housing loss due to hope IV and NCI. Develop strategy to recover net loss of public housing units. Identify*

specifically public housing levels at each program site to determine if one for one replacement has taken place.

2. *Include data points narrative and policy/actions showing status of implementation of **Action H-1.4. E: Additional Public Housing** that will ensure net additions to public housing stock. Data points narrative and policy/actions should include real time analysis of unit recovery vs lost.*

Whereas the Office of planning has failed to include lived experience in Narrative and in policy and action steps. Proposed language and policy come from organizations and individuals not affected by displacement. The Office of Planning's definition of "displacement" is particularly troubling because it doesn't represent the full scope of what has happened in the District. If we are truly striving towards an "equitable" and "inclusive" city, neglecting to mention that the thousands of residents lost to the effects of gentrification-based displacement are Black is disingenuous and a blatant act of erasure. Speaking on "cultural displacement" is not representative of the thousands of Black families forced out as a result of being priced out of their homes or having their homes snatched from under them due to mortgage scams, taxes, deaths in the family, etc. The loss of "a sense of belonging" is caused by forcing luxury developments and "mixed-income neighborhoods" on existing communities. To state that DC has "one of the strongest sets of anti-displacement programs in the country" is a slap in the face to the thousands of low- and moderate-income Black residents who have been forced to leave their homes to make way for the wealthier class that DC is actively fighting to attract. Maintaining existing communities should be DC's top priority, not attracting thousands who have no intention of staying. DC has always been transient by nature, but the culture leaves with each new iteration. Language does not provide proper prescriptive and intentional measures to affect, avoid, prevent, or eliminate displacement, in addition there is no language or policies/actions addressing displacement in Land Use, Far NE/SE, Lower Anacostia Waterfront, Rock Creek East, Rock Creek West elements.

Be it Resolved the office of planning gathers comments and suggestions from affected families and individuals to incorporate into plan update. (see examples below).

Any efforts to renovate and revitalize distressed public and assisted housing projects must utilize build-first principles and other efforts that prevent displacement, providing one-for-one replacement on-site

or in the immediate surrounding area of any public housing units that are removed or re-developed. Where density is more than doubled on a public housing site, replacement units must account for the number of original units plus 50% of the new units. Public housing must be kept in public control (through the DC Housing Authority, Community Land Trust or similar entity), must be kept permanently affordable, and the share of any private entity who assists in the redevelopment must be less than 50%.

Maintain programs to prevent displacement resulting from the conversion or renovation of affordable and subsidized rental housing to more costly and/or mixed-income forms of housing. The District must ensure that, when any rental housing, including public housing, that is affordable to those at 80% of AMI and below, is undergoing redevelopment, there is a tenant-approved relocation plan, tenants are allowed to continue their tenancy with minimal disruption, and will have the right to return to their units or an equivalent replacement on the same property. Redevelopment must observe build-first and build in place principles. Resident return criteria must not be more restrictive than those of the housing undergoing redevelopment. Programs offered to tenants must include financial, technical, legal, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units, if they are being converted to ownership units. In order to receive approval from the zoning commission, developers must supply the commission with a plan for avoiding displacement that complies with the principles in this policy.

Whereas proposed Housing goal is insufficient to keep in line with Homeward Dc unit planning. Office of Planning should specifically state this and create narrative and overall production and preservation goal in addition to what unit planning in homeward dc suggests. Data policy and action steps should refer to this discrepancy and address the overall need of Homeless vs rent burden and cost burden populations.

Be it Resolved the Office of Planning Create table showing existing stock before [Homeward Dc](#)'s original publish date. The data should also show net increase

and loss as of [homeward Dc progress to date as well as housing stock levels as of comp plan update](#), and estimate net level increase stated in [housing equity report](#) goals plus the units need for Homeward DC.

Economic Development Element

Whereas the Office of planning did not include wage and housing cost analysis. Office of planning does not have data sets to show progress thus far and estimated projections of policy/action implementation

Be it Resolved the Office of Planning include recommendation to analyze impact related to former policies included in section ed-3. Include estimated impact of implementation of Ed-3 policies/actions.

Whereas the proposed original amendment wording is very prescriptive with the intention of targeting specific communities in the district of Columbia. Proposed language offer by the Office of Planning is not prescriptive enough to truly measure outcomes

Be it Resolved The office of Planning Include original text in Economic development element. If this cannot be achieved include in area elements contained within amendment

Policy ED 2.2.1 Chapter 3 INSERT NEW POLICY EXPAND STREET VENDOR OPPORTUNITIES Increase Public Space Sidewalk Vending city-wide in all commercial corridors and especially in Southeast Washington, D.C. This strategy will create business and job opportunities for returning citizens, homeless veterans, unemployed persons, single mothers, at risk youth, and senior citizens on fixed and reduced incomes. Increased street vending opportunities will create an indigenous grassroots business class, that would in time, establish larger retail ventures in District's underserved areas, such as Southeast Washington DC.

Whereas Proposed Original text is more prescriptive and could be used verbatim in area elements.

Be it Resolved the Office of Planning return to original wording of amendment and include in area elements specified in the original text.

Policy ED

2.2.6

D.C. GOVERNMENT OWNED LAND AND BUILDING USE FOR STREET VENDORS, FLEA MARKETS, AND FARMERS'S MARKETS.

Provide government owned land to indigenous District residents for the creation of flea markets and farmers markets. This strategy will allow grassroots entrepreneurs to bring fresh farm produce, general merchandise, and services to underserved areas of the District and allow District citizens to revitalize obsolete commercial areas of the city, especially in southeast D.C.

Whereas original amendment text specifically mentions DCPS as a partner to train residents for wealth generation and is specific about population targets. Proposed language offered by the Office of Planning is not as specific.

Be it Resolved the Office of Planning Use original text, original amendment is broad and prescriptive enough to measure outcome by target population and sets a broad policy to create economic independence for underserved residents

CHAPTER 7

*NEW POLICY UNDER Policy
ED 4.2.5*

BUSINESS AND LABOR AND GOVERNMENT PARTNERSHIPS TO TRAIN D.C. Citizens AS STREET VENDING, VOCATIONAL SKILLS, AND HOME-BASED BUSINESSES,

Create partnerships between District public schools and small business partnerships, to train returning citizens, single mothers, veterans, homeless persons, and unemployed at-risk youths as street vendors,

produce vendors, home based business owners, landscapers, tailors, journeymen, brick masons, carpenters, and jewelry crafts persons. This strategy will assist the aforementioned groups to be self-sufficient and economically secure to create wealth, buy homes, and generally create new generational legacies.

DC GRASSROOTS PLANNING COALITION

HOUSING JUSTICE PRIORITIES

FOR THE DC COMPREHENSIVE PLAN

In the midst of an ongoing housing crisis that has led to the displacement of tens of thousands of predominantly Black DC residents, the DC Grassroots Planning Coalition (DCGPC) and partner organizations call on the DC Council to strengthen the city's Comprehensive Plan by adding policies and actions that fortify existing affordable housing programs and require community-led equitable development strategies that further racial equity.

THE COMPREHENSIVE PLAN AMENDMENT PROCESS MUST BE CONDUCTED IN COMPLIANCE WITH DC LAW. The Comprehensive Plan is DC law and a 20-year planning document.[1] The Comp Plan requires the Mayor to submit reports to DC Council[2] at least once every 4 years on the District government's progress in implementing Elements of the Plan, the Plan's Action items, and the key projected implementation activities by land use policy over the succeeding 5 years.[3] Additionally, the Mayor shall submit amendments every 4 years for Council consideration and the amendments "shall be accompanied by an environmental assessment of the proposed amendments." [4] Notwithstanding the law, the Mayor initiated a full rewrite of the entire Plan with almost 1,000 pages of edits and substantial changes to the Future Land Use and Generalized Policy Maps, and did so without progress reports on the impact of current Elements, environmental assessment of proposed amendments, or in-depth community participation in every phase of the Plan's development.

Therefore, the Coalition asks that DC Council:

1. Ensure that all Ward level amendments as well as changes to the Future Land Use and Generalized Maps proposed by the Mayor's Office of Planning are examined and discussed with affected Ward-level residents at well-publicized, open and participatory roundtables led by the Ward Councilmembers;
2. Ensure that all proposed amendments to the Citywide Elements are examined and discussed at well-publicized, open and participatory Council roundtables held by the relevant Council Committee. (For example, the Housing Element should be reviewed at a public roundtable held by the Committee on Housing and Neighborhood Revitalization and the Committee on Human Services);
3. Ensure compliance with Comprehensive Plan law and regulations, as referenced above, before considering and voting on the substantial changes proposed by the Mayor. No Council vote should be taken without knowing in detail the impacts of the current Elements and their Action items on housing, land use, economic development, and all other facets of social, economic, and physical development influenced by the Comprehensive Plan.[5]

THE COMPREHENSIVE PLAN MUST PROACTIVELY ADDRESS DC'S HOUSING CRISIS BY STRENGTHENING THE FOLLOWING POLICIES:

RENT CONTROL:^[6] Rent control, also known as rent stabilization, is a popular affordable housing program. Rent control does not subsidize housing providers or tenants; rather, the program limits rent increases by tying them to increases in the Consumer Price Index (CPI).^[7] The Housing Element of the Comprehensive Plan must articulate the goals of: (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing.

PUBLIC HOUSING: The Comprehensive Plan, as amended, must continue the District's commitment to public housing. This means that Comp Plan amendments must require action on maintenance, preservation, and redevelopment of existing public housing and the building of additional public housing to accommodate the District's 51,000 extremely low-income renter households^[8] (31% of all renter households and at or below 30% MFI) who can afford at most just over \$900 monthly rent.^[9]

Accordingly, the Housing Element must include the following policies and goals: (1) fully fund repair and renovation of deteriorating public housing units; (2) require 1-for-1 replacement of public housing units and more when increasing site density, with no loss of family size multi-bedroom units; (3) ensure no new barriers to residents' return and true affordability based on the HUD standard of 30% of income for housing expenses; (4) use a mandatory build first model to prevent displacement, strengthen anti-discrimination enforcement during periods of relocation, and cover residents' relocation and return costs; (5) create an enforceable right of return of displaced public housing residents; (6) reinstate the goal to create a minimum of 1,000 new, additional public housing units over the next ten years;^[10] (7) retain public ownership and control of publicly owned housing and developments; (8) mandate that public housing resident-led organizations share decision making authority in all phases of redeveloping public housing; (9) incorporate community development strategies that improve the economic condition of residents such as equity for and home ownership by public housing residents, land trusts, cooperatives, and worker-owned businesses; and (10) remove barriers to the ability of returning citizens to live in public housing.

SUBSIDIZED HOUSING: Housing DC's low wage workers, seniors, people with disabilities and other low-income households must be recognized as those with the need for increasing housing capacity overall. To do so requires expanding the Local Rent Supplement Program (LRSP) -which provides ongoing rental subsidies to make housing affordable to extremely low-income families - with the aim of realizing the 2006 Comprehensive Housing Strategy Task Force goal

of 14,600 locally funded rental subsidies in the District by 2020.[11] Additionally, the District must purchase expiring Section 8 projects to maintain operating subsidies. Transfer of expiring Section 8 projects should be made only to developers who agree to lifetime affordability requirements. The District must continue real property tax abatements as an incentive to preserve expiring project-based Section 8 facilities. Funding must be increased for the Housing Production Trust Fund, the main source of funding for the Tenant Opportunity to Purchase Act (TOPA) and District Opportunity to Purchase Act (DOPA) programs, which must provide opportunities to tenants and tenant associations to own and manage their housing units. The District must adopt the policy that affordable housing created and preserved with public financing be protected by lifetime affordability restrictions and monitored to prevent transfer to non-qualifying households while still allowing residents to build equity which can result in concrete wealth growth.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

Equitable development is defined as development in which low wealth Black and brown communities and other working class communities fully participate from the beginning to ensure that the infrastructure and services they determine to be needed for their communities to grow and prosper are foremost features of the development.[17] Community Economic Development (CED) recognizes that neighborhood investment begins with investing in the capacity of low income residents to own, manage, maintain, and ultimately replicate the development process, leading to a significant shift in economic condition and overall power. To date, the development projects receiving generous taxpayer subsidies and assistance have primarily benefited new and wealthier residents while failing to adequately respond to the basic human needs of existing

markets and residents with “the false promise of trickle-down benefits that justify orienting development around the needs of well-heeled populations.”[18]

Accordingly, the Comprehensive Plan must adopt a new Community-Led Equitable Development model that mandates full participation by long-term community members with a record of community involvement. The process must start with organizing residents around engagement in small area community development plans as a principal measure of expression of community preferences. The Comprehensive Plan must expressly endorse providing significant equity to existing community members, particularly public housing residents, allowing them to withstand displacement and improve their economic standing. To support racially equitable development, the Comprehensive Plan must endorse shared equity models of homeownership such as community land trusts, deed-restricted housing programs, and limited equity housing cooperatives as they balance preservation of affordability with wealth creation.[19]

As the guiding document for development in the city, it is critical that the amended Comprehensive Plan reflect the realities and priorities that we face in the District. The issues of racial inequity must be tackled head-on in specific, actionable Comprehensive Plan priorities.

These priorities are endorsed by:

Empower DC
Washington Legal Clinic for the Homeless
People Power Action
People for Fairness Coalition
DC Federation of Civic Associations
NCBL-DC Unhoused Collective
Plymouth Congregational UCC Board of Social Action
Committee of 100 on the Federal City
Us Helping Us, People Into Living
DC Statehood Green Party
Washington Teachers Union
SW DC Action
Southwest Voice: The People's Paper
Serve Your City/Ward 6 Mutual Aid
Dupont East Civic Action Association
Dupont Circle Citizens Association
Ryan Linehan, Commissioner ANC 5D01
Ra Amin, Commissioner ANC 5B04
Janice Ferebee, Commissioner ANC 2F08
Tiffani Johnson, Commissioner ANC 4B06
Renee Bowser, Commissioner ANC 4Do2

[1] DC Code §1-306.01 (2020).

[2] DC Council shall schedule a public hearing on the Mayor's progress report and following review issue findings to the Mayor and a copy of the public testimony. Id. at §1-306.04(b).

[3] DC Code §1-306.04(b), (c) (2020).

[4] DC Code §1-306.04(d) (2020).

[5] DC Code §1-306.01(b) (2020).

[6] The Rental Housing Act of 1985, DC Code §§42-3501.01-3502.24 (2020) was enacted to cover 5-unit and larger residential properties whose permits to build issued by 1975. Yesim Taylor, History of Rent Control in the District of Columbia, D.C. Policy Center, April 1, 2020 at 2. Rent control was legislated to protect low- and moderate-income tenants from the erosion of their income from increased housing costs and protect the existing supply of rental housing from conversion to other uses. DC Code §42-3501.02(1), (3) (2020). Purposes.

[7] DC Code §42-3502.08 (2020) Increases above base rent.

[8] Housing Needs by State 2020/District of Columbia, National Low Income Housing Coalition, (<https://nlihc.org/housing-needs-by-state>)

[9] Out of Reach 2020, District of Columbia, National Low Income Housing Coalition, July, 2020, (<https://reports.nlihc.org/oor/district-columbia>)

[10] 506.17 Action H-1.4.E: Additional Public Housing in current Comprehensive Plan Housing Element is removed in Office of Planning's proposed April, 2020 amendments submitted to DC Council.

[11] Homes for an Inclusive City, A Comprehensive Housing Strategy for Washington, D.C., Executive Summary, DC Government-Brookings Institute, June 13, 2006 at 8. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf) The 2006 Housing Strategy stated that DC "should directly assist an additional 14,600 extremely low-income renter households by adopting a local rent supplement program." The LRSP was set forth as a supplement to the goal of 55,000 additional units by 2020, including at least 19,000 affordable units. Id.

[12] Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time (PIT) Count of Homeless Persons, June 10, 2020, Metropolitan Washington Council of Governments, (<https://www.mwcog.org/documents/2020/06/10/homelessness-in-metropolitan-washington-results-and-a-analysis-from-the-annual-point-in-time-pit-count-of-homeless-persons-featured-publications-homelessness/>) There were 6380 residents identified as experiencing homelessness as of the January, 2020 point in time (PIT) street count.

[13] District of Columbia Interagency Council on Homelessness, Homeward DC Strategic Plan 2015-2020, DC, 2015.

[14] Id. at 31 and Table 11: System Conversion-Annual Projections for Single Adult System Inventory shows the change in inventory needed to get to a right-sized system. Given that Homeward DC earmarks production of 6000 housing units targeted specifically for the unhoused and those on the brink of homelessness and the 2006 Homes for An Inclusive City called for 19,000 affordable units by 2020, Homes for an Inclusive City A Comprehensive

Housing Strategy for Washington D.C., Comprehensive Housing Strategy Task Force, 2006 at 3. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf), the Mayor's goal to produce 12,000 affordable housing units (up to 80% MFI) by 2025, contained in DCHCD, DCOP, Housing Equity Report: Creating Goals for Areas of Our City, October, 2019, (https://housing.dc.gov/sites/default/files/dc/sites/housingdc/page_content/attachments/Housing%20Equity%20Report%2010-15-19.pdf), marks a significant reduction in previous affordable housing goals, is wholly inadequate, and must be increased.

[15] Office of Revenue Analysis, DC Economic and Revenue Trends: December, 2019 OCFO, Dec., 2019 at 9 (As of November 15, 2019, there were nearly 10,000 vacant residential units in DC). (https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_December%202019.pdf)

[16] B23-0038, March 11, 2020.

[17] See generally Carlton Eley, Planning for Equitable Development: Social Equity by Design, American Planning Association, March/April 2017. (<http://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-03-04.pdf>)

[18] Id. at 2.

[19] Evidence Matters, Shared Equity Models Offer Sustainable Homeownership, PD&R, U.S. Dept. of HUD, Fall, 2012. (<https://www.huduser.gov/portal/periodicals/em/fall12/highlight3.html>)

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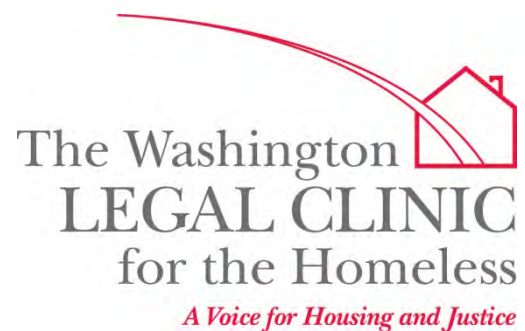
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Testimony for the Committee of the Whole on Bill 22-736, Comprehensive Plan Amendment Act of 2020

Thursday, November 12, 2020 (oral testimony)
Thursday, December 3, 2020 (written addendum)

Oral Testimony submitted November 12, 2020

Good afternoon. My name is Caitlin Cocilova. I am a staff attorney at the Washington Legal Clinic for the Homeless and a member of the DC Grassroots Planning Coalition Steering Committee. I am also a Ward 1 resident. The Legal Clinic envisions a just and inclusive community for all residents of DC, where housing is a human right and where every individual and family has equal access to the resources they need to thrive. We support the Housing Justice Priorities put forth by the Grassroots Planning Coalition and are against the passage of the Mayor's amendments to the Comprehensive Plan as proposed, as they will not stop displacement, expand and ensure affordability for people with the lowest incomes, or ensure community-led, inclusive, equitable development.

Particularly, we urge Council to:

1. Reject OP's position that the Comp Plan should be a flexible guide with weakened language;
2. Incorporate more language around specific housing asks; and
3. Require our planning agencies do analyses of needs and current housing stock, not just market demand.

Council has an opportunity to oversee and legislate provisions of the Comprehensive Plan, which, according to the Introduction, is meant to be a plan from which "all plans relating to the District's physical development should take their leads." (103.1, 103.2)¹ Rather than shifting power from the legislative to the executive by weakening its language, Council must

¹ OP is proposing to remove language that says agency heads "must bring other plans in line with it." (Introduction 109.2) Relatedly, "The Comprehensive Plan is not intended to be a substitute for more detailed plans nor dictate precisely what other plans must cover. Rather it is the one document that bridges all topics and is crosscutting in its focus. It is the Comprehensive Plan, alone, that looks at the "big picture" of how



continue in its efforts in accountability and decreased spending inefficiencies by maintaining stricter language.²

We know that lawsuits that are frequently referenced as a reason for justifying changes to the Comp Plan are actually the result of a Zoning Commission that has failed to comply with laws and regulations mandating that we actually do this accountability work. It should be noted that these same lawsuits, however, may be able to take credit for DC dropping from number one to number thirteen on the list of most intensely gentrifying cities in the U.S.

With the changes OP has proposed, it seems as though DC is clamoring to get back on top of that gentrification list by allowing for unfettered development with less definitive checks and balances. How else do we reconcile conversations about building more housing – 24,000 more luxury units – when there are already myriad housing units available and vacant units that are not being filled? Truly, who are these apartments being built for? It isn't our clients or the community members we organize with. Even with vouchers, they're nearly impossible to access. The community members we work with are rather subject to a new form of "Urban Renewal" by being kicked off their encampments, when new developments go up, to make room for people like me a few years ago – students who use their government loans to subsidize and afford the luxury units.

I would love to see, in practice, humility by those who have been responsible for planning in a way that pushed tens of thousands of Black and poor people out of the city, as these are not natural cycles and are actually the subject of pending litigation.³ As we continue to pontificate about things such as red lining, we must recognize the tactics that are being used today by our own planning agencies that will perpetuate the same cycles in a more hidden way.⁴ Until we start breaking planning down in terms of matching the actual demand, the actual need, to the units being produced, we will continue to build for the sake of building, for the sake of continuing and furthering a market that does not work for people with low incomes, for the sake of legacy and maintained political power. The results we see today, of people in high numbers doubled up, in shelters, on the street, and in temporary housing programs, are the consequences of planning that has failed to include their needs.

change will be managed now and in the years ahead." (Introduction 110.1, with minor proposed changes included)

² See, e.g., Economic Development Return on Investment Accountability Amendment Act of 2018 (Law 22-295). Inaugural report from 2019 available at:

<https://dmped.dc.gov/sites/default/files/dc/sites/dmped/publication/attachments/FY19%20ED%20Return%20on%20Investment%20Accountability%20Report.pdf>.

³ Jenna Wang, "Residents Sue Washington D.C. for Racist Gentrification Practices," *Forbes* (June 28, 2018), available at <https://www.forbes.com/sites/jennawang/2018/06/28/residents-sue-washington-d-c-over-1-billion-for-racist-gentrification-practices/?sh=176f62683e8f>.

⁴ The impact has been similar. The results of seemingly well-intentioned planning policies are often an after-thought. For example, at the 20 Years of Comprehensive Planning event on October 27, 2020 with five former planning directors, Harriet Tregoning raised how when she was director, they allowed ADUs across the city, but low- to moderate- income homeowners did not have the credit to take advantage of those opportunities. Policies implemented in this way allow wealthier, and usually whiter, residents to take advantage of wealth-building opportunities that increase the wealth gap, while other legislation and changes take time to catch up to mitigate the impact.

I have no doubt at the amount of work that went into producing the amended document before you today, but the result of that work, without adjustments, will not achieve the stated goals of racial equity and inclusivity, especially not across economic classes.

We will be submitting more detailed written testimony with specific recommendations on proposed provisions. Thank you for the opportunity to testify.

Written Addendum submitted December 3, 2020

We look forward to continued discussions with members of this Council on suggested changes to specific provisions and Elements of the Comprehensive Plan over the next couple of months. Below are a few items to consider, in addition to the DC Grassroots Planning Coalition Housing Justice Priorities, as you continue your examination of Bill 22-736.

Affordable Housing Definitions

Language on housing in the Comprehensive Plan must prioritize what is currently lacking in DC and what is less frequently produced by the private market, alone: affordable housing for those at 0 to 30 percent of the Median Family Income (MFI). Affordable housing is defined in the Comprehensive Plan Glossary (“Glossary”) as, “Housing that can be rented or purchased by a household with very low, low, or moderate income for less than 30 percent of that household’s gross monthly income.” Similarly, “mixed income” is defined as, “Generally refers to housing (or neighborhoods) that includes both affordable units and market-rate units, suitable for a mix of low, moderate, and above-moderate income households.” To understand what these definitions mean, look to the definitions of “very low income,” “low income,” and “moderate income”:

- Very-low income: Having an income that is less than 50 percent of the areawide median income.⁵
- Low income/lower income: Household income that is less than 80 percent of the area median. Low income thresholds vary depending on the number of persons in the household.
- Moderate income: Household earning between 81 and 120 percent of the areawide median income.

Accordingly, any section in the current version of the Comprehensive Plan and in the Bill before Council that discusses “affordable housing” is referring to housing of up to 120 percent of the Median Family Income. In fiscal year 2020, the HUD MFI for the DC area was \$126,000.⁶ A prioritization of “affordable housing,” under this current definition, is therefore for households of four making up to \$151,200 a year, an amount \$120,000 more than the \$31,200 a minimum wage worker earns after a year of full-time work.⁷ With “affordable housing” further defined as 30 percent of these incomes, this means:

⁵ Please note that HUD now uses Median Family Income (MFI) instead of Area Median Income (AMI). The terms are functionally the same.

⁶ HUD, “FY 2020 Income Limits Documentation System,” *available at* <https://www.huduser.gov/portal/datasets/il/il2020/2020MedCalc.odn> (last visited December 3, 2020).

⁷ Calculation for minimum wage workers’ salaries: \$15/hr x 40hrs/wk x 52 wks/yr = \$31,200/year

- Very-low income (< 50% MFI): < \$63,000; rent affordable at < \$1,575
- Low income/lower income (< 80% MFI): < \$100,800; rent affordable at < \$2,520
- Moderate income (80% to 120% MFI): \$100,800 to \$151,200; rent affordable at \$2,520 to \$3,780⁸

Neither the “affordable housing” nor “mixed use” definitions explicitly discuss people with “extremely low income,” defined in the Glossary as “income less than 30 percent of the areawide median.” Using the FY 2020 HUD standards, 30 percent of the MFI comes to \$37,800 a year, making the affordable monthly rent \$945 (compared to \$2,520 to \$3,780 for a moderate income household). \$37,800 is still well above the annual SSI income of \$9,528 for individuals,⁹ which was the primary source of income for 46 percent of unhoused adults receiving some form of income in 2020.¹⁰ \$37,800 also greatly exceeds the maximum \$21,216 a year for a family of four receiving TANF assistance,¹¹ which was the primary source of income in 2020 for over half of the unhoused families who received some form of income.¹² Affordable rent at 30 percent of these incomes is thus \$238 for an SSI holder and \$530 for a family of four on TANF.

The Glossary is “not a formally adopted part of the Comprehensive Plan” and is subsidiary to any conflicting formal, legal definition in other laws.¹³ It is therefore imperative that “affordable housing” is even more clearly defined in any Element as to the intended target population.

Furthermore, because the Land Use Element carries greater weight than the other Elements and can override competing or conflicting language in other chapters, Council should consider incorporating any specific housing policies related to affordability for residents with extremely low and very low incomes, and housing for larger families, into the Land Use Element. Useful language introduced by the Office of Planning in other Elements may not be implemented as readily without proper mandates in the Land Use Element. Take, for example, proposed language to Housing Element Section 500.19 (current)/ 500.28 (proposed), which states:

⁸ Compare these to the amount affordable for a minimum wage worker: \$31,200/yr x .3 (30% for rent) / 12 months/yr = \$780/month in rent. *See also* National Low Income Housing Coalition, “Out of Reach 2020: District of Columbia” (2020), <https://reports.nlihc.org/oor/district-columbia>.

⁹ Social Security Administration, “SSI Federal Payment Amounts for 2021,” <https://www.ssa.gov/oact/cola/SSI.html> (last visited December 3, 2020) (stating monthly income is \$794; when multiplied by 12 months, this equates to an \$9,528 annual income).

¹⁰ The Community Partnership for the Prevention of Homelessness, “2020 Point-in-Time Count” at 21 (June 10, 2020), available at <https://community-partnership.org/wp-content/uploads/2020/07/PointinTime2020.pdf>.

¹¹ DC Department of Human Services, “TANF for District Families,” <https://dhs.dc.gov/service/tanf-district-families> (last visited December 3, 2020). Please note that the \$21,216 amount includes the maximum \$11,568 annual income (\$964/month) that a family of four may earn to qualify for TANF. The TANF amount, alone, is \$804 a month for a family of four.

¹² The Community Partnership for the Prevention of Homelessness, “2020 Point-in-Time Count” at 21 (June 10, 2020), available at <https://community-partnership.org/wp-content/uploads/2020/07/PointinTime2020.pdf>.

¹³ DC Comprehensive Plan, “Glossary of Terms & Index” at G-1 (2020), available at https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Vol%25203%2520glossary_index.pdf.

“Family households with children need larger housing units with more bedrooms. Of the existing housing stock, only 34 percent of the units have three bedrooms or more, which is a slight decline from 2006, when 35 percent of units had three or more bedrooms. Eighty-nine percent of recent new construction has been apartments, of which only two percent had three or more bedrooms. Of new condominium units built since 2006, less than 10 percent had three or more bedrooms. Because the vast majority of Washington, DC’s capacity for growth is in multi-family development, the District will need to look to apartment buildings to add larger family-sized units.” (citations omitted)

Compare this with proposed language to Section 306.4 (current)/307.4 (proposed) in the Land Use Element discussing principles for development around Metrorail stations:

“A preference for diverse housing types, including both market-rate and affordable units; a mix of unit sizes that can accommodate both smaller and larger households; and housing for older adults and persons with disabilities...”

Neither “smaller” nor “larger” household is defined in the Glossary nor in the Land Use Element, despite some language in the Housing Element identifying a unit size that may accommodate what could be considered a larger household (i.e. three or more bedrooms). If the Executive and this Council is serious about implementing housing strategies that align with the findings and recommendations from “An Assessment of the Need for Large Units in the District of Columbia” completed in June 2019, in addition to other feedback and knowledge from current and displaced residents, specific language around what constitutes a “larger” household must be added to the Land Use Element.¹⁴

Affordable Housing Language and Racial Equity

In 2018, the Black median household income in DC was \$45,200, compared to the \$142,500 annual income for white households.¹⁵ If development continues in the same fashion, more and more people from the same Black communities that are currently facing displacement pressures will be pushed out of DC and/or into DC’s already overcrowded homeless services system, of which approximately 90 percent is Black.¹⁶ One step to ensuring the changes to the Comprehensive Plan are racially equitable, in addition to the recommendations in the DC Grassroots Planning Coalition Housing

¹⁴ Peter A Tatian, Leah Hendey, & Scott Bruton, “An Assessment of the Need for Large Units in the District of Columbia” (June 2019), *available at* https://dmped.dc.gov/sites/default/files/dc/sites/dmped/publication/attachments/Formatted%20FSU%20Study_FINAL%206-24_1.pdf.

¹⁵ DC Fiscal Policy Institute, “Black Workers Matter: How the District’s History of Exploitation and Discrimination Continues to Harm Black Workers” (January 28, 2020), <https://www.dcfpi.org/all/black-workers-matter/>.

¹⁶ The Community Partnership for the Prevention of Homelessness, “2020 Point-in-Time Count” at 14 (June 10, 2020), *available at* <https://community-partnership.org/wp-content/uploads/2020/07/PointinTime2020.pdf>.

Justice Priorities, is to have the changes undergo a REACH Act racial equity analysis prior to passage of the Bill.¹⁷

UpFLUMing and Homelessness

UpFLUMing and Access to Housing

In the same year that a revised Comprehensive Plan is on the table that would allow the private market to build much more than is currently allowed by right (i.e. upFLUMing), the Mayor and Council's approved FY2021 budget dramatically cut the amount of money going to permanent housing vouchers that could give individuals facing chronic homelessness possible access to any of these new units.¹⁸ Moreover, 40,000 households remain on the Housing Choice Voucher waitlist, with 27,000 and 23,000 households on the Public Housing and Mod/Rehab waitlists respectively¹⁹; shelters remain at, or almost at, full capacity;²⁰ hundreds of residents remain on the streets in encampments,²¹ and small apartments continue to be filled with people who are doubled up, unable to access the housing market independently.²² Homeward DC, the Interagency Council on Homelessness's (ICH) strategic plan for making homelessness in the District "rare, brief, and non-recurring" by this year, 2020, has yet to accomplish all of its goals: Even without a pandemic, the District was far from ending chronic homelessness among individuals and families by the end of 2017.²³

¹⁷ DC Council LIMS, "B23-0038 - Racial Equity Achieves Results Amendment Act of 2019 (now known as "Racial Equity Achieves Results (REACH) Amendment Act of 2020")," <https://lms.dccouncil.us/Legislation/B23-0038> (last visited December 3, 2020).

¹⁸ See Kate Coventry, "What's in the Approved Fiscal Year 2021 Budget for Homeless Services?" DC Fiscal Policy Institute (October 2, 2020), available at <https://www.dcfpi.org/wp-content/uploads/2020/10/Whats-In-the-Approved-Fiscal-Year-2021-Budget-for-Homeless-Services.pdf>. Admittedly access to luxury units using vouchers is only possible if the Neighborhood Payment Standard is even high enough for the voucher to sufficiently cover the rent and if other barriers to entry, such as criminal history or credit score, are not prohibitive impediments.

¹⁹ DCHA, "District of Columbia Housing Authority 2019 Oversight and Performance Hearing...Responses to Pre-Hearing Questions" at 16, available at <https://dccouncil.us/wp-content/uploads/2020/03/dcha.pdf>.

²⁰ See, e.g., The Community Partnership, "Daily Census 12-1-20" (December 1, 2020) (showing the daily numbers for people in singles' shelters throughout DC).

²¹ See, e.g., Washington Legal Clinic for the Homeless, "Our neighbors were displaced in the middle of winter. DC can and must do better." (January 31, 2020), <https://www.legalclinic.org/our-neighbors-were-displaced-in-the-middle-of-winter-dc-can-and-must-do-better/>; see also People for Fairness Coalition and Serve Your City, "Ask Yourself: Do all human beings deserve a safe place to live?" <https://syc-dc.org/campaigns/unhoused/> (last visited December 3, 2020).

²² See, e.g., Lilah Burke, "Seeing Double: DC drastically reduces the number of people in shelter as more double up," Street Sense Media (October 1, 2019), <https://www.streetsensemedia.org/article/dc-homeless-family-prevention-program/#.X8kkG81Kg2w>.

²³ See, e.g., District of Columbia Interagency Council on Homelessness, "Homeward DC: ICH Strategic Plan 2015 - 2020," <https://ich.dc.gov/page/homeward-dc-ich-strategic-plan-2015-2020> (last visited December 3, 2020); The Community Partnership for the Prevention of Homelessness, "2020 Point-in-Time Count" at 10-11 (June 10, 2020), available at <https://community-partnership.org/wp-content/uploads/2020/07/PointinTime2020.pdf> (showing population of people experiencing homelessness in DC in 2020).

So how does additional unrestrained growth affect the individuals and families who are currently in our homeless services system? The way we have seen the growth of DC most intimately impact our clients has been by increased, sometimes permanent, encampment sweeps in gentrifying neighborhoods due to complaints on neighborhood listservs (ex. NoMa) and cases of clients discriminated against when attempting to access Class A apartments using vouchers. We have few cases of clients with vouchers, including rapid rehousing, who have been able to access any of the many new builds. Even if Council believes in supply and demand theory – the idea that building more housing to meet a growing demand will reduce housing costs and allow for people with lower incomes to access the housing market presumably without a voucher – how long do we wait for the tipping point to occur that causes housing costs to decline? How does new growth affect the immediate demand shown in the voucher waitlist and shelter numbers? We have seen some decreases in rental costs as a result of the pandemic,²⁴ but, in concrete numbers, at what level do we expect an influx of luxury Class A units to decrease the housing costs in DC? And what happens in the meantime? How long are unhoused residents supposed to wait until the market allows them in? Will the market ever let them in? It may be that “affordable housing” was never meant to be for those with the lowest incomes in DC; few people working in the DC area with salaries aligned with national median income levels (\$68,700²⁵) likely think of themselves as “low income,” though that is how it is defined in the Comprehensive Plan. Such definitions give young professionals access to the affordable units that one would think would be for those who really have no other option, those who cannot necessarily double up with roommates to foot the bill.²⁶

UpFLUMing Along the New York Avenue Corridor

Pay close attention to the proposed changes along the New York Avenue corridor, as any development decisions will have a major impact on that area, including several shelters, which we raised in DGS oversight testimony earlier this year:

On December 5, 2019, Bisnow held an event entitled, “Welcome to New York Avenue.”²⁷ The event focused on projects coming to the area between Union Market and the Maryland

²⁴ See, e.g., Jon Banister, “D.C.-Area Apartments Had the Biggest Rent Drop This Century in Q2” (July 23, 2020), Bisnow Washington, D.C., <https://www.bisnow.com/washington-dc/news/multifamily/dc-area-apartment-rents-fell-32-as-pandemic-impact-began-in-q2-105322>.

²⁵ Jessica Semega et al., “Income and Poverty in the United States: 2019,” United States Census (September 15, 2020), <https://www.census.gov/library/publications/2020/demo/p60-270.html#:~:text=Median%20household%20income%20was%20%2468%2C703,and%20Table%20A%2D1>.

²⁶ As stated in the 2019 study assessing the need for large housing units in DC, people with vouchers are also at a competitive disadvantage to accessing larger units, as non-voucher holders can combine two to four incomes to collectively pay for a unit, while voucher holders are restricted to the limits of the subsidy. Peter A Tatian, Leah Hendey, & Scott Bruton, “An Assessment of the Need for Large Units in the District of Columbia” at iv (June 2019), *available at* https://dmped.dc.gov/sites/default/files/dc/sites/dmped/publication/attachments/Formatted%20FSU%20Study_FINAL%206-24_1.pdf.

²⁷ Bisnow, “Welcome to New York Avenue: The Projects and People Building Up Northeast’s Biggest Artery” (December 5, 2019), <https://www.bisnow.com/events/washington-dc/welcome-to-new-york-avenue-2395>.

border, including a fireside chat on Doug Jemal’s “visionary” plans for a place he calls “New City” and discussions on making that corridor a flourishing gateway to the city. That same corridor currently houses hundreds of families in overflow motels²⁸ and hundreds of single men at the New York Ave and Adam’s Place Men’s Shelters. New York Ave Men’s Shelter is part of the ICH’s Low Barrier Shelter Capital Improvement Plan and is set to be renovated beginning this fall or soon after (the timeline may have been pushed back). On the whole, however, shelters won’t fit well into the new development picture. We recommend this Committee monitors DMPED and DGS collaborations around government-owned buildings and land in that area, particularly in areas in or near opportunity zones, to keep apprised of any potential shifts, closures, or displacement of shelter residents as a result of changes to the New York Avenue Corridor.²⁹

Amendment ID 9815 on the Future Land Use Map stretches an almost 3-mile section of New York Avenue NE – from Florida Ave NE to just before Dakota Ave NE – in one amendment.³⁰ The proposed change would shift the map designation from Production and Technical Equipment (PROTECH) to PROTECH + high density residential (RHD) + high density commercial (CHD). While the New York Avenue corridor is now designated a Future Planning Analysis Area in the Generalized Policy Map,³¹ allowing for increased by-right development through upFLUMing gives permission and authority to private property owners to build without any prior mandated community planning.³²

²⁸ While unhoused families are no longer staying in the overflow motels, at least one hotel along the corridor is currently being used as a PEP-V site during the COVID-19 pandemic for medically vulnerable community members. *See, e.g.*, Aoife Maher-Ryan, “As the number of people in quarantine dwindles, DHS expands its use of hotel rooms to protect the most vulnerable,” Street Sense Media (November 5, 2020), <https://www.streetsensemedia.org/article/covid-coronavirus-dhs-isolation-quarantine/#.X8kTHs1Kg2w>.

²⁹ Caitlin Cocilova, “Testimony before the DC Council Committee on Facilities and Procurement Performance Oversight Hearing on the DC Department of General Services,” Washington Legal Clinic for the Homeless (February 27, 2020), available at <https://www.legalclinic.org/wp-content/uploads/2020/03/DGS-Performance-Oversight-Testimony-with-attachments-WLCH-Feb.-2020.pdf>.

³⁰ DC Office of Planning, “Comprehensive Plan Future Land Use Map,” <https://dcgis.maps.arcgis.com/apps/webappviewer/index.html?id=a20689b0eacc48beb26164c6f3980a46> (last visited December 3, 2020).

³¹ DC Office of Planning, “Comprehensive Plan Policy Map,” <https://dcgis.maps.arcgis.com/apps/webappviewer/index.html?id=0b22abce1a244973aef45d6a6cba2b33> (last visited December 3, 2020).

³² During the DC Council hearing on this Bill on November 13, 2020, OP Director Andrew Trueblood testified that a land owner could in fact go to the Zoning Commission to request an alternate use for a property along New York Ave using the new FLUM designations right after they are passed, if approved, despite a planning analysis not yet happening; however, OP would not support the development, as doing so would contradict other Comp Plan policies (ex. Land Use Policy 1.1.1).

Access to Public Space and Amenities

Access to sidewalk space, libraries, and other public amenities is critical to the communities we work with, particularly those who are unhoused and rely on public spaces for survival. When reviewing the Parks, Recreation, and Open Space; Urban Design; and Community Services and Facilities Elements in particular; Council must analyze the language with this in mind.

Environmental protections must also be reviewed through the lens of those most consistently subject to inclement weather as the result of climate change, including people living in substandard housing and on the streets.

DC GRASSROOTS PLANNING COALITION

HOUSING JUSTICE PRIORITIES

FOR THE DC COMPREHENSIVE PLAN

In the midst of an ongoing housing crisis that has led to the displacement of tens of thousands of predominantly Black DC residents, the DC Grassroots Planning Coalition (DCGPC) and partner organizations call on the DC Council to strengthen the city's Comprehensive Plan by adding policies and actions that fortify existing affordable housing programs and require community-led equitable development strategies that further racial equity.

THE COMPREHENSIVE PLAN AMENDMENT PROCESS MUST BE CONDUCTED IN COMPLIANCE WITH DC LAW. The Comprehensive Plan is DC law and a 20-year planning document.[1] The Comp Plan requires the Mayor to submit reports to DC Council[2] at least once every 4 years on the District government's progress in implementing Elements of the Plan, the Plan's Action items, and the key projected implementation activities by land use policy over the succeeding 5 years.[3] Additionally, the Mayor shall submit amendments every 4 years for Council consideration and the amendments "shall be accompanied by an environmental assessment of the proposed amendments." [4] Notwithstanding the law, the Mayor initiated a full rewrite of the entire Plan with almost 1,000 pages of edits and substantial changes to the Future Land Use and Generalized Policy Maps, and did so without progress reports on the impact of current Elements, environmental assessment of proposed amendments, or in-depth community participation in every phase of the Plan's development.

Therefore, the Coalition asks that DC Council:

1. Ensure that all Ward level amendments as well as changes to the Future Land Use and Generalized Maps proposed by the Mayor's Office of Planning are examined and discussed with affected Ward-level residents at well-publicized, open and participatory roundtables led by the Ward Councilmembers;
2. Ensure that all proposed amendments to the Citywide Elements are examined and discussed at well-publicized, open and participatory Council roundtables held by the relevant Council Committee. (For example, the Housing Element should be reviewed at a public roundtable held by the Committee on Housing and Neighborhood Revitalization and the Committee on Human Services);
3. Ensure compliance with Comprehensive Plan law and regulations, as referenced above, before considering and voting on the substantial changes proposed by the Mayor. No Council vote should be taken without knowing in detail the impacts of the current Elements and their Action items on housing, land use, economic development, and all other facets of social, economic, and physical development influenced by the Comprehensive Plan.[5]

THE COMPREHENSIVE PLAN MUST PROACTIVELY ADDRESS DC'S HOUSING CRISIS BY STRENGTHENING THE FOLLOWING POLICIES:

RENT CONTROL:^[6] Rent control, also known as rent stabilization, is a popular affordable housing program. Rent control does not subsidize housing providers or tenants; rather, the program limits rent increases by tying them to increases in the Consumer Price Index (CPI).^[7] The Housing Element of the Comprehensive Plan must articulate the goals of: (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing.

PUBLIC HOUSING: The Comprehensive Plan, as amended, must continue the District's commitment to public housing. This means that Comp Plan amendments must require action on maintenance, preservation, and redevelopment of existing public housing and the building of additional public housing to accommodate the District's 51,000 extremely low-income renter households^[8] (31% of all renter households and at or below 30% MFI) who can afford at most just over \$900 monthly rent.^[9]

Accordingly, the Housing Element must include the following policies and goals: (1) fully fund repair and renovation of deteriorating public housing units; (2) require 1-for-1 replacement of public housing units and more when increasing site density, with no loss of family size multi-bedroom units; (3) ensure no new barriers to residents' return and true affordability based on the HUD standard of 30% of income for housing expenses; (4) use a mandatory build first model to prevent displacement, strengthen anti-discrimination enforcement during periods of relocation, and cover residents' relocation and return costs; (5) create an enforceable right of return of displaced public housing residents; (6) reinstate the goal to create a minimum of 1,000 new, additional public housing units over the next ten years;^[10] (7) retain public ownership and control of publicly owned housing and developments; (8) mandate that public housing resident-led organizations share decision making authority in all phases of redeveloping public housing; (9) incorporate community development strategies that improve the economic condition of residents such as equity for and home ownership by public housing residents, land trusts, cooperatives, and worker-owned businesses; and (10) remove barriers to the ability of returning citizens to live in public housing.

SUBSIDIZED HOUSING: Housing DC's low wage workers, seniors, people with disabilities and other low-income households must be recognized as those with the need for increasing housing capacity overall. To do so requires expanding the Local Rent Supplement Program (LRSP) -which provides ongoing rental subsidies to make housing affordable to extremely low-income families - with the aim of realizing the 2006 Comprehensive Housing Strategy Task Force goal

of 14,600 locally funded rental subsidies in the District by 2020.[11] Additionally, the District must purchase expiring Section 8 projects to maintain operating subsidies. Transfer of expiring Section 8 projects should be made only to developers who agree to lifetime affordability requirements. The District must continue real property tax abatements as an incentive to preserve expiring project-based Section 8 facilities. Funding must be increased for the Housing Production Trust Fund, the main source of funding for the Tenant Opportunity to Purchase Act (TOPA) and District Opportunity to Purchase Act (DOPA) programs, which must provide opportunities to tenants and tenant associations to own and manage their housing units. The District must adopt the policy that affordable housing created and preserved with public financing be protected by lifetime affordability restrictions and monitored to prevent transfer to non-qualifying households while still allowing residents to build equity which can result in concrete wealth growth.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

Equitable development is defined as development in which low wealth Black and brown communities and other working class communities fully participate from the beginning to ensure that the infrastructure and services they determine to be needed for their communities to grow and prosper are foremost features of the development.[17] Community Economic Development (CED) recognizes that neighborhood investment begins with investing in the capacity of low income residents to own, manage, maintain, and ultimately replicate the development process, leading to a significant shift in economic condition and overall power. To date, the development projects receiving generous taxpayer subsidies and assistance have primarily benefited new and wealthier residents while failing to adequately respond to the basic human needs of existing

markets and residents with “the false promise of trickle-down benefits that justify orienting development around the needs of well-heeled populations.”[18]

Accordingly, the Comprehensive Plan must adopt a new Community-Led Equitable Development model that mandates full participation by long-term community members with a record of community involvement. The process must start with organizing residents around engagement in small area community development plans as a principal measure of expression of community preferences. The Comprehensive Plan must expressly endorse providing significant equity to existing community members, particularly public housing residents, allowing them to withstand displacement and improve their economic standing. To support racially equitable development, the Comprehensive Plan must endorse shared equity models of homeownership such as community land trusts, deed-restricted housing programs, and limited equity housing cooperatives as they balance preservation of affordability with wealth creation.[19]

As the guiding document for development in the city, it is critical that the amended Comprehensive Plan reflect the realities and priorities that we face in the District. The issues of racial inequity must be tackled head-on in specific, actionable Comprehensive Plan priorities.

These priorities are endorsed by:

Empower DC

Washington Legal Clinic for the Homeless

People Power Action

People for Fairness Coalition

DC Federation of Civic Associations

Federation of Citizens Associations of the District of Columbia

NCBL-DC Unhoused Collective

Plymouth Congregational UCC Board of Social Action

Committee of 100 on the Federal City

Us Helping Us, People Into Living

DC Statehood Green Party

Washington Teachers Union

National Lawyers Guild - DC Chapter

DC for Democracy

The Platform of Hope

Brookland Manor Coalition

Brookland Manor Brentwood Village Residents Association

SW DC Action

Southwest Voice: The People's Paper

Serve Your City/Ward 6 Mutual Aid

Save McMillan Action Coalition

Dupont East Civic Action Association

Dupont Circle Citizens Association

Ryan Linehan, Commissioner ANC 5D01

Ra Amin, Commissioner ANC 5B04
Janice Ferebee, Commissioner ANC 2F08
Tiffani Johnson, Commissioner ANC 4B06
Renee Bowser, Commissioner ANC 4Do2

[1] DC Code §1-306.01 (2020).

[2] DC Council shall schedule a public hearing on the Mayor's progress report and following review issue findings to the Mayor and a copy of the public testimony. Id. at §1-306.04(b).

[3] DC Code §1-306.04(b), (c) (2020).

[4] DC Code §1-306.04(d) (2020).

[5] DC Code §1-306.01(b) (2020).

[6] The Rental Housing Act of 1985, DC Code §§42-3501.01-3502.24 (2020) was enacted to cover 5-unit and larger residential properties whose permits to build issued by 1975. Yesim Taylor, History of Rent Control in the District of Columbia, D.C. Policy Center, April 1, 2020 at 2. Rent control was legislated to protect low- and moderate-income tenants from the erosion of their income from increased housing costs and protect the existing supply of rental housing from conversion to other uses. DC Code §42-3501.02(1), (3) (2020). Purposes.

[7] DC Code §42-3502.08 (2020) Increases above base rent.

[8] Housing Needs by State 2020/District of Columbia, National Low Income Housing Coalition, (<https://nlihc.org/housing-needs-by-state>)

[9] Out of Reach 2020, District of Columbia, National Low Income Housing Coalition, July, 2020, (<https://reports.nlihc.org/oor/district-columbia>)

[10] 506.17 Action H-1.4.E: Additional Public Housing in current Comprehensive Plan Housing Element is removed in Office of Planning's proposed April, 2020 amendments submitted to DC Council.

[11] Homes for an Inclusive City, A Comprehensive Housing Strategy for Washington, D.C., Executive Summary, DC Government-Brookings Institute, June 13, 2006 at 8. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf) The 2006 Housing Strategy stated that DC "should directly assist an additional 14,600 extremely low-income renter households by adopting a local rent supplement program." The LRSP was set forth as a supplement to the goal of 55,000 additional units by 2020, including at least 19,000 affordable units. Id.

[12] Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time (PIT) Count of Homeless Persons, June 10, 2020, Metropolitan Washington Council of Governments, (<https://www.mwcog.org/documents/2020/06/10/homelessness-in-metropolitan-washington-results-and-a-analysis-from-the-annual-point-in-time-pit-count-of-homeless-persons-featured-publications-homelessness/>) There were 6380 residents identified as experiencing homelessness as of the January, 2020 point in time (PIT) street count.

[13] District of Columbia Interagency Council on Homelessness, Homeward DC Strategic Plan 2015-2020, DC, 2015.

[14] Id. at 31 and Table 11: System Conversion-Annual Projections for Single Adult System Inventory shows the change in inventory needed to get to a right-sized system. Given that Homeward DC earmarks production of 6000 housing units targeted specifically for the unhoused and those on the brink of homelessness and the 2006 Homes for An Inclusive City called for 19,000 affordable units by 2020, Homes for an Inclusive City A Comprehensive Housing Strategy for Washington D.C., Comprehensive Housing Strategy Task Force, 2006 at 3. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf), the Mayor's goal to produce 12,000 affordable housing units (up to 80% MFI) by 2025, contained in DCHCD, DCOP, Housing Equity Report: Creating Goals for Areas of Our City, October, 2019, (https://housing.dc.gov/sites/default/files/dc/sites/housingdc/page_content/attachments/Housing%20Equity%20Report%202010-15-19.pdf), marks a significant reduction in previous affordable housing goals, is wholly inadequate, and must be increased.

[15] Office of Revenue Analysis, DC Economic and Revenue Trends: December, 2019 OCFO, Dec., 2019 at 9 (As of November 15, 2019, there were nearly 10,000 vacant residential units in DC). (https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_December%202019.pdf)

[16] B23-0038, March 11, 2020.

[17] See generally Carlton Eley, Planning for Equitable Development: Social Equity by Design, American Planning Association, March/April 2017. (<http://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-03-04.pdf>)

[18] Id. at 2.

[19] Evidence Matters, Shared Equity Models Offer Sustainable Homeownership, PD&R, U.S. Dept. of HUD, Fall, 2012. (<https://www.huduser.gov/portal/periodicals/em/fall12/highlight3.html>)

From: [Nick DelleDonne](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Fwd:
Date: Thursday, November 12, 2020 3:17:43 PM

Sent from my iPhone

Begin forwarded message:

From: Nicholas DelleDonne <[REDACTED]>
Date: November 12, 2020 at 1:19:46 PM EST
To: Nicholas DelleDonne <[REDACTED]> Nicholas Delledonne
<[REDACTED]>

Testimony of Nick DelleDonne
Dupont East Civic Action Association
Before the DC Council, Committee of the Whole,
Phil Mendelson, Chairman
Re: Bill 23-736 Comprehensive Plan Act of 2020
November 12, 2020

Good morning, Chairman Mendelson, Councilmembers, and Staff,
My name is Nick DelleDonne president of Dupont East Civic Action Association, a non-profit corporation dedicated to community engagement and civic action, particularly in the area of development and historic preservation. Thank you for the opportunity to express our views on the Mayor's proposed amendments to the Comprehensive Plan. We have partnered with Empower DC and concur with the Housing Justice Priorities developed by the DC Grassroots Planning Coalition. DECAA joins the DC Grassroots Planning Coalition in testifying AGAINST the passage of the Comp Plan amendments as proposed. They do nothing to **stop displacement**, provide affordable **low-income housing**, or promote **community-led** equitable development.

As the Council moves through the mark-up process, we urge 3 things

Strengthen language the Mayor has weakened throughout

the bill – for example directives like “must” have been changed to “should”,
Incorporate language that reflects our top **housing priorities** (public housing, rent control, subsidies, housing the homeless, and community-led development, and
Require **development based on existing housing needs** versus perceived future needs, require reporting of housing vacancy rates and require the study of the impact of new development on other systems like education, transportation, environment, etc.

Mayor Bowser along with DC’s major developers and the so-called “Smart Growth” faction have worked hard to manipulate the narrative behind the amendments. What we are getting unfortunately is not smart.

DECAA supports the provision for Small Area Plans as a way to engage communities in their own behalf in their own neighborhood.

But, I want to pick up on a discussion we had last week about what is enforceable in the Comp Plan and what we should give attention to. You said repeatedly **zoning shall not be inconsistent with the Comp Plan**. You cautioned that language on housing, rent control, transportation and the environment are not zoning. You cautioned us about **unrealistic expectations**. The Court of Appeals disagrees with you and has rebuked the Zoning Commission repeatedly for example, for not requiring environmental impact studies in development in DC.

This is what I say: The Mayor is in a frenzy to get us housing at any cost and in the end, **her efforts are not working. The city is not getting what the city needs.**

Indeed, the Mayor is moving in the **opposite** direction. Valuable, **irreplaceable resources are being spent**, but the city is not getting what the city cries out for. **Blacks are being displaced** in record numbers. **Low-income earners below 30% of Average Median Income** are not even in the plan. The city has **record numbers of homeless**, and

encampments grow while an infectious virus spreads. These are the ones whose needs the Mayor and the Council must address.

As **Reginald Black**, one of our Coalition members said, “We are paying for our own displacement.” How can that be allowed? As **William Jordan** of our Coalition alerts us, the Mayor has changed the emphasis in the Comp Plan from “fill-in” development, filling in empty spaces, to displacement development, where the projects are so huge, they require destruction and displacement of residents. As ANC1B Commissioner **Deborah Thomas** told me, in displacement development, we are **losing our neighborhood** communities, a cultural, irreplaceable resource – the loss of which affects the quality of life in our city.

So, we say to you, there is a cry across the city, Stop the Mayor’s madness, engage the residents with community-led development and address the needs of people currently living in DC.

We say the problem is not that our expectations are too high, the problem is that yours are too low. We want accountability. We want language in the Comp Plan to be enforceable. The Mayor clearly wants none of it enforceable. If most of this mammoth 1500-page Plan is not enforceable, as you say, this will go down as the biggest waste of time and resources in the annals of the city, with devastating consequences. We appeal to you, DC Council, with all your powers in legislation and oversight: **Help DC get what it desperately needs in planning and enforcement.**

11/12/20 Testimony of Barbara Kahlow
on B 23-736, Comprehensive Plan Amendment Act of 2020

I, Barbara Kahlow, live at 800 25th Street, N.W. in the Foggy Bottom-West End part of Ward 2. Today, I am representing the West End Citizens Association (WECA), one of the oldest citizens associations in DC (we began in 1910). The WECA is primarily interested in maintaining the quality of life for the existing residential community in Foggy Bottom-West End.

I am testifying in opposition to B23-736, a proposed bill to amend the DC Comprehensive Plan (Comp Plan). On March 20, 2018, I testified before the Council on behalf of the WECA in opposition to B22-663, which is now the first/Framework Chapter of the proposed new Comp Plan. Today, I will discuss objections to: (a) widespread upzoning to allow out-of-scale development projects which are incompatible with existing low-density residential zoning; (b) 3-fold expansion of the downtown (including into part of Foggy Bottom-West End) at the cost of environmental protection analyses and affordable housing which should be in all parts of DC; and (c) protection of Federal-DC land in Foggy Bottom which was made and then retained as permanent parkland in each past Comp Plan since 1994.

Before I discuss these three objections, I want to note that, on April 23, 2020, the Washington Business Journal reported that only 16% of the community's proposed changes were adopted by the Office of Planning (OP) in its bill submitted that day to the Council. That is astonishing and justifies the Council's not rubber-stamping B23-736 without making very much needed changes.

Widespread Upzoning to Avoid Possible Lawsuits and Change Neighborhood Character

As I testified in March 2018, in late 2010 (i.e., 10 years ago), a **Ward 5** ANC Commissioner asked me to help oppose a proposed clearly out-of-scale Planned Unit Development (PUD) project in Brookland for 901 Monroe Street (the Colonel Brooks site). The 200-Footers filed three DC Court of Appeals cases, resulting in remands and finally a May 2016 full repeal of the Zoning Commission PUD Order. The repeal was largely because the proposed development was clearly inconsistent with the Comp Plan's Future Land Use Map (FLUM).

The Comp Plan bill before you today would use unprofessional spot-zoning to upzone this largely low-density residential site¹ and to upzone many other sites across DC in a revised FLUM. Upzoning would permanently change the residential character of many neighborhoods. In fact, a recent (10/27/20) Bisnow article² admitted for the 901 Monroe Street site, "The developer is now waiting for the new Comprehensive Plan before restarting the process Menkiti Group CEO Bo Menkiti said." Would widespread upzoning be fair to long-term residents in many low-density residential communities across DC?

Expansion of Downtown with Exemption from Key Protections

In the WECA's December 12, 2019 letter commenting on OP's full Draft Comp Plan, the WECA objected (comment #1348) to OP's essentially redefining "Downtown" and "Central Area" into a 3-fold expansion (including into part of Foggy Bottom-West End) of the Federal statutorily-defined Central Employment Area (CEA). The Comp Plan bill before you today

¹ Map Amendment #1866 and Text Amendments #1882 & #1887 for 901 Monroe Street NE (Square 3829).

² https://www.bisnow.com/washington-dc/news/economic-development/thousands-of-dc-housing-units-waiting-for-new-comprehensive-plan-as-council-considers-punting-to-2021-106480?utm_medium=email_share&utm_source=website.

would exclude this larger CEA area from National Environmental Policy Act (NEPA)-required environmental impact analyses (20 DCMR § 7202.1(g)) and we understand it would also exclude the expanded area from the desirable Inclusionary Zoning (IZ) regulatory requirements (11 DCMR § C1000 et seq.). We hope that the Council wants more, not less, affordable housing and to be located everywhere in DC, including downtown. **The WECA recommends that the Council add** an applicability of IZ requirement to the entire area. *[ANC-2A also submitted to OP a 2/14/20 resolution on this.]* In addition, **the WECA recommends that the Council delete** “the CEA may include additional land” in renumbered §305.7, Policy LU-1.2.2.

Threat to Permanent Foggy Bottom Parkland

In the WECA’s December 2019 comment letter, WECA asked (comment #2520) for retaining current law which, since 1994, has defined the publicly-owned Federal and DC land³ between M Street and Virginia Avenue and between 26th and 29th Streets as permanent parkland and which specifies that this land shall not be used for development. The WECA is opposed to OP’s revision to current law in §2115.10 (renumbered as §2115.11), Policy NNW-2.5.4, West End/Foggy Bottom Parkland by removing the protective provision that the parkland “shall be retained as parkland and shall not be used for development or highways.” This is flatly unacceptable!

The WECA also opposes OP’s addition to this subsection that the parkland shall be “part of a larger study on open space accessibility, transportation infrastructure reconfiguration, urban fabric reconnectivity for Foggy Bottom” and also recommends removal in its entirety of OP’s new §2115.12, Policy NNW-2.5.5, Study Potential for Removing Highway Infrastructure in Foggy Bottom,” and new §2115.15, Action NNW-2.5.C, “Foggy Bottom River, Park, and Cultural Access Study.” **The WECA strongly recommends that the Council retain** the current statutory language in its entirety which has protected this Federal and DC parkland since 1994 **and delete all of OP’s proposed drastic and impractical changes** in §§2115.11, 2115.12 and 2115.15. The Foggy Bottom-West End community, especially the surrounding community, is united in its opposition to any new development in this permanent parkland area. Is OP as out-of-touch with the will of other long-established residential communities?

Thank you for your consideration of our views.

³ The permanent parkland area is complicated and includes several Squares. For example, 2 of them are: (a) Square 0001 with 6 lots - 2 federally-owned (Lots 0843 & 0848), 3 DC-owned (Lots 0847, 0849 & 0850), & 1 with unknown ownership (Lot 0840); and (b) Square 0004W which is all federally-owned except 1 DC-owned lot (Lot 0811).

From: [REDACTED]
To: [Committee of the Whole \(Council\)](#)
Cc: [Cash, Evan W. \(Council\)](#); [Koster, Julia \(Council\)](#); ["Brooke Pinto"](#); [Hanson, Ella \(Council\)](#); [REDACTED]
Subject: Supplement to Barbara Kahlow's Thurs 11/12/20 Comp Plan testimony on behalf of the West End Citizens Association (WECA)
Date: Tuesday, December 1, 2020 9:10:59 PM
Attachments: [CompPlan-bill-111920-testimony-Brooke.pdf](#)

Chairman Mendelson – Attached please find a copy of Barbara Kahlow's 11/19/20 WECA testimony at Councilmember Brooke Pinto's Ward 2 Roundtable on the Comp Plan. She asked each of the witnesses to forward a copy to COW for the COW's Comp Plan bill hearing record. In addition, I want to address some mis-statements by the Barnhard Brothers (Dale and Maryland resident Gary) about the statutorily-defined permanent parkland addressed both in the WECA's 11/12 testimony and in more detail in the WECA's 11/19 testimony.

First, Dale Barnhard made various erroneous claims about the West End Citizens Association (WECA) of which he is not and has never been a WECA Member and for which he has never attended a WECA membership meeting. Here is a link to the WECA's website which includes recent testimonies before various DC bodies, recent letters to various DC agencies, etc.: <https://www.wecadc.org/>. It was one of the first citizens associations established in DC – in 1910. Chairman Mendelson and other Councilmembers have addressed various WECA Membership meetings.

Second, Dale Barnhard said that the WECA's claim of overwhelming support for the continuity of the permanent parkland is erroneous. Frankly, he has no basis for such a statement. I personally have spoken to a wide range of community residents, including former and newly-elected ANC Commissioners, WECA Board and other WECA Members, Foggy Bottom Association Board and other FBA Members, residents of my condominium (The Plaza at 800-25th St.) overlooking the parkland, residents of the two other condominiums overlooking the parkland (the Griffin at 955-26th St. and 2600 Penn. Ave.), etc. All support continuation of the current parkland and clearly oppose any change, especially for any development. As far as we know, only the Barnhard brothers who would benefit economically want the area developed. The WECA has testified in support of the continuity of the permanent parkland in each Comp Plan cycle starting in 1994. Former Council Chair Linda Cropp directed at least one prior OP Director to work on any revised language about this parkland with the WECA and an agreement was easily reached. The current OP has never approached the WECA about this subject.

Thank you for your consideration of the WECA's concerns not only in Foggy Bottom-West End but also City-wide. – Barbara, WECA Secretary-Treasurer

From: [REDACTED]
Sent: Tuesday, November 10, 2020 5:21 PM
To: 'Committee of the Whole (Council)'
Cc: [REDACTED]
Subject: e-copy of Barbara Kahlow's Thurs 11/12/20 Comp Plan testimony on behalf of the West End Citizens Association (WECA)

11/19/20 Testimony of Barbara Kahlow in Brooke Pinto's Roundtable
on B23-736, Comprehensive Plan Amendment Act of 2020

Last Thursday, I testified before the City Council on behalf of the West End Citizens Association (WECA) in opposition to the Office of Planning's (OP's) proposed 1,500-page bill to amend the DC Comprehensive Plan (Comp Plan). I discussed objections to: (a) widespread upzoning – much of it by unprofessional spot zoning – to allow out-of-scale development projects which are incompatible with existing low-density residential zoning; (b) 3-fold expansion of the downtown (including into part of Foggy Bottom-West End) at the cost of environmental protection analyses and affordable housing which should be in all parts of DC; and (c) protection of Federal-DC land in Foggy Bottom which was statutorily deemed and then retained as permanent parkland in each past Comp Plan since 1994.

Tonight, I will focus on our third objection – the threat to the permanent Foggy Bottom parkland. The WECA asked for retaining current law which, since 1994, has defined the publicly-owned Federal and DC land¹ between M Street and Virginia Avenue and between 26th and 29th Streets as permanent parkland and which specifies that this land shall not be used for development. The WECA is opposed to OP's proposed revision to current law [*in §2115.10 (renumbered as §2115.11), Policy NNW-2.5.4, West End/Foggy Bottom Parkland*] by removing the protective provision that the parkland “shall be retained as parkland and shall not be used for development or highways.” This is flatly unacceptable!

This parkland is surrounded by Federal highways with multiple ramps and – contrary to the assertion by the landowners of three isolated townhouses who would profit economically from a change in law – the land is not all DC-owned. In fact, the parkland has complicated ownership with multiple parcels owned by the Federal government and others owned by DC (see my footnote). In addition, this entire parkland area has a complicated and lengthy history which resulted in studied decisions where Federal highways and ramps could and should be placed.

The WECA also opposes OP's addition that the parkland shall be “part of a larger study on open space accessibility, transportation infrastructure reconfiguration, urban fabric reconnectivity for Foggy Bottom” and also recommends removal in its entirety of OP's new §2115.12, Policy NNW-2.5.5, Study Potential for Removing Highway Infrastructure in Foggy Bottom,” and new §2115.15, Action NNW-2.5.C, “Foggy Bottom River, Park, and Cultural Access Study.” **The WECA strongly recommends that the Council retain** the current statutory language in its entirety which has protected this Federal and DC parkland since 1994 **and delete all of OP's proposed drastic and impractical changes** in §§2115.11, 2115.12 and 2115.15. The Foggy Bottom-West End community, especially the surrounding community, is united in its opposition to any new development in this permanent parkland area.

In addition, there are other Comp Plan proposals which could adversely affect other parts of Foggy Bottom. For example, a lawyer proposed upzoning the large Columbia Plaza compound (Square 33) for high density commercial use. In reading her pre- and post-hearing submissions, it revealed that the objective is to rebuild the complex which would most probably turn this

¹ The permanent parkland area is complicated and includes several Squares. For example, 2 of them are: (a) Square 0001 with 6 lots - 2 federally-owned (Lots 0843 & 0848), 3 DC-owned (Lots 0847, 0849 & 0850), & 1 with unknown ownership (Lot 0840); and (b) Square 0004W which is all federally-owned except 1 DC-owned lot (Lot 0811).

middle-income residential complex with many rent-controlled units into another market-rate housing complex and with more commercial use than presently. This would be contrary to one of the Mayor's objectives to provide more, not less affordable housing – especially for those at the low end of the income scale.

The Committee of 100

on the Federal City



Supplemental Testimony B23-0736, the Comprehensive Plan Amendment Act of 2020 November 20, 2020

We are gravely disappointed in the thrust of the amendments to the Comprehensive Plan and urge that Council to reject them. As was apparent during the hearings on November 12-13, nearly all of the Black residents (other than those who represented their employers) expressed both knowledge of the amendment text and anger that Council's adoption will continue to displace communities of color, clearing the path for the for-profit real estate industry to assume even greater control over Washington's demographics and physical form. Their analysis was in stark contrast to the simplistic script that many White witnesses parroted: immediately pass the 1,500 page Plan as it is.

We urge the Council to scrutinize the language changes and the uniform map changes that have no obvious benefits for residents and will create intentional mischief for our communities and cherished historic resources. We implore you to stand back and see that this plan will deepen the serious divisions in the city.

Residents have never been as cynical as they are now. You cannot remove residents' voices and not expect a reaction. You cannot ignore the frustration and hardship of families that are burdened in so many other ways, and not expect a reaction. You cannot demonize some residents or parts of the city to advance a development agenda and not expect a reaction.

The amendments are based on several questionable assumptions and assertions:

First, the amendments assume large population growth and therefore, a pressing need for much more market-rate housing. Yet in-migration has declined nearly every year since 2012. According to the Office of the Chief Financial Officer, D.C.'s population grew by only [4,202 in 2019](#), the smallest increase in a decade, with a [total net increase in the adult population of only 398](#).

Second, creating affordable housing is the rationale for radical densification of large swaths of land throughout the city. But the amendments will not achieve the affordable housing goals on which so many people in the city say they agree, many of which are not outlined in the amendments:

- Deeply affordable housing in all wards for those earning 50% or less of MFI;
- Assurances against displacement;
- Substantial new city investments in public housing;
- Expansion of rent control;
- Extension of IZ to the Central Employment Area;
- Lifetime affordability requirements for investment of public funds;
- Permanent supportive housing for the unhoused;
- Target public investment to improve services and amenities in underserved areas; and
- Equitable development that mandates full participation by long-term community members in the destiny of their neighborhoods.

Third, many specific terms in the Plan have been changed to weaken the protections of both the character of our existing neighborhoods and the image of the city itself. A number of witnesses called out the administration's ploy to undercut the ability of citizens to participate meaningfully in the planning process.

Finally, the testimony made abundantly clear that the city is being sold a bill of goods by those who will profit under the guise that they want to help residents when, in fact, their schemes will primarily benefit themselves.

To achieve racial and economic equity in this city, and to gain the confidence and community buy-in necessary to do that, we recommend that Council:

- Retain the current plan as a starting point, as flawed as it may be;
- Immediately focus our city government capacities on implementing best practices in community visioning and planning to develop community-driven Small Area Plans; and
- Identify specific sites and potentially convertible spaces and buildings in each ward that can produce affordable housing to strengthen our neighborhoods and enable low income families to achieve a better and more equitable future.

Submitted by

Meg Maguire, Trustee (

Nancy MacWood, Trustee (202

Andrea Rosen, Trustee



Testimony of the Committee of 100 on the Federal City on B23-0736, the Comprehensive Plan Amendment Act of 2020, virtual hearing on Thursday, November 12, 2020, 10am

I am Kirby Vining, Chair of the Committee of 100, presenting testimony on behalf of the Committee of 100. Today in the three minutes provided me I will point out main points we suggest you change in the Amended Comprehensive Plan, to be followed up by much lengthier comments on many more specific policies and actions in the draft Plan that we will submit later.

We have argued that this amended Plan is so flawed that it should be sent back to the Office of Planning. But we are also aware that if it were sent back, the Office of Planning is under strict instructions to support the Mayor's Housing Initiative and might return a version even worse than this. Thus the importance of Council consideration of the Plan as presented. The Council is, according to law, the ultimate arbiter of this Plan.

We see extensive changes in the proposed amended Plan made to accommodate the Mayor's Housing Initiative and question how much of any Plan should be changed to accommodate the administrative wishes of any one particular administration. We also argue that the amended Plan has been skewed by the use of 2017 census statistics, statistics from a time when our population growth was still relatively robust. Not only is population increase trending downward, it may have gone negative during the current pandemic and it was in any event heading in that direction even before the pandemic. Yet the projections and trends behind proposed changes to the Plan ignore all that entirely.

Below are examples of key points we recommend the Council look at before we submit more extensive comments on policies and actions for Council consideration:

- The Amended Plan is littered with changes that specifically address the Mayor's Housing Initiative call for 36,000 housing units to be created by 2025, at the expense of existing prudent planning language which in most cases should be restored.
- To support the 36,000 unit initiative, demographic figures from 2017 are cited throughout the amended Plan. The Comprehensive Plan process mandates that the Plan be updated periodically to "reflect updated data and analysis of forces driving change and growth projections," among other things. While the Office of the Chief Financial Officer has published information in a 2019 report showing that the District's population growth peaked in 2013 and has been falling since, resulting in net in-migration in 2019 of only 398 persons(!), these numbers are nowhere to be found in the Amended Plan¹. It appears that these current updated figures were avoided because they do not support the alleged need for 36,000 additional housing units. We question the extent to which the basic Plan for our city should be bent to a specific Mayor's specific policy agenda.

¹
https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_January%202020.pdf See Migration and Population Appendix, page 23, for figures and charts showing this figure of net in-migration of 398 persons in 2019. No more recent data is available from the OCFO.

- Many specific terms in the Plan have been changed to weaken the protections of both the character of our existing neighborhoods and the image of the city itself. Reference to it is proposed for removal, for example, in Action LU-1.1: “Neighborhood character is no longer to be “protected” but is now to be “respected,” whatever that means, as in Policy LU-2.1.3 and elsewhere, and the term is eliminated entirely in Policy LU-2.3.4 and elsewhere. Is this antecedent to changing the name of one of our boards to the *Historic Respect Review Board*? The imperative “must” has been weakened to “should” five times in the Land Use Element, first at 305.2, and three times in the Housing Element. “Ensure” is likewise changed to “should” several times, including at LU-2.3.3. “Ensure” has a common and defensible meaning, but “should” is arguably not enforceable. In LU-2.3.3 “should” is now accompanied by a new term, “buffer,” whatever that means. If these topics are policy, why weaken the language to unenforceability? How is a citizen to seek implementation of the weaker words such as “respect” and “should”? These assaults on citizen involvement with the planning process follow on several deliberate weakenings of language in the Framework Element, such as the insidious insertion of “and other zones may apply” in the descriptions of all residential and commercial property types. Strong verbs are needed to assert mandatory compliance where relevant, such as extend rent control; require action on maintenance, preservation and redevelopment of public housing; and mandate specific goals for supportive housing. The single mention of the word “viewshed,” in the existing Urban Design Element at 903.7, has been removed. Why?
- Given that our Home Rule Charter explicitly states that the Council is prohibited from making any changes to the Height of Buildings Act of 1910, references in the amended Plan to considering this are out of place and should be eliminated. The Housing Element, Action H.1.1.D, explicitly encourages this and it should have no place here.
- Most useful language concerning the L’Enfant and McMillan Plans and the 1910 Height of Buildings Act has been moved to the Urban Design Element, which is a question in itself, but perhaps more importantly: do the HPRB and HPO staff know to find it there, language that would seem to find a natural home in the Historic Preservation Element?
- Housing figures that guide the Housing Element, paragraphs 500.6 – 500.8, cover only the period up to 2017 and thus do not indicate that in-migration growth is flat or negative. These figures, and policies and actions based on them, must be revised to reflect a very different trend we’re experiencing now. The ‘increase in demand’ so frequently cited is just not the case now.

In the appendix to this testimony please find more specific examples of the above. We will provide much more detailed material to the Council before the close of the record.

Thank you.

(signed)

Kirby Vining

Chair

Committee of 100 on the Federal City

Appendix

Key examples of changes and deletions to the Plan in support of our remarks:

~~309.8~~310.10 ***Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods***
Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to ~~protect~~ respect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create ~~successful~~ vibrant neighborhoods” in all parts of the ~~city~~ District requires an emphasis on ~~conservation~~ conserving units and character in some neighborhoods and revitalization in others, although all neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. ~~309.8~~310.10

Comment: *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods.* The goal to protect neighborhood character should not conflict with providing affordable housing so the replacement of protect with respect, which is a meaningless concept, should be deleted. This section should be premised on balancing goals to increase the supply of affordable housing, which should be the expressed housing priority throughout these amendments. Similarly, the original language using the *General Policy Map designation of conservation to distinguish neighborhoods that don’t need revitalization should be restored.* Conservation has a larger meaning and distinguishes neighborhoods that don’t need the level of government resources that neighborhoods identified for revitalization need. The amendments make a clear statement at the beginning of the Land Use Element that a major goal is the creation and preservation of affordable housing. It should not be necessary to interject phrases to reiterate the overarching goal.

~~312.10~~313.14 ***Policy LU-2.4.6: Scale and Design of New Commercial Uses***
Develop ~~Ensure that~~ new uses within commercial districts ~~are developed~~ at a height, mass, scale, and design that is appropriate for a growing, densifying Washington, DC, ~~and that is compatible~~ with surrounding areas. ~~312.10~~313.14

Comment: *Policy LU-2.4.6: Scale and Design of New Commercial Uses.* This section includes amendments that reframe the intent of the policy from ensuring compatible height, mass, scale, and design to developing at a height, mass, scale and design that reflects a growing, densifying city...and secondarily is compatible with the adjacent neighborhood. The amendment curbs dissent when a neighborhood finds that a development proposal overwhelms the development pattern in a neighborhood. The amendment says clearly that any intensity of development will be acceptable when growth is invoked. This is contrary to decades of Land Use Element policies that promote neighborhood engagement and the goal of compatible development.

~~304.16~~305.20 ***Action LU-1-~~1.2~~C: Development of Air Rights***

Analyze the unique characteristics of the air rights development sites within Washington, DC the District. Development sites should address the growing need for housing, and especially affordable housing, reconnect the L'Enfant grid, and enhance mobility. Determine appropriate zoning and means of measuring height for each unique site consistent with the Height Act, taking into consideration the ability to utilize zone densities, the size of the site, and the relationship of the potential development to the existing character of the surrounding areas. ~~304.16~~305.20

Comment: Deleted reference to 'consistent with the Height Act' should be reinstated.

~~309.8~~310.10 ***Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods***

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to ~~protect~~respect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create ~~successful~~ vibrant neighborhoods” in all parts of the ~~city~~ District requires an emphasis on ~~conservation~~conserving units and character in some neighborhoods and revitalization in others, although all neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. ~~309.8~~310.10

Comment: Protecting neighborhood character should be allowed to stand.
“Respect” has no legal meaning.

~~903.10~~ ***Policy UD-1.1.4: Height Act of 1910***

~~Protect the civic and historical character of the city, particularly the “horizontal” urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910. Basic principles of the Height Act are shown in Figure 9.4.~~ ~~903.10~~

Comment: Restore reference to limiting building heights in accordance with the Height Act.

921.4 ***Policy UD-4.3.1: Recognize the Legacy of the Height Act***

Utilize the basic principles for regulating building height by street width in the Height of Buildings Act of 1910 to guide the redevelopment of corridors and new large site developments, continuing Washington, DC’s historic design tradition of well-proportioned streets and consistent building height (see Figure 9.22). Examine opportunities where enabling buildings to exceed zoning height restrictions can encourage better site massing and architectural design. 921.4

Comment: “Examining opportunities” to circumvent the Height Act has no place here.

311.5312.5

Policy LU-2.3.3: Buffering Requirements

Buffer ~~Ensure that~~ new commercial development adjacent to lower-density residential areas ~~provides effective physical buffers~~ to avoid adverse effects. Buffers may include ~~larger~~ setbacks, landscaping, fencing, screening, height ~~step-downs~~ ~~step-downs~~, and other architectural and site-planning measures that avoid potential conflicts. 311.5312.5

***Comment:** Replacing “Ensure” that neighborhoods avoid adverse impacts of commercial development should be left intact. What does “buffer” mean?*

503.13

Action H.1.1.D: Research New Ways to Expand Housing

Continue research to expand market rate and affordable housing opportunities in Washington, DC, such as expanding existing zoning tools and requirements. Consider a broad range of options to address housing constraints, which could include updating the Height Act of 1910 (a federal law) outside of the L’Enfant Plan area, if it can promote housing production.
503.13

***Comment:** Explicit challenge to the Height Act is out of place here in the Housing Element.*

504.67

Policy H-1.2.1: Affordable Housing Production as a Civic Priority

Establish the production **and preservation of affordable housing** ~~for low and moderate income households~~ as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation

***Comment:** Unless the words “for low and moderate income households” are restored, Our housing program approvals will continue to produce housing primarily at the 80% AMI level. Absolutely must restore this language.*

504.14

Policy H-1.2.7: Density Bonuses for Affordable Housing

Provide zoning incentives, **such as through the PUD process,** to developers proposing to build ~~low-and-moderate-income~~ **a substantial amount of affordable housing.** ~~Affordable housing above and beyond any underlying requirement. The affordable housing proffered~~ shall be considered a **high priority** public benefit for the purposes of granting density bonuses ~~when new development is proposed,~~ **especially when the proposal expands the inclusiveness of high-cost areas by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood** ~~Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood.~~ 504.14

***Comment:** Same as above: unless the original language is restored, this language Will be used to encourage more 80% AMI housing in government programs.*

Policy H-1.1.6: Housing in ~~the~~ Central ~~City~~ Washington

Absorb a substantial component of the demand for new high-density housing in ~~the~~ ~~Ccentral~~ Central Washington, ~~DC~~ **Planning Area** and along the Anacostia River. Absorbing the demand for higher-density **housing** within these areas is an effective way to meet housing demands, **maximize infrastructure and proximity to jobs,** create mixed-use areas, and ~~conserve~~ **minimize the cost pressure on existing** ~~single-family~~ residential neighborhoods throughout the ~~city~~ **District. Market rate and affordable** ~~Mixed~~ **mixed-income,** higher-density downtown housing also provides the opportunity to create vibrant street life, and to support the restaurants, retail, entertainment, and other amenities ~~that are desired and needed~~ in the heart of ~~the city~~ **Washington, DC.** 503.78

Comment: The Central Planning Area has miraculously crept into Anacostia and this policy would have a huge accelerating impact on displacement and gentrification in an area that is already having a very difficult time absorbing it. The developments at St. Elizabeth's, east and west, are already threatening to overheat an already precarious neighborhood in the Barry Farm area.

From: [Kirby Vining](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Committee of 100 Testimony for B23-0736 -Kirby Vining
Date: Tuesday, November 10, 2020 10:06:05 PM
Attachments: [C100_B23-0736_CompPlanAmendment_testimony_12Nov20.pdf](#)

Please accept the attached testimony from the Committee of 100 on the Federal City which will form the basis for the three minutes of oral testimony I will present at the allotted time on Thursday, November 12th.

I hope this testimony arrives in time to share it with the Council Chair and Members.

Thank you, -Kirby Vining, Chair, Committee of 100 on the Federal City.

Sent with [Unibox](#)

From: [Dennis Williams](#)
To: [Committee of the Whole \(Council\)](#)
Subject: TNA Testimony on the Comprehensive Plan Amendment Act of 2020
Date: Friday, November 6, 2020 4:44:34 PM
Attachments: [TNA TESTIMONY ON THE COMPREHENSIVE PLAN AMENDMENT ACT OF 2020.pdf](#)

To DC Council Chairman Phil Mendelson

Dear Mr. Chairman,

On behalf of the Tenleytown Neighbors Association (TNA), I am submitting Testimony on the Comprehensive Plan Act of 2020 (Bill 23-726) for presentation at the public hearing before the Committee of the Whole on Thursday, November 12, 2020. The Testimony follows immediately below. For your convenience, I am also attaching at the end of the email a pdf version of the same Testimony.

Sincerely,
Dennis Williams
Treasurer and Member of the Board of Directors
Tenleytown Neighbors Association

TENLEYTOWN NEIGHBORS ASSOCIATION TESTIMONY ON THE COMPREHENSIVE PLAN AMENDMENT ACT OF 2020

Tenleytown Neighbors Association (TNA) urges the DC Council to reject Bill 23-726 in light of new data challenging the Plan's outdated and overly optimistic population estimates and the Plan's failure to assess the impact of the covid-19 pandemic on the District's future.

The Framework Element enacted by the City Council in February 2020 was several years in the making. Because of this lengthy production time, the Element relies on population data through 2017 in determining its socio-economic forecasts. From the perspective of 2017, the Element concludes: "Rapid growth in population and jobs has made the District one of the fastest growing large cities in the United States..." (202.1). Indeed, the Element projects DC population to reach 842,000 in 2030, an increase of 15% over 2020. (217.2)

Reflecting this upbeat assessment of growth in the District, Bill 23-726 includes 21 amendments to the Future Land Use Map for Upper Wisconsin Avenue where our members live. If approved, all but one of these amendments would encourage developers to invest in high-rise, high-density developments along Wisconsin Avenue from Friendship Heights to Tenleytown.

More recent analyses suggest that such high-density development may be both risky and unwise. In January 2020, the District's Chief Financial Officer reported that net migration into DC has been declining for the last 7 years from over 10,700 in 2012 to 400 in 2019. As a result,

the total DC population in 2019 amounted to less than 706,000, an increase over the prior year of 4,202, the smallest increase in 12 years. According to one private forecasting firm (IHS Markit) cited in the CFO report, this trend could lead to a net **out-migration** of 6,000 by 2030 and a total population of 744,000, or 98,000 less than the estimate used in the Framework Element.

Bill 23-726 was introduced in April 2020 and makes no attempt to forecast the long -term impact of the covid-19 pandemic on future trends in the District's population and economy. That impact could be dramatic. Indeed, as reported by Steven Pearlstein in his October 4 story in the Washington Post, "In the short term, the pandemic is likely to accelerate ...out-migration of jobs, people and capital to the suburbs and mid-size cities." (In fact, as cited in the CFO report, Moody's Analytics projects payroll employment growth in DC to fall from 17.3% in the last decade to 5.4% in the next decade). But once rents and real estate prices decline, a process that could last for a decade, cities like Washington "...will be able to rebalance themselves for a post-coronavirus world of slower growth, less density and lower prices", i.e. cities that are "more affordable and livable again". (As reported in a October 18 Washington Post story, Zillow Research classifies DC rents as "high and falling" suggesting that this process may have already begun).

Given these very different forecasts, City Council members face a clear choice: To approve a Plan that forecasts robust growth in population despite recent trends and ignores the potential effects of the pandemic, or reject Bill 23-736 and leave the current Comprehensive Plan and zoning districts in place until time and the 2020 Census provide a better understanding of the impact of the pandemic on the economy and our community. The first choice risks encouraging developers to invest in high-density developments in Upper Wisconsin Avenue that many residents oppose and might well fail in a post-pandemic environment. The second choice highlights the plentiful opportunities available now for mixed-use development that are consistent with a more affordable, post-pandemic world of slower growth and less density.

TNA urges the City Council to follow the second path and reject Bill 23-736.

From: [Dennis Williams](#)
To: [Committee of the Whole \(Council\)](#)
Subject: TNA Testimony on the Comprehensive Plan Amendment Act of 2020
Date: Friday, November 6, 2020 4:44:34 PM
Attachments: [TNA TESTIMONY ON THE COMPREHENSIVE PLAN AMENDMENT ACT OF 2020.pdf](#)

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Dennis Williams
Treasurer and Member of the Board of Directors
Tenleytown Neighbors Association

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Reflecting this upbeat assessment of growth in the District, Bill 23-726 includes 21 amendments to the Future Land Use Map for Upper Wisconsin Avenue where our members live. If approved, all but one of these amendments would encourage developers to invest in high-rise, high-density developments along Wisconsin Avenue from Friendship Heights to Tenleytown.

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Given these very different forecasts, City Council members face a clear choice: To approve a Plan that forecasts robust growth in population despite recent trends and ignores the potential effects of the pandemic, or reject Bill 23-736 and leave the current Comprehensive Plan and zoning districts in place until time and the 2020 Census provide a better understanding of the impact of the pandemic on the economy and our community. The first choice risks encouraging developers to invest in high-density developments in Upper Wisconsin Avenue that many residents oppose and might well fail in a post-pandemic environment. The second choice highlights the plentiful opportunities available now for mixed-use development that are consistent with a more affordable, post-pandemic world of slower growth and less density.

TNA urges the City Council to follow the second path and reject Bill 23-736.

Testimony of Matthew Frumin on the
Comprehensive Plan Education Facilities Element

Thank you for this opportunity to testify on this important subject.

My focus today is not on the land use issues which will be the focus of much of the testimony, but on the Education Facilities Element that is intended to offer a vision for the education infrastructure in our city. Settling a clear vision is critical to our success in this all important area on which so much of the city's growth and future depend.

There is much to commend in the proposed Education Facilities Element, but also important things that can and should be fixed by the Council in its review process so that as enacted it:

- ***Unequivocally establishes that the key priority in the next decade is to ensure an excellent matter-of-right path from PK through high school in every community.*** Achieving that goal lay at the heart of ensuring equity and fairness and supporting the long-term growth of the city. The goal is almost universally endorsed, but rarely followed through on. The current draft endorses the goal, but then, as is all too common, significantly undermines it with specific proposed policies.
- ***Calls for rational correlation of the addition of new school capacity and location of such capacity to accommodate realistic expectations of need, recognizing that achieving rationality will require coordinated planning between the sectors.*** The current draft implies a significant need for new capacity based on projected enrollments based on estimates formulated years ago. Even before COVID, the actual increases in enrollment lagged the projections. Meanwhile, in many parts of the city, we already have significant overcapacity. That excess capacity drives up costs and dilutes the dollars available to directly serve students sending them to administrators and building owners. Fiscal responsibility requires a rational approach to new school capacity that has been sorely lacking.
- ***Rejects the encouragement of co-location of charter schools inside DCPS buildings.*** Such an approach would make a mockery of the core goal of delivering an excellent matter-of-right system in every community and as has been seen in many jurisdictions invites operational challenges and with dual administrations in one building maximizes administrative cost as opposed to investing in direct service to students. The suggestion in the draft to encourage such co-locations is drawn from the proposed 2018 Master Facilities Plan that the Council declined to embrace. The Council should not embrace it here through the back door.
- ***Reflects the expectation that the city will significantly invest in its low enrolled matter-of-right schools including through completing the full modernization of all DCPS schools by a date certain (the vast majority of which that remain to be completed and are not yet slated for full modernization are east of the river) in an***

effort to attract students, achieve long-term economies of scale. Invest in the schools we have before further feeding excess capacity.

For years, even as there have been loud calls and strong support to ensure great matter-of-right schools offering families predictability from PK through high school in every community in the city so that families need not be at the mercy of a lottery, every community enjoys the social capital of great schools and District taxpayers are not burdened with per student costs significantly inflated by excess capacity, we have effectively drifted without a vision, some times wrongly believing our power to shape this critical local service was more limited than it actually is.

The Comp Plan Education Facilities Element offers an opportunity to stake out a sensible vision. The Council should work with the draft proposed by the Office of Planning, making relatively modest revisions, to create such a vision and establish a broad roadmap for success in this all important area on which so much of the city's growth and future will turn.

We stand ready to support you in that effort and would happily share specific, redlined proposed revisions to the current draft.

Thank you for your time and attention to this matter.

Public Testimony: Comprehensive Plan
Keith Hasan-Towery, Submitted/Spoken Testimony

Dear Council,

I am Ward 7 resident and live in the Marshall Heights community. I am submitting this written testimony today because I want my statement about my support for the addition to the comprehensive plan to be documented. I especially want to express my support for all amendments designed or targeted toward Fletcher-Johnson (Far NE/SE: 1708.4, 1715.2, and 1715.4).

I know this isn't the space for this exactly, but it is so important the land we have remaining in Ward 7 is used strategically to help bring economic prosperity. The Fletcher-Johnson site offers this unique opportunity to increase both the commercial and residential densities. Our lack of grocery stores and sit-down restaurants are no surprise at this point. We want to be able to spend our tax dollars in the District, instead of spending our disposable incomes in Maryland. We understand though that in order to seek the appropriate zoning changes, we need these thoughts to be reflected in the Comprehensive Plan.

I am also appreciative of the District acknowledgment of the boundaries for both the Marshall Heights and Benning Ridge neighborhoods (1715.1) and additional acknowledgments of the sacred landmarks in our community (1708.4). It is also great to see that the majority of the FLUM suggestions were taken into consideration and will make it into the Comprehensive Plan (AN 7E-15 through AN7E 21).

Last Note: Too often, the voice in Ward 7 barely makes it to these types of hearings. I do want to make sure we understand that this isn't because of apathy. Many folks are unaware of how to participate, and others lack access to do so as well; whether that is via WebEx or the lack of transportation options to ferry them to the Wilson Building pre-Covid.

Sincerely,

Keith Hasan-Towery

Chair, Marshall Heights Civic Association

Meridith Moldenhauer

Good morning Chairman and Councilmembers, my name is Meridith Moldenhauer, land use counsel at Cozen O'Connor and resident of Capitol Hill. I would like to start by thanking the Council's strong efforts in updating the Framework Element of the Comprehensive Plan. Now, as the Council turns its focus toward the remaining Comp. Plan and the Future Land Use Map – I am encouraged with the Mayor and the Office of Planning's focus on housing. As residents zoom into this hearing from houses and apartments all over the city – housing is critical and I ask that the Council Approve the Comp Plan submitted by OP with one Mark Up that would provide the opportunity for more Housing and economic growth in Ward 5.

With the Support of the ANC 5D, I am testifying on behalf of the owner of 500-520 Florida Ave to request a change to the Future Land Use Map for these two lots on Florida Avenue NE – Open Call Reference # 1358. This change would request a FLUM increase to medium-density residential and high-density commercial.

The current unutilized property is out of character with the 2020 Union Market neighborhood, which has emerged as a bustling mixed-use community with high-density buildings. The FLUM has played a major part in this transformation, as many of the surrounding lots have been approved through the Zoning Commission's planned-unit-development process. However, the current FLUM recommendation for the property is more restrictive than its abutting Union Market neighbors – this current FLUM designation restricts future development and does not provide the needed incentive to change this undesired industrial land into housing. The ANC shares in the desire to not have by-right Production and Distributions Uses at the entrance Union Market but rather to encourage high density - that is consistent with this Ward 5 neighborhood's goal for inclusive housing.

While, the initial submission to Office of Planning did not have the ANC Support for this FLUM Change, during the extended Open call process - the ANC submitted its own resolution encouraging this FLUM Change. In our discussion with OP the draft before you does not include this change because the ANC's resolution which was filed during the comment period was overlooked. I ask the Council to support the Owner and the ANC endorsed request for this FLUM Change which is consistent with the Mayor's "Housing Equity Report," land use policies of the Framework Element and Near Northeast Area Element.

This request is consistent with the Framework Element passed by the Council last year including policies that encourage redevelopment of underused industrial sites and increased density along corridors and near transit stations – like this site.

For all these reasons, we believe the Council should mark-up the FLUM map and accept the ANC recommendation for 500-520 Florida Avenue NE which would provide the opportunity for appropriately located economic growth that has the ability to include affordable housing and inclusive development. Thank you for your time and consideration – my testimony will be filed.



**Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3/4G**

CHEVY CHASE, BARNABY WOODS, HAWTHORNE

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**ANC 3/4G Testimony before the
Committee of the Whole on the
Comprehensive Plan Amendment Act of 2020
November 12, 2020**

Thank you Chairman Mendelson and Councilmembers for this opportunity to address proposed changes to the District's Comprehensive Plan, the "Comprehensive Plan Amendment Act of 2020," Bill 23-736. I am Randy Speck, Chair of ANC 3/4G, and I submit this testimony on behalf of our Commission, which approved it by a vote of 4 to 0 on November 9, 2020 (a quorum being 4). We generally support the significant aspects of the proposed amendments related to the "Chevy Chase Gateway" (i.e., the Connecticut Avenue corridor from Chevy Chase Circle to Livingston Street, NW). These provisions mostly align and are consistent with the Commission's recommendations and will provide guidance for any future development in that specified area. While we have significant reservations about some of the other proposed Comprehensive Plan elements,

we do not oppose the Council’s approval of Bill 23-736 based on representations that the Comprehensive Plan will be completely rewritten by 2025.¹

Since March 2018, our Commission has actively reviewed and commented on proposed Comprehensive Plan amendments.² The Commission’s comments have focused particularly on recommended changes to the Future Land Use Map that would permit mixed-use, low-density commercial and moderate-density residential development along the Chevy Chase Gateway.³ The ANC’s February 10, 2020 resolution supported these proposed changes but with an essential proviso:

that [the Office of Planning] include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan. The Small Area Plan should be a prerequisite so that new development will be consistent with that Plan.⁴

¹ See Staff Report from the Director of the Office of Planning to District of Columbia Council Members, April 2020, page 8, available at <https://bit.ly/3jPCT8l>.

² “ANC 3/4G Testimony before the Committee of the Whole on the Comprehensive Plan Framework Amendment Act of 2018,” March 20, 2018, available at <https://bit.ly/2MSuCD8>; “ANC3/4G Resolution Regarding the Comprehensive Plan Amendments Act of 2019 (B23-0001),” July 22, 2019, available at <https://bit.ly/2GkpIhS>; “Comprehensive Plan Task Force Report and Recommendations,” January 23, 2020, available at <https://bit.ly/324DWex>; “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, available at <https://bit.ly/2Ir1Gzb>.

³ Future Land Use Map, April 2020, available at <https://bit.ly/2JtU1nE>.

⁴ “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, paragraph 9, available at <https://bit.ly/2Ir1Gzb>.

The Office of Planning accepted this condition and revised the Generalized Policy Map accordingly to identify the Chevy Chase Gateway as part of a “Future Planning Analysis Area” defined as

areas of large tracks or corridors where future analysis is anticipated to ensure adequate planning for equitable growth. . . . Planning analyses usually include, but are not limited to, *Small Area Plans*, Development Frameworks, Technical Studies, Retail Strategies, or Design Guidelines. Such analysis should precede any significant zoning change in this area. The planning process should evaluate current infrastructure and utility capacity against the full build out and projected population growth. Planning should focus on issues most relevant to the community that can be effectively addressed through a neighborhood planning process.⁵

Consistent with the Generalized Policy Map, the approved FY 2021 Budget included \$150,000 for the Office of Planning to prepare a Small Area Plan for the Chevy Chase Gateway.⁶ That approved budget was executed, and work has already begun.⁷ Thus, the proposed Comprehensive Plan amendments related to the Chevy Chase Gateway have incorporated that aspect of our Commission’s recommendations, and we support that portion of the Plan.

Our Commission also supports the Comprehensive Plan’s goals for more affordable housing along the Chevy Chase Gateway. We have repeatedly suggested that

⁵ Generalized Policy Map, April 2020, available at <https://bit.ly/2TvxCZ6> (emphasis added).

⁶ Fiscal Year 2021 Approved Budget and Financial Plan, August 27, 2020, page B-79, available at <https://bit.ly/3bVYeKO>.

⁷ “Chevy Chase Small Area Plan, ANC 3/4G Meeting, October 13, 2020, Erkin Ozberk, DC Office of Planning,” available at <https://bit.ly/360S4Xc>.

any new development along the Connecticut Avenue include a significant number of affordable housing unit — e.g., above the new Chevy Chase Community Center and the new Chevy Chase Neighborhood Library as well as on current privately owned sites such as Safeway, Wells Fargo Bank, and the WMATA bus depot. The Commission’s Task Force on Racism is currently working on specific recommendations to address these affordable housing objectives. The Comprehensive Plan amendments related to the Chevy Chase Gateway will help promote the creation of more affordable and workforce housing in our neighborhood.

The Commission continues to have serious reservations, however, about some aspects of the proposed Comprehensive Plan changes. Since 2018, we have questioned the basis for the Office of Planning’s assumption that the District’s population would increase to almost one million by 2045.⁸ We continue to believe that such projections are not well founded, could be based on changing lifestyles that are being accelerated by the current public health emergency, and could create unrealistic expectations and planning assumptions, as described below.

The COVID-19 public health emergency casts doubt on many of the assumptions that underly the proposed Comprehensive Plan amendments. The pandemic may create permanent shifts in the places where people work, the kinds of services that they require,

⁸ “ANC 3/4G Testimony before the Committee of the Whole on the Comprehensive Plan Framework Amendment Act of 2018,” March 20, 2018, pages 2-3, available at <https://bit.ly/2MSuCD8>; “ANC3/4G Resolution Regarding the Comprehensive Plan Amendments Act of 2019 (B23-0001),” July 22, 2019, paragraphs 4 and 5, available at <https://bit.ly/2GkplhS>.

where people want to live, and how public spaces are used. It is impossible now to predict how those changes will impact the Comprehensive Plan. No matter what Comprehensive Plan changes the Council adopts, there is a strong probability that they will almost immediately be obsolete as the key assumptions morph.

Finally, and most importantly, despite our repeated criticism, the Comprehensive Plan amendments do not contain specific planning for the infrastructure that will be necessary to support projected growth. The Commission advised the Office of Planning to “include a policy that addresses the need for infrastructure — e.g., transportation, parks and recreation, libraries, utilities, and schools — that accommodates projected population growth” and

to create a specific plan for where, when, and how the District will locate, build, and fund public schools for the children in the Wilson High School Feeder Pattern so that new development and population growth will not exacerbate current school overcrowding.”⁹

The Office of Planning’s only response was that our request for a specific plan was “beyond the scope of the Comprehensive Plan.”¹⁰ It is irresponsible to plan for significant population growth and to encourage significant new affordable housing without a commensurate emphasis on planning for critical infrastructure like schools and recreation space.

⁹ “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, paragraph 16, available at <https://bit.ly/2Ir1Gzb>.

¹⁰ Letter from Andrew Trueblood to Advisory Neighborhood Commission 3/4G, re: Advisory Neighborhood Commission 3/4G Comprehensive Plan Resolution, April 23, 2020, page 7, available at <https://bit.ly/328HQTD>.

The Office of Planning's proposed Comprehensive Plan amendments are incomplete in terms of overall community planning, opaque as to how amendment recommendations were solicited, analyzed and proposed, and may be based on seriously flawed assumptions. The only saving grace is that they will be replaced by the 2025 Comprehensive Plan rewrite. For this reason, we do not oppose the Council's approval of Bill 23-736 based on representations that the Comprehensive Plan will be completely rewritten by 2025, when the Office of Planning will better understand the long-term impacts of population growth trends and COVID-19.

From: [Speck, Randy \(SMD 3G03\)](#)
To: [Committee of the Whole \(Council\)](#)
Subject: ANC 3/4G Testimony on Comp Plan Amendments 11-9-20
Date: Wednesday, November 11, 2020 11:22:20 AM
Attachments: [ANC 34G Testimony on Comp Plan Amendments 11-9-20.pdf](#)

Please accept this testimony on Bill 23-736 on behalf of ANC 3/4G. Thank you

Randy Speck
Chair, ANC 3/4G

For the latest information on the District Government's response to COVID-19 (Coronavirus), please visit coronavirus.dc.gov.



Testimony for hearing on the DC Comprehensive Plan, Bill B23-0736

The Dupont Circle Citizens Association (DCCA) thanks Chairman Mendelson for the opportunity to testify, and for considering postponing the Council's final decision until the next Council session.

DCCA testified on the Comp Plan in 2018, and we were pleased that Framework passed by Council addressed some of our concerns. In particular, the Framework adopted in October 2019 strengthens language giving priority to the Plan to provide oversight of the zoning commission and thereby allowing citizens to appeal zoning commission decisions. In addition, there was added language on equity and affordable housing.

DCCA also submitted comments on the amended Plan released in October 2019, in which we focused on the Near Northwest Element. The Plan now under consideration, released in April, did incorporate one of our suggestion, to restore to every Area Element the section entitled "Planning and Development Priorities" in which communities detailed their hopes, desires, fears, and aspirations for their neighborhoods.

While the Plan has improved in some areas owing to feedback from ANCs, community organizations, and individuals, DCCA has remaining concerns with the amended Plan:

- We urge Council to postpone consideration of the Plan until it is possible to assess the long-term impacts of the COVID-19 epidemic on how we live, work and commute in DC. In particular, the need for a large increase in market rate housing, as projected by the plan, should be reconsidered until we have a better estimate of population growth.
- Although the Framework now includes additional language on housing equity and affordability, these principles are not adequately incorporated into the amended Plan. The Plan should include specific plans for community-led equitable development and much more emphasis on the preservation of existing affordable housing and building new affordable housing in all wards. Affordable housing should be defined to include housing that is affordable to families, existing residents, and people with low and moderate incomes (e.g., city workers, restaurant employees).
- At community meetings in 2019, Near Northwest residents expressed a strong desire to prevent future giveaways of city-owned land without adequate public benefit (e.g., significant amounts of housing that is affordable to low and moderate income residents, and the creation or preservation and maintenance of public green space). This matter is of particular importance to us given the pending conversion to public/private use indicated on the Future Land Use Map (FLUM) of the Reeves Center at 14th and U Streets (parcel 9813), the Division 3 Police Station (parcel 707), and potentially other city-owned parcels in Near Northwest, either within our just outside the borders of our association.

- The DCCA borders include all or parts of five historic districts – Dupont Circle, 16th Street, Greater 14th Street, Strivers Row and Massachusetts Avenue. These historic designations contribute to the unique character of our neighborhood, and therefore we request that the FLUM for our area remain as is in the Plan, except for changes of commercial zones to mixed use, south of Dupont Circle, to allow for the conversion of office buildings to housing.
- Although there is certainly room for more development in our area, both within and outside these historic districts, DCCA is concerned that the language on building design in the Dupont Circle Section 2112.3 has been seriously and consistently watered down in various versions of the plan. First, the October 2019 version replaced the words “consistent with” with “sensitive to.” Then, in the April 2020 version, the words “require” and “ensure” were replaced with “encourage” in three instances.¹ We request that the stronger language be reinstated.

Submitted by:
Glenn Engelmann
President
Dupont Circle Citizens Association

¹• ~~Require~~ **Encourage** a scale of development ~~consistent with~~ **sensitive to** the nature and character of the Dupont Circle area in height and bulk;

• ~~Ensure a general compatibility in the scale of new buildings with older low-scale buildings by restricting the maximum permitted height and floor area ratio of the new buildings to that of the underlying zone~~ **Encourage a general compatibility in the scale of new buildings with older lowscale buildings by enacting sensitive design and appropriate transitions;**

• ~~Ensure~~ **Encourage** compatibility of development with the Comprehensive Plan, including District-wide goals to address the affordable housing need, by promoting increased housing opportunities. 2112.3

2010 5th Street NW
Washington, DC 20001

November 12, 2020

Council of the District of Columbia
Committee of the Whole
John A. Wilson Building
1350 Pennsylvania Avenue NW
Washington, DC 20004

Re: Testimony to support for Bill 23-736, the Comprehensive Plan Amendment Act of 2020

Good morning, Councilmembers.

My name is Eric Fidler and I am an 11-year resident of LeDroit Park and four-year participant in this Comprehensive Plan amendment process, having participated in community meetings, submitted feedback, and testified in support of the Framework element in 2018. I am testifying today to support the Office of Planning's proposed changes to the Comprehensive Plan and I'm asking the Council to pass OP's amendments this year. I am particularly pleased with two areas of OP's proposal: the *Expanding Housing Supply* section (H-1.1) and map amendments for Howard University Hospital, which is my next-door neighbor.

OP has rightly prioritized expansion of the housing supply as an important, but not sole, means to address housing affordability. New housing is not a threat, as some will state, but an opportunity to give ever more people places to live and thrive in DC. Furthermore, restricting the creation of new housing will not magically make housing affordable: a zoning-enforced scarcity of housing will mean that residents will outbid each other for the limited supply until what's left is only affordable to a few and unaffordable to the many.

On an issue literally close to home to me, OP proposes a Future Land Uses Map (FLUM) amendment to reclassify Howard University Hospital from Institutional a mix of uses. As you know, Howard University is planning to reconstruct its hospital a few blocks north of the existing hospital and the university envisions redeveloping its existing hospital site once the new hospital opens. I support Howard University's goal.

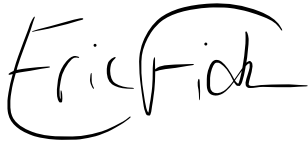
In the proposed FLUM, the western half of the hospital site, fronting Georgia Avenue, would go from Institutional to Medium Density Commercial, High Density Residential, and Institutional. The eastern half of the site, backing onto 5th Street NW in LeDroit Park, would go from Institutional to Medium Density Commercial, Medium Density Residential, and Institutional.

Unlike witnesses who testify against density, I enthusiastically support this change. In fact, I would support High Density Residential for the entire site, not just the western half. Whereas

some people become part of a neighborhood and immediately slam the zoning gate behind themselves, I am neighbor who welcomes more neighbors.

We have waited several years for this Comprehensive Plan amendment process to conclude and I urge the Council to pass OP's proposed update this year.

Thank you.

A handwritten signature in black ink that reads "Eric Fidler". The signature is written in a cursive style with a large, looping "E" and "F".

Eric Fidler
Resident
2010 5th St NW
Washington, DC 20001



Testimony of Mark Rosenman
Council of The District of Columbia, Committee of The Whole
Public Hearing on B23-736, Comprehensive Plan Amendment Act of 2020
November 12, 2020

Thank you, Chairman Mendelson and Councilmembers, for this opportunity to speak to my deep concerns about elements of the Comprehensive Plan Amendment Act of 2020 regarding the Cleveland Park neighborhood. I have lived there for twenty-two of my more than fifty years as a DC resident and believe that proposed changes would yield profound harm to my small community with little benefit to the District as a whole. I urge the Council to reject them.

Proposed changes would significantly weaken historic preservation in Cleveland Park, allow the development of the Connecticut Avenue corridor with mixed-use buildings of over 120 feet in height, and through the promotion of “gentle density” abrogate single-family zoning on our side streets by allowing the construction of four- and three-story apartment buildings, and quad-/tri-/and du-plex units. It would very dramatically change our Connecticut Avenue strip between Macomb and Porter Streets from low-density commercial and residential to medium-density commercial and high-density residential.

The Office of Planning (OP) attempts to justify these changes to Cleveland Park in great part as necessary to the District’s commendable goals to increase the stock of affordable housing and to advance diversity and equity across the city’s wards. That, however, is a specious argument for any number of reasons. Newly allowed development would produce few genuinely “affordable” units while greatly increasing market-rate housing, and even displacing lower-income residents. There are much better ways to increase truly affordable housing and diversity in Cleveland Park using currently available stock and more modest development.

As others will detail, Cleveland Park is being singled out inappropriately while other neighborhoods adjacent to Metro stops, including those in historic districts, do not face significant increases in height and density. These Amendments would weaken – or even eliminate – existing provisions which provide appropriate protection to Cleveland Park’s historic resources and take account of neighborhood scale. However, strengthening such protections is proposed for other DC neighborhoods.

In fact, when “affordable housing” is mentioned in the proposed Plan changes, *moderate-income housing has been added*. There is the spurious argument that our small, locally owned and neighborhood-serving retail can be best served through development. OP suggests that the “challenges” experienced by Cleveland Park’s businesses are attributed in great part to limited population growth — while we know both from the 2016 Deputy Mayor for Planning and Economic Development (DMPED) study of Cleveland Park businesses and from recent testimony of business owners commenting on the covid-related closure of the service lane, the vast majority say that *parking is the most critical issue* (in the DMPED study, for instance, by 86% of respondents).

The development of nine- and eleven-story apartment houses on Connecticut Avenue, buildings that literally will cast shadows over neighboring residences and businesses, is not the answer to problems of commerce or of truly affordable housing. Neither is the destruction of single-family homes on our side-streets.

These proposed Amendments for Cleveland Park should be rejected by the Council.

Comments on Comp Plan with amendments

Parks, Recreation and Open Space Element

The Parks, Recreation and Open Space Element describes the availability and attributes of DC public parkland and open space. In doing so, it relies heavily on the 2014 DC Parks and Recreation Master Plan.

Unfortunately, the Comp Plan Element fails to even mention, let alone address, how public parkland overcrowding will be prevented if the Comp Plan's 2045 population promotion of 987,00 residents is achieved.

There are four areas of major concern that need to be addressed. They are:

1)FAILURE TO ADDRESS 2045 POPULATION NEEDS This is the most serious error in the Element. Significant new public parkland needs to be acquired and developed.

The 2014 DC Parks and Recreation Master Plan states that there are 7,821 acres of DC public parkland. DC's 2014 population was about 631,000 residents. That results in a Parks Master Plan standard of 12.4 acres per 1,000 residents. (In fact, even if one adds the additional 180 acres that the 2014 Parks Master Plan calls for in order to have public parkland close to all residents, the standard is slightly increased from 12.4 acres per 1,000 residents to 12.7 acres per 1,000 residents.)

The amended DC Comp Plan's Framework section promotes a 2045 population of 987,000, an increase from 2014 of about 356,000 residents.

No provision is made to provide needed public parkland for the additional 356,000 residents in 2045. Nor is any provision made to ensure that the 12.4 acres per 1,000 residents standard will be maintained. In fact, the standard will be reduced to 7.92 acres per 1,000 residents, causing serious overcrowding. (4,418 additional acres of parkland is needed to maintain the 2014 standard.)

Also, it should be noted that the standard only covers public parkland, not private open space used for parkland and outdoor recreation. Since the Comp Plan calls for huge residential density increases in most neighborhoods, much single family and row house side and rear yards will be lost, adding to further crowding of public parklands.

2) OPEN SPACE AS A FLOOD PREVENTION TOOL AND WATERFRONT The element fails to identify parkland as a creative and very effective flood prevention tool. Much of the existing DC waterfront open space is in a US Federal Emergency Management Agency 100 or 500 year flood plain. The area is vast and some floodplains go inland over 1,000 feet from current high watermarks. The flood prone area includes much of the open space along the western shore of the Anacostia. Major public works are needed to address this pressing problem, including

building flood walls and raising ground elevation and retaining open space to absorb the floodwaters. But the Plan is silent on addressing it on the scale that conditions call for. The Plan only calls for the need to help folks once they're flooded and requiring new development to floodproof it's own new construction. Nothing is said about preventing the flood in the first place, including using new parkland to retain flood waters.

3) SMALL TRIANGULAR OPEN SPACES The Element calls for very small triangular open space, caused when some DC State named streets intersect with grid streets or a roundabout, to be considered meaningful parkland. Such space downtown may be a good place for a worker on a pleasant day to eat his/ her sandwich at lunch time. But they are no good as family recreational space.

4) ADDITIONAL ACTIONS NEEDED While the Element does discuss public/ private partnerships, it fails to adequately identify useful techniques, including development fees and land transfer actions to acquire and develop new parks that serve the residents of new developments.

RECOMMENDED TEXT CHANGES

FAILURE TO ADDRESS 2045 POPULATION NEEDS p.1
800.2 Add as first bullet, "An additional 4,418 acres of new public parkland is needed to accommodate the 356,000 new residents promoted in the Framework section."

p.3 800.6 Add "4,418 acres of" to the third bullet, after "... to make sure that" and before to "new park and recreational". It should read, "...to make sure 4,418 acres of new park and recreational opportunities are provided and existing parks are improved to meet the needs of a changing and expanding population."

p.11 804.15a Text Box New Parkland AND p.18 807.2 are wrong. Both citations state that the 2014 DPR study estimates that only an additional 180 acres will be needed over the next 20 years. What the 2014 DC DPR Parks and Recreation Master Plan states on page 28 is that 180 acres of new parkland **is needed** in order to make sure that all residents will have some parkland close to home, not that only 180 acres of new parkland is all that is needed to meet predicted increases in population. In fact, **4,418 additional** acres will be needed to meet the Comp Plan's Framework section's projected population. Both citations need to be corrected to state that 4,418, not 180 acres of additional parkland is needed. 804.15 should read, "An additional 4,418 acres of parkland will be needed to address the increase of **356,000** new residents by 2045."

p.12 805.6 Figure 8.3 Add to Benchmark "Public Open Space Land area" a new bullet "Citywide 12.4 acres of parkland per resident".

p.19 807.4 Add after, "... residents, workers, and visitors." "However, they are too small to meet the parkland needs of new resident populations and are not readily available for low and moderate income residents.

p.20 807.10 Remove, "Balance the need for additional open space with other District priorities, such as affordable housing."

p.40 813.1a Add a new section 813.1a "If the District is to come anywhere near its current parkland to resident standard [12.4 acre per 1,000 residents] and accommodate the Comp Plan target 2045 population of 987,000, significant areas of the Anacostia Waterfront are going to have to be acquired for public parkland so that all residents, not just those in new luxury high rise apartments facing the water, provide waterfront recreation opportunities regardless of income and to dissipate flooding."

OPEN SPACE AS A FLOOD PREVENTION TOOL AND

WATERFRONT p.1 800.2 Add to the 6th bullet, "... flood mitigation, especially to dissipate flood waters along the west bank of the Anacostia River, well-connected ..."

p.15 806.2 Add... and other spaces", including using new large areas of the Anacostia River west bank as open space recreation areas that will act as flood prevention by

dissipating flood waters and thus protect existing development,”

p.37 812.8a Add a new policy 812.9a. “Also, the Anacostia waterfront is uniquely able to both provide large open spaces for flood protection and recreational opportunities for low income families to picnic, fish, boat and swim – once plans now under discussion to further clean up the River by 2045 are implemented.”

p.40 813.2 Delete all new language after, “... have yet to be realized.”

p.40 813.3 Add, “...and their flood prevention ability.”

pp.41,42 813.6 Add to end of title “... and significantly increase public parkland for recreation and flood protection.” AND add to end of text, “...The additional parkland should be large enough to ensure that thousands of residents from all neighborhoods can enjoy waterfront activities.”

p.42 813.8 Add, “Also, work is about to begin to study technologies and projects that will continue to clean up the Anacostia River. It is possible the River will be clean enough for residents city-wide to swim and to picnic on its shoreline.

SMALL TRIANGULAR OPEN SPACES p.15 806.3 Add, “Even though they provide a brief pass through green space, they are not able to meet most recreational needs.”

ADDITIONAL ACTIONS NEEDED p.19 807.3a Add a new policy. "Establish an impact fee on new development for parkland acquisition."

p.20 807.9 Add to the title "Large PUDs".

p.39 812.22 Delete.

p.55 819.2a Add a new policy "Impact Fees and Land Donations".

"Enact legal provisions to require large individual and small cumulative developments of over 50 residential units to provide sufficient funds or donate sufficient open space to maintain the standard of 12.4 acre per 1,000 residents open recreational space requirement."

Comments on the Comp Plan with amendments Land Use Element 6/30/2020 Charles Bien AICP

The Land Use Element should describe how the future land use, density and architectural character of future developments should compliment or alter current practices. The current Comp Plan's Land Use Element emphasizes that new developments' land use, density and design be compatible with the character and quality of life of existing neighborhoods. However, the proposed amendments threaten existing neighborhoods by radically altering new development land use, density, and design standards. The rationale for this Element, as it is for other Elements, is that such drastic changes are necessary in order to accommodate, what it claims to be an inevitable and desired huge population growth.

Here are five areas of major concern that need to be addressed. They are:

1) NEIGHBORHOOD PRESERVATION The proposed revisions seriously weaken the District's ability to preserve and conserve its existing neighborhoods. The current Plan has numerous land use policies that protect

existing neighborhoods land use compatibility, density and character. The proposed amendments practically reduce all neighborhood conservation policies and actions and need to be removed.

2) HISTORIC PRESERVATION A major policy set that helps conserve the character and livability of many District neighborhoods are Historic Preservation policies and regulations. Proposed amendments to this and to the Historic Preservation Element eliminate or significantly weaken existing HP policies and their ability to safeguard our neighborhoods and core area.

3) HOUSING EQUITY The proposed amendment goal to “create affordable housing” does not say “for whom we are to create affordable housing”. Without such clarification, the statement could be interpreted to promote a trickle-down housing market that, in turn, would add to the problem of displacing poor citizens due to gentrification.

4) HEIGHT AND THE HEIGHT ACT Enforcement of the Height of Building Act, passed by Congress in 1910, has successfully ensured that the District skyline is not

threatened by skyscrapers. The existing Comp Plan repeatedly states that, in general, the height of new developments should complement existing neighborhoods' building height and new developments should be scaled down when they are not compatible. This Element either removes or severely weakens all such references.

5) WATERFRONT ACCESSIBILITY & FLOOD PROTECTION

Past waterfront preservation accessibility and flood protection projects, Teddy Roosevelt Island, Potomac Park and waterfront areas near the Lincoln Memorial exemplify of how public spaces can be used to abate permanent flood damage. Much of the waterfront, especially areas along the Anacostia River, provide incredible opportunities to continue this tradition by providing flood protection of the entire area by building new flood walls, rising ground elevation and large public open space recreational projects. However, the proposed Plan amendments are silent on any meaningful prevention and much needed public space for all, including low and low moderate income citizens. Instead, the proposed amendments call for dense, high rise residential and commercial buildings along the

waterfront. These would not provide adequate homes and open space for low and low moderate income persons. Also, the District proposed policies merely call for flood protection of only the new individual buildings, not the entire area.

RECOMMENDED TEXT CHANGES

NEIGHBORHOOD PRESERVATION

p.1 300.2 Keep “Promoting neighborhood conservation”. Add to the, “Conserving creation ...” sentence, “that prevent displacement of low and low moderate income persons.”

Add a new issue, “Building in areas safe from natural disasters, including flooding.”

p.1,2, 300.4 Add “... provided it does not displace low and low moderate income persons.”

p.2, 3, 301.1 Add to the end, “Adding to the livability of these neighborhoods are large public open spaces including McMillian, Rock Creek and Dupont Parks.”

P.10, 304.3 Remove all proposed amendment text after the first sentence. Add in place of the removed text, “Growth should be encouraged only if it does not displace low and low moderate income persons.”

p.11, 304.5 Remove in the last paragraph, line 5. “site specific solutions” and add “public open space, floodwalls and ground elevations,”.

p.17, 305.13 Keep all existing text and remove all proposed amendments. Examples of words and phrases used to weaken the current Plan’s assurances that Central Employment Area development does not intrude on surrounding residential areas are the replacement of the verb “protect” with “respect”. Replacement of “shall be required” with “are needed” and “a stepping down” with “transitions”.

p.17, 305.14 Remove references in the proposed rule that include encouragement of air rights development along major corridors.

p.17, 305.15 Remove the last line of the original text, “and be sufficient to induce investment needed for such construction.”

p.18, 305.20 Keep original text. Throw out proposed revisions. The proposed revision removes the Height Act of 1910 as the standard for the height of air rights development.

p.14, 305.7 Remove “respecting”. Replace it by keeping “protecting.”

p.16, 305.11 Add after the introductory text, “ Provided it can be accomplished without displacement of low income persons.”

p.19, 306.4 Add a new second sentence, “These sites along the Anacostia should only be developed if, throughout the entire area, adequate public investment is undertaken for floodwalls, ground elevation and new large public open space in areas that are subject to the Federal Flood Management Agency 500 year flood designation.

p.25, 307.6 Remove the entire section.

p.27, 307.8 Remove reference in the first sentence, “or along a high volume transit corridor”.

p.31, 308.2 Remove from proposed amendment, “There are opportunities for change from vacant areas to vibrant residential and commercial areas.”

p.32, 307.7 [current Plan section number] Keep the current Plan 307.7 section and text, “Ensure that zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multifamily development.” The proposed amendment eliminates this section entirely.

p.32, 310.1 Remove “should”. Keep “must”.

p.33, 310.3 Keep the word “conservation”. Throw out the proposed revision word, “character”.

p.34, 310.7 and p.36, 310.10 Remove proposed amendments. Keep current Plan text. Both proposed revisions would trump neighborhood conservation and preservation by saying that even though we should be sensitive to the neighborhood character, we should let new development for additional DC residents override all other considerations.

p.36, 310.11 Remove the proposed amendment's limitation on rehabbing buildings before demolition to only architecturally or historically significant buildings.

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p.47, 48, 313.11 Keep the existing text. Remove all proposed amendments. The proposed amendments do not provide sufficient safeguards to protect existing neighborhoods.

p.48, 313.12 Keep existing text. Remove proposed amendments. The text requires that both height and density are appropriate to the scale and function of development in adjoining neighborhoods.

p.48, 313.14 Remove “for growing, densifying”. Keep all of the current Plan’s text.

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p.29, 307.16 The word “significantly” should be returned as a modifier to show the degree to which historic preservation should be taken into account when considering transit oriented development.

HOUSING EQUITY

The Element is replete with references to affordable housing. But nowhere is there any explicit reference to the need to require the production of new or rehabilitation or preservation of low and low moderate income housing . Examples on this deficiency are found in p.1, 300.2, p.1,2, 300.4, p.10, 304.3, p,16, 305.11,

p.22, 306.11, p.22, 306.12, p,29, 307.18, p.34, 310.7,
p.38, 310.20, p.52,53, 31.55, p.55, 316.5

HEIGHT AND THE HEIGHT ACT

p.18, 305.20 Remove the proposed amendment text and keep the current Plan text. The proposed amendment would eliminate requiring use of the Height Act to measure the height for air rights developments.

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p. 19, 306.14 Add the following text to the policy on Large Sites and Waterfront. “All waterfront lands designated by the Federal Emergency Management Agency as 500 year flood prone should be protected with floodwalls and/or ground elevations and/or large public open recreation areas.”

Charles Bien AICP 11/21/20

Comments on the Comp Plan with amendments Land Use Element 6/30/2020 Charles Bien AICP

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Charles Bien AICP 11/21/20

Comments on Comp Plan with amendments

Urban Design Chapter 6/2020

The Urban Design Element describes the characteristics of the District's physical setting and its man-made urban environmental design. The existing Comp Plan's Urban Design element places emphasis on new developments being compatible with existing traditional designs. The proposed amendments severely loosen the standards for ensuring compatibility. The rationale for this element, as it is for other elements, is that such radical change is necessary to accommodate what it claims is an inevitable and desired huge population growth.

There are six areas of major concern that need to be addressed. They are:

1) NEIGHBORHOOD PRESERVATION The proposed revisions seriously weaken the District's ability to preserve and conserve its existing neighborhoods. The current Plan has numerous urban design policies that protect existing neighborhoods architecture and density. The proposed amendments practically reduce all neighborhood conservation policies and actions need to be removed.

2) HOUSING EQUITY The proposed amendment goal to “create affordable housing” does not say “for whom we are to create affordable housing”. Without such clarification, the statement could be interpreted to promote a trickle-down housing market that, in turn, would add to the problem of displacing poor citizens due to gentrification.

3) WATERFRONT ACCESSIBILITY & FLOOD PREVENTION
Past waterfront preservation/ accessibility and flood protection projects, including Teddy Roosevelt Island and Potomac Park, and waterfront areas near the Lincoln Memorial are elegant urban design statements. Much of the waterfront, especially areas along the Anacostia River, provide incredible opportunities to continue this tradition by providing flood protection of the entire area if new flood walls, ground elevation and large public open space recreational places projects are developed. However, the proposed Plan amendments are silent on any meaningful prevention and meaningful and much needed additional public open space for all, including low income citizens. Instead, the proposed amendments call for dense, high rise residential and commercial buildings along the waterfront. These would not provide adequate homes and open space for low and low moderate income persons. Also, the Districts proposed policies merely call for flood protection of only the new individual buildings not of the entire area.

4)FUTURE OPEN SPACE As the population increases, there will be a need for new additional large open space recreation. The Plan and proposed amendments are silent on this point.

5)NATURAL AREA PRESERVATION/ ACCESSIBILITY The Comp Plan and the proposed amendments are silent on the need to persevere and make enjoyment of these areas available to everyone. Instead they call for developments that would block accessibility to these areas for most residents.

6)STREETSCAPE Streetscape design is a critical component of quality urban design and the District has many policies and actions that produce great results. Not the least of which is the incredible tree canopy that covers much of our streets and public spaces. However, the Plan and the proposed amendments are deficient in preventing the new G5 network infrastructure and fail to remove existing electronic billboards from harming our existing streetscape.

RECOMMENDED TEXT CHANGES

NEIGHBORHOOD PRESERVATION

p.1 900.2 Keep the existing listing of design “assets, such as public spaces, boulevards, and waterfront areas.”

p.1 900.2 Remove proposed addition, “while accommodating growth and change” to quality of factors.

p.3 902.2 Keep the reference to the Height Act as a key component of making DC what DC is. “The Height Act resulted in a predominance of structures that are as wide as they are tall, and street environment, somewhat uniform, has more in common with Paris than New York, Chicago, and other cities in North America.”

p.4 902.3 Keep “must” and eliminate its replacement of “should” design inequities that persist in the District, when discussing what future District design needs to do.

p.12 old 903.10 Keep the entire text about the importance of the Height Act. “Protect the civic and historical character of the city, particularly the “horizontal” urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910.”

p.45 old 910.4 and old 910.5 Keep both. The first states that, “... overpowering contrasts in scale, height, and density should be avoided as infill development occurs. ...” The second states that, “The design of commercial and mixed-use development also should be harmonious

with its surroundings.” Both laudable principles that should be kept.

p.47 909.6 Keep the second sentence, “This should be achieved in part by relating the scale of infill development, alterations, renovations and additions to existing neighborhood context. Remove the suggested text, “... and building renovations occur by encouraging the use of high-quality and high-performance architectural designs.”

P.49 909.10 Keep the last sentence about a gradual change in buildings size and design impact, “... and when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood.”

p.50 909.12 The policies to reduce the disruptive impact of developments that are larger than prevailing neighborhood lot size have been weakened by replacing by the verb “Ensure” with the phrase “should be” and by inserting the phrase, “where possible”. Remove “should be” and replace “Ensure”. Remove the phrase, “where possible”.

p.51 old 910.21 and old 910.23 Keep both policies. The first promotes a policy of minimizing the visual presence of parking garages. The second calls for zoning and parking standards to discourage strip commercial shopping centers and auto oriented building designs that conflict with neighborhood centers.

p.55 old 911.9 Keep "Design Guidelines for Large Sites". The guidelines include some useful criteria, including protection of historic resources and blending of development with surrounding neighborhoods.

p.65 old 9.13.17 Keep a policy that discourages enclosure of sidewalk cafes in a manner that effectively transforms them into indoor floor space

HOUSING EQUITY

p.52 909.18 Add the words "low income and" before the words "affordable housing".

WATERFRONT ACCESSIBILITY & FLOOD PREVENTION

p.4 902.4 To the following discussion about the Waterfront add, "for the next century include continuous large public open spaces along all of the Anacostia waterfront.

p.22 Add a new action item 905.2A. Open Space along the Anacostia.

"The Anacostia waterfront is a physical resource that has been neglected for many years. Its potential for exceptional recreational experiences is beginning to be understood. But, the rush to develop almost all of the current vacant land abutting the waterline with high rise residential and office buildings that extend up to a sidewalk in front of the water's edge will deny future generations enjoying the waterfront experience. Hardest

hit will be low and low moderate-income families. They will not be able to rent or buy housing or shop along the river's edge, nor will there be space for them to spread out a blanket and have a picnic. Also, by allowing high rise along the waterfront we deny residents just a block away from viewing the river.

Therefore, all along the waterfront, there should be open space of sufficient depth to provide for public active and passive recreation."

p.23 905.4 Add to the end of text ", as well as large public works projects to provide flood protection for all existing flood prone areas."

p.24 905.6 Remove the last sentence. It encourages high density development all along the immediate waterfront.

p.25 705.8 Add at the end of the new text, "Spearheading this effort should be a large public works project of floodwalls, ground elevation and large public open space that will provide flood protection throughout the entire area in the Federal Emergency Management Agency's 500year floodplain designation."

p.28 905.14 Add at the end of the new text, "But first, amend the Guide to show how all flood prone areas will become protected from flooding."

p.52 ADD a new Action 909.19 A

Prepare recommendations on needed public flood prevention capital improvements including funding sources to remove all lands subject to FEMA 500-year designated flooding.

FUTURE OPEN SPACE

p.10 903.10 Add second line of text, before public parks the phrase, "provide additional".

p.53 912.2 Add to the end of the text, "Parkland should be increased to provide future residents with enough parkland within easy walking distance from home to park."

p.70 916.5 Recreational Space Design for Large Site Development

Add the word "sufficient" before the word "public". The phrase should read, "... in neighborhoods lacking access to sufficient public open spaces."

NATURAL AREA PRESERVATION/ ACCESSIBILITY

p.19 904.3 Keep the word "limited," add the word "and", when describing density encroaching on natural features.

p.19 904.5 Keep all of the original text. It calls for protecting prominent ridgelines and remove all of the new text.

STREETSCAPE

p.7 903.4 Remove in the first line the words "to balance the need" and the words "with the" to the second line. Add to the end of the second line the phrase, "in a manner that expands the District's quality of life features, while addressing the...".

p.16 903.25 ADD a New Action item that addresses the G5 streetscape problem. "Explore ways to make installation of utility and G4 and G5 lines in streets and alleyways to improve, not to harm, neighborhood character."

p.90 ADD 921.2 Electronic Billboards

Add, "Electronic billboards are intrusive and inconsistent with the District's Urban Design principles. They should be prohibited and a program should be developed and implemented within the next two years to remove all such billboards presently constructed in the District."

C. Bien 6/3/2020

Charles Bien AICP

November 12, 2020 Testimony before
the District of Columbia Committee of the Whole
Comprehensive Plan Amendment Act of 2020

I am Charles Bien, a certified Community Planner who has practiced community and environmental planning for over half a century. Positions I have held include: Assistant Director of the California Coastal Conservation Commission where we saved the coastal lands and waters of California, Director of the Cleveland Community Renewal Program, ran the US DHUD Office of Environment and Energy, and Research Director of the Congressional Advisory Committee on National Growth.

In the limited time I have here today, I would like to stress a couple of points that show why replacing the existing plan with the proposed plan amendments will release a torrent of development that will forever deplete the quality of life in DC neighborhoods.

1. The Plan amendments fail to take into account the impact Covid 19 will have upon DC land

development and use. Working at home computers could become the norm and not an aberration.

This might result in drastic land use demand changes throughout the city and metro area. We all know the impact computer shopping has had on brick and mortar commercial. A similar transformation might be possible from working at home.

There is much discussion in the planning profession about Covid's impact. For example, the 2020 American Planning Association's Convention had three separate sessions devoted to this topic. Our own Wash COG supported a recent study on the subject entitled "Employer Telework Survey". Both agree that change is coming and there might be less demand for inner city office, commercial and residential space. There is some thought that as generation X and Z families form and grow in cramped inner-city apartments, movement to the inner city will slow and some reverse movement might occur.

The point is we all know change is coming and we should wait until we have a better handle on how much and where and when, before we adopt the plan that will have permitted helter-skelter new density increases and elimination of the DC's quality of life that is the envy of the world.

2. The Plan fails to take into account the huge impact it will have for additional public services and major new capital projects

One example is found in the Plan's Parks, Recreation and Open Space Element. The Park Element references the 2014 DC Parks and Recreation Master Plan for information and park standards. The Parks Master Plan set a standard of 12.4 acres per 1,000 residents when the DC population was a little more than 630,000. The Framework section of the Plan amendment calls for a population of 986,000, but only calls for 180 additional acres of public parkland, when an additional 4,418 acres are needed to maintain the 12.4 acres per 1,000 residents standard.

The Plan amendments are replete with such impact omissions, such as traffic congestion schools, libraries and flood wall construction.

Thank you,

Charles Bien AICP

To be submitted separately are specific word changes recommended for the Land Use, Urban Design and Open Space Elements proposed Plan Amendments.

From: [Pamela McKinney](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Statement for Public Hearing on B23-736, Comprehensive Plan Amendment Act of 2020(Day 1)
Date: Thursday, November 12, 2020 11:58:47 AM

Dear Council of the Whole,

Below is my statement for today's hearing. Thank you!

Public Hearing on B23-736, Comprehensive Plan Amendment Act of 2020

Public Statement

November 12, 2020

Pamela McKinney

My name is Pamela McKinney and I am a resident of Ward 6 and a member of SW DC Action. Thank you for your time today. **The proposed amendments do nothing to stop displacement, expand affordability for low-income people, or promote community-led equitable development.**

Last winter, members of SW Action submitted their own suggestions to the proposed amendments, particularly chapter 19, which regards the SW community in ward 6. 168 community members in SW signed on to our recommendations.

Those recommendations noted that socioeconomic diversity remains important to residents, but the type of development that has taken place since those documents were created has not catered to those ideals. Our group strongly encouraged the Office of Planning to retain some of the language in the original document, such as that of Section 1907, which is now part of Section 1906 in the amended version. From the original plan: quote *“Revitalizing the waterfront must not be done at the expense of the established communities that exist near its shoreline. Existing neighborhoods and important community institutions should be conserved and should be the focus of reinvestment during the coming years. Residents must have a say in the future of the waterfront and should be protected from displacement as change occurs. Within new neighborhoods, diverse housing choices should be provided so that a mix of household types and incomes are accommodated. Affordable housing for working families and for the city’s poorest residents must be part of this equation. Social and economic diversity must be respected.”* End quote(1907.2b)

All of the “musts” in the amended section are now “should”. For example, it now says quote “Residents should have a say in the future of the waterfront and should be protected from displacement as change occurs.” End quote Should? How is this a stronger document?

Or these changes in section 1906.3 quote “affordable housing for working moderate-

income families and for the District's lowest-income residents *should* be part of this equation. Social and economic diversity *should* be respected." end quote

I hope we would all agree that residents, especially lower income residents, *must* be part of the conversation and equation for affordable housing. We don't want segregated communities so social and economic diversity *must* be respected, not should.

Why was this language changed? If we truly believe that Black Lives Matter, then Black homes must matter and the Comp Plan language and initiatives should reflect this. When policies lead to racial disparities in outcomes, the true intent of those policies speak for themselves. The suggested amendments to the Comp Plan does not preserve public housing, promote cooperatives and land trusts, or prioritize community-led equitable development. It rather says, "Hey, you could do this, but it's also cool if you don't."

The ratio of affordable to market-rate units continues to be disproportionate towards more market-rate luxury dwellings. The majority of units in SW, for example, are luxury, market-rate rentals (with a high proportion of studios) that are unsuitable for families. This has impeded the neighborhood's ability to evolve equitably and helps explain why we have seen a decrease in the youth and Black population in SW since 2000 while White professionals without children has grown.

As the Council moves through the mark-up process, I urge you to:

- Strengthen language that has been weakened throughout the bill – for example where directives state "ensure that" or "must" have been turned to "should"
- Incorporate language that reflects equitable housing priorities (public housing, rent control, subsidies, housing the homeless, and, community-led development)
- Require analysis of real housing needs (existing low-income housing needs vs perceived future needs), reporting of vacancy rates, and study of the impact of new development on other systems (education, transportation, environment, etc)

I hope you will work with the DC Grassroots Planning Coalition to develop needed amendments to strengthen the Comp Plan prior to final passage. I join the Coalition and members of SW DC Action in testifying AGAINST the passage of the Comp Plan amendments as proposed. Thank you again for your time.

**Testimony of Doni Crawford, Policy Analyst
at the Public Hearing on the Comprehensive Plan Amendment Act of 2020
Committee of the Whole
November 12, 2020**

Good morning, Chairperson Mendelson and members of the Committee. Thank you for the opportunity to testify today. My name is Doni Crawford, and I am a policy analyst at the DC Fiscal Policy Institute (DCFPI). DCFPI is a non-profit organization that promotes budget choices to address DC's racial and economic inequities and to build widespread prosperity in the District of Columbia, through independent research and policy recommendations.

I'm here today to urge the Council to pass the Office of Planning's amendments to the Comprehensive Plan (Comp Plan) intact by the end of 2020. I am a resident of Ward 5, and I care deeply about ensuring that DC is a place where all Black and brown residents can live without fear of involuntary displacement and have the same opportunities to experience positive life outcomes in economic security, job retention, and physical and mental well-being as historically entitled to most white residents. District planning policy is a way to achieve this.

This Moment Calls for Dismantling the Structures of Racial Inequality

This week, the Council passed landmark legislation to incorporate racial equity as a key focus of DC government, as envisioned in the Racial Equity Achieves Results (REACH) Amendment Act of 2020.¹ It is therefore timely that the Comp Plan update is before us today because the Comp Plan is one tool that can be used to help dismantle the structures and policies that make Black communities and other communities of color face the greatest housing, economic, health, and environmental inequalities in DC. It can also be used to remedy deeply entrenched racial residential segregation that results in a built environment that leaves many Black residents with poor air quality, limited access to full-service grocery stores, and even intergenerational trauma.²

Racial inequities in DC have gotten worse and continue to be exacerbated by the public health crisis. This is not an accident; this is by design. Black and brown communities have been neglected by public policy for far too long, and we now have the responsibility to ensure that these communities are not further displaced as the District continues to grow. As a result, any new amendments to the Comp Plan should support DC Housing Priorities Coalition guiding principles that will:

- encourage the equitable distribution of affordable housing, especially in affluent neighborhoods;
- meet housing needs at all income levels, especially deeply affordable housing for families with the lowest incomes;
- preserve existing affordable housing; and,
- protect tenants.³

Any new Comp Plan amendments should also support DC Grassroots Planning Coalition guiding principles that will:

- urge the Comp Plan update to benefit residents and communities of color, especially Black residents and communities;
- aim to prevent involuntary physical, economic, and cultural displacement of those residents; and,
- prevent the exacerbation of poverty and racial wealth disparities.⁴

Considerations for the Full Comprehensive Plan Rewrite Process

We support the Council's desire to review and affirm that the Comp Plan reflects the community's values and will achieve our racial equity priorities across the District. Given that the Office of Planning has signaled that a full rewrite of the Comp Plan is on the horizon and will conclude by 2025, the Council should consider incorporating language into this update legislation that will simplify and make that process more accessible and inclusive of residents.

As a paid advocate with a broad policy agenda, this 1,600 page plus redlined document was not easy to follow and wonkier and weedier than even I prefer. The Council can legislate that the forthcoming rewrite incorporate national best practices in comprehensive planning, including that it be high-level, accessible, and user-friendly; be nimble to address new responses to events such as an unexpected global health pandemic; have mandated specific timeframes for rewrite commencement and completion; and be community driven and formalize more equitable engagement practices.^{5,6}

Thank you for the opportunity to testify and I am happy to answer any questions.

¹ Council of the District of Columbia, [Racial Equity Achieves Change Amendment Act of 2020](#), B23-0038, Second Vote November 10, 2020.

² Brittney Drakeford and Ras Tafari Cannady II, [City planners need to talk about race. The lives of our residents depend on it.](#), Greater Greater Washington, March 12, 2019.

³ Housing Priorities Coalition, [Housing Priorities Coalition - Background](#), Housing Association of Nonprofit Developers (HAND), 2020.

⁴ DC Grassroots Planning Coalition, [About the Coalition](#), 2020.

⁵ Andrew Trueblood, [Letter to DC Council](#), DC Office of Planning, April 2020.

⁶ Alex Baca, [Can DC build a better Comp Plan process? An Office of Planning report hints at "yes."](#), Greater Greater Washington, May 6, 2020.

From: [Doni Crawford](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Comp Plan Testimony (DCFPI)
Date: Tuesday, November 10, 2020 5:11:52 PM
Attachments: [Outlook-qeiejxoc.png](#)
[Outlook-ri15fzpr.png](#)
[Outlook-ukyci533.png](#)
[Outlook-a3hrbd2h.png](#)
[Outlook-uln2qnnp.png](#)
[11.12.20 Comp Plan COW DCFPI Testimony.pdf](#)

Hi all,

I hope you are well! Please find attached my testimony for Thursday.

Thanks,

Doni

Doni Crawford
Policy Analyst
DC Fiscal Policy Institute
Office (direct): (202) [REDACTED]
dcfpi.org

Want to get updates from the DCFPI blog? Subscribe [here](#).



Testimony of Carol Aten
Bill 23-736 Comprehensive Plan Amendment Act of 2020
DC City Council of the District of Columbia, Committee of the Whole
November 12, 2020

The proposed amendments to the DC Comprehensive Plan offer a changed vision for our city. But I don't think it's a better vision, and I urge you to look beyond the many individual changes and note their cumulative impact. The amendments turn a plan for residents into a plan for planners and developers by promoting growth, change, and density for their own sake.

The vision of Washington as a city that values its varied and interesting neighborhoods and has a cohesive central business district is unraveled by:

- undermining neighborhood protections;
- changing the land use map to allow significant up-zoning;
- redefining the central employment area as a sprawling mash up that looks like a badly gerrymandered congressional district;
- making unrealistic assumptions of huge population growth;
- conflating affordable housing with equity; and
- diminishing the role of residents in planning for their city.

Diminished Role of Residents in Planning

Starting with the last one first. Despite the “public involvement” touted by the planners, it was not interactive. We were given canned public presentations, invited to blindly submit proposed amendments absent a Framework Element with new data and focus, and then provided the opportunity to comment on extensive changes in a 1500 page document with most of our comments summarily dismissed. The 2006 plan that is being amended was developed with citizen workshops, meetings with stakeholders, working with ANCs and other meaningful interactions with communities—a far cry from this amendment process with its very extensive changes to the 2006 plan. Now, the amended plan is before the City Council. You are our best hope to be the “voices” of the residents that have been essentially ignored.

Adding insult to injury and further discounting citizen input, the Planning and Development Priorities sections specific to each area element of the 2006 plan were all deleted in the initial draft. After comments noted that these sections provided important community context and direction and had been developed with extensive community involvement, they were reinserted in the version before you, but then basically invalidated by the following statement that was inserted at the beginning of each section:

This section summarizes the opportunities and challenges residents and stakeholders prioritized during the 2006 Comprehensive Plan revision. During large community workshops, residents shared their feedback on District-wide and

neighborhood specific issues. Since the 2006 community workshops, however, some of the challenges and opportunities facing the community have evolved. The following summary does not reflect new community priorities or feedback from either amendment cycle but summarizes the most important issues during the 2006 Comprehensive Plan revision.

Admittedly, there have been changes and projects completed, but rather than update them, all the actual and still valid citizen involvement is dismissed as history.

Undermines Neighborhood Protections

By methodically replacing clear words with weak, vague and judgement-based words, the amendments destroy the force of the plan and diminish its direction and certainty.

A few examples include:

“Require” and “ensure” changed to “encourage”

“Protect from” intrusions changed to “buffer” intrusions

“Must” changed to “should”

“Consistent” and “inconsistent” changed to “compatible” and “incompatible”

Some of these might seem like minor, semantic changes, but words have meaning. For example, whereas one might clearly see that something is inconsistent, it would certainly be more of a judgement call and a weaker standard to find it incompatible. And encouraging something suggests it might or might not happen depending on what the one being encouraged decides to do, whereas require or ensure means the desired outcome will happen.

There is an obvious pattern here: Even where the plan stays the same, these changes weaken the ability of citizens to rely on it and make it virtually impossible for them to challenge zoning or development decisions that are inconsistent.

Lastly, the map changes are being superimposed on neighborhood throughout the city with no citizen involvement.

Sprawling Central Employment Area

The map in the Land Use Element contemplates a greatly expanded central business district that sprawls across the river, potentially includes some discontinuous pieces, and encroaches on neighborhoods. Maybe we need to have some “employment nodes”, but trying to link everything together and designating such an unwieldy area risks significantly weakening the

area we currently think of as downtown. Between the Central Area Element and its adjacent eight focus areas, the 2016 zoning rewrite that tripled the size of what is zoned as “downtown”, and the new map of the Central Employment Area in the Land Use Element (none of which have the same boundaries), there is considerable need to determine what our CBD should be and, in light of the pandemic, to be concerned about maintaining some cohesiveness and viability. We should be wary of shiny new developments draining tenants from our long established downtown and decreasing occupancy.

Unrealistic Population Growth

There is some evidence that DC’s growth has plateaued and may even decrease some in coming years. The Office of the Chief Financial Officer is projecting less than 5,000 new residents a year through 2024. The amendments suggest we need to sacrifice our quality of life to accommodate extraordinary growth. I believe we need to challenge that premise.

Affordable Housing and Equity

Last but not least, I think the City Council needs to consider what “equity” means for the residents of this city beyond providing affordable housing. Even that is a bit of a myth when much of what is provided is at 80% AMI and beyond the reach of many who are in need. But equity is not likely to mean “even” for all. I frankly have a hard time visualizing how one would put affordable housing in the Kalorama neighborhood for example or even why we would want to do that. There needs to be housing available at all income levels, and it would be good to be more dispersed throughout the city. But it seems unrealistic to think that it can go everywhere. What does need to be everywhere are good schools, access to medical facilities and grocery stores, more parks and recreational areas, good infrastructure, protection from flooding, etc. We need to address issues of income disparity, but I think we are fooling ourselves if we think that up-zoning neighborhoods is going to do anything to really address equity. We should focus on tools to address the affordable housing problem, some of which the city hasn’t even used on the land it controls, like community land trusts. We are not going build our way out of the affordable housing problem—“trickle-down” from more housing supply may occur 20 years out and IZ, while laudable in concept, is having a minimal impact on the supply of affordable housing let alone deeply affordable housing. We don’t need to mangle the comprehensive plan to accomplish the Mayor’s housing goals, but we do need to use the tools at hand to create a more equitable city.

Please do not rubber stamp these amendments. They are not in the best interest of our city and its residents.

Thank you.

TESTIMONY OF THE CLEVELAND PARK HISTORICAL SOCIETY
Rick Nash, President, Board of Directors
District of Columbia Council – Committee of the Whole
Hearing on Proposed Comprehensive Plan and FLUM Amendments
November 12, 2020

Mr. Chairman and Council Members,

The Cleveland Park Historical Society worked to establish the neighborhood historic district almost 35 years ago, to preserve the largest and most intact assemblage of Art Deco buildings in Washington, including the Uptown Theater and a commercial area which OP has called unique in scale among all of DC's historic districts. Shortly afterward, the Zoning Commission conformed zoning to protect and backstop Cleveland Park's scale and historic character.

However, the Comprehensive Plan and FLUM amendments before you would fundamentally alter that balance, resulting in matter-of-right, downtown height and density that would overwhelm, hollow out and diminish the historic district and which would be inappropriate for a residential neighborhood.

Others have claimed today that historic preservation review somehow will protect against out of scale development, but that's just not so. First, if that's correct, then why increase height and density so substantially at all? The Zoning Commission recognized that historic review was necessary but not sufficient without also having compatible zoning. Second, developers routinely cite zoning before the HPRB to assert that projects even slightly below matter of right limits are therefore compatible with historic preservation. Increase those limits as proposed and the result will be a fundamentally changed streetscape that so undermines and overwhelms the historic core that it will be almost unrecognizable in a few years.

The amendments also disparately impact Cleveland Park. Other neighborhoods near Metro stations, including those with historic districts, are not proposed for significant increases in height and density. Indeed, there appears to be no low density DC neighborhood other than Cleveland Park where such dramatic change is proposed. No other Metro stop area outside downtown and certainly no other historic district, is proposed to jump as many density levels.

Moreover, the amendments weaken existing provisions that provide protection to historic resources and take account of neighborhood scale and character in Cleveland Park, while actually strengthening such protection in other Washington neighborhoods.

The targeting of the historic district is unnecessary, particularly because the amendments prioritize market rate housing and there are opportunities to add more infill without impacting historic resources. Currently there are three infill projects along Connecticut Avenue, going forward under existing zoning. There are over 1500 residential units under construction or ready to break ground, in or adjacent to the historic district. This total is 120% of the mayor's net new 2025 housing target for Rock Creek West, just in the Cleveland Park neighborhood alone. And steps from the Metro, just outside the historic district itself, are vacant sites capable of substantial additional density, without impacting a single contributing historic structure. Others have testified today that the proposed amendments

prioritize market rate housing and do not address true affordable housing, and I will not repeat their testimony. However, it is important to note that Cleveland Park has an array of housing options not present in most other Ward 3 neighborhoods, which include iconic apartment buildings, townhouses, garden apartments, attached houses, single family homes, rent-controlled housing, voucher housing, IZ units, and The Brooks. Unlike some other neighborhoods today, there is no “missing middle.”

In closing, consider the Uptown, the iconic movie palace, symbol and crown jewel of the historic district, which I mentioned at the beginning and which starkly illustrates what’s at stake. The Uptown shut down as COVID started to spread. So far, over 15,000 people from around the District have petitioned to protect the Uptown, and the historical society is working to do that. But nothing would destroy the opportunity to preserve the theater more ... than approving the Comp Plan and FLUM amendments targeted at Cleveland Park, including the Uptown site. At today’s height limit, our challenge, while considerable, stands a chance of success. Yet increasing height from 40 to 90 or 120 feet will create an irresistible economic incentive to redevelop the site as yet another dense, upper market-rate, mixed-use project looming above and behind the empty façade. To protect the Uptown...and the integrity of the Cleveland Park Historic District... the Council should reject these amendments.

We intend to supplement with record with more detailed comments before the record closes on December 3, 2020. Thank you for your consideration.

The Cleveland Park Historical Society, now in its fourth decade, was instrumental in the establishment of the Cleveland Park Historic District on the National Register of Historic Places. CPHS is a long-established 501(c)3 nonprofit incorporated in the District of Columbia. We file annual returns with the IRS and our governance is transparent.

My name is Rosie Hepner, and I am Ward 4 resident.

I am testifying to support the Office of Planning's amendments to be passed intact by the end of this year, and fully support the Future Land Use Map with increased density in Rock Creek West and any measures that reduce displacement.

DC is an increasingly unaffordable city and, for those who do live here, a segregated city. We know how this came to be from legal segregation and racial covenants, to redlining and NIMBYism. The updated Comp Plan can begin to right these wrongs and make DC a more equitable and inclusive city.

Now, I know this isn't a hearing on transportation, but as a cyclist it infuriates me that the roads in the city are clogged with drivers from Maryland and Virginia, while I dodge potholes, car doors and reckless drivers. Yet I know this is a symptom of a housing crisis: so many of those drivers exist because they have either been priced out of DC or can't find reasonably priced housing near transit. The built environment has failed them, and we pay for it in traffic, pedestrian deaths and pollution. And especially now, in light of the ongoing pandemic, DC's essential workers -- from our emergency responders, to nurses and grocery store clerks -- should be able to live in the communities they are so selflessly serving, not commuting to them.

And I know this isn't a hearing on health, but it makes my blood boil that a [recent Georgetown study](#) showed the life expectancy difference between a Ward 3 resident and a Ward 8 resident is 15 years. There are many other studies that show the correlations between life expectancy and wealth generation by zip code. And that happens in large part because of our housing: the quality and location of housing, lack of stable housing and experience of evictions, access to schools, healthcare and amenities, and proximity to polluting industries.

On a personal note, last year I unexpectedly went into labor 8 weeks early. My daughter was born not even 3 1/2lbs and spent a month in the NICU. But, we had access to an incredible hospital. After she was discharged, we were able to bring her home, one we could afford in a safe neighborhood, near her neonatal specialists, a short bike ride to the daycare she'd come to attend, near parks and spaces for her to play. And for that, she is now a thriving 18 month old. This is a result of our privilege, it is not the norm and I hate that our premature birth experience could have been worse, or fatal, if we lived in a different zip code, or even if the color of our skin was different. The statistics on pre-term labor, infant deaths, and maternal deaths are all worse for black families. And this is a result of our segregated built environment; it is the reason that one DC resident will likely live 15 years longer than another.

All this was just to say that I think the OP amendments are a step in the right direction and can improve DC's equity and inclusivity for our future generations, because we need it. Thank you.



**Testimony of
Payton Chung
Sierra Club, Washington DC Chapter
to the District of Columbia Council, Committee of the Whole
Hearing on Bill 23-736, the Comprehensive Plan Amendment Act of 2020
November 12, 2020**

The Sierra Club's Washington DC Chapter applauds the work that the Mayor's Office of Planning, the Department of Environment and Energy, and the Department of Transportation have put into updating the 2006 Comprehensive Plan for 2020. We urge the Council to adopt the Office of Planning's (OP) amendments soon, as they will amplify the implementation of critical recent environmental victories. We also urge OP to begin laying the groundwork now for an all new Comprehensive Plan, which will be necessary to guide the District's built environment towards its midcentury goal of net zero carbon emissions.

These updates have strengthened the Comprehensive Plan to better reflect the Club's mission "to enlist humanity to protect and restore the quality of the natural and human environment."

Many policies that the Chapter has championed are reflected in this document, including incorporating DC's carbon neutrality goal and implementation of a cleaner energy system; fishable and swimmable surface waters throughout the District; a zero-waste goal for solid waste source reduction; and reducing safety and health dangers from the transportation system. The Club has worked with the Council and other District agencies on improving legislation and plans, including the Clean Energy DC Omnibus Act, the Sustainable Solid Waste Management Amendment Act, and the Vision Zero Action Plan, and we are glad to see that the updated Comprehensive Plan text reflects these policies and plans. We are also heartened to see new text addressing necessary climate adaptation and resilience measures, as these measures will only become more necessary in the years ahead.

We also applaud suggested revisions to the Housing Element, such as policy H-1.1, which seek to better balance jobs and housing in high opportunity parts of the District and region. This policy reflects the Sierra Club's Urban Infill Policy, which states:

An essential strategy for reducing urban related carbon emissions is supporting dense, mixed use communities and land uses that prioritize walking, biking or transit to meet daily transportation needs, as well as balancing jobs and housing within the region. All neighborhoods should be open to people of all income levels and backgrounds.

We look forward to engaging soon with the District in the multi-year process that will shape the next Comprehensive Plan. That should begin over the next year or two, with a public process to foster agreement on the core values and guiding vision that the upcoming plan will achieve. This approach has proven critical to helping other climate leader cities around the world adopt transformative new Comprehensive Plans, and to make significant progress towards achieving their climate and equity goals.

The 20 year horizon of the next Comprehensive Plan, from the 2020s to the 2040s, must be an era defined by a just transition away from the fossil-fuel era. Otherwise, the continued suitability of the District of Columbia as human habitat will be in grave doubt

We have, on several occasions, applauded the District's commitment to achieving net zero carbon by 2050. The built environment (buildings and transportation) account for the lion's share of DC's carbon emissions, so the Comprehensive Plan will shape much of this transition. Future Comprehensive Plans should root themselves in foundational themes of sustainability, resilience, and justice, rather than siloing "environmental protection" off into one element among many

OP should take lessons and inspiration from its colleagues at DOEE and DDOT, whose strategic plans make achieving sustainability the goal, not just an element. An example is DOEE's 2012 Sustainable DC plan, which set a goal of cutting carbon emissions from transportation and set a travel mode target, with 75% of commute trips via non-auto modes. A complementary target urged 20-minute neighborhoods, with daily services within walking distance for all District residents. DDOT then adopted DOEE's goal as its own, requiring that mode share goal be achieved through its 2014 MoveDC Plan and rejecting scenarios that did not achieve it

Those two plans treat a sustainable built environment in DC as a destination that actions can achieve, and make measurable progress towards, rather than merely as one of many worthy directions that we can reactively steer existing movement towards. The current Comprehensive Plan timidly assumes that the unsustainable, unjust status quo and "business as usual" can only be tinkered with; the next Comprehensive Plan must instead boldly imagine and forge a sustainable future

Thank you for the opportunity to address the Council on this important bill



Payton Chung
Chair, Smart Growth Committee
Sierra Club, Washington DC Chapter

From: [Aquarius vann](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Public Housing In the Mayor Com Plan
Date: Monday, November 16, 2020 6:41:33 AM

from desk of the President of Potomac Gardens PUBLIC HOUSING COMMUNITY, AQUARIUS VANN-GHASRI, on behalf of the MINORITY of the residents in 700 , 12th, 13th and I Street, in WHICH I REPRESENT does not SEE IN THE PLAN WHERE THE MAYOR is ENGAGING IN 30 percent to zero rent contracts why? Nor do we see WHERE THE CITY ENCOURAGES zero to? Contracts agreements for developers to partner with the City. Housing Authority.

Whether or not the Comp Plan incorporated voucher Renters into the plan, if so explain how many landlords of newly built apartment buildings are renting to Voucher Holders of DC without a credit check in the plan??????

Sent from my iPhone

From: [Michael Whelan](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Testimony Submission for Nov 12th Hearing on B23-736 (Comp Plan)
Date: Tuesday, November 10, 2020 2:04:36 AM

I am submitting the following as testimony for the November 12th Hearing on the Comprehensive Plan amendments:

Good Afternoon Councilmembers.

My name is Michael Whelan and I live on Kansas Ave in Petworth. I want to make sure we can keep housing affordable here in my neighborhood. The only way we can do that is if DC is welcoming towards our new neighbors, instead of trying to turn them away or say that they can only live in one or two neighborhoods.

Because I support welcoming new neighbors to our community, I am really glad that the Office of Planning has put together such a great set of amendments to the Comprehensive Plan. These amendments build upon the "framework element" that you passed almost exactly one year ago by pushing for housing across the whole city, ensuring that each neighborhood does its fair share to solve our housing crisis. I ask that you ***pass all OP amendments with urgency*** - at least before the end of the year.

I would also urge you to support any other amendments that may be offered up by members of the Council if they further bolster the goal of ensuring that every part of DC accommodates homes for people. This is especially true because COVID-19 has shown that we really need to support our small local businesses. Here in Petworth, we have had a spate of business closures on Upshur Street, even before the pandemic. I am hopeful that if we can get some more neighbors in the community, we could support more great local businesses.

If any Councilmembers propose amendments to weaken the OP's proposal or exclude some part of the city from doing its fair share to support homes for our neighbors, I ask you to please vote those amendments down. Language like "protect the neighborhood from apartments" is immoral during a housing crisis, and unfairly biased against renters and people who live in apartments, such as myself.

Please also add language to the plan to speed up this process next time. I can't believe it's been a year since the framework was passed!

Thank you to each one of you for listening, and for your hard work to keep our city safe during this pandemic.

Very Best Wishes,

Mike Whelan
4014 Kansas Ave NW, Apt 105
Washington DC, 20011

Committee of the Whole
Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”
Testimony of Natalie Avery, November 12, 2020

Good morning, Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak today. I am a DC native and lifelong resident of Washington DC currently raising my family in Mount Pleasant. I’m here today to urge the Council to pass, intact, and without further delay, the Office of Planning’s amendments to the Comprehensive Plan.

Passing the Comprehensive Plan is absolutely essential to building a more equitable DC with more abundant housing options, especially in the neighborhoods west of Rock Creek Park where I grew up. I have been following this process for years and am deeply impressed with the level of engagement and the many ways in which the plan centers equity and reckons with the legacy of racism on our city’s built environment. The plan incorporates thousands of community comments and reflects input from dozens of community meetings.

After the Council adopted the Framework Element last year, Council staff and community members from a variety of perspectives have worked tirelessly to bring forward ideas and solutions that both honor and expand upon the core values expressed during that process.

I know you’ve heard concerns from constituents concerned about the impact of allowing more density on their quality of life. I can tell you that as a resident of a very dense mixed use neighborhood, that more density and more housing types, including multifamily buildings and duplexes and fourplexes, means a greater diversity of neighbors, more people to support great neighborhood amenities and more variety. Unlocking the ability to build more housing in parts of the city that have seen very little new residential development will not only expand housing supply, enabling more people to live in amenity rich neighborhoods. I truly believe it will bring new life and variety to areas of the city that have seen little change over the decades.

I have also heard the concerns that the plan does not do enough to stop displacement and build a more equitable DC and therefore should be further delayed. I strongly believe that passing the Comp plan is an essential step in the right direction. The work of building a more just and equitable city will continue on many fronts. Further delaying its passage will only thwart efforts to bring new housing online, including hundreds of affordable units.

Chairman Mendelson, and the rest of the Committee. Thank you for this opportunity to testify today. I am glad to add my voice to the chorus of support for Passing the Comp Plan, intact, in 2020, with no further delays.



The Honorable Phil Mendelson Chairman,
Council of the District of Columbia 1350
Pennsylvania Avenue NW, Suite 504
Washington, DC 20004

Via E-mail

12 November 2020

Dear Chairman Mendelson:

My name is Japer Bowles and I am the current chair of the ANC Rainbow Caucus. Since the past election, the ANC RAINBOW CAUCUS has grown from 26, to now 36 LGBTQ ANC Commissioners. Our mission is to address issues impacting LGBTQ residents of the District of Columbia, regardless of sexual orientation or gender identity and expression. We represent the diversity of the LGBTQ community in race, gender, education, location, age, and income and we have come together to be a voice for LGBTQ people in DC. It is our mission as to why I am speaking today.

Like others have said previously and will continue to say, this document is extremely important and determines the direction of the city. Frankly speaking, the Comprehensive Plan isn't gay enough!

DC has the largest LGBTQ population per capita in the nation and we face real problems-- 48% of youth experiencing homelessness are LGBTQ, our community faces record hate crimes, and housing and job discrimination is still rampant.

My testimony today is to better educate the council on two passed recommendations from Rainbow Caucus members from ANC 1A, 1C, 2A, 2B.

1. Improving Access to Long-Term Supports and Services for Vulnerable Populations and Action and Improving Coordination and Service Delivery among District Agencies: T
 - a. Recognizing that vulnerable populations include many members of the LGBTQ community and their needs need to be included in any effort to create and implement a cross-agency case management system that can enhance coordination among relevant agencies to improve service delivery. For example, in health care and services LGBT patients often are overlooked as a group that faces disparities. However, like other populations identified as at-risk or



**Rainbow Caucus of
LGBTQ Advisory Neighborhood Commissioners**
Washington, D.C.

disadvantaged, the lesbian, gay, bisexual and transgender community has faced stigma, lack of cultural competence and insensitivity to their unique needs.

2. The Housing Element needs to address the following issues and oversights as it relates to LGBTQ Youth, Seniors and our Transgender/GNC community.
 - a. LGBTQ Seniors: LGBTQ adults face unique circumstances, such as fear of discrimination. Many do not have children to help them in older age. Senior housing, transportation, legal services, support groups and social events are the most commonly cited services needed in the LGBT community. LGBTQ older adults are generally an underserved and understudied population, yet, by 2060 their numbers will exceed five million, and will account for more than 20 million older adults, including those who do not publicly self-identify but have engaged in same-sex sexual behavior, or romantic relationships, and/or are attracted to members of the same sex. Much of this increase is fueled by millennials.
 - b. LGBTQ Youth Homelessness: LGBTQ young people are 120% more likely to experience homelessness than non-LGBTQ youth. Right off the bat, these young people are presented with an uneven playing field. It's estimated that about 7% of youth in the United States are LGBTQ, while 40% of youth experiencing homelessness are LGBTQ.
 - c. Transgender Housing and Homelessness: One in five transgender people in the United States has been discriminated when seeking a home, and more than one in ten have been evicted from their homes, because of their gender identity. The U.S. Department of Housing and Urban Development (HUD) has issued guidance stating that discrimination against transgender renters or homebuyers based on gender identity or gender

Our caucus encourages DC Council to dig in deep to be inclusive of all people in every section and every element.

Although none of you identify as LGBTQ+, please listen to us and rely on your LGBTQ+ staff to make recommendations for a more inclusive plan.

Thank you for your time today.

Japer Bowles,
ANC Rainbow Caucus, Chair



**Rainbow Caucus of
LGBTQ Advisory Neighborhood Commissioners**
Washington, D.C.

Citation/Track #	Element	Comments	OP Comments
CSF-2.3.9; CSF2.3.D	Community Services and Facilities	The Rainbow Caucus welcomes this policy and action item. However, we urge OP to include language that references and/or recognizes that vulnerable populations include many members of the LGBTQ community and their needs need to be included in any effort to “create and implement a cross-agency case management system that can enhance coordination among relevant agencies to improve service delivery.” For example, in health care and services LGBT patients often are overlooked as a group that faces disparities. However, like other populations identified as at-risk or disadvantaged, the lesbian, gay, bisexual and transgender community has faced stigma, lack of cultural competence and insensitivity to their unique needs. ANC Rainbow Caucus asks that language be added to the Comp Plan to ensure that these needs are equally considered among efforts to address service for every vulnerable population in the District of Columbia.	The text was changed to include the proposed language. See the Framework Element for a discussion of federally defined protected classes.
H-4.3	Housing	<p>ANC Rainbow Caucus recommends that language be added to the Housing Element to address the following issues and oversights:</p> <p>H-4.3 Meeting the Needs of Specific Groups – LGBTQ Community</p> <p>ANC Rainbow Caucus strongly recommends that language be added identifying the LGBTQ community as a “Specific Group”, recognizing the unique needs of this community, and outlining specific housing strategies to address their needs. We note that Persons with HIV/AIDS, Older Adults, and other identified groups may address some of the needs ... but they fall short of fully and comprehensively understanding overall housing needs and homelessness in the LGBTQ community. Specifically, the three following areas need to be addressed in the comprehensive plan and are currently absent:</p> <ul style="list-style-type: none"> ○ LGBTQ Seniors: LGBTQ adults face unique circumstances, such as fear of discrimination. Many do not have children to help them in older age. Senior housing, transportation, legal services, support groups and social events are the most commonly cited services needed in the LGBT community. LGBTQ older adults are generally an underserved and understudied population, yet, by 2060 their numbers will exceed five million, and will account for more than 20 million older adults, including those who do not publicly self-identify but have engaged in same-sex sexual behavior, or romantic relationships, and/or are attracted to members of the same 	Added language regarding at LGBTQ+ youth at risk of or experiencing homelessness. See H-3 Housing Access and protected classes and Action H4.2.D: Ending Youth Homelessness



**Rainbow Caucus of
LGBTQ Advisory Neighborhood Commissioners**
Washington, D.C.

		<p>sex. Much of this increase is fueled by millennials.</p> <ul style="list-style-type: none">○ LGBTQ Youth Homelessness: LGBTQ young people are 120% more likely to experience homelessness than non-LGBTQ youth. Right off the bat, these young people are presented with an uneven playing field. It's estimated that about 7% of youth in the United States are LGBTQ, while 40% of youth experiencing homelessness are LGBTQ.○ Transgender Housing and Homelessness: One in five transgender people in the United States has been discriminated when seeking a home, and more than one in ten have been evicted from their homes, because of their gender identity. The U.S. Department of Housing and Urban Development (HUD) has issued guidance stating that discrimination against transgender renters or homebuyers based on gender identity or gender stereotypes constitutes sex discrimination and is prohibited under the Fair Housing Act (FHA). Unfortunately, general lack of awareness has contributed to continued discrimination, eviction and homelessness of transgender people in the United States. In the District of Columbia, LGBTQ leaders have also identified that service gaps exist for Transgender youth who age out of housing and are forced to live on the streets as they have not been homeless "long enough" to qualify for adult housing services.	
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Good afternoon Chairman Mendelson and Councilmembers,

My name is John Nelson and I am here to speak in support of a proposed amendment to the Future Land Use Map for two lots in the Union Market neighborhood at 500-520 Florida Avenue NE. For the Council's reference, the amendment is being processed under tracking number 1358.

The property at 500-520 Florida Avenue NE has been under our family's ownership over 5 decades and is currently being used for a gas station. However, over the past ten years, the surrounding Union Market neighborhood has evolved from a former industrial area to a bustling mixed-use community with hundreds of housing units, restaurants, bars, and other commercial establishments. Many of the new developments were approved through the Zoning Commission's planned-unit-development process.

We believe our property on Florida Avenue NE can play an important role in the continued evolution of the Union Market neighborhood. Due to its location on Florida Avenue between 5th and 6th Streets NE, our highly visible property is a "gateway" to the neighborhood. Florida Avenue is 100-feet wide, so greater density is appropriate on that street.

We therefore envision a high-density, mixed-use development at the front of Union Market that will provide more housing, active retail and commercial establishments. Unfortunately, our property's current designation in the FLUM limits the potential density for a redevelopment.

Our proposal requests a designation of medium-density residential, high-density commercial and PDR. This designation would help achieve our goals for the family property by allowing for significantly more housing through greater density and flexibility in development standards. If granted, our FLUM designation would be the exact same as all the other properties in the Union Market neighborhood.

Finally, I'd like to mention that ANC 5D has been very receptive to our proposal. In February 2020, ANC 5D unanimously passed a resolution supporting our proposed amendment to the FLUM. Commissioner Ryan Linehan's testimony in support urges you to recognize the property's potential as a community gateway and as a site to provide more housing – a much needed resource in the District. We are appreciative that the community has shown its support for this proposal and that they recognize the property's potential.

Despite all of these factors, we were disappointed to learn the Office of Planning did not support our requested FLUM amendment. For all the reasons I have mentioned this property is an excellent candidate for an amendment to the Future Land Use Map. Therefore, we encourage the Council to incorporate the request under tracking number 1358 into the Comprehensive Plan legislation and amend the Future Land Use Map for 500-520 Florida Avenue NE to medium-density residential, high-density commercial and PDR.

Thank you for the opportunity to speak with you this afternoon and for your consideration.

DC COMPREHENSIVE PLAN PUBLIC TESTIMONY
November 12, 2020

NAME: Gary Pearce Barnhard
ADDRESS: 2639 I Street NW, Washington, DC 20036
SUBJECT: In support of the bill with the caveat that this there is a need for the Council to both approve the amended Comprehensive Plan and support the fine grain planning processes for scalable developments to achieve the objectives of the plan.

Thanks for this opportunity to testify in support of this bill to approve the amended comprehensive plan. My name is Gary Pearce Barnhard, I was born at Doctor's Hospital on I Street NW, I am a 4th generation Washingtonian. I am the managing member of Barnhard Family LLC which owns the only private property in Square 5 of the city (2639/2637/2635 I Street, NW). Truth be told my connection to building real estate is also not inconsequential, as a robotic space systems engineer I had the honor and privilege of helping to build the most expensive piece of real estate our species has ever constructed, the International Space Station.

My concerns with respect to the District Comprehensive Plan and the planning process is that such efforts need to be focused on fostering and managing outcomes not subsumed by interminable process. This concern likely can be best expressed by example.

A long time ago, in a great city some think belongs in a galaxy far, far away some of the most desirable land for development was offered up to the ghods of freeway development with the fervent hope that traffic would flow and a plethora of benefits would befall the inhabitants.

Alas, what reality and the passage of time has wrought has proven far less sanguine. What is known as Square 5 has for over 50 years languished as a set of three nondescript town homes stranded in a sea of failed traffic intersections, bisected by a collection of freeway ramps, with effectively all the remaining ground rendered unusable/inaccessible. The magnitude of lost opportunity to the city comes into focus when the fate of Square 5 is put into the context of the available property in adjacent squares (Eye Street terminus, part of Squares 6, 4 and 1). The combined total developable land area of the seven parcels is ~500,000 Sq.ft. To put this in perspective this aggregation of parcels is larger than the entire Watergate complex (~435,000 Sq.ft.). This situation is offered not as a personnel lament for resources wasted over many real estate cycles, rather as an example of a process failure and the need to fix how the city orchestrates opportunities for fine grain development, particularly those at larger scales.

To date no reliable mechanism has been established that allows for large scale development projects in the city to move forward on a deterministic time line. Even the most coordinated Planned Urban Developments (PUDs) seem to come to resolution based on court action rather than a negotiated confluence of interests that secures the best possible outcome for the city and its inhabitants.

The amended District Comprehensive plan seeks to architect and orchestrate multiple opportunities for fine grain development. Mechanisms that are identified in the same are tangible and require the Councils support include:

DC COMPREHENSIVE PLAN PUBLIC TESTIMONY

November 12, 2020

- Allow groups of properties to be aggregated in a manner that would enable public private partnerships to be formed to provide for the highest and best use of the land serving the best interests of the city and its people.
- Provide a deterministic timeline which is cost able and is economically viable.
- Provide for explicit actionable outcomes for each process element completed.
- All stakeholders must commit to a balancing of “Matter of Right” development versus enhanced development opportunities which increase the value of the project for all stakeholders.

A failure to achieve these objectives will result in ad hoc development which is far less optimal for all stakeholders. So returning to our opening example, shall we wait for the future of whatever comes, or lend our efforts to architecting the future we wish to see come to pass? I recommend the latter and request that the Council support the approval of the amended Comprehensive Plan and that the Council provide support for fine grain planning efforts deemed necessary and appropriate to realize the objectives of the plan.

Thank you for this opportunity to share my views on the District Comprehensive Plan and encourage the Council to visit the website <http://www.foggybottomfuture.org>.

- Gary P. Barnhard

Amendments to the Comprehensive Plan

Emily Hamilton

Ward 5 Resident & Senior Research Fellow, Mercatus Center at George Mason University

D.C. Council

November 12, 2020

Chairperson Mendelson and members of the D.C. Council, thank you for the opportunity to comment. I'm a housing economist and Ward 5 resident. I have three points to make today.

- First, I encourage the Council to pass the Office of Planning's amendments to the Comprehensive Plan immediately.
- Second, I support a Comprehensive Plan rewrite in the near future that acknowledges it is not a valid purpose of public policy to prevent expensive neighborhoods from accommodating more residents over time.
- Third, I encourage the Office of Planning and the Council to adopt a less prescriptive approach to determining what type of housing may be built in which neighborhoods.

To my first point, the outdated plan and Future Land Use Map are holding up badly needed housing and standing in the way of achieving the Bowser administration's important housing goals. The time has come to adopt OP's proposed amendments to move past the barriers of the 2006 plan.

To my second point, OP should now begin work on a simpler, more progressive comprehensive plan rewrite. OP has suggested a modest improvement by changing the plan's language from "protecting neighborhood character" to "respecting neighborhood character." As OP has pointed out, regulations intended to protect neighborhood character contribute to racial segregation in housing markets. But tweaking the comprehensive plan's language does not remedy the District's exclusionary land use policies, and a future comprehensive plan should reject exclusionary zoning rather than respect it.

Like all localities, the District's authority to regulate land use comes from its police power to enforce regulations that benefit residents' health, safety, and general welfare. Land use regulations that prevent change may benefit landowners in exclusionary neighborhoods, but they do not benefit the general interests of this majority-renter city. A future plan should support denser residential redevelopment—particularly in the highest-income neighborhoods.

Finally, to my third point, the comprehensive plan suggests implementing rules to discourage mansionization by limiting the size of new structures. However, these proposed restrictions could backfire. Minneapolis policymakers replaced single-family zoning with triplex zoning, but now other restrictions on the size and location of buildings are standing in the way of actually building triplexes. Further, had anti-mansion rules been on the books historically, they would have choked off an important source of relatively low-cost housing today for roommates who

share large houses in neighborhoods from Capitol Hill to Takoma. Instead of banning mansions, we should make it legal to build multi-family housing in rich neighborhoods.

Thank you for considering my comments. I urge the Council to adopt OP's amendments now, and I hope to see a future comprehensive plan that will make the city a more affordable and inclusive place.

TESTIMONY OF AIDAN JONES BEFORE THE DC CITY COUNCIL 11/12/20
RE PROPOSED AMENDMENTS TO THE COMPREHENSIVE PLAN

The Proposed Amendments, particularly to the Future Land Use Map, Are Deeply Flawed

- The Amendment process was flawed from the start because initiated **based on a false assumption**—that DC’s population would continue to increase, when, in fact, the data and the Jan. 2020 analysis by the Mayor’s own Chief Financial Officer reflect that it had already begun to decline, and, excluding for several thousand new births, still is declining and is not expected to increase significantly in the immediate future.
- A flawed process of input-gathering that OP controlled, along with OP alone deciding what Amendments to recommend, predetermined a flawed result. Inevitably, the result was a proposal almost entirely reflecting developers’ wishes, not those of DC’s citizens and neighbors—a result based on the flawed premise that DC needs up-zoning and much greater density, a result that would flow from a radically revised Future Land Use Map.
- Also, the proposed Amendments were drafted before the Covid Pandemic and only superficially updated to account for its effects. The Pandemic has demonstrated greater infection risk with more dense living arrangements, not to mention constricted mobility in high rise buildings.
- And the Pandemic has already engendered greatly changed living and work patterns. Any appropriate Comp Plan should consider what OP’s proposed Amendments do not.
- It was not time for a new Comp Plan, and these Amendments were an attempt to do a major re-write without neighborhood citizens’ participation without considering greatly changed global health concerns. Without moving to the country or the suburbs, we can preserve the livability of our communities in DC.

Why Did the Office of Planning Propose Such Flawed Amendments?

- Quite simply, OP, at the behest of the Mayor, preconceived and preordained an outcome in order to favor developers by greatly up-zoning and increasing density—at citizens’ expense.
- To achieve the Mayor’s goal, OP designed a process where only *it* decided what to propose amending, thereby ignoring citizen wishes.

What Should City Councilmembers Do?

- Listen to your constituent-neighbors, not developers, who typically have little skin in the game, and not to the large corporate investors and hedge funds who typically fund development projects-- whose sole goal is to make a profit for their investors -- not to safeguard DC residents.
- Remember that developers, to profit more, always push elected and non-elected officials to up-zone for higher, denser buildings, even when they can make a fair profit with existing zoning.
- Voters can’t afford to take you out to lunch to lobby you to protect their zoning rights, but they elected you--and will only continue to support you if you support them.
- Use your legislative power to hold developers accountable to you and those who elected you. That means not allowing developers to radically up-zone and harm residential neighborhoods throughout all 8 Wards. That means rejecting OP’s proposed Amendments to the Comprehensive Plan, particularly its proposed changes to the Future Land Use Map.



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2020 Counsel

Paul Tummonds
Goulston & Storrs

December 3, 2020

The Honorable Phil Mendelson, Chairman
Committee of the Whole
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue NW
Suite 504
Washington, DC 20004
[REDACTED]

Re: Supplemental Comments on Bill 23-736, the Comprehensive Plan Amendment Act of 2020

Dear Chairman Mendelson,

DCBIA and our members greatly appreciate the opportunity to testify at the Committee of the Whole's hearing on Bill 23-736, the Comprehensive Plan Amendment Act of 2020 ("Comprehensive Plan Amendment"), on November 12–13. I am writing now to reiterate the key themes across our testimonies and to follow up on specific points raised.

As indicated in our testimony at the hearing, DCBIA supports the shared goals and philosophy behind the Comprehensive Plan Amendment as proposed. We believe that the Comprehensive Plan Amendment is a fair planning document that helps all District residents, supports job growth and opportunities, and provides agencies with guidance so that important issues, such as land use, economic development, workforce development, housing, environmental protection, historic preservation, transportation, and more, are addressed in a way that is equitable and inclusive, although some minor modifications would improve it even more, as detailed below. We also urge the Council to approve the legislation expeditiously.

More than 60 DCBIA members participated in our review of the Comprehensive Plan Amendment, studying the elements in detail. Our intent was to ensure that the Comprehensive Plan's key objectives and principles remained intact, while confirming that the document reflects the economic realities of real estate development. Our detailed comments on specific elements are attached hereto as **Exhibit A**.

~more~

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In Memoriam
Albert R. "Butch" Hopkins, Jr.
(1941-2012)

From our review, we determined that there are areas within the Comprehensive Plan Amendment, as proposed, that should be modified to ensure that the District attracts the investment needed to continue the growth and economic activity necessary to advance the document's guiding principles and move the City towards increased equity and inclusivity. These include the following points:

- **Affordable Housing Impact Statements:** The Comprehensive Plan should include the concept that a housing affordability impact statement should be required prior to the passage or implementation of any new law, regulation, statute, or agency policy decision. There is no dispute that affordable housing is an essential civic priority. The amendment to the Framework Element allowed this to be even clearer. However, legal and policy requirements have a direct impact on housing costs and housing production. Such a statement would help District leaders make policy decisions with this priority in mind.
- **Incentivizing and Increasing Production:** The Comprehensive Plan, particularly the Housing Element, focuses on preservation and production of affordable and family-sized units. There should also be discussion of how to incentivize the market to meet housing demand. Such supply and production incentives could take the form of flexibility with zoning requirements, including height, density, lot occupancy and setback requirements, expedited entitlement review and permitting tracks, and other incentives noted in our attachments. The District is an expensive environment for real estate development, and it should encourage the use of a broad array of tools to facilitate housing production. Additionally, rather than prioritizing housing preservation versus housing production without further considerations, the focus should be on build-first, on-site, or non-displacement approaches to allow for development projects to proceed in a manner that can benefit everyone while more efficiently utilizing limited land resources. An example of this is found in Section 509.1 of the Housing Element.
- **Emphasizing the District's Economic Trajectory and Competitiveness:** The Comprehensive Plan Amendment has been reframed to focus decision-making on concepts of equity and inclusion. At the same time, however, the benefits of growth and investment must be weighed. For decades the City struggled to obtain investment and it has been successful in part due to growth-supportive policies. That success had led to fiscal strength and enhanced public resources, among other benefits. The District's economic competitiveness and private market decisions to invest in the District cannot be taken for granted and recent legislative initiatives have called such concepts into question. It is essential to the achievement of the Comprehensive Plan's goals and numerous other District priorities to maintain an environment conducive to further investment and economic activity. The Comprehensive Plan should acknowledge this dynamic throughout and utilize language that encourages economic activity, growth and investment alongside encouraging concepts of equity and inclusion. In response to your questions to Jeff Utz of Goulston & Storrs at the hearing, specific provisions illustrating the opportunities to update relevant language such that economic activity and investment are still encouraged are attached hereto as **Exhibit B**.

- **Future Land Use Map:** We strongly support the proposed changes to the Future Land Use Map (“FLUM”). They support transit-oriented development and meaningful infill opportunities, as well as affordable housing in priority areas. Clearly, the Office of Planning was deliberate in its election of which sites to “up-FLUM”. We would not recommend reducing any proposed update to the FLUM and, in fact, we would be supportive of additional “up-FLUM” opportunities.
- **Language Changes:** We recognize that there has been debate over changes of “must’s” to “should’s” in the Comprehensive Plan. We strongly believe that these language changes should be maintained because this will enable the Zoning Commission to consider the Comprehensive Plan holistically and assess and accommodate conflicts within the document’s parameters. The use of “should” (and related verbiage) would still firmly set the Commission on a court to implement the relevant goal or policy and the Commission would be required to supply compelling rationale if it did not implement such goal or policy. In addition, the use of “should” rather than “must” would allow for the Commission to resolve conflicts between potentially conflicting provisions. The Comprehensive Plan is not intended to be a prescriptive document, but rather to leave open a degree of careful consideration, on a case-by-case basis, for individual entitlement actions in a highly-public and participatory process.
- **Discuss Mixed-Income and Workforce Housing:** There is an opportunity, particularly in the Housing Element, to describe and prioritize mixed-income multifamily housing. This would encourage more robust investment in a wider variety of housing choices, including unit types geared towards additional variation in income levels and pricing.
- **Support Transit-Oriented Development:** We are pleased that the Comprehensive Plan supports enhanced density in transit corridors. However, the Land Use Element in particular should make clear that greater density can occur on transit-oriented sites, when consistent with the FLUM, to support housing and affordable housing goals, without automatically creating untenable transitions to adjacent lower-height or lower-density properties. An example of this is found in Section 307.14 (LU-1.4.5 – Development Along Corridors).
- **Clearly Define Equity and Inclusion:** DCBIA supports the added themes of equity and inclusion. However, these terms should be more specifically defined so that they can apply to the practical implementation of land use policy and processes. One possibility is updating the Implementation Element to include a provision that gives allows the terms to have flexibility depending on the Area Element in which they are being applied.

DCBIA and our members appreciate the opportunity to provide comments for the record on the Comprehensive Plan Amendment. We would be happy to discuss any of our recommendations in

greater detail and look forward to continuing to work with you, your staff, and your colleagues between now and Council passage of the Comprehensive Plan Amendment.

Sincerely,

A handwritten signature in black ink that reads "Lisa Maria Mallory". The signature is written in a cursive, flowing style.

Lisa Maria Mallory
Chief Executive Officer

Attachments

EXHIBIT A

DCBIA COMMENTS COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED

CHAPTER 3 – LAND USE ELEMENT COMMENTS

Specific Edits to Proposed Text

- Section 304 – “Supporting Growth” (New subsection within Section 304) – Consider inserting language that map amendments need not wait until the conclusion of a small area plan or other study within the Future Analysis Areas once the Comprehensive Plan amendments and updates to the FLUM go into effect.
- 310.6 – We recommend including a reference to economic activity and growth, along the lines of the highlighted language below. We appreciate the language that OP included in the last paragraph of this section regarding “vibrant neighborhoods” and “investment and development” but the edits made do not fully address our prior comment that the concept of economic activity and growth being integrated into the definition/standards put forth in this section and arguably take it farther away. Putting up walls to investment and economic growth is not the way to progress towards a more inclusive city, nor to achieve any of the many civic goals of the Comp Plan.

310.8 An inclusive neighborhood should create a sense of belonging, civic pride, **vitality**, and a collective sense of stewardship and responsibility for the community’s future among all residents. Indeed, a neighborhood’s vibrancy has to be measured by more than the income of its residents or the size of its homes. The In 2004, “A Vision for Growing an Inclusive City” identified essential physical qualities that all neighborhoods should share. These included the following:

- 310.14 (Policy LU-2.1.7: Conservation of Row House Neighborhoods Character) - Protect Respect the character of row house neighborhoods by requiring the– The text of this policy should be recast in terms of “compatibility” rather than “consistent” and discouraging additions. The rowhouse neighborhoods have substantial potential to contribute to housing goals. If the point of this policy is to address the need to take care of the District rowhouse neighborhoods, then this can be achieved by supporting compatible development in these areas. Otherwise, this section can be contrary to housing goals in addition to unnecessarily locking a neighborhood in place.

Respect the character of row house neighborhoods by requiring the height and scale of structures to be **consistent compatible** with the existing patterns.

- 310.15 (Policy LU-2.1.8: Zoning of Low- and Moderate-Density Neighborhoods) – include the highlighted phrase:

EXHIBIT A

- Where indicated through neighborhood planning efforts **or otherwise consistent with the Future Land Use Map**, consider the rezoning of areas currently developed with single-family homes, duplexes, and row houses for missing middle forms of housing, [...]
- 310.1 – The following language should be deleted. This language introduces an impossibility where proposed new development is required to demonstrate a reduction in demand. If this language is intended to reflect that a preliminary transportation study should be performed prior to any approval for relief to fully understand projected demand and traffic impacts, this section should so state.
 - “...should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented ~~and a reduction in demand can be clearly demonstrated.~~ 309.16”
- 312.9 – Consider providing an opportunity for additional housing based on the following language:

312.9 Policy LU-2.3.7: ~~Non-Conforming~~ Nonconforming Institutional Uses
Carefully control and monitor institutional uses that do not conform to the underlying zoning to **promote ensure their** long-term compatibility. In the event such **institutions uses** are sold or cease to operate, **as institutions**, encourage conformance with existing zoning and continued compatibility with the neighborhood, **while still providing the opportunity to provide new housing and affordable housing.** 312.9
- 314.7 – Recommend that the text of this policy be revised as follows. It is imperative that industrial land is not retained only for the sake of retaining industrial land when often such land has not been used – efficiently or otherwise – for decades. This is potentially a lost opportunity for a more productive use for the District as a whole. In addition, other sorts of uses in addition to residential and retail can be compatible for the proposed co-existence with industrial uses.
 - **316.2 Policy LU-3.12.1: ~~Conservation~~ Preservation of Industrial Land -**
Recognize the importance of industrial land to the economy of the District ~~of Columbia~~, specifically ~~its ability~~ to support public works functions, and accommodate ~~production, distribution, and repair (PDR)~~ activities. ~~Ensure that~~ ~~Z~~ zoning regulations and land use decisions **should continue to preserve pr)otect** active and viable PDR land uses **in the locations where maintaining such uses is appropriate** while allowing compatible **residential, office, office and retail and other** uses and development under standards established within CM and M

EXHIBIT A

- zoning. Economic development programs should work to retain and permit such uses. ~~in the future~~ **316.2**
- 316.5 – The following edit (highlighted) should be made:
 - **316.5 Policy LU-3.12.4: Rezoning of Industrial Areas** - Allow the rezoning of industrial land for non-industrial purposes only when the land can no longer viably support industrial or PDR activities, ~~or~~ is located such that industry cannot co-exist adequately with adjacent existing uses, **or where such rezoning is called for by a master plan aimed at using land more effectively (or is otherwise approved by the Zoning Commission)** and creating opportunities for **affordable housing, people experiencing homelessness, and jobs for District residents**. Examples include land in the immediate vicinity of Metrorail stations, sites within historic districts, ~~and~~ small sites in the midst of ~~stable~~ **established** residential neighborhoods, **and District-owned public works properties**. In the event such rezoning results in the displacement of active uses, assist these uses in relocating to designated PDR areas. ~~314.10~~ **316.5**
- 316.11 (Policy LU-3.2.11: Infrastructure Adequacy) – Clarify that the installation of additional infrastructure (above and beyond what the project would use or that could be utilized by other parcels not owned by the developer/owner) can be a benefit of a project as part of a PUD.
- 317.9 (Policy LU-3.3.3: Nonprofits, Private Schools, and Service Organizations) - Insert “and/or mitigations” at the end of this section so that it is not only benefits that are considered in a project’s effect on adjacent residential areas.

EXHIBIT A
DCBIA COMMENTS
COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED
CHAPTER 5 - HOUSING ELEMENT

Specific Edits to Proposed Text

Legislation as Introduced:

Subsection 503.4

Policy H-1.1.2: Production Incentives

Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for those that do not **and relaxation of height and density limits near transit.**

Comments: Add the following text at the end of the section:

“The following and other incentives may be appropriate to facilitate development: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.”

Explanation: Housing production should be incentivized to overcome the barriers to housing production. DC is one of the most expensive and bureaucratically difficult jurisdictions in which to develop real estate. We should encourage the use of a broad array of tools to make development more efficient to meet housing production goals.

Legislation as Introduced:

NEW Policy H-1.1.8 Production of Housing in High Cost Areas

Encourage development of both market rate and affordable housing in high cost areas of the city making these areas more inclusive. Develop new innovative tools and techniques that support affordable housing in these areas. Doing so increase costs per unit but provides greater benefits in terms of access to opportunity and outcomes.

Comments: Add the following text at the end of the section:

“The following and other incentives may be appropriate to facilitate development in high cost areas: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.”

Explanation: The text states a policy goal of developing affordable housing and acknowledges that the goal increases development costs. However, the text is too vague regarding how to appropriately incentivize the market to meet this policy goal. The recommended text provides important detail on incentives to help the private sector meet the policy goal and gives agencies an array of tools to facilitate housing production.

Legislation as Introduced:

NEW Action H.1.1.D

NEW Action H.1.1.D: Research New Ways to Expand Housing

Continue research to expand market rate and affordable housing opportunities in Washington, DC such as expanding existing zoning tools and requirements. Consider a broad range of options to address housing constraints which could include updating the Height Act of 1910, a federal law, outside of the monumental core if it can promote housing production.

Comments: Add the following text at the end of the section:

“Encourage agencies to utilize a variety of tools to make projects feasible, including: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking mandatory requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.”

Explanation: The chapter should emphasize that agencies and the Zoning Commission have flexibility and discretion, coupled with a range of tools, to incentivize the production of housing that can offset the cost burden of building affordable and family-sized units.

Legislation as Introduced:

Subsection 504.14 Policy H-1.2.7: Density Bonuses for Affordable Housing

Provide zoning incentives, such as through the PUD process, to developers proposing to build ~~low and moderate income~~ a substantial amount of affordable housing. ~~Affordable housing above and beyond any underlying requirement. The affordable housing proffered~~ shall be considered a high priority public benefit for the purposes of granting density bonuses when new development is proposed, especially when the proposal expands the inclusiveness of high cost area by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood. ~~Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood.~~

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Comments: DCBIA suggests the section be re-written as follows:

504.14 Policy H-1.2.7: Density Bonuses and Flexibility for Affordable Housing
Provide zoning incentives and entitlement and regulatory relief, such as through the PUD process, to developers proposing a meaningful substantial amount of affordable housing ~~above and beyond any underlying requirement~~. The affordable housing proffered shall be considered a high-priority public benefit to be considered in the context of other public benefit priorities for the purposes of granting regulatory flexibility, including density bonuses, when new development is proposed, ~~especially when the proposal expands the inclusiveness of high cost area by adding affordable housing~~. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood maximize housing production and project viability.

Explanation: Existing regulatory and legal requirements that require the production of affordable units already stress the development environment in the District. This, coupled with land and construction costs, permitting delays, labor and environmental requirements, and appeal uncertainty, have slowed-down housing production. Use this opportunity to match affordable unit production with zoning incentives and easing of regulatory burdens that add cost and slow production. Replace “top priority” public benefit with “an important” public benefit to allow the Zoning Commission and agencies the necessary discretion and flexibility to approve projects while balancing a variety of competing priorities and factors unique to each development project.

Legislation as Introduced:

NEW Policy H-1.2.10

Redevelopment of Existing Subsidized and “Naturally Occurring” Affordable Housing
Encourage and incentivize build-first, one-for-one, on-site, and in-kind replacement of affordable units, including larger family sized units. In addition, encourage and incentivize relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial assistance to ensure long-term affordability when projects meet these criteria.

Comments: Add the following text at the end of the section:

Zoning incentives and entitlement and regulatory relief are appropriate to maximize housing production and project viability under these circumstances. Relief might include: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of mandatory parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, granting of tax credits and abatements, and other financing tools.

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Explanation: These standards are not economically viable for private parties. Imposition of these standards is likely to economically injure private owners who are held to a far higher standard than owners of sites that do not include “naturally occurring” affordable housing.

Legislation as Introduced:

Subsection 509.1

Preservation of housing in the District-especially affordable housing-is perhaps an even higher priority than increasing housing supply. This section focuses on two aspects of housing conservation: (1) retaining affordable housing units specifically and (2) retaining existing housing stock generally.

Comments: DCBIA suggests the section be re-written as follows:

Preservation of housing in the District-especially affordable housing-is ~~perhaps an even a higher priority~~ to be balanced with the high priority of ~~than~~ increasing housing supply, which should include the replacement of older affordable housing experiencing deficiencies with newer and higher quality affordable housing with regulatory relief, incentives and financial subsidies. This section focuses on two aspects of housing conservation: (1) retaining affordable housing units specifically and (2) retaining existing housing stock generally.

Explanation: Production of many more new, efficient units should be prioritized along with the preservation of existing affordable housing.

Legislation as Introduced:

510.4a Text Box: Principles for the Redevelopment of Existing Affordable Housing

EXHIBIT A

Text Box: Principles for the Redevelopment of Existing Affordable Housing
Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that, in addition to the affordability controls expiring, the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. Furthermore, the neighborhoods, the surrounding land uses, and the needs of Washington, DC have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies that are critical to Washington, DC's growth as an inclusive District, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;**
- Advance mixed-income neighborhoods with both market rate and affordable housing;**
- Implement one-for-one replacement of affordable units;**
- Provide family-sized housing, including multigenerational families;**
- Build affordable units first to minimize displacement and maximize the return of residents to their community; and**
- Include tenants' rights of return and comprehensive relocation plans for tenants prior to redevelopment. 510.4a**

Comments: DCBIA suggests the Council insert the underlined text:

NEW Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that not only are the affordability controls expiring, but the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. In addition, the neighborhoods, the surrounding land uses, and the needs of the city have changed. As the cost of constructing, preserving, renting and owning housing rises, the need for dedicated affordable units and public policies and programs incentivizing such units, becomes even greater. For these reasons, redevelopment of expiring publicly owned affordable housing should use several strategies critical to Washington, DC's growth as an inclusive city, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;
- Advance mixed income neighborhoods with both market rate and affordable housing;
- ~~One for one~~ Prioritize replacement of affordable units in proportions applied to other projects;
- ~~Provide~~ Where feasible and needed, include family-sized housing, including multi-generation families;
- Where feasible, build affordable units first to minimize displacement and maximize the return of residents to their community;
- Where feasible, include tenants' ~~rights of opportunity~~ to return and comprehensive relocation plans for tenants prior to the redevelopment.

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Explanation: When an affordability covenant expires on private property, the owner should be permitted to redevelop the property in a manner consistent with all other privately held sites (IZ, etc.), regardless of whether there was affordable housing on the site prior to redevelopment. A privately held site that was utilized for 30 or 40 years as affordable housing cannot be expected to be permanently affordable. Indeed, many owners/investors were induced to enter affordability covenants expressly with the long-term redevelopment opportunity in mind as a return on the original investment. In fact, owners/investors of affordable projects often forgo market returns and distributions over the life of the affordability covenant. Overly burdening privately-held sites with onerous restrictions will render them undevelopable and may subject the District to litigation. The most prevalent housing program, the Low-Income Housing Tax Credit Program, has affordability requirements of 30 years while the tax credit subsidy ends after ten years, and if bond financing is involved, affordability requirements often extend to 40 years although the financial benefits of the bond financing have long expired.

Legislation as Introduced:

Subsection 510.15

509.14 *Action H-2.1.C: Purchase of Expiring ~~Section 8 Projects~~ Subsidized Housing and 'Naturally Occurring' Affordable Housing*

Implement and use DOPA (District Opportunity to Purchase Act) to acquire, preserve and dedicate new affordable housing through a process of transferring ownership to pre-qualified developers that will maintain the properties with long term affordability requirements.

Comments: DCBIA suggests the Council insert the underlined text:

Study the market effects of using ~~Implement and use~~ DOPA (District Opportunity to Purchase Act) to acquire, preserve and dedicate new affordable housing through a process of transferring ownership to pre-qualified developers that will maintain the properties with long term affordability requirements.

Explanation: Interfering with private transfer rights is another way in which the District makes itself uncompetitive compared to surrounding jurisdictions. In nearly all instances, a quality affordable housing developer is the intended contract purchaser of an affordable building, and the prospect that the District could undermine a transaction by invoking DOPA will discourage the deployment of time and resources by the best affordable housing developers for the risk of losing the project through DOPA. DOPA should only be used where there is a demonstrable and high risk of adverse consequences for the tenants of the housing accommodation. DOPA was enacted out of fear of the loss of affordable housing as federal subsidies were declining. Other laws protect against tenant displacement. The perceived loss of affordable housing, whether through certain housing programs or rent control, misses the fact that the District's old affordable housing has been replaced by new affordable housing or the rehabilitation of those units, removing those units from the older programs, including rent control. The impact of

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emphasizing the use of DOPA should be further considered. The focus should be on the production of a significant amount of new housing and incentivizing the market to meet demand, which would also include the replacement of existing housing with higher quality housing.

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DCBIA COMMENTS
COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED
CHAPTER 6 – ENVIRONMENTAL CHAPTER

Specific Edits to Proposed Text

605.2: The 40% tree canopy is a good overall metric; but suggestion could be to have individual ward metrics to ensure there are not major disparities AND ensure that offsite tree planting does not get put on one developer/project just to meet a district goal

625.2: "DC Water's efforts to replace water service lines are partially supported through a new meter-based fee established in 2016."

- Something to note in this section. The increased new meter fees are partially supporting upgrading existing lead pipes to reduce the potential risk of lead poisoning
- Developer will need to replace any existing lead pipes (already known by most developers/designers)

630.2: "District government will continue to integrate the most recent version of the IgCC in the District's construction codes for all new construction and major renovations, which will apply to both public and private buildings of over 10,000 square feet"

- Not a new requirement; just something to be aware of if the IgCC regulations change and get more stringent
- 630.7: "Update legislation to increase green standards for projects constructed by the District or receiving funding assistance from the District"
 - This is in line with DOEE requirements; just something for projects/developments to be aware of

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DCBIA COMMENTS COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED CHAPTER 7 – ECONOMIC DEVELOPMENT

DCBIA proposed to add to this chapter a missing major theme: **Leveraging District Assets:** utilize the power of the executive branch to anchor mixed-use development by placing government offices in locations that need economic growth such as Ward 7 and 8. Such leases can be a catalyst engine for economic growth.

Specific Edits to Proposed Text

Page	Section	Comments
0	700	Generally, the Overview section is fine but it lacks sufficient emphasis on the COVID-19 public health emergency and what the District will do over the next five years to mitigate the impacts on businesses, employees and residents. There is a very brief mention in 700.3 but more is needed with respect to impacts on office and retail. There also needs to be more focus on the (a) impact of Amazon (brief mention in 707.5) and other delivery-oriented retailers (see 702.9), (b) working from home and related issues such as which home-based businesses will thrive, and (c) enticing employers and employees to return to the office. Finally, there needs to be some focus on adjusting building valuation as a result of the changing office and retail landscapes. If it takes downtown more than a year to recover, what will the impact be on the taxes generated by real property, sales, hotel and entertainment activity? Will the change in the federal Executive administration (e.g., jobs, leases and procurement) have on the District over the next five years, and how will the results of the 2020 Census have on job training, health care and other issues that support economic development?
5	700.14	With these concerns, is the job growth projection (247K versus the original 125K) realistic? What can the District do to prevent another flight to the suburbs for open space and cheaper rents? Can open space be incentivized? What incentives can the District offer to retain and improve commercial corridors? What job training programs can be tailored to growth industries (see table in 702.6)
9	702.8	Ask George Mason University's Center for Regional Analysis to look at the costs and benefits of gig workers (see 705.22) and shared workspaces.
10	703.3	COVID is another "shock" to the District's economy. The District needs cross-industry collaboration to build the economic resilience to offset the shocks for COVID.
12	703.7	Do not delete legal and add accounting services from this subsection. These two service industries have a vital role to play in supporting the District's economic growth.
12	703.8	Do not delete universities and hotels for the same reasons as above.
16	703.14	Add energy-saving design to industries with economic growth potential.
16	703.16	Don't delete education. K through 12 education is the foundation for post-secondary education.

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DCBIA COMMENTS
COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED
CHAPTER 8 – PARKS, RECREATION AND OPEN SPACE

Specific Edits to Proposed Text

- Previous Comments on pg 16:
https://d1a8dioxuajls.cloudfront.net/accounts/10011/original/Full_Submission.pdf?1597941927
- Comments Addressed?
 - o Comment A --no, still does not specifically mention EventsDC's work at RFK or any other golf course other than Langston
 - o Comment B -- no (first bullet), yes (second bullet), no (third bullet)
 - New section 815.10 suggests that riverfront developers should provide public right-of-way and riverfront trail improvements for the public RATHER than encouraging the use of NPS and DC lands per DCBIA's comment
 - New section 810.26 suggests maintenance and programming be included in public-private partnerships when funding park acquisitions and improvements
 - Still seems reliant on public-private partnerships and developer led park development (817.2-3)
 - o Comment C -- no; the revised section 807.13 (previously 807.10) is looking into a **requirement for dedication of parkland (or park impact fee if not providing land)**
 - **It seems that this is a big difference from the previous process of paying a fee that was determined during the PUD process and used for acquiring/improving nearby parks. It does not seem that developing individual pocket parks will create DC OP's vision of connected parks through DC. Also need definition of "parkland".**
- New Sections that do / do not align with DCBIA Priorities
 - o Section 805.13 allows repurposing of spaces for temporary / seasonal uses; this does align with DCBIA's priority of flexibility
 - o Section 815.10 suggests that riverfront private developments should provide public right-of-way to the river; this does not align with DCBIA's priority of flexibility

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DCBIA COMMENTS COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED

CHAPTER 11 – COMMUNITY SERVICES AND PUBLIC FACILITIES ELEMENT

Specific Edits to Proposed Text

On impact fees: from 1104.8 *Policy CSF-1.2.6: Impact Fees*

Existing Language: New development **should** pay its fair share of the capital costs needed to build or expand public facilities to serve that development. Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large. 1104.8

to

Recommended Language: 1104.8 Policy CSF-1.2.6: Impact Fees – Continue to ensure that new development pays its “fair share” of the capital costs needed to build or expand public facilities to serve that development **through the current PUD Community Benefit process**. ~~Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large.~~ 1104.8

“Adoption of any fees shall take potential **positive** fiscal, economic **impact of the** and real estate **development impacts** into account and shall be preceded by the ~~extensive~~ involvement of the development community and the community at large.”

Co-Location

1103.9 Co-location can help residents individually, by providing a one-stop shop with a variety of services typically needed by the same people in the same facility or by keeping facilities occupied and thus safer day and night, as when apartments sit atop libraries or schools are used for community meetings in the evening. Co-location can be physical, when two or more uses occur on the same site, and/or temporal, where different uses take place at different times in the same room or same building on the site, as when religious congregations rent school auditoriums on weekends and private sports leagues use school athletic facilities. Thus, co-location includes, but is not limited to, the following potential combinations of uses on a single site:

- One or more community services or programs located with government offices or in Government facilities;
- **Private uses, such as affordable and mixed-income housing built together;** [emphases added]

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- Public uses, such as libraries, recreation facilities, and police and fire stations located together **or with private uses, such as housing**; [emphases added]
- Child development facilities located on school property;
- Multiple health and wellness-related facilities; and
- Retail and commercial uses (such as grocery stores) that can serve community needs located alongside government uses.

A Public Facilities Plan can encourage the District to consider co-location of a wide range of municipal uses and assets that can help maximize the ability of any given facility to deliver services to District residents. This is especially critical when uses under consideration are under the auspices of separate agencies. 1103.9

1103.20 Policy CSF-1.1.9: Co-Location

Encourage the **strategic co-location of public municipal uses on publicly-owned and controlled sites**, provided that the uses are functionally compatible with each other and **the site's future land use designation. Consider co-location of private and public uses as a strategy that can help advance District-wide and neighborhood priorities, such as the creation of affordable housing and equitable access to services.**

1103.29 Action CSF-1.1.F: Co-Location of Housing with Public Facilities

As part of facilities master planning and the CIP, conduct a review of and maximize any opportunities to co-locate mixed-income multi-family housing when there is a proposal for a new or substantially upgraded local public facility, particularly in high-cost areas.

1103.29

1104.6 Policy CSF-1.2.4: Innovative Financing Strategies Continue to explore alternative financing strategies for projects that provide public benefits, including public facilities. Strategies include ground leases, impact investing, joint development, creative leasing arrangements, and other financing instruments that have no effect on the District's debt cap and can maximize financial performance and achieve public policy outcomes. 1104.6

These three sections do not go far enough and are a housing opportunity. Co-location should just not mean affordable and mixed-income housing built together (that is a good 1995 idea). In 2020 and beyond, housing can be built with libraries, childcare, community kitchens, wellness and recreation facilities.

As to the 1104.6 financing language, it's amazing that this is only real public/private financing reference in 75 pages and does not go as far as the Mayor already done. The "that have no effect on the District's debt cap" should be eliminated. The District needs to have the ability to use Community Development Financial Institution (CDFI) lenders and various tax credit programs including federal New Markets Tax Credits and other alternatives as traditional affordable housing equity and financing has dried up.

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DCBIA COMMENTS COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED

CHAPTER 13 – INFRASTRUCTURE ELEMENT

Specific Edits to Proposed Text

- 1300.8 says that Washington DC has increased by 121,000 people since 2006 but the Environmental Protection Element in section 600.11a says that Washington DC increased by 100,000 between 2000 and 2015.
- 1304.3: "The plan sets the objective of replacing or rehabilitating one percent of linear water infrastructure annually."
 - "More than 1,350 miles of drinking water pipelines and 1,800 miles of sewers"
 - 7,128,000 ft of water main; 71,280 lf = 1%
- 1306.8: "These projects include the replacement of undersized, aging, or deteriorated sewers; the installation of sewers to serve areas of new development or redevelopment; and replacement and rehabilitation of pumping station force mains"
 - This does not specify the responsibility for the replacement cost. As we know; that is usually, if not always, the developer
- 1306.9: "Encourage the use of on-site water collection and reuse systems for any Planned Unit Development."
 - Cistern and water re-use can be expensive on the developer/project
 - Based on the "DCBIA priorities" one of the purposes is to make the PUD process easier and more frequent. This could potentially add cost to the developer
- 1307.1: "In the existing combined sewer area, pipes and infrastructure have been upgraded as new developments connect to the existing system."
 - Similar to the above note; this does not specify the responsibility for the replacement cost. As we know; that is usually, if not always, the developer
- 1310.2: DC does not currently have a construction and demolition debris transfer station and large-scale building debris disposal is handled privately
 - Potential extra cost for developer
- 1310.5 "Work to achieve zero waste in the District by 2032 by diverting 80 percent or more of waste generated in Washington, DC. This diversion can be achieved through reuse, composting, and recycling"
 - Potential extra cost for developer

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- 1310.8: "Encourage the private sector to provide more efficient, cleaner, and more environmentally friendly waste processing facilities for all types of solid waste"
 - Potential extra cost for developer
- 1315.2: "Local law requires that, by 2032, the District will source all of the energy it consumes from renewable sources and up to 200 megawatts from local solar generation. "
 - Potential extra cost for developer. May be implemented in later PUDs if the goal is not being met by the District
- 1320.4: "Private developers should fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to infrastructure, including water and wastewater, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project"
 - This outlines directly that additional improvements/upgrades will be on the developer.

DCBIA COMMENTS
COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED
Chapter 13 - COMMUNITY SERVICES AND PUBLIC SERVICES
ELEMENT

Edits in yellow and blue

DELETIONS
ADDITIONS

Comprehensive Plan Infrastructure Element

Proposed Amendments

1300

Overview 1300

1300.1

The Infrastructure Element provides policies and actions on the District's water, sanitary sewer, stormwater, solid waste management, energy, information and communications technology, and enhanced coordination among these sectors. ~~telecommunication systems.~~ Investments in these systems are essential to Washington, DC's ~~our city's~~ future, specifically in both to ~~meeting~~ the demands of existing users, ~~and to~~ accommodating future change and development, and enhancing the District's resiliency and sustainability. These policies are complemented by those in the Land Use, Urban Design, Environmental Protection, Transportation, Community Services and Facilities, and other elements, all of which recognize the interplay between infrastructure and related topics. 1300.1

1300.2

~~Like many older historic cities, the District suffers from aging infrastructure. Some portions of the water and sewer systems were built more than a century ago. The central challenge faced by the District is not one of capacity but one of meeting maintenance and replacement needs. In fact, the number of households in the city today is not substantially different than it was in 1950, though there are 230,000 fewer residents. Consequently, infrastructure is generally in place to support additional development, with some exceptions at specific locations where development did not previously exist. The conveyance systems and facilities, however, are suffering from structural deterioration and are in need of significant rehabilitation, modernization, and expansion as aging components approach the end of their useful lives. Since the 2006 update to the Comprehensive Plan, billions of dollars have been invested in the energy, water, digital, and solid waste systems that are intrinsic to the District's daily life and functions for its residents and visitors. Collectively, these investments have made the District a better place to live, work, and visit through the replacement of aging infrastructure, modernization of existing infrastructure, as well as environmental mitigations that are improving Washington, DC's natural environment. However, most of these investments were not directed toward expanding capacity because existing systems had spare capacity. With the level of forecasted growth in population and jobs, Washington, DC will need to think innovatively about how to build on the substantial infrastructure investments made in the last decade.~~ 1300.2

1300.3

To meet future demands effectively, the District should take a cross-system approach to infrastructure, identify ways to use existing infrastructure more innovatively, apply new and emerging technologies to make infrastructure more efficient, and expand capacity where needed. This approach should

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Comprehensive Plan Infrastructure Element

Proposed Amendments

focus on improving quality of life. The District will also need to plan for a future where infrastructure is forced to contend with increased pressures from climate change. Infrastructure should be designed in a resilient way to withstand chronic stressors and system shocks. 1300.3

1300.4 Infrastructure is critical to the continued success and growth of Washington, DC; infrastructure capacity and effectiveness directly impact quality of life. Infrastructure systems provide vital services to residents, workers, and visitors; shape and enhance the public realm; underlie and contribute to health, wellness, safety, security, and quality of life; are fundamental to promoting economic growth; and form a backbone that allows the District to function as a home to hundreds of thousands of persons and as the nation's capital. In these ways, infrastructure fundamentally contributes to Washington, DC's ability to fulfill the Comprehensive Plan's vision of an equitable, inclusive, and resilient District. 1300.4

1300.5 The District's current infrastructure includes:

- More than 1,350 miles of drinking water pipelines and 1,800 miles of sewers;
- More than 2,200 miles of electrical cable;
- More than 2,300 miles of natural gas pipelines;
- Approximately 700 miles of fiber-optic cable owned by the District;
- More than 400 outdoor Wi-Fi access points;
- Thirteen communications towers strategically located across the District; and
- More than 70,200 street lights. 1300.5

1300.36 The planning, management, and oversight of the District's energy, water and sewer, solid waste, and information and communications technology ~~utilities~~ systems is ~~are distributed among~~ ~~shared by~~ several ~~entities~~ ~~agencies~~, including ~~the District of Columbia Water and Sewer Authority (WASA)~~ DC Water (formerly DC Water and Sewer Authority), the U.S. Army Corps of Engineers (USACE), the Potomac Electric Power Company (PEPCO), Washington Gas, ~~and~~ the District's Department of Public Works (DPW), the District's Office of the Chief Technology Officer (OCTO), commercial telecommunications providers, and others. In addition, the General Services Administration (GSA) contracts with Washington Gas and PEPCO to supply federal agencies with natural gas and electricity, respectively, and many federal agencies, as well as some hospitals, educational institutions, and other nonprofit organizations that avail themselves of DC-Net. ~~electricity and natural gas.~~ This ~~Element~~ element incorporates planning and policy guidance from the short-~~term~~ and long-term plans of these service providers. 1300.36

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Comprehensive Plan Infrastructure Element

Proposed Amendments

1300.47 The critical infrastructure issues facing ~~the District~~ **Washington, DC** ~~of Columbia~~ are addressed in this ~~Element~~**element**. ~~These issues~~ **They** include:

- **Achieving and maintaining a state of good repair across all infrastructure systems;**
- Improving water quality and public health by addressing the **District** ~~city's~~ combined sewer, **sanitary sewer,** and wastewater systems;
- **Responding to rapid changes in technology and equitably and accessibly distributing new digital technologies and services;**
- Modernizing the aging water, **gas, and electric** distribution systems;
- ~~Ensuring the District has a world-class telecommunications system with access for residents and businesses across the city~~
- **Addressing infrastructure sufficiency for new development; and**
- **Enhancing the District's utility systems to increase resilience.**

1300.47

1300.8 **Since 2006, when the Comprehensive Plan was last revised, Washington, DC has experienced rapid population and job growth, which has made the District one of the fastest growing large cities in the country. In 2018, the District's population grew to 700,000, a figure not seen since the 1970s. Washington, DC has grown by 121,000 people, or 20.8 percent, since the 2006 update of the Comprehensive Plan. This trend puts the District on track to bypass its previous peak population of 802,000 within the next decade. Washington, DC experienced the largest share of this growth (79,000 residents) in the six years since the 2010 decennial census. Investing in infrastructure is a critical part of sustaining this growth. 1300.8**

1301 Infrastructure Goal 1301

1301.1 The overarching goal for infrastructure is: ~~P~~**to** provide high-quality, **robust,** efficiently managed and maintained, and properly funded infrastructure to **meet the needs of residents, workers, and visitors in an accessible and equitable way,** ~~serve existing development~~, as well as **to support** future change and growth.

1301.1

1302 IN-1 Drinking Water 1302

1302.1 The water system serving the District ~~of Columbia~~ consists of two primary components: the water supply and treatment system, and the water distribution system. 1302.1

1302.2 **DC Water was created by District law in 1996, with the approval of the United States Congress, as an independent authority of District government with a separate legal existence. As of 2016, DC Water distributes safe, treated drinking water to all residents, workers, and visitors in the District. 1302.2**

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Comprehensive Plan Infrastructure Element

Proposed Amendments

- 1302.3** **Since 2006, there has been an evolution in the way water management is approached: while previously siloed as separate systems, potable water, wastewater, and stormwater are now managed together. This approach focuses on optimal outcomes, with all components considered together during the planning process. The whole water cycle, from capture, treatment, and reuse, is now integrated at both the local and District-wide scale. Thus, some of the policies and actions below may apply to drinking water infrastructure, as well as to wastewater and stormwater systems. 1302.3**
- 1302.24** ~~Water Supply and Treatment~~
The **water** supply and treatment system includes raw water sources, pipelines carrying this water to treatment plants, and the water treatment plants themselves. ~~The Washington Aqueduct Division of the US Army Corps of Engineers-USACE~~ operates and maintains these facilities and supplies treated water to several distributors. These distributors (which include ~~WASA-DC Water~~) deliver water to over one million users in ~~the District~~ **Washington, DC** and Northern Virginia. ~~1302.24~~
- 1302.35** The Washington Aqueduct **water system** was commissioned by Congress and built by ~~the~~ USACE in the 1850s to provide the nation's capital with a plentiful water source. It has been in continuous operation ever since **and is the only public water supply in the United States where the federal government has a direct role in providing drinking water.** ~~1302.35~~
- 1302.46** The **Washington Aqueduct System-system** is ~~composed~~**composed** of the Great Falls and Little Falls intakes on the Potomac River, the Dalecarlia and McMillan Reservoirs, the Georgetown Conduit and Reservoir, the Washington City Tunnel, and the East Shaft Pump Station. **The sand filtration site located at the McMillan Reservoir and Water Treatment Plan was decommissioned in 1986 and is no longer part of the water treatment system.** Figure 13.1 shows the Washington Aqueduct system. ~~1302.46~~

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stormwater system area ~~in order to~~ are identified. ~~sanitary lines that may be illegally discharging into the stormwater system. Take~~ These appropriate corrective measures; include penalties and termination of service to abate ~~such~~ unauthorized connections. [REDACTED]

Action IN-2.1.A: Wastewater Treatment Capital Improvements

Continue to implement wastewater treatment improvements as identified in the ~~WASA~~ DC Water CIP. These projects include the replacement of undersized, aging, or deteriorated sewers; the installation of sewers to serve areas of new development or redevelopment ~~changed development patterns~~; and replacement and rehabilitation of pumping station force mains ~~replacement and rehabilitation~~. Capital projects are required to rehabilitate, upgrade, or provide new facilities at Blue Plains to ensure that it can reliably meet its ~~National Pollutant Discharge Elimination System (NPDES)~~ permit requirements and produce a consistent, high-quality dewatered solids product for land application now and in the future. [REDACTED]

Action IN-2.1.B: On-site Wastewater Treatment

Encourage the use of on-site water collection and reuse systems for any Planned Unit Development. On-site water systems collect stormwater and treat it so that it can be reused in a building or at the local, neighborhood scale for non-potable needs, including toilet flushing and cooling. 1306.9

1307 IN-2.2 Stormwater Management 1307

1307.1 The District's storm drainage system consists of approximately ~~8,200 catch basins, 600 miles of storm sewers~~ 1,800 miles of sanitary and combined sewers, and 156 stormwater pumping stations, 75,000 catch basins and manholes, and 22 flow-metering stations. ~~WASA~~ DC Water also maintains ~~over~~ more than 4500 separate storm sewer discharges into local rivers and creeks. Since the early 1900s, separate stormwater and sanitary sewers have been constructed within the District. In the existing combined sewer area, pipes and infrastructure have been upgraded as new developments connect to the existing system. ~~and no new combined sewers have been built.~~ 1307.1

1307.2 Planned and programmed stormwater improvements include the replacement of undersized or deteriorated storm sewers with new and larger diameter pipes, and the installation of storm sewers to serve areas of new development or redevelopment ~~changed development patterns~~. Rehabilitation and replacement of pumping station force mains ~~also are~~ is also planned. Regional and intergovernmental cooperation will be needed to maximize the effectiveness of these upgrades (see the Chesapeake Bay Watershed Agreement ~~"Regional Initiatives"~~ text box). 1307.2

See the Environmental Protection Element for policies and actions related to

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1307.8

Action IN-2.2.C Rainwater Reuse

Develop guidance on the installation, treatment, monitoring controls, and inspections for rainwater reuse for non-potable purposes. 1307.8

1307.8a

Callout Text Box: Chesapeake Bay Watershed Agreement
Regional Initiatives 1307.6

~~The District has participated in several Chesapeake Bay Stormwater Initiatives in the past few years. The Chesapeake 2000 Agreement, undertaken in partnership with the EPA, the Chesapeake Bay Commission, and Maryland, DC, and Virginia, resulted in a directive called “Managing Stormwater on State, Federal and District Owned Lands and Facilities.” The directive called for better management of stormwater on public lands and facilities, which comprise more than 13 percent of the Chesapeake Bay watershed. The ultimate goal is to prevent stormwater problems resulting from increased development and to remediate stormwater problems on lands that have already been developed.~~

~~The 2001 Anacostia Watershed Restoration Agreement established new comprehensive goals for restoring water quality and living resources in the Anacostia basin. These goals include the creation of additional riparian forest buffers, decreasing impervious surface area through low impact development, and establishing active river advocacy groups in each major Anacostia subwatershed.~~

On June 16, 2014, the Chesapeake Bay Watershed Agreement was signed. Signatories included representatives from the entire watershed. The agreement commits the Bay’s headwater states to full partnership in the Bay Program. This is a historic agreement, as it facilitates coordination across the Bay’s political boundaries. The agreement establishes goals and outcomes for the restoration of the Bay, its tributaries, and the lands that surround them.

1307.8a

1308

IN-2.3 Combined Sewer System ~~(Csw)~~ 1308

1308.1

As noted earlier, a portion of the District’s sewer system includes combined wastewater and stormwater pipes. This area encompasses about 12,600 acres—or one-third of the District’s land area (see Figure 13.34). A majority of this area was developed before 1900. 1308.1

1308.2

~~In 2002, WASA developed a Long Term Control Plan (LTCP) to eliminate Combined Sewer Outfalls and thereby improve water quality (see text box on next page). A key component of the plan is the construction of four large tunnels which will allow runoff to be stored and then transported to the Blue Plains Wastewater Plant for treatment and gradual release. Two of the tunnels will be located near the Anacostia River, one will be near the Potomac River, and one will be near Rock Creek. The LTCP also includes separation of combined sewers in several sections of the District, consolidation and elimination of 13 of the 60 outfalls, and implementation of Low Impact Development (LID) practices at~~

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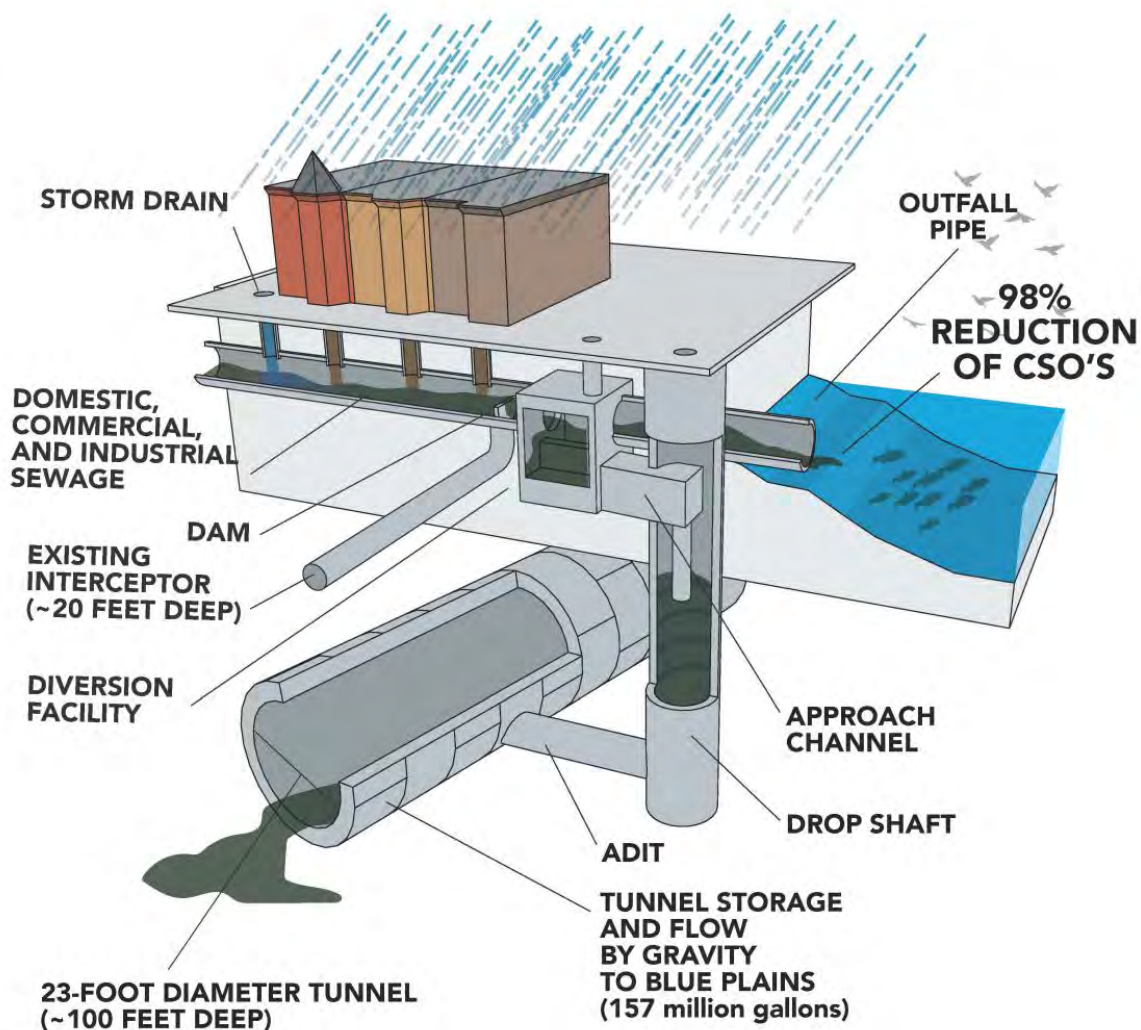
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~~WASA facilities and across the District. The project will take 20 years to complete and has a projected construction cost of over \$1.2 billion.~~ The Clean Rivers Project is DC Water's ongoing program to reduce CSOs into the District's waterways, specifically the Anacostia and Potomac rivers and Rock Creek. The project is a large-scale infrastructure and support program designed to capture and clean wastewater during rainfalls before it reaches these water bodies. The project also aims to stop the chronic sewer overflows that have plagued Washington, DC since the early 1900s. The project is comprised of a system of deep tunnels, sewers, and diversion facilities that capture CSOs and deliver them to DC Water's Blue Plains advanced WTP, where the water is treated and cleaned before release to the District's rivers. Figure 13.3 illustrates the system. 1308.2

1308.3

Figure 13.3: DC Water's Clean River Tunnel System 1308.3



(Source: DC Water 2018)

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experience for residents, workers, and visitors. Having infrastructure keep pace with growth will be critical in coming years, given that existing infrastructure systems may require modernization or expansion to meet the needs of these new areas. ~~However, as this Element highlights, any of the infrastructure improvements required to serve development are funded by entities other than the District of Columbia.~~ ~~1317.1~~ 1319.1

1319.2 The efficient and effective financing, maintenance, operation, replacement, and expansion of local infrastructure are important for a high quality of life in Washington, DC and to properly support that growth. 1319.2

1319.3 ~~Interagency coordination is necessary to ensure that capacity remains adequate. Coordination with the private sector is also important.~~ The general trend in cities and counties across the country has been for the development community to bear a greater share of the cost of infrastructure expansion, rather than leaving this burden to local taxpayers and ratepayers (see text box entitled Green Century Bonds). This is already common practice in the District ~~and will continue to be so in the future, given the District's already high tax rates and fiscal imbalance.~~ ~~1317.3~~ 1319.3

1319.4 Coordination between agencies and with the private sector is necessary to ensuring that infrastructure capacity remains adequate. Coordination helps to ensure that infrastructure is modernized and developed to serve future growth needs appropriately. It also helps identify where addressing infrastructure needs together will create time and cost savings. 1319.4

~~1317.2~~ 1319.5 *Policy IN-6.1.1: Coordination of Infrastructure Improvements*
~~Ensure that i~~Infrastructure upgrades ~~are~~ should be carefully scheduled and coordinated with development and redevelopment plans ~~in order~~ to minimize traffic rerouting, pavement cuts for laying cable or placement of other infrastructure within the street right-of-way, street closings, disruptive subsurface excavation, and utility shut-offs. ~~1317.2~~ 1319.5

1319.6 *Policy IN-6.1.2: Infrastructure Capacity for New Neighborhoods and Large Sites*
Undertake infrastructure system capacity planning when master planning new neighborhoods and large sites. 1319.6

~~1317.20.3~~ IN-6.2 Paying for Infrastructure ~~1317.20.3~~

1320.1 In general, local governments and/or independent agencies or authorities (e.g., ~~i.e.,~~ ~~WASA~~ DC Water and PEPCO) are responsible for the maintenance and upkeep of infrastructure. There are a number of ways that local governments fund infrastructure improvements. The most common are long-term financing via bonds and “pay-as-you go” revenues collected via taxes or utility rates. In many

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cases, municipalities have foregone investment in infrastructure due to revenue constraints. The result is deferred maintenance and a long backlog of unfunded repairs—an unfortunate reality in cities across the country. 1320.1

1320.2 Many local governments require infrastructure costs for new development to be borne by the developer through impact fees, special assessments, or other fees or taxes. Such fees are usually proportionate to the actual costs of building new water lines, sewer lines, and other utilities to serve the development site. While impact fees are an effective way to address the impacts of new development, they usually cannot be used to address deferred maintenance. Those costs must be financed through other means—generally through higher rates that cover the cost of bonds and capital projects that address deferred maintenance. 1320.2

1320.2a **Text Box: Green Century Bonds**
In July 2014, DC Water issued its inaugural green bond to finance a portion of the DC Clean Rivers Project. This historic \$350 million issuance represented DC Water’s inaugural green bond issue and the first certified green bond in the U.S. debt capital markets. It was also the first municipal century bond issued by a water/wastewater utility in the United States. The bond will be paid back over a 100-year period, to distribute the cost among those who benefit from the significant investment. The issuance achieved its green certification based upon the DC Clean Rivers Project’s environmental benefits, which include improving water quality by remediating CSOs, promoting climate resilience through flood mitigation and improving quality of life through promotion of biodiversity and waterfront restoration. 1320.2a

~~1317.4~~ 1320.3 **Policy IN-6.2.1.12: Creative Financing**
Promote creative financing tools to fund infrastructure development, maintenance, and replacement. These could include innovative taxing programs, user fees, ~~and~~ new development charges, improvements through Planned Unit Developments, and other innovative cost recovery mechanisms. ~~1317.4~~ 1320.3

~~1317.5~~ 1320.4 **Policy IN-6.2.1.23: Developer Contributions**
~~Require that p~~ Private developers should fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to ~~water and wastewater~~ infrastructure, including water and wastewater, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project. ~~1317.5~~ 1320.4

1320.5 **Policy IN-6.2.3: Infrastructure Maintenance**
Support investments in infrastructure to reach and maintain a state of good repair across all systems. 1320.5

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CHAPTER 17 – FAR NORTHEAST AND SOUTHEAST

Specific Edits to Proposed Text

Far NE and SE Comments

- 1700.3
 - Good attention to retaining park space and neighborhood amenities
 - Could maybe be even more direct in language - such as "ongoing and future developments should consider..." rather than "as the population grows," which is less measurable and enforceable in a zoning context. Also, if population declines, that may unintentionally render the rest of the guidance invalid.
- 1700.4
 - Recommend taking out "while the area is not without its challenges..." because that sets it up for the rest of the sentence to be positive, when it actually talks about an *increase* in poverty rate.
 - Are crime rates (regardless of whether they are higher or lower) discussed equally for other areas of the city? We want to ensure crime as a topic isn't disproportionately discussed in predominantly Black areas.
- 1700.5
 - On last sentence, recommend adding "improving the quality of life ***and avoiding displacement of*** the individuals who live there today."
- 1700.6
 - It appears that acknowledgment of removal of affordable housing was removed. Recommend re-inserting (updated) statistics on how the housing stock has shifted in terms of affordability, even with the vacancy rate
- 1700.7
 - Which affordability levels are represented by the 250 residential units?
- 1700.8
 - Support inclusion of climate vulnerabilities and flooding. Potentially add other climate risks as well in addition to flooding (i.e. heat related illnesses, infrastructure damage from increase in storm severity)
- 1703.1
 - When discussing replacement of public housing with single-family homes, suggest mentioning potential equity implications.
- 1704.1

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- It appears that the “25.1 percent” statistic is being used for two statistics instead of one; are those indeed identical, or is one statistic missing?
- 1704.2
 - 63.3 percent renters is **higher** than 58.3 percent, not lower
- 1705.1
 - Recommend inserting explanation of loss of 4,825 jobs since last Comp Plan; if the area has been largely residential throughout, that explanation does not cover the job loss
 - If I'm reading correctly, the median household income in this area dropped from 68% of District-wide median to 49% of District-wide median household income since the last update. That significant inequality **gap widening** is important to acknowledge in addition to the pure numbers.
- 1706.1
 - Recommend acknowledging any applicable equity/ gentrification concerns with replacement of affordable housing , or insert statements encouragement of new affordable housing within new multi-family developments
- 1707.1
 - Was this community engagement not repeated for this revision cycle? If not, should it be?
- 1707.2
 - Glad mention of preserving affordable units is this paragraph; could even be stronger and more specific language
- 1708.3
 - Good mention of "mixed-income" - could even be more explicit about including housing that is affordable to those below Median HH Income
- 1708.10
 - If bikeshare stations are added (which would be beneficial), must also encourage simultaneous addition of safe bicycle infrastructure - so we are not unintentionally increasing cyclist casualties on unsafe roadways
- 1709.5
 - Consider including assessment of **houses** that are projected to be repeatedly flooded, and strategies to either 1) mitigate the flooding 2) incentivize elevation and flood-proofing of houses in those areas (perhaps through coordination with zoning and building code), and 3) study potential government purchase of those properties that may face most dire repeated flooding events and require repeated expensive FEMA rehabilitation
- 1713.10

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- Good specific language here (equivalent number of affordable units)
- 1714.2
 - Great specific guidance here
- 1715.4b
 - Recommend listing those specific community preferences - they were in the RFP in 2019.
 - Also recommend inserting specific language on vision for the site to prevent potential development of this site into a low-quality, cookie-cutter suburban-style mass housing development that does not address the community's needs or customization to the DC context (speaking from seeing proposals for this)
 - Have the property issues been resolved on that site?

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DCBIA COMMENTS COMPREHENSIVE PLAN LEGISLATION AS INTRODUCED

CHAPTER 21 – NEAR NORTHWEST AREA ELEMENT

Specific Edits to Proposed Text

Now 2108.6

Chapter: 2108.8 Near Northwest Area Element

Existing Text: Policy NNW-1.1.7: Loss of Housing.

Strongly discourage the demolition of viable housing or the conversion of occupied units to non-residential uses such as medical offices, hotels, and institutions. Maintain zoning regulations that limit the encroachment of non-residential uses into Near Northwest neighborhoods, particularly around the Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom.

Proposed Text: ~~Loss~~ Support of Housing. ~~Strongly discourage the demolition of viable housing or the conversion of occupied units to non-residential uses such as medical offices, hotels, and institutions. - - Maintain zoning regulations that limit the encroachment of non-residential uses into~~ Allow ground floor commercial uses in Near Northwest neighborhoods, particularly around the Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom.

Recommendation: Modify as proposed above.

Explanation: Encouraging housing is one thing, but in the future there may be a need for commercial development and having a plan that expressly discourages this development is not conducive to providing services and economic development that residents may need.

Now 2108.8

Chapter: 2108.10 Near Northwest Area Element

Existing Text: Policy NNW-1.1.9: Affordable Housing

Protect the existing stock of affordable housing in the Near Northwest Planning Area, by bringing to bear new measures to preserve and to produce affordable housing in a way that advances fair housing goals and minimizes displacement.

Proposed Text: “Protect a higher quality stock of affordable housing and allow for the redevelopment of outdated buildings and units and encourage new, efficient mixed income communities.”

Recommendation: Strike original text and replace as noted.

Explanation: Existing housing may not be capable of reasonable upgrades and renovations and maintaining housing that cannot meet today’s standards does not help residents. New developments can provide better housing with mixed income and affordability controls.

Still 2111.5

Chapter: 2111.5 Near Northwest Area Element

Existing Text: Policy NNW-2.1.1: Affordable Housing

Protect existing affordable housing within the Shaw/Convention Center area and produce new affordable housing and market rate housing on underutilized and future development sites. Use a range of tools to retain and develop affordable housing in the study area, including tenant organization and public education, inclusionary zoning, renewing project-based Section 8 contracts, tax abatements, public-private partnerships, and including affordable housing when development on publicly owned land includes a residential component.

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Proposed Text: Policy NNW-2.1.1: Affordable Housing

~~Protect existing~~ Encourage the development of affordable housing within the Shaw/Convention Center area by ~~producing and produce~~ new affordable mixed-income housing and ~~market rate housing~~ on underutilized and future development sites. Use a range of tools to encourage ~~retain~~ and develop mixed-income affordable housing in the study area, including ~~tenant organization and public education~~, inclusionary zoning, ~~renewing project-based Section 8 contracts~~, tax abatements, public-private partnerships, incentive density bonuses, entitlement and regulatory relief, and increased ~~including~~ affordable housing when development on publicly owned land includes a residential component.

Recommendation: Strike and insert the text as indicated.

Explanation: The development of new mixed-income housing should be encouraged with incentives and flexibility.

Still 2111.6

Chapter: 2111.6 Policy NNW-2.1.2: Reinforce Existing Development Patterns

Existing Text: Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is consistent with sensitive to and complements the neighborhood's character. 2111.6

Proposed Text: Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area, while allowing higher density mixed-income buildings that are complementary to the neighborhood's character. ~~Locate~~ Encourage multi-unit buildings ~~in areas already zoned for greater density, including areas~~ near the Mount Vernon Square, Shaw/Convention Center, and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. ~~Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is consistent with sensitive to and complements the neighborhood's character.~~

Recommendation: Strike and insert the text as indicated.

Explanation: Fundamentally we must build more housing to ease the affordability problem in the city. Metrorail stations and the Convention Center area are primary candidates for more multifamily. These neighborhoods should evolve to accommodate higher density mixed-use, mixed income buildings if we are serious about building 36,000 units in 5 years.

Now 2111.15

Chapter: 2111.22 Action NNW-2.1.J: Expiring Section 8 Contracts

Existing Text: Implement the DC Housing Preservation Strike Force recommendations for Develop a strategy to renew all affordable housing the expiring project-based Section 8 contracts within the Shaw area, and beyond, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include, at a minimum, an equivalent number of affordable units, and additional market rate units, and measures to avoid displacement of on-site residents.

Proposed Text: Implement the DC Housing Preservation Strike Force recommendations for Develop a strategy to renew all affordable housing the expiring project-based Section 8 contracts within the Shaw area, and beyond, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include at a minimum, an equivalent a significant percentage of affordable units, and additional market rate units, and measures to avoid

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displacement of on-site residents. **Offset affordability cost burdens with incentives such as: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.**

Recommendation:

Explanation: The District should focus on building new, efficient mixed-income multifamily buildings across the city. One-for-one replacement is an extraordinary economic burden that likely renders a project “uninvestable” by private markets. Affordability requirements must be offset with appropriate relief.

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CHAPTER 25 – IMPLEMENTATION ELEMENT

Specific Edits to Proposed Text

2502.1: "In their areas of expertise, the views and recommendations of District agencies, should be carefully considered, and, where called for by law or regulation, given great weight."

Comment - If required by law or regulation, why do we need to say it here?

2503.3 - In concept, shouldn't Small Area Plans be amendments to the Comprehensive Plan and supersede them? Otherwise, what is the purpose? Change language to say "Small Area Plans are to be approved by the DC Council and incorporated into, and given the same force and effect as the Comprehensive Plan. If there is a conflict between the two, the Small Area Plan shall prevail."

2503.4 - I think this section is intended for future action once a Small Area Plan is adopted, Staff should go back and revise Comprehensive Plan.

2507.4 - Why Faith-Based Institutions, why not non-profits generally, including faith-based? 2514 -

2514 - unclear on timeframe; comprehensive review does appear to take more than 2 years

2516 - extending to 40 years the time frame, and overall making it difficult for non-residential to develop; the District needs non-residential development too, do not want it to be too onerous

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LAND USE ELEMENT

300.2 The critical land use issues ~~faciing the District of Columbia~~ are addressed in this element. These include the following:

- ~~Promoting neighborhood conservation~~
- Providing adequate housing, particularly affordable housing;
- Conserving, Ccreating, and maintaining successful inclusive neighborhoods, accessibility, and diversity while allowing new growth;
- Strengthening downtown;
- Enhancing neighborhood commercial districts and centers;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open spaces;
- Promoting transit-accessible, sustainable development;
- Improving resilience; and
- Siting challenging land uses. 300.2

303 LU-1 ~~SHAPING THE CITY~~ Shaping Washington, DC 303

303.1 This section of the Land Use Element describes the desired pattern of growth and development in the District ~~of Columbia over the next 20 years~~. Its focus is on the specific areas or types of areas ~~within the city~~ where change is most likely to take place. The section begins with information about supporting growth and guiding policies for the ~~center of the city~~ District. It then turns to the large sites ~~around Washington~~ where ~~future~~ changes are envisioned. This is followed by ~~a discussion~~ information about of the opportunities for change along ~~the city's~~ corridors and ~~around its~~ transit station areas. Policies for neighborhood infill development are also ~~are~~ included. 303.1

304 LU-1.1 Supporting Growth 304

304.1 Washington, DC has been experiencing a shift in growth over the past decade. This growth has occurred in a variety of forms: land development, income, economic strength, population, and innovation. Previous planning efforts focused on retaining residents and attracting growth to strengthen the economy. Since the Comprehensive Plan was developed in 2006, the District's population has grown almost 20 percent and is anticipated to reach 987,200 residents after 2045. The continued interest in living and working in the District requires a shift in planning efforts to support such growth and the challenges it brings. The needs and desires of a growing District in the 21st century are different and the approach to how growth is supported reflects that difference. 304.1

304.3 Supporting growth through an equity lens places a different emphasis on development guidance and expectations. Growth cannot be ignored, as it is necessary for continued prosperity and revenues to provide for social supports and municipal services. A change in the Future Land Use Map designations can affect the value of the designated and neighboring properties, the capacity of the infrastructure and civic services, and the short- and long-term expectations of

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development. Previous benefits and amenities used to catalyze growth are now necessities for supporting growth: affordable housing, transportation improvements, infrastructure improvements, open space development and maintenance, sustainable and resilient design, and arts and culture. 304.3

304.5 Policy LU-1.1.1: Future Planning Analysis and Resilience Focus Areas

Areas of large tracts and corridors where future analysis is anticipated to plan for inclusive growth and climate resilience. Boundaries shown are for illustrative purposes. Final boundaries will be determined as part of the future analysis process for each area.

In certain locations, planning efforts will be undertaken to analyze land use and policy impacts and ways to capitalize on, mitigate, and incorporate the anticipated growth. Current infrastructure and utility capacity should be evaluated against full build-out and projected population growth. The planning process will target issues most relevant to the community that can be effectively addressed through neighborhood planning. Planning analyses generally establish guiding documents, such as Small Area Plans, Development Frameworks, Retail Strategies, or Design Guidelines. Areas anticipated for future planning analysis include the following:

- New York Avenue NE corridor;
- Upper Wisconsin Avenue NW corridor;
- Upper Connecticut Avenue NW corridor;
- Foggy Bottom/West End;
- Benning Road corridor;
- Poplar Point;
- Congress Heights;
- North Capitol Crossroads—Armed Forces Retirement Home; and
- RFK Stadium.

~~306.11~~ 307.10 Policy LU-1.34.2: Development Around Metrorail Stations

~~Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that~~ In developments above and around Metrorail ~~such~~ stations emphasizes land uses and building forms ~~which—that~~ minimize the ~~need~~ need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. ~~306.11~~ 307.10

~~■~~ Infill development on vacant lots is strongly supported in the District of Columbia, provided that such development is compatible ~~in-scale~~ with its surroundings and consistent with environmental protection and public safety objectives. There are opportunities for change from vacant to vibrant in residential and commercial areas. In residential areas, infill sites present some of the best opportunities ~~in-the-city~~ for "family" housing and low-to-moderate-

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density development, as well as community gardens and pocket parks. In commercial areas, infill development can fill gaps in the ~~streetwall~~street wall and create more cohesive and attractive neighborhood centers. Vacant lots in such settings may also present opportunities for public uses, ~~such as pocket parks, job training facilities, and child care centers.~~ [REDACTED]

[REDACTED] The same effort given to keep Washington, DC's monumental core a symbol of national pride ~~must~~ should be given to the ~~city's~~ District's neighborhoods. After all, Washington, DC's ~~the~~ public image ~~of the city~~ is defined as much by the diversity and vibrancy of its communities, local culture, homes, businesses, streets, and neighborhood spaces as it is by its monuments and federal buildings. For Washington, DC's residents, the neighborhoods are the essence of the ~~city's~~ District's social and physical environment. Strong neighborhoods are key to continued livability in a growing and changing District. Land use policies ~~must~~ should seek to ensure that all neighborhoods have adequate access to commercial services, parks, educational and cultural facilities, economic mobility, and sufficient and accessible housing opportunities while ~~protecting~~ respecting their rich historic and cultural legacies. [REDACTED]

310.5

Continued growth, competing demands for land, and the desire to manage policy priorities across Washington, DC requires renewed attention to all areas in the District. 310.5

[REDACTED] During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities ~~increased stability in its transitional, emerging, and distressed neighborhoods.~~ This does not mean that all neighborhoods should become the same or that a uniform "formula" ~~for stability~~ should be applied to each community. Rather, it means that each neighborhood should have certain basic assets and amenities (see ~~text box~~ What Makes a Great Neighborhood). These assets and amenities should be ~~protected~~ respected and enhanced where they exist today and created or restored where they do not. [REDACTED]

Policy LU-2.1.1: Variety of Neighborhood Types

[REDACTED] Maintain a variety of ~~residential~~ neighborhoods ~~types in the District,~~ ranging from low-density, ~~single-family neighborhoods~~ to high-density, ~~multi-family mixed-use neighborhoods.~~ The positive elements that create the identity and character of each neighborhood should be preserved and enhanced ~~in the future~~ while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability and opportunity. [REDACTED]

[REDACTED] An inclusive neighborhood should create a sense of belonging, civic pride, and a collective sense of stewardship and responsibility for the community's future among all residents. Indeed, a neighborhood's vibrancy has to be

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measured by more than the income of its residents or the size of its homes.

The ~~In~~ 2004, "A Vision for Growing an Inclusive City" identified essential physical qualities that all neighborhoods should share. These included the following:

- Transportation options for those without a car, including convenient bus service, carsharing, bicycle facilities, and safe access for pedestrians;
- Easy access to shops and services ~~meeting~~ that meet day-to-day needs, such as child care, groceries, and sit-down restaurants;
- Housing choices, including homes for renters and for owners, and a range of units that meet the different needs of the community;
- Safe, clean public gathering places, such as parks and plazas—places to meet neighbors, places for children to play, and places to exercise or connect with nature;
- Quality public services, including police and fire protection, high-quality, safe, and modernized schools, health services, ~~and as well as~~ libraries and recreation centers that can be conveniently accessed ~~(though not necessarily located within the neighborhood itself)~~;
- Distinctive character and a "sense of place" defined by neighborhood architecture, visual landmarks and vistas, streets, public spaces, and historic places;
- Evidence of visible public maintenance and investment—proof that the ~~city~~ District ~~"cares" about the neighborhood and~~ is responsive to ~~its~~-neighborhood needs; and
- A healthy natural environment, with street trees and greenery, and easy access to ~~the city's~~ Washington, DC's open space system.

The understanding of what makes a great neighborhood has evolved, particularly in terms of addressing social equity, advancing sustainability, and building community resilience to everyday and long-term challenges, such as environmental and manmade disasters and public health emergencies. Where a resident lives—a person's neighborhood—remains one of the greatest predictors of individual health and economic outcomes. Vibrant neighborhoods have distinct character and can support growth. This investment and development should advance neighborhood vitality, growth, and economic mobility, and increase access, equity, and where appropriate, jobs. ~~A neighborhood's success must be measured by more than the income of its residents or the size of its homes. A successful neighborhood should create a sense of belonging and civic pride, and a collective sense of stewardship and responsibility for the community's future among all residents.~~

The positive elements that create the identity and character of each neighborhood should be preserved and enhanced. ~~in the future.~~ [REDACTED]

[REDACTED] Since 2006, the District has experienced significant population growth with the emergence of new neighborhoods and revitalization of existing ones. Growth of commercial centers has favored walkability and a retail mix led by food establishments and neighborhood shopping options. Residential growth has also spurred local commercial growth, buoying the success of

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more commercial centers and alleviating the District's long-standing retail gap. These changes have reshaped the retail landscape. Established retail areas have new competition while new opportunities emerged in underused centers. Commercial centers in neighborhoods provide amenities to residents, help to define public life, and provide community anchors and places for social interaction. ~~Many District neighborhoods, particularly those on the east side of the city, lack well-defined centers or have centers that struggle with high vacancies and a limited range of neighborhood-serving businesses. Greater efforts must be made to attract new retail uses to these areas by improving business conditions, upgrading storefronts and the street environment, and improving parking and pedestrian safety and comfort. The location of new public facilities in such locations, and the development of mixed use projects that include upper story housing, can encourage their revival.~~ [REDACTED]

HOUSING ELEMENT

500.2 The critical housing issues facing ~~the District of Columbia~~ Washington, DC are addressed in this ~~Element~~ element. These include:

- ~~Ensuring~~ Promoting housing affordability across all incomes and household sizes;
- Furthering fair housing opportunities, especially in high-cost areas;
- Fostering housing production to improve affordability;
- Preserving existing affordable housing;
- Promoting more housing proximate to transit and linking new housing to transit;
- Restoring or demolishing vacant or underused properties;
- Conserving existing housing stock;
- Maintaining healthy homes for residents;
- Promoting homeownership;
- Ending homelessness; and
- Providing housing ~~for residents with special needs~~ integrated with supportive services for vulnerable populations and residents with disabilities. 500.2

507.2 Policy H-1.5.1: Land and Building Regulations

~~Ensure that the~~ The District's land regulations, including its housing and building codes, ~~its~~ zoning regulations, ~~its~~ construction standards, and ~~its~~ permitting fees, ~~enable~~ should not prevent the production of housing for all income groups. Avoid regulations ~~which~~ that make it prohibitively expensive or difficult to construct housing. 507.2

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IMPLEMENTATION ELEMENT

2505.5 *Policy IM-1.4.3: Regional Planning*

Actively participate in regional ~~land use~~ planning initiatives, and recognize the link between these initiatives and broader District goals relating to housing, transportation, economic growth, ~~social~~ equity, and environmental quality. Encourage jurisdictions across the region to do their part to meet regional housing demand for ~~persons of all incomes~~ residents at all income levels, accommodate ~~special needs populations~~ the needs of persons with disabilities, contribute to transportation improvements, and make equitable and sustainable land use and transportation decisions which support “smart growth”. 2505.5

ECONOMIC DEVELOPMENT ELEMENT

700.2 The critical economic development issues facing ~~the District of Columbia~~ Washington, DC are addressed in this ~~element~~ Element. These include:

- Seeking to ensure that prosperity is equitably shared by addressing the disparities that exist across race and geography;
- Growing and diversifying Washington, DC’s economy;
- Defining the District’s role in the national and regional economies
- Increasing career job-opportunities and the workforce development system’s effectiveness for ~~District~~ residents most in need;
- Identifying locations for future job growth
- Expanding opportunities for small, local, and minority businesses; and
- Responding to the impacts of technological advancements on employment and businesses.
- Enhancing and revitalizing the city’s shopping districts. 700.2

700.79 ~~The economic paradoxes of the District of Columbia have been widely documented.~~ The ~~city~~ District has more jobs than residents but still has an unemployment rate that is ~~twice more~~ than 50 percent higher than the regional average. Jobs in the District provide some of the highest wages in the country, but over ~~20-16~~ percent of the ~~city~~ District’s residents live below the poverty line. The region ~~has the fastest annual job growth rate in the country (2.3 percent);~~ has had strong and sustained economic growth, adding an average of more than 41,000 jobs a year since 2000. ~~Yet~~ Despite sustained job growth locally and regionally, many District residents continue to face long-term unemployment due to persistent gaps in skills and education. ~~in the city is rising.~~ Additionally, billions of dollars of income are generated in the District, the majority of which the ~~city~~ District is unable to tax because its earners live in other states. This limitation adds to the District’s challenge harnessing its economic growth to invest in residents with the greatest need. 700.79

701 Economic Development Goal 701

701.1 The overarching goal for economic development in the District is: to drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status. Strengthen the District’s by sustaining its core industries, attracting new and diverse industries,

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~~accommodating future job growth, fostering the success of small businesses, revitalizing neighborhood commercial centers, improving resident job skills, and helping a greater number of District residents find and keep jobs in the Washington regional economy.~~ 701.1

705 ED-1.3 ~~Creating a Knowledge~~ **Supporting Innovation in the Economy** 705

705.1 The District's long-term economic strength depends on fostering continual growth and diversification. Historically, the federal government has driven the vast majority of the District's economic growth. Looking forward, it is likely that an increasing amount of growth will be driven by the private sector. 705.1

706 ED-2 **The Spatial Impacts of the Job Market** 706

706.1 The **forecasted** addition of ~~125,000~~ **247,100** jobs ~~during the next 20 years~~ **between 2015 and 2045** will create ~~the~~ demand for office, retail, hospitality, institutional, and industrial space. Estimates of floor space needs for the ~~30~~ **20**-year period vary from around ~~35~~ **50** million to ~~65~~ **94** million square feet, depending on the mix of jobs and space utilization trends. ~~Several hundred acres of land will be required to sustain this~~ **This real estate development will take place across the District** ~~in a variety of settings~~ with a variety of building types. ~~Accommodating this growth will pose a challenge for the District, given that it is a mature city with fixed boundaries.~~ **However, accommodating this growth will require more challenging real estate development techniques, including** ~~included~~ **lot assembly and/or extensive redevelopment of existing facilities, because the District is a mature city.** 706.1

707.6 *Policy ED-2.1.1: Office Growth*

Plan for an office sector that will **continue to accommodate growth in** government **agencies and growth in** government contractors, legal services, international business, trade associations, and other ~~service-sector~~ **service-sector** office industries. The primary location for this growth should be in Central Washington and the ~~emerging~~ **adjoining** office centers, **including** ~~along South Capitol Street and the Anacostia Waterfront~~ **NoMa, Capitol Riverfront, Buzzard Point, St. Elizabeths, and Poplar Point.** 707.6

707.10 *Policy ED-2.1.5: Infill and Renovation*

Support the continued growth of the office sector through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space. 707.10

708.23 ~~Nonetheless, the District still loses, or "leaks," an estimated \$1 billion per year in retail spending from its resident population, amounting to almost \$4,000 per household~~ **The retail economy is important to the tax base, and new retail options are anticipated to capture more consumer spending from residents, workers, and visitors, which strengthens the tax base. Retail expansion has occurred in numerous neighborhood**

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commercial areas across the District and in the Central Employment Area. Since 2006, District-wide retail growth has dramatically reduced the District's retail leakage as a proportion of resident spending, which was estimated at \$1 billion per year in 2006. Between 2009 and 2016, retail sales and use taxes were up 36 percent, and retail employment was up 28 percent. ~~The leakage is even higher when the potential spending of the daytime population, including workers and visitors, is included. The District's underperforming retail sector has a pronounced impact on its fiscal health, since retailing pays both real property taxes and sales taxes, and is more also likely to employ District residents than office development (see text box on next page).~~ **708.3**

~~708.6 Callout Box: The Importance of Retail Sales to the District's Finances~~ 708.6

~~An analysis of the fiscal impacts of different land uses was performed as part of the revision of the Comprehensive Plan to better understand the implications of future land use decisions. This analysis found that retail floor space generated more tax revenue for the city than comparable amounts of housing or office space. In fact, 100 square feet of "typical" retail space generated \$1,995 of revenue annually, compared to \$1,246 for office space, and \$869 for market-rate condominiums. For a "typical" market-rate condominium, 70 percent of the municipal revenues generated were from income taxes and 25 percent were from property taxes. By contrast, almost three-quarters of the municipal revenue derived from retail space was from sales tax.~~

~~The analysis found that mixed use development may be more favorable than single-use development from a revenue standpoint. Combining retail and residential uses allows the District to capture sales taxes, income taxes, and property taxes, while also reducing retail "leakage" and providing housing for the local workforce. Likewise, retail in tandem with office development provides an opportunity to capture worker spending on retail sales, currently a missed opportunity in many parts of Downtown.~~

~~Some caveats to this analysis are worth noting:~~

- ~~• Although retail uses are the best generator of revenue, this is dependent on the health of the economy and the specific mix of retail businesses. Some types of retail clearly generate more sales tax revenue per square foot than others.~~
- ~~• Office uses are the most reliable generator of revenue since a higher proportion of the revenue comes from property taxes, which fluctuate less than income and sales taxes.~~
- ~~• The fiscal impacts of residential uses are highly sensitive to the income levels and household characteristics of occupants. For example, a market-rate housing unit occupied by two income earners with no children generates more revenue and requires fewer municipal expenses than an affordable family unit.~~
- ~~• While fiscal impacts alone should not drive land use decisions, this type of data can help the city create balance, and achieve an appropriate mix of uses and activities as it grows.~~



Testimony of the District of Columbia Building Industry Association

Before the

Committee of the Whole

Chairman Phil Mendelson

Public Hearing

on

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Virtual Hearing

November 12, 2020

10 am

Good afternoon Chairman Mendelson, members of the Committee, and staff. My name is Lisa Mallory, and I am Chief Executive Officer of the District of Columbia Building Industry Association (“DCBIA”). I am also a longtime resident of Ward 4. DCBIA is the leading voice of real estate development in the District of Columbia.

DCBIA appreciates the opportunity to testify on Bill 23-736, the Comprehensive Plan Amendment Act of 2020 (“Act”). The Comprehensive Plan is a critical document that will guide development in the District for the coming decade. DCBIA believes that the Act as proposed by the Mayor is a fair planning document that helps all D.C. residents, supports economic growth, and provides decisionmakers with guidance so that multiple priorities can be addressed in a way that is more equitable and inclusive than has ever before been attempted in the District. In particular, we strongly support the proposed Future Land Use Map. The changes made reflect wise planning choices, including promoting transit-oriented development and affordable housing in areas that need it most.

As our members reviewed the Comprehensive Plan in detail, we set out to ensure that its guiding principles remained intact, while reflecting the economic realities of real estate development. We have identified areas where the Comprehensive Plan should be enhanced to ensure that the District attracts the

investment needed to continue the economic growth necessary to carry out the document's guiding principles.

In my own testimony, I want to highlight three broad themes, which can be developed and put into action through the specific recommendations of our members.

First, the Comprehensive Plan should require the District to consider the impact of new policies on housing affordability. There is no dispute that the District has a great need for more and affordable housing. While the Comprehensive Plan describes the challenge, it lacks a robust discussion of the drivers of housing costs. The District's regulatory environment makes developing housing more expensive than it needs to be and slows housing production. We urge the Council to address this by including in the Comprehensive Plan a requirement of an affordable housing impact statement before adopting any new statute, regulation, or policy. This will give decisionmakers the information needed to balance multiple ambitious priorities against what has been identified as an essential priority: the need for more and affordable housing.

Second, the Comprehensive Plan should include additional focus on incentivizing and increasing supply. The document throughout, and the Housing Element specifically, discusses at length the importance of producing affordable housing and family-sized units, as well as the cost of housing. It should also give

similar weight to incentivizing the market to meet demand for multiple types of housing at all income levels. These incentives can help overcome the high cost of producing housing in the District. Additionally, rather than prioritizing preservation over increasing supply, we think the focus should be on build-first, on-site, or non-displacement approaches to allow for construction of additional units, where appropriate, to achieve everyone's goals.

Finally, the Comprehensive Plan should acknowledge the importance of the District continuing to remain economically competitive. For decades, the District struggled to attract investment, but it has been successful recently due to supportive policies. This has enabled the city to weather the pandemic and launch a number of ambitious initiatives. But economic development cannot be taken for granted, especially in our competitive region and as we recover from the pandemic. The Comprehensive Plan should place greater emphasis on continuing to attract investment and grow inclusively and equitably for the benefit of all D.C. residents.

Thank you for the opportunity to testify. We look forward to continuing to engage with you, your staff, and your colleagues as the Council works toward adopting the Comprehensive Plan. I am happy to answer any questions you may have.



**TESTIMONY OF PETER FARRELL, MANAGING PARTNER
CITYINTERESTS DEVELOPMENT PARTNERS LLC**

**COUNCIL OF THE DISTRICT OF COLUMBIA
COMMITTEE OF THE WHOLE**

Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

**November 12, 2020
10 am**

Good afternoon Chairman Mendelson, members of the Committee, and staff. Thank you for the opportunity to testify on Bill 23-736, the Comprehensive Plan Amendment Act of 2020 (“Comprehensive Plan”). My name is Peter Farrell, and I am Managing Partner of CityInterests Development Partners LLC (“CityInterests”). CityInterests is a Certified Business Enterprise real estate firm focused on mixed-use, transit-oriented development that builds thriving communities in the District’s East End neighborhoods. I am testifying today to urge the Council to include the Parkside development in Ward 7 in the Central Employment Area (“CEA”), as defined in the Comprehensive Plan.

The inclusion of Parkside in the CEA, which has the strong support of Advisory Neighborhood Commission 7D, would help make Parkside more competitive for locating federal and District government offices. This in turn will bring jobs and increased foot traffic to the benefit of residents and businesses on the East End. Adding Parkside to the CEA will help ensure that the project fulfills its potential for Ward 7.

As many of you probably are aware, Ward 7 is the only ward without a federal office installation. The CEA is part of the point system that the U.S. General Services Administration uses to determine the placement of federal office leases. Its geographic boundaries are

established in Map 3.4 of the Land Use Element, as proposed by the Office of Planning (“OP”). These boundaries reach Wards 2, 5, 6, and 8. However, they do not encompass any of Ward 7. While OP’s proposal recognizes Parkside as a federal employment area, the fact that it is located outside the CEA’s boundaries puts Parkside at a disadvantage when it comes to attracting government agencies.

As OP’s proposal states, the CEA must include core federal facilities and areas of concentrated private office development. However, it also states that the CEA may include additional land necessary to support economic growth and federal expansion, and to guide economic development initiatives. Including Parkside in the CEA will directly advance the District’s economic development goals while providing Ward 7 with the tools it needs to fairly compete against other areas of the city. As the largest transit-oriented development project in the city, and the only site in Ward 7 that can contain large-scale transit-oriented federal government office needs, doesn’t it make sense to provide Parkside with the tools necessary to attract this type of economic expansion?

Parkside as currently planned provides for up to 50,000 square feet of retail (to include an urban grocer), 750,000 square feet of office space, 2,000 mixed-income (workforce and affordable) residential units for sale and for rent, a community park, a new pedestrian bridge connecting the development to the Minnesota Avenue Metro Station across D.C. 295, and a host of other amenities and benefits memorialized in a Community Benefits Agreement with our residents (e.g., we have agreed to establish a scholarship fund for our community residents). Parkside’s location, amenities, affordable and workforce housing, and its capacity to house commercial office and retail tenants, make it a prime location for federal and District government employers as the city grows.

Parkside will also include housing for all income levels in close proximity to these new jobs. Over 284 units of affordable housing have already been completed, a 191-unit workforce housing building broke ground earlier this year, and another 230 units of workforce housing will begin construction next year. These units are the direct result of the Council's investment in Parkside, including through emergency legislation and the Fiscal Year 2021 Budget Support Act adopted over the past year. By ensuring that this community can be competitive for locating a large number of quality jobs, the Council can get even more value for District residents from the investments it has already made.

We appreciate the Council's ongoing support for Parkside, and we urge you to include it in the CEA when it adopts the Comprehensive Plan. The future of Ward 7 will be directly affected by the decisions made here today as we strive to achieve greater economic prosperity and opportunity for all D.C. residents. Thank you for the opportunity to testify. I am happy to answer any questions you may have.

Testimony prepared by:

LaToya Thomas Principal, Brick & Story and Housing Policy Director, HAND

November 12, 2020

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Good morning, Chairman Mendelson and Councilmembers,

Thank you for the opportunity to testify today to lend my wholehearted support to the comprehensive plan and to urge the Council to review and adopt the amendments and updates with all expediency.

My name is LaToya Thomas, Principal & Founder of Brick & Story, a Ward 7-based small business. I am also a proud of native Washingtonian. Today, however, I am here in my capacity as the Housing Policy Director with the Housing Association of Nonprofit Developers - better known as HAND.

HAND is a nonprofit membership association comprised of over 450 organizations working across the private, public and nonprofit sectors to collaborate in the production and preservation of affordable housing in the Capital Region of Baltimore, Washington, and Richmond. Through education, engagement and regional advocacy, HAND builds the capacity of its diverse membership to support the development of sustainable communities for individuals and families at all income levels. HAND is also a member of the Housing Priorities Coalition, which includes organizations like the Coalition for Smarter Growth and Enterprise Community Partners, that was formed to help guide the updates to the Comprehensive Plan.

In early 2021, HAND will be releasing its Housing Indicator Tool (HIT), a digital platform of real-time data that will provide information on housing production and preservation throughout the Capital region. Tracked against the housing targets established by Metropolitan Council of Governments in 2019, the tool will tell us - both at the local and regional levels - how we are doing and if the policies and programs we have in place to further housing opportunities are really working. The tool will look at a variety of indicators as inputs to help us understand the effectiveness of the work happening in each jurisdiction. The adoption of a strong and equitable comprehensive plan is one of the key indicators we are tracking.

Firstly, we applaud the Office of Planning’s hard work to develop the updates to the plan, particularly the robust public engagement process they undertook to bring all of DC into the planning process. This is the type of work that makes for a more equitable and inclusive city and a more transparent government.

Just as this process has been equitable and inclusive, we need to ensure that the comprehensive plan updates are adopted immediately so that our land use policies can help to further equity and inclusion throughout the city.

Housing affordability - something that is central to HAND's mission and also a critical issue for many residents in the District - can be addressed through the provisions in the updated comprehensive plan. The District is already one of the most aggressive jurisdictions in the region with its goal to produce 36,000 units by 2025; now we need the land use policies in place to ensure that those units are allocated in a way that creates opportunities across the economic spectrum. We also need to ensure that the entire city takes responsibility for housing affordability and that we are creating housing opportunities for those who need it most in all 8 wards of the District.

We also know that COVID-19 has thrown a major wrench into our local economy (not to mention the global economy); adoption of the comprehensive plan can ignite the economic rebuilding effort that will ultimately help families stabilize and then thrive.

Lastly, I would be remiss not to mention the framework of racial equity that is crafted into the proposed amendments to the comprehensive plan. At this point, most of us know the role that land use and planning has played in shaping American cities, resulting in segregated neighborhoods, displacement of people of color, and severe wealth, education, and health disparities that persist to this day. We are finding ourselves in a unique moment of reckoning as a country, and many cities along with the District are taking a second look at their land use policies and how those policies can be reshaped to create opportunity for those who, for generations, have been without. The policy recommendations outlined in the comprehensive plan updates are key to preventing displacement and achieving the opportunity and equity that our city needs and that our people demand.

In closing, I again commend the Office of Planning and the Council for giving the proper time and attention to the development of the Comprehensive Plan, a tool that can have a transformative impact on so many residents in this city for years to come, and I encourage you to adopt the comprehensive plan so that we can finally have the foundation in place to build a more equitable DC.

Thank you again for your time and attention today, and I welcome any questions you may have.

Testimony to
The Council of the District of Columbia, Committee of the Whole:
Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Public Hearing, November 12, 2020

Kerry B. Kemp
DC Resident, Ward 2, ANC 2B

Good afternoon, Chairman Mendelson and DC Council Members. My name is Kerry Kemp, and I am a long-time resident of the Dupont Circle neighborhood in Ward 2, who cares deeply about the District of Columbia. I appreciate your giving me the opportunity to express my views regarding proposed amendments to the DC Comprehensive Plan.

The Comprehensive Plan will have many far-reaching effects on everyone who lives or works in the District of Columbia. It will affect how the city grows and changes economically, how inclusive the city is, the character of DC neighborhoods, how sustainable the city is, and how DC residents live, work, and play.

I do not believe that the Comp Plan amendments as proposed by Mayor Bowser and the DC Office of Planning are ready for adoption without significant changes and urge the DC Council to postpone consideration of the plan until such changes are made. Some of my specific concerns about the proposed changes to the Comp Plan include the following:

1. The DC Office of Planning’s “amendments” constitute a major rewrite of the Comp Plan, which exceeds the scope of the 5- to 10-year amendment cycle. Moreover, the process used to develop the proposed amendments has been a top-down process that has not allowed for meaningful public engagement. Given that a complete rewrite of the plan is scheduled for 2026, one option would be to require the Office of Planning to remove amendments that exceed the scope of an amendment cycle and begin a rewrite with extensive community involvement as soon as possible.

2. The Mayor and Office Planning have not complied with the DC law that requires the submission of progress reports and data related to the DC Comp Plan (DC Code § 1–306.04). Consequently, there are no data on actual housing needs, the impact of new development on other systems (education, transportation, environment), or the impact of development on racial equity on which to base future policies. We should not proceed with the adoption of the amended plan until we have better information
3. While the Framework Element of the Comp Plan talks about the creation of “an authentic, equitable, and inclusive city,” there are inadequate specific mechanisms to advance this vision in the Comp Plan amendments submitted by the Office of Planning. Gentrification in areas such as 14th and U and the Navy Yard and Barry Farms has caused has caused the massive displacement of low- and moderate-income African American residents from the city. Simply building more and denser market-rate housing with inclusionary zoning in Ward 3 will not significantly advance racial and economic equity and inclusiveness. The Comp Plan should include specific strategies and mechanisms to ensure that we advancing the vision of an equitable and inclusive city, and data should be collected to monitor outcomes.
4. The Comp Plan amendments do not advance the goal of making housing more affordable to families and existing residents with low and moderate incomes. We shouldn’t pretend that trickle-down housing economics actually works to make housing affordable for everyone. Simply building market-rate housing with inclusionary zoning for residents with incomes at 80% of the area median income will not advance housing affordability for DC residents with low and moderate incomes, who are disproportionately people of color. The Comp Plan should include specific strategies and mechanisms to get more affordable housing for DC residents with incomes at 0%, 30%, and 50% of the area median income, and data should be collected to monitor outcomes.
5. The Comp Plan amendments submitted by the DC Office of Planning do not consider in any meaningful way with the profound economic and social impacts of the COVID-19 pandemic. The pandemic has changed how DC residents live, work, and shop, and it is important to recognize that some of the changes are likely to endure.

6. The guiding principles in the Parks, Recreation, and Open Space Element section of the fail to envision the designation, acquisition, and protection of more parks and open space. I think this is a significant oversight given the importance of parks and open space to the social, economic, and physical well-being of our city and its residents.

1. Major Rewrite of the Comp Plan. The DC Office of Planning's "amendments" constitute a major rewrite of the Comp Plan exceeding the scope of the 5- to 10-year amendment cycle. Implementation Element Section 2513.2). Moreover, the process used to develop the proposed amendments has been a top-down process that has not allowed for adequate public engagement. The Committee of 100 has suggested requiring the Office of Planning to remove amendments that exceed the scope of an amendment cycle and begin the 2026 Comp Plan rewrite with extensive community involvement as envisioned in the 2006 plan. I urge the DC Council to consider that option.

2. Lack of Data on Effects of Existing Comp Plan Policies. Mayor Bowser has not complied with DC law requiring the submission of data and progress made by the government in implementing the Comprehensive Plan. Consequently, there are no data on housing needs or the impact of new development on other systems (education, transportation, environment) or racial equity) on which to base future policies. We should not proceed with the adoption of the amended plan until we have better information.

DC law that requires the Mayor to submit progress reports and supporting data on the Comp Plan to the DC Council at least once every 4 years (DC Code § 1-306.04);

1-306.04 (b). Not less frequently than once every 4 years, beginning March 31, 2000, the Mayor shall submit to the Council a report, accompanied by a proposed resolution, on the progress made by the government of the District of Columbia in implementing the District elements of the Comprehensive Plan.

DC law also requires that the DC Council hold a public hearing on the progress report:

1-306.04 (b). The Council shall schedule a public hearing on the progress report and, following each review period, submit to the Mayor the findings of the Council and a copy of the public testimony on the progress report.

There is good reason for these legal requirements, and I urge the DC Council to take these legal requirements seriously. The DC Grassroots Planning Coalition has submitted a letter to Attorney General Karl Racine requesting an opinion about the legal sufficiency of the actions of the Mayor by and through the DC Office of Planning.

3. Lack of Mechanisms to Ensure the Creation of an Equitable and Inclusive City. As written, the DC Comprehensive Plan will not ensure equity or prevent gentrification that displaces long-time African-American residents with low and moderate incomes. The Office of Planning's website claims that the guiding vision of the DC Comprehensive Plan is "Planning an Inclusive City,"

"where every member of the community feels welcome wherever they are in the city, and where everyone has a fair and equitable opportunity to live a healthy, successful, and fulfilling life. In an inclusive city, residents are able to make choices about where they live, how they earn a living, and how they get around—regardless of whether they have lived here for generations or moved here last week, and regardless of their race, income, or age."

Committing to racial equity and inclusiveness is not enough. Without specific mechanisms to ensure equity and prevent displacement, the Comp Plan's commitment to an "inclusive city" is meaningless.

A study by the Community Neighborhood Reinvestment Coalition found that 20,000 black residents were displaced from low-income District neighborhoods (40,000 black residents citywide) mostly by white, more affluent newcomers from 2000 to 2013. Moreover, the numbers of black residents displaced by gentrification from the most recent decade are expected to be double the number in the previous decade.

The construction of new market-rate housing, much of it consisting of smaller units in high rise buildings, is destroying the housing that is affordable to existing DC residents and leading to the displacement of African American residents from communities in which their families have resided for generations. Many of us are seeing displacement of entire African-American communities in or near our own neighborhoods (e.g., the U and 14th street corridors, Petworth, Mount Pleasant, Brookland).

The Office of Planning has proposed a large number of changes to the Future Land Use Map (FLUM) of the Comp Plan. Many of these changes were initially proposed by developers and/or property owners, and most, if not all propose a change to a higher density category—a change referred to as “up-FLUMing.” UpFLUMing creates a domino effect, setting stage for upzoning. It immediately raises the value of land. Opening the door to increased density as a matter of right eliminates public review and community input of any benefits or impacts of future development. Moreover, in low-income, historically African-American areas such as Barry Farm and Ivy City, UpFLUMing will harm community organizing efforts to achieve equitable outcomes

Celebrated author and historian Ibram X. Kendi, says that policies that produce or sustain racial inequity between racial groups are racist. I believe we should reexamine DC government policies underpinning development and proposed amendments to the Comp Plan with this in mind. The Comp Plan should include specific strategies and mechanisms to ensure that we are advancing the vision of an equitable and inclusive city, and data should be collected on outcomes.

4. Inadequate Measures to Ensure Affordable Housing. Mayor Bowser frames the proposed changes in the Comp Plan as essential to achieving “Housing Equity Goals” of building 36,000 units by 2025. Although the Mayor claims that 12,000 of the newly built units will be “affordable,” she has not defined what levels of affordability will be achieved.

Affordable housing should be more clearly defined to include housing that is affordable to DC residents and families earning 0%, 30%, and 50% of the area median income, who are disproportionately African Americans and other people of color. The Comp Plan should include specific strategies and mechanisms to get more affordable housing for people at each of these income levels, and data should be collected on outcomes.

Building market-rate housing with inclusionary zoning for people with incomes at 80% of the area median income will not yield enough affordable to meet the needs of DC’s low- and moderate-income DC residents. Moreover, the proposed amendments to the Comp Plan make

no mention of some of the best mechanisms to get more affordable housing. These include shared equity housing cooperatives, community land trusts, and mixed-income social housing.

Finally, it is important to point out that the 12,000 units of affordable housing in the Mayor's pipeline will not be built for 5 to 10 years. Affordable housing for DC residents is needed now, not in 5 years. To that end, I support the DC Grassroots Planning Coalition's bold Housing Justice Priorities:

- Expand rent control to buildings built before 2005 to expand the number of rent-stabilized units and prohibit the siphoning off of rent-controlled inventory into other affordable housing programs
- Maintain, preserve, and improve existing public housing and build additional public housing to accommodate DC's 51,000 extremely low-income renter households (31 percent of all rental households) who can afford at most \$900 monthly rent.
- Meet the Homeward DC goals which called for making homelessness in DC a "rare, brief, and nonrecurring experience" by 2020.
- Expand rental subsidies for low-wage workers, seniors, people with disabilities, and extremely low-income families.
- Promote community-led and racially equitable development and augment pending DC Council legislation that titled Racial Equity Achieves Real Change Amendment Act by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development and setting forth procedures for monitoring and enforcing desired outcomes.

5. Failure to Consider Economic and Social Impacts of the COVID-19 Pandemic. The Comp Plan amendments submitted by the DC Office of Planning do not consider in any meaningful way with the profound economic and social impacts of the COVID-19 pandemic. The Office of Planning recently added a "COVID-19 Crosswalk" to the plan and inserted the words "public health emergency" into several plan elements, but those superficial changes are no substitute for seriously considered how changes in consumption, work, transportation, recreational, and

housing patterns caused by COVID-19, including impacts on city revenues, will affect the evolution of the city going forward.

The COVID-19 pandemic has changed how DC residents live, work, and shop, and it is important to recognize that some of the changes are likely to endure. Commercial real estate markets in particular are likely to be affected. In addition to posing challenges for the city, the changes may offer new opportunities (e.g., an opportunity to convert vacant commercial space downtown in Ward 2 into mixed-income social housing where residents pay no more than 30% of their income in rent).

6. Parks, Recreation, and Open Space Element. The guiding principles in the Parks, Recreation, and Open Space Element section of the proposed amendments to the Comprehensive Plan focus primarily on the protection and utilization of existing parks and open space; they do not envision the designation, acquisition, and protection of more parks and open space. I think this is a significant oversight.

I would urge the city to ensure that there are parks and open spaces in rapidly developing areas like NoMA, the Wharf, McMillan Park, Bruce Monroe, and the RFK Stadium site. In the wake of the COVID-19 pandemic, the importance of open green space and parks is increasingly apparent. City parks play a vital role in the social, economic, and physical well-being of America's cities and their residents. According to the City Parks Alliance, parks are now recognized as powerful tools for urban communities and local economies to help drive more vibrant and equitable cities. City parks provide access to recreational opportunities, increase property values, spur local economies, improve safety, and mitigate stormwater runoff, and other environmental threats.

I would also like to see the city preserve and protect our remaining open waterfronts on the Anacostia River and the Potomac River. Shorelines are an important asset to our nation's capital and have significant environmental benefits. I agree with the Committee of 100 that two principles should be applied to waterfront sites—maximum access for all citizens to waterfront amenities and conservation of natural resources. Restricting new development in flood areas

along the Anacostia and Potomac Rivers to appropriate open space land uses could also mitigate flood impacts. Chicago has an 18-1/2-mile linear park along Lake Michigan that includes beaches, volleyball courts, playgrounds, baseball diamonds, tennis courts, and soccer fields. This is a true public space shared and prized by Chicago residents throughout the city. Perhaps DC could create something similar.

From: [Coy McKinney](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Written testimony
Date: Wednesday, November 11, 2020 5:19:11 PM

If the DC government is as serious about racial justice as the mayor, office of planning, and other government officials proclaim they are, then the comprehensive plan must reflect that clearly and unequivocally. The current write-up of the Comp Plan does not do this for a variety of reasons which are pointed out in the housing justice priorities document which I support. The two issues I'd like to focus on in my testimony are the hollow language that is used and the lack of priority given to shared equity models.

Throughout the Comp Plan allusive words are used that curtail the document's directives. Words like "should be," "perhaps," and "encourage" allow for ambiguous interpretations, when clear and direct language is needed. Without explicit guidance, land use attorneys will spin the words into meaningless jargon. For example, the small area plan for the neighborhood where I live, Southwest, D.C., says residents want the area to be, quote, "an exemplary model of equity and inclusion." Jeff Utz, a land use attorney for Goulston & Storrs, interpreted "inclusion" as meaning "jelling with the fabric that surrounds you in a more holistic way." Uhh, wut? No, we're talking about preventing displacement of people based on income. The Comp Plan must lay out exactly what it plans to do and how it plans to do it.

The Comp Plan must prioritize the production of shared equity units. I was disappointed to not find a single reference to limited equity cooperatives, or plans to further the work of the city's only community land trust. These are models that are well-tested and known to be effective in permanently creating affordable homeownership opportunities. In October 2019, the Limited Equity Cooperative Task Force, created by the council, released its report, calling for 2,000 more units limited equity units. A 2018 study by Grounded Solutions, looked at over 4,000 units, in 20 states, over 3 decades and found that 99% of the shared equity units avoided foreclosure. Houston, Texas is vying to have the country's largest CLT by adding 1100 units in the next 5 years. Are we saying that DC can't up its game?

You mean DC is gonna rely on inclusionary zoning? A program that has only created 200 units a year since its inception, most of which aren't even truly affordable and certainly aren't sized for families? Or rely on for-profit developers to build themselves out of their own profit margins by building more Class-A, market-rate units that cater to the affluent, who are predominantly White? Really? How many more Class-A units must be built, then? How far will the rent drop? How long will it take for this to happen? What are Black folks, and low and moderate-income folks supposed to do in the interim? Wait and hope?

That's not justice. Justice dictates that those who have been historically underserved must

be given priority; in DC's case, that's Black folks. The median household income for Black families in DC is around \$40,000/year. The Mayor's Housing Equity Report found that, quote, "housing production has consisted mostly of small rental units targeted to households earning more than 120% MFI, that's over \$100,000 a year. According to the CFO, in the third quarter of 2019, the number of Class A units rose 13%, averaging over \$2,600 a month in rent. Those units ain't for Black folks.

If the blacked out profile pictures and self-mutings from this summer are to mean anything, especially from self-described urbanists, who should know better, it must be that we can't just say "build more" without centering racial justice. We must commit to the simple point made by Dr. Ibram X. Kendi, author of *How To Be An Antiracist*, that in order to be truly antiracist, you must be truly anticapitalist. So for the love of whatever you believe in, center your policies around those who have been historically underserved, and we'll see far better results.

--

Urban Agriculture teacher: [@techprepgreenhands](#)

Community gardener: [swgardens.org](#)

In the neighborhood: [SW DC Action](#)

Politics: [@ecoylogy](#)

"In order to be truly antiracist, you have to be truly anticapitalist."

- Dr. Ibram Kendi, author of, *How To Be An Antiracist* - [\(link\)](#)

The Comprehensive Plan Amendment Act of 2020

Testimony

Samuel Leone
11/12/2020

Good afternoon, Chairman Mendelson and members of the Council. Thank you for the opportunity to speak with you today.

My name is Sam Leone. I'm an economics PhD candidate at the University of California, Berkeley. I'm a resident of Ward 1. And I'm a renter.

I've come here to ask you to urgently pass a Comprehensive Plan that allows for an increase, not a decrease, in housing across the District. I believe that the Office of Planning's draft before you achieves that objective.¹ I hope that you'll either pass it as written or pass it with pro-housing amendments that, for example, further "upflum" the Future Land Use Map.²

Myself, my partner, and many of our family, friends, and colleagues - we've all wrestled with the difficulty of finding appropriate housing. And the fundamental cause of that difficulty is laws that block new construction. The economics literature is clear on this point; it shows that liberalizing land-use policies has three clear benefits.

First, increasing housing supply really does decrease housing rents. If we use zoning rules to force the number of units to remain fixed, then newcomers compete with existing residents for the same homes, bid up the prices, and cause displacement. But if instead we let the number of units grow, then we can reverse these forces and ensure long-term affordability. Evidence comes from decades of academic studies, including three recent working papers arguing that new housing can lower rents by as much as 7% and displacement by as much as 17%.^{3,4,5}

Second, more housing gives a boost to the economy. Folks across the country would love to move to the D.C. Area and take jobs in our leading public-, private-, and social-sector

¹ Baca, Alex. "We're Reading the Amendments to D.C.'s Comp. Plan. Here's What It Says about Land Use." 10/18/2019.

<https://ggwash.org/view/74354/were-reading-the-amendments-to-dcs-comp-plan-heres-what-it-says-about-land-use>

² Baca, Alex. "D.C.'s Comp. Plan Comes Down to a Lot of Maps. Here's Why This One Matters." 01/08/2020.

<https://ggwash.org/view/75544/were-reading-amendments-to-the-comp-plan-heres-our-critique-of-how-the-flum-works>

³ Asquith, Brian, Evan Mast, and Davin Reed. "Supply Shock Versus Demand Shock: The Local Effects of New Housing in Low-Income Areas." Federal Reserve Bank of Philadelphia working-paper series. 2020.

<https://www.philadelphiafed.org/-/media/research-and-data/publications/working-papers/2020/wp20-07.pdf> /

https://research.upjohn.org/cgi/viewcontent.cgi?article=1334&context=up_workingpapers

⁴ Xiaodi, Li. "Do New Housing Units in Your Backyard Raise Your Rents?" *Mimeo*. 2019.

<https://blocksandlots.com/wp-content/uploads/2020/02/Do-New-Housing-Units-in-Your-Backyard-Raise-Your-Rents-Xiaodi-Li.pdf>

⁵ Pennington, Kate. "Does Building New Housing Cause Displacement?: The Supply and Demand Effects of Construction in San Francisco." *Mimeo*. 2020.

https://www.dropbox.com/s/oplls6utgf7z6ih/Pennington_JMP.pdf?dl=0

institutions. By making housing more affordable, we make it easier for them to do so. Importantly, that's not just good for the movers themselves. It's good for their new employers, for the local businesses and workers who get more customers, and for the District's tax revenues. Overall, an influential analysis estimated that land-use reforms in our most productive cities could raise the average American's income by thousands of dollars.⁶

Third, infill development is a tool in the fight against climate change. Building new housing within dense, vibrant regions like the D.C. Area lowers America's carbon footprint by allowing more people to take advantage of public transportation, short commutes, and energy-efficient architecture.⁷⁸

Fortunately, elected officials like yourselves have the power to solve our affordable-housing problem. Shortly before he left office, President Obama said that "we can work together to break down rules that stand in the way of building new housing and that keep families from moving to growing, dynamic cities."⁹ By passing a pro-housing Comprehensive Plan, that's exactly what you'd be doing.

Thank you.

⁶ Hsieh, Chang-Tai, and Enrico Moretti. "Housing Constraints and Spatial Misallocation." *American Economic Journal: Macroeconomics*. 2019.

<https://pubs.aeaweb.org/doi/pdfplus/10.1257/mac.20170388>

⁷ Andersen, Michael. "A Duplex, A Triplex And A Fourplex Can Cut A Block's Carbon Impact 20%." Sightline Institute. 2019.

<https://www.sightline.org/2019/06/07/a-duplex-a-triplex-and-a-fourplex-can-cut-a-blocks-carbon-impact-20/>

⁸ Wu, Dien, John Lin, Tomohiro Oda, and Eric Kort. "Space-Based Quantification of Per Capita CO₂ Emissions from Cities." *Environmental Research Letters*. 2020.

<https://iopscience.iop.org/article/10.1088/1748-9326/ab68eb>

⁹ The Obama Administration. "Housing Development Toolkit." 2016.

https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit%20of.2.pdf

Bill 23 736, the Comprehensive Plan Amendment Act of 2020

NOV 12 2020 COMP PLAN HEARING TESTIMONY

Zachari Curtis

Greetings and thank you for assembling this body to discuss the comprehensive plan. My name is Zachari Curtis. I am a Native Washingtonian, living in the MidCity area element overlapping with Ward 1 (ANC1B) who works on food security and economic justice issues in the Far NE/Far SE area element.

For residents of those areas, every day is an uphill battle against the racialized economic and structural barriers codified in previous plans and policies. This year, those barriers and the inherited disadvantages of caste have had deadly consequences, placing black DC residents at a higher risk for death from COVID19 because they have been redlined into the worse housing and denied the resources to develop their own communities; concentrated into segregated neighborhoods and restricted to the lowest paid and most precarious jobs or no jobs at all at nearly eight times the rate of white DC residents. This circumstance is by design and no policy document should pass which doesn't center the role of government in creating the policies which undergird inequality and the responsibility of government in turning the tides.

Contrary to what my ANC Commissioner, Dan Winston, claims, economic losses on the U St. corridor, which never benefited from intentional city-planning level recovery focus after the 68 riots or urban renewal in Shaw and has been again hit hard by the COVID19 health and economic crisis, can be characterized as extremely racially disparate and a result of DC's current legacy of "moving forward" without making black DC residents whole.

In the Far SE / NE area, the existence of only one grocery store per 50,000 residents, the majority of whom are black, is not simply a factor of market forces but a consequence of interlocking policy decisions which do not secure the rights of Black DC residents to live as full citizens. The proposed changes will not make anything better and passing the Comp Plan as written favors the short sided false urgency promulgated by those who stand to benefit from increasing displacement and the maintenance of economic inequality.

According to the Washington Post and based on census data, DC lost 40,000 Black residents between 2000-2010 alone at the same time that the city experienced a increase in population. When the National Community Investment Coalition named DC the nation's most intensely gentrifying city in 2019 they noted that 20,000 black residents had been displaced specifically due to gentrification 2000-2013. These are the result of de jure policy decisions to intentionally target black communities for disadvantage or to subject them to benign neglect.

Today, I join the DC Grassroots Planning Coalition in testifying AGAINST the passage of the Comp Plan amendments as proposed and will touch on the main points of DCGPC Housing Justice Priorities within my testimony. I also join the voices of witnesses who reject the "smart growth" and "build more" ideology that all new high density development is to be regarded as an answer to the need for affordable housing. This assumption is based on a dishonest and self-serving equation about creating units for residents who are able to ascend into upper income brackets, freeing up extremely low income affordable housing for families in waiting. The reality is, those opportunities do not currently exist for black DC residents who make up the majority of low income households and have experienced a net loss in income since. In contrast DC actually has a well documented history of robust affirmative action benefitting white capital, especially as it relates to accountability-free wealth transfers to developers who under-deliver or never deliver actually affordable housing. Some examples:

- JBG's Wren: \$30M in public land, took 6 years to produce 132 affordable units at \$6,300/month
- PN Hoffman's Wharf: \$300M in subsidy 150 affordable units after 9 years
- New City \$38.5M in low-income subsidy, 57 units

The Mayor's proposed changes are designed to do only two things: to thwart any attempt by concerned residents to appeal developments approved by the Zoning Commission, and grease the wheels for unfettered large scale development that will result in the same inequity that has dominated the city to this point.

Housing and economic development for black DC residents is an urgent priority and Council should not be led to believe that our opposition to the Comp Plan as written is not an opposition to building housing or economic development.

Instead, DC residents want truly an opportunity to engage meaningfully in shaping

the city and the maintenance of accountability measures serve the needs of existing residents.

As the Council moves through the mark-up process, I urge you to:

- Strengthen language that has been weakened throughout the bill and which erode the meaning of standards of performance on equity priorities – for example where directives that “must” have been turned to “should”.
- Incorporate language that reflects our top housing priorities (public housing, rent control, subsidies, housing the homeless, and, community-led development).
- Require analysis of real housing needs (existing low-income housing needs vs perceived future needs), reporting of vacancy rates, and study of the impact of new development on other systems (education, transportation, environment, etc).
- Do the analysis about the impacts of proposed new density on achieving low income housing goals, rising tax rates, environmental impacts, need for city services, etc.
- Prevent upfluming from circumventing community planning such as Small Area Plans. OP proposes increasing the density allowed on 6% of DC land through changing the Future Land Use Map, there is nothing in the Comp Plan that requires affordability beyond Inclusionary Zoning. IZ only sets aside 8-10% of units at 50-80% AMI – so we are talking about no new units below 50% AMI being mandated by the Comp Plan, while 31% of DC’s renters – around 51,000 people – are very low income and can only afford around \$900 per month in rent.

In 1960, W.E.B. Dubois gave a speech called Socialism and the American Negro. Speaking on the necessity of governments to secure not only legal rights and full franchise to Black Americans but the means to live fully as Americans, he said that advocates of justice should

“...insist on the legal rights that are already theirs and to add to that....an insistence upon a welfare state which denies the further carrying out of industry for the profit of those corporations which monopolize wealth and power. The stopping of a government of wealth for wealth....and the returning of government

power to the individual voter...along with an industry carefully organized for the good of the masses of people and not for the manufacture of millionaires.”

The DC residents speaking today against the passage of the Comp Plan are not confused about how the political process works. We urge the Council to affirm the right of current citizens to have sustained, meaningful input into whether or not they even get to live in this city in the future. **The proposed amendments are a freeway to displacement, a reprise of white man’s rides through black man’s homes. Changing this dynamic is not compatible with this document as written.**

TESTIMONY IN SUPPORT OF BILL 23-736, THE “Comprehensive Plan Amendment Act of 2020”.

Testimony by: Laurence Caudle, AIA, Principal - Hickok Cole

Date: November 12, 2020

Good Afternoon Chairman Mendelson and Council Members. My name is Laurence Caudle, I am an architect, Principal and Director of Housing with Hickok Cole Architects here in Washington, D.C. I am here to urge the Council to pass the Office of Planning’s amendments to the Comp Plan intact, and by the end of 2020.

What I see in these amendments is the ability to create a more resilient and equitable City.... And to accomplish this, we need to have more viable, diverse, and walkable neighborhoods, more housing and diversity of housing in all quadrants of the District.

These amendments will increase the number of neighborhoods with a mix of densities and uses, including housing, shopping, and workplaces. These types of neighborhoods rely less on public infrastructure and energy, encourage walking.....leading to healthier living. And the more that these types of neighborhoods are created the more options there will be for people of all means and in all stages of life.

I also believe and hope that these amendments will expand the city’s housing supply and the types of housing available. A variety of housing types, of various construction types, will provide a broader spectrum of price points. More variety of housing will support different types of households, not just for single or dual household incomes, but also families, young and old, and even for multi-generational living. This cannot be achieved if we don’t have the zoning in place to allow for a more varied type of housing.

In the years that I’ve presented projects to the public, two examples come to mind of a how positive an effect these amendment may have. The first is was a project proposed in a well-established, middle-income neighborhood in northeast, the adult children were talking with me how they were waiting for a housing option they could afford so they could still live near their aging parents. The large low-rise project that was delivered gave them that housing option as well as much needed retail and access to groceries. To this day the building has succeeded in providing workforce housing, being occupied with, many teachers, policeman and fireman.

The second example is in a NW neighborhood, with a project that was proposed on an avenue surrounded by single family homes. There was clearly a public generational divide when it came to approving density on the avenue itself. Those living in the single-family homes raising young families clearly understood that the future and viability of their neighborhood needed the diversity and density of the proposed multi-family project, that did propose affordable units in a neighborhood with little affordable housing. In the end we were successful, but the process was slow and inefficient, and encumbered by the lack of teeth the current zoning had to support this right type of development.

This opportunity is more timely than ever. Because of the pandemic, we are living in a moment where people are questioning the very viability of Cities, our relationship with our City and our surroundings. But the pandemic event has been a catalyst for positive movements of change, with increased awareness of our climate, the importance of health and wellness of our residents, of providing more equitable housing options, all which will create a more resilient city.

I believe that the proposed changes to the comprehensive plan will provide us the clay from which we together can shape the right future for our city.

Thank you.

Testimony of Scott L Parker, President, Spring Valley West Homes Corporation

Opposing the Proposed Zoning Changes to area 5009 in the Comprehensive Plan

November 11, 2020

Scott Parker's Testimony to the City Council re: The Proposed Comprehensive Plan

The purpose of this testimony is to provide important historical background and constraints on the area shown in the proposed Future Land Use Map (FLUM) as 5009 and to oppose the potential re-zoning for 5009. I represent the Board of Directors of Spring Valley West (SVW), as its current President, because our immediately adjacent community would be affected by the proposed changes. All nine Board members, including me, are elected, are resident homeowners, and are all unpaid.

The 5009 area referenced in the proposed FLUM is in Spring Valley in Ward 3. It is bordered by 49th Street NW, Massachusetts Avenue NW, Yuma Street NW, and 50th Street NW. Toward the southern portion of 5009, it is bordered by Warren Street NW; part of our SVW sub-development. Another portion of SVW is across 50th Street NW and down farther west on Yuma Street NW. The SVW Board wants to make the Council aware of long-term and perpetual restrictions that affect the 5009 area.

- The northern portion of 5009 (i.e. Massachusetts Avenue) is currently zoned Commercial Low Density (CLD), while the southern portion is currently zoned Residential Low Density (RLD).
- The proposed changes requested by Holland & Knight on behalf of WC and AN Miller (Miller) would add Residential Moderate Density (RMOD) to the northern portion of the site, making it CLD/RMOD, and, would move the southern portion of the site from RLD to RMOD.

So, a bit of background on what is currently on the site and about the restrictions that affect it, both for the next thirteen years, and, with some perpetual restrictions. There are currently four commercial buildings on 5009, totaling 133,000 square feet, plus a central surface parking lot behind the buildings:

- The oldest is 4900 Massachusetts Avenue, built in the 1960's, and it's largely used by eight medical and dental practices. It is 35,000 square feet in a three story, above ground structure. There is also a bank and other commercial service providers.
- The next building, 4910 Massachusetts Avenue, finished in 1986, is 74,000 square feet, also is three stories. It is also predominantly used by medical and dental practices (two dozen), in addition to other professional offices, such as small, local law firms.
- For over 35 years, these two buildings have provided medical and dental services to many residents in the surrounding population of Ward 3. They house important service providers to residents of much of the surrounding areas, well beyond simply Spring Valley. The next closest alternatives are in the offices adjacent to Sibley Hospital and in Chevy Chase, MD. Both of them are already heavily used for other medical and dental practices, so there is no other logical local alternative for the over thirty practices now housed on Massachusetts Avenue.
- There are also two small commercial buildings that front on 50th Street. They were built in the late 80's and are used as business offices, rather than for medical or dental practices.

The most important fact to know with respect to the proposed Comprehensive Plan and the FLUM is that further development of 5009 is significantly restricted until October, 2033, and, even then, there are perpetual restrictions that affect development beyond 2033. Those restrictions are legally recorded, and they were the result of an agreement in October 1983 between Miller and the community, as then represented by the Spring Valley Wesley Heights Citizens' Association (SVWHCA) at the time.

As part of that agreement, Miller was able to reconfigure and rezone the 5009 area to create an additional 64,500 sf of commercially zoned property, which largely contributed the space for the larger

medical building and the two smaller commercial buildings that were built, and it allowed for the 157 single family units now known as Spring Valley West to be developed in return for:

- A 50-year limitation on any further building other than potentially two other small commercial buildings. No residential, including multi-family development, is permitted until after 2033.
- Perpetual limitations on this tract (known as Tract A in the agreement). In perpetuity, the total square footage cannot exceed 232,000 sf of which not more than 139,000 sf can be commercial. In other words, even after late 2033, there would be no more than 100,000 additional sf available for residential development, unless the existing buildings were demolished. These perpetual restrictions reduce any future development substantially below the levels permitted under the current zoning. If the medical and dental practice buildings were razed after 2033, to accommodate the RMOD change that Miller seeks, the provision of medical and dental services to the surrounding community would be severely and detrimentally affected. That outcome would also be incompatible with the existing neighborhood, which is overwhelmingly Residential Low Density and, across 49th Street, Commercial Low Density (e.g. small restaurants + a Crate & Barrel store.)

To complete the history and to further clarify the restrictions, the 1983 agreement was amended by the same parties, Miller and SVWHCA, to allow an additional 24,000 square feet to be added to the original 4900 Massachusetts Avenue building (in lieu of the two additional, small commercial buildings that were never built), while maintaining the 1983 restrictions and adding that no commercial building could front on Warren Street.

In discussions with the Ward 3 planner for the Office of Planning and with Councilwoman Cheh's Chief of Staff, neither knew about the restrictions of the original nor amended agreements. Their focus was on ultimately moving the zoning for 5009 to include moderate density residential use which could add more residential space. But the restrictions on 5009 will not allow that before 2034; 14 years from now.

The Zoning Commission-approved Ladybird PUD, which will be just across Massachusetts Avenue from 5009, presumably in the next few years, will add well over 220 dwelling units, including some affordable units, certainly in time to help the City toward its residential unit goals. By contrast, the prospective development of 5009 is much further into the future.


It is reasonable to assume that we will know more about the effects on vehicular and pedestrian traffic in this greater neighborhood commercial and residential area a few years after Ladybird is open and occupied, so future development can adjust accordingly. What we know now, however, and what will continue to be the case several years from now, is that the Spring Valley, AU Park, and surrounding areas need service complements to truly offer a vibrant neighborhood mix of residences, both the currently and predominantly low density residential as well as the RMOD addition of Ladybird. A very important service complement has been and hopefully will continue to be medical and dental services. Vibrant neighborhoods require more than restaurants and small offices in the limited commercial space.

The proposed zoning change by Miller seems at best premature and is potentially detrimental to the long-term health and welfare of an evolving neighborhood, given the current and continuing restrictions on 5009. The proposed change would very likely reduce the total commercial space in the area, mostly the medical and dental services, in order to use the RMOD re-zoning, if it were to pass the Zoning Commission. Given the historical protection constraints on adjoining lots on both sides of Massachusetts Avenue, those services would be lost, while RMOD development would increase the demand for all commercial services. That would be out of balance and not in the best interests of the community.

**WRITTEN TESTIMONY OF KAREN GAAL, ANC 1B04 CIVIC ASSOCIATION, CHAIR TO
SUPPLEMENT ORAL TESTIMONY DURING HEARING REQUESTING AMENDMENT
CHANGES TO BILL 23-736 COMPREHENSIVE PLAN AMENDMENT ACT OF 2020**

Submitted to Committee of the Whole
Chairman Phil Mendelson
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Suite 410
Washington, DC 20004

From Karen Gaal, Chair
ANC 1B04 Civic Association
1424 W Street, NW
Suite 101
Washington, DC 20009



Council Chairman Phil Mendelson and fellow Council Members my name is Karen Gaal the Chair of the ANC 1B04 Civic Association and ANC 1B04 Commissioner Candidate. On behalf of ANC 1B04 Civic Association I am here today to offer testimony in favor of proposed changes to D.C.'s Comprehensive Plan and to request that these changes be implemented on an ongoing basis to the Bill 23-736 Comprehensive Plan Amendment Act of 2020.

Our Civic Association represents 9th Street NW to 16th Street NW from V to Belmont Streets in Ward 1.


We are here to speak for those not often represented in these planning processes.

We have over 51,000 households and thousands of Unhoused residents and residents with mobility issues not represented in the language of the plan. As you can see around the city we are experiencing a consistent growth of encampments. We are looking for the council to make changes for those affected by lack of housing and unaffordable housing, the bad design of the bike lanes and shrinking access to needed parking and a revamping of the Workforce Investment Element.

**WRITTEN TESTIMONY OF KAREN GAAL, ANC 1B04 CIVIC ASSOCIATION, CHAIR TO
SUPPLEMENT ORAL TESTIMONY DURING HEARING REQUESTING AMENDMENT
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Washington, DC 20004

From Karen Gaal, Chair
ANC 1B04 Civic Association
1424 W Street, NW
Suite 101
Washington, DC 20009



We are against the Comp Plan as it stands. We are requesting the following amendments to the plan.

The proposed changes that We are requesting to the act is threefold they're all correlated to the Housing, Transportation, and Workforce Investment elements for the comprehensive plan. This unique legislation can help to improve equity in Washington, D.C.

We're interested in a positive ongoing vision for the physical development of the District of Columbia. We hope that Our Vision guides the Council towards a positive future for the residents of the District of Columbia. The 1st proposed element change is to the Transportation Element.

1. Transportation Element: Roadway System – Auto Movement, Sidewalks, Bike Lanes

**WRITTEN TESTIMONY OF KAREN GAAL, ANC 1B04 CIVIC ASSOCIATION, CHAIR TO
SUPPLEMENT ORAL TESTIMONY DURING HEARING REQUESTING AMENDMENT
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From Karen Gaal, Chair
ANC 1B04 Civic Association
1424 W Street, NW
Suite 101
Washington, DC 20009




This photo applies to the suggested upgrades for bike lanes under the **Transportation Element: Roadway system auto movement action item**. My suggestion is to make the bike lanes much more inclusive for everyone in the city. This will help for everyone who rides their bikes and uses any type of mobility device as well as scooters etc. This surface transfer will allow bicyclist to use the lanes without the hazard of being hit by vehicles. it will improve the surface transit for everyone in the city. By moving the lanes from the street and adding additional space to the sidewalks (as pictured) it will also allow there to be ample parking for the residents of the District of Columbia. The functionality is

**WRITTEN TESTIMONY OF KAREN GAAL, ANC 1B04 CIVIC ASSOCIATION, CHAIR TO
SUPPLEMENT ORAL TESTIMONY DURING HEARING REQUESTING AMENDMENT
CHANGES TO BILL 23-736 COMPREHENSIVE PLAN AMENDMENT ACT OF 2020**

Submitted to Committee of the Whole
Chairman Phil Mendelson
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Suite 410
Washington, DC 20004

From Karen Gaal, Chair
ANC 1B04 Civic Association
1424 W Street, NW
Suite 101
Washington, DC 20009



safer and will increase accessibility for all residents. This moves bike lanes from the current long city roadways making it safer and bike friendly and there is a way to include traffic calming techniques as well as technologically monitoring the process by installing tech systems underneath the sidewalks to also help with Traffic Safety. This program will help the economy and infrastructure of the District of Columbia as well as the safety of our residents and visitors.

**2. Housing Element: Rezoning Commercial Space and adding to the
Housing Supply through acquisition of Commercial Space in All
Wards**

As we look around the District of Columbia, we can see several unhoused residents throughout the streets living in encampments. This is due to the unaffordable housing situation as well as the compounded need for long term treatment facilities for substance abuse and behavioral health. Compounded with the COVID-19 pandemic we need to address this situation with a lot of care and concern for the ongoing health of the residents of Washington DC.

**WRITTEN TESTIMONY OF KAREN GAAL, ANC 1B04 CIVIC ASSOCIATION, CHAIR TO
SUPPLEMENT ORAL TESTIMONY DURING HEARING REQUESTING AMENDMENT
CHANGES TO BILL 23-736 COMPREHENSIVE PLAN AMENDMENT ACT OF 2020**

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Unhousing doesn't occur because of low housing stock but because ongoing allocation needs to be a major priority. We have to make choices in ensuring that everyone has access to a home. The suggestion is to increase the housing stock with unused commercial properties. This repurposing this will require the acquisition of unused commercial property stock. COVID-19 has shown that We have several large entities in various wards throughout Washington, DC some specific sites have 899 thousand square feet of space. This ongoing project can have a lot of Interagency input and rezoning while applying the best use of housing stock for the unhoused. We can utilize social services agencies specializing in transitional, low- and moderate-income housing and community care. This ongoing project can provide needed incentives for owners looking to have their private properties utilized to add to the housing stock. Addressing the reasons for homelessness while providing housing is a win - win for the District of Columbia and it keeps the disparities of housing low. Washington DC is a City of Leadership and we should build on our wealth of knowledge to tackle the lack of stabilization in the housing of residents who are high risk, zero to low income and vulnerable with 90% of their income going towards housing

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and many other factors and which leads to the homelessness situation.
This leads to the next element on Workforce Investment.


3. Workforce Investment Element

Oftentimes the Advisory Neighborhood Commission (ANC) in Washington DC is underutilized especially when it comes to helping to identify unemployment or job services needed in a neighborhood and identifying unused housing spaces which can often be resolved with just sheer consistent communication/outreach with the residents. With the needed funding to assist in making outreach and ongoing project. The Advisory Neighborhood Commission can create better neighborhood planning to assist in having a thriving workforce. The District's interagency workforce investment can help address residents who earn \$30,000 to \$0 yearly income with an ongoing solution. The issues to address are inadequate food subsidies and benefits, past due utilities assistance, housing, transportation costs, and underemployment. COVID-19 has shown that telework is possible and training investments and revamping the workforce to include paid

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positions to fulfill and cover the dual roles, and new adjustments that have been made by a majority of D.C. residents during this crisis. Building on the technological skills, essential services skills, etc. an ongoing job creation plan could help get the city moving forward with all of the listed elements. All of these should be listed as ongoing with the oversight that's necessary to keep the programs intact. We appreciate the openness of the DC Council to hear from the residents who often are not represented in these planning processes.

Good Morning to the Chairman and Members of the Committee,

My name is Gordon-Andrew Fletcher and I am a three term ANC Commissioner representing ANC 5A08, Vice Chair of ANC 5A and a Professor at American University. On behalf of Ronnie Edwards, Chair of ANC 5A and all 5A Commissioners, we would like to say thank you to the Committee for conducting this important hearing on Bill 23-736, the Comprehensive Plan Amendment Act of 2020.

Moreover, ANC 5A we would like to thank the entire 5A community, especially Uchenna Evans, Lorenz Wheatley, and David Kosub for their input and recommendations. We strongly urge the Committee to take serious consideration to the recommendations that we submitted to Director Trueblood on February 12, 2020. I will speak to the most critical recommendations in turn:

A) ANC 5A General Comments and Proposed Amendments to the Upper Northeast Element Framework:

1. Clarify and strengthen by inserting definitive language replacing "should" with "shall" and removing all ambiguous language resulting in policies becoming discretionary
2. A. All recommendations from the 2009 Area Development Plan should be included in the Comprehensive Plan; B) the Plan should include all of Ward 5 including the Rock Creek East Chapter

B) Land Use

1. Seek transfer of land on SW corner of Riggs Road and South Dakota Avenue from DC DDOT to DC Department of Parks and Recreation (DPR). Originally supported via ANCSA Resolution dated September 27, 2017 (attachment #6)

C) Transportation

1. Emphasize the importance of enhancing environmental and safety measures at Fort Totten due to its status as a "transit village"; and immediate implementation and execution of yet to be realized "transit-oriented development"
2. Riggs Park should be added to the list of communities potentially impacted by proposed improvements to the Fort Totten metro station, including stressing the importance of pedestrian access, bicycle, and public safety and infrastructure access including docketing stations, etc., in specifically designated areas, with architectural

landscaping and overall beautification, if it is truly going to be considered a "transit village"

D) Housing

1. Support the Mayor's goals for a multi-pronged approach for building new homes, including emphasis on preserving space for existing affordable to low-income residents
2. Support aggressive programs making Affordable Housing the "Highest Priority" mandating a minimum 30% or more below AMI and approximately 70% at AMI

E) Economic Development

1. Maintain focus on housing ownership and affordability, providing for an equitable distribution of mixed income and seniors
2. Encourage overall inclusion and development of local, small and disadvantaged businesses

F) Parks, Recreation & Open Space

1. Sufficient resources should be allocated to reactivate the Fort Circle Park/Civil War Defenses of Washington" Parkland Site-Improvement Plan to include hiking path; paved trails and an open air public recreational area.

The areas addressed today is not an exhaustive list of the recommendations by the ANC 5A. Thus, we urge this body to carefully review the recommendations sent to the D.C. Office of Planning on Feb. 12, 2020.

Thank you for your time today.

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

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- Realizing design excellence and innovation in architecture, infrastructure, and public spaces to elevate the human experience of our built environment.

A discussion of the treatment of commercial land use in the Urban Design Element follows, together with our comments and suggested changes to language.

Page/Section	Suggested Changes
23/905.6	Policy UD-1.3.2: Waterfront Public Space Encourage the density and mix of land uses that <u>include small-scale, first-floor commercial and</u> enliven waterfront sites with pedestrian activity, provide a sense of safety, create visual interest, and draw people to the water.
23/905.7	Policy UD-1.3.3: Innovative and Resilient Waterfront Development Utilize bold and innovative architecture, <u>not prototypical architecture of chain stores,</u> to create a range of building forms that express contemporary needs.
29/906.9	Policy UD-1.4.3: Thoroughfare Vistas and View Corridors Vistas along such streets should be accentuated by street trees and include distinct facades and high architectural quality along well-defined street walls <u>with ground-floor commercial uses</u> and, if appropriate, maintain a park-like character.
29/NEW	Policy UD-1.4.5: Grading of New Streets ... and sidewalks in <u>pedestrian- and bicycle-accessible</u> commercial areas ...
31/908.1	To realize a shared vision of livability we must design the District of Columbia to be a place where all residents feel safe in their neighborhoods and are socially connected to one another; where they feel closely linked to community services, employment, education, <u>neighborhood-serving</u> shops, public parks, leisure and culture; where healthy and active lifestyles can be fulfilled ...
32/909.1	Policy UD-2.1 Streets for People ... whereas the bustling pace of a <u>small-scale, ground-floor</u> retail corridor can encourage patrons to pause at a sidewalk café or window shop while passing through.
37/NEW	Policy UD-2.1.1: Streetscapes that Prioritize the Human Experience Commercial streetscapes should <u>include small-scale, ground-floor retail and</u> be designed to be comfortable, safe and interesting to pedestrians. At a minimum, commercial corridor sidewalks should be designed with clear, direct, accessible walking paths that accommodate a range of pedestrian users and facilitate a sense of connection to the adjacent uses. Where width allows, corridors

	should have a generous presence of shade trees and café seating areas, as well as bicycle facilities. In areas with large pedestrian volumes, streetscapes should provide seating, drinking fountains, publicly-accessible restrooms and other infrastructure that support increased frequency and duration of walking.
39/NEW	Action UD-2.1.A: Streetscape Design by Neighborhood Type As necessary, develop a typology for basic streetscape design standards that <u>enliven the street with small-scale, ground-floor retail and</u> meet the unique needs of various types of neighborhoods in the District, including the downtown business district, commercial areas, <u>and</u> high and low-density residential neighborhoods.
44/910.9	Policy UD-2.2.3: Neighborhood Mixed-Use Centers Undertake strategic and coordinated efforts to create neighborhood mixed-use centers that reinforce community identity and form compact, walkable environments with a broad mix of housing types, employment opportunities, <u>small-scale, neighborhood-serving</u> shops and services, and civic uses and public spaces. New buildings and projects should support the compact <u>and small scale of</u> development of neighborhood centers, <u>include retail on the ground floor of buildings,</u> and the increase of diversity of uses and creation of public spaces where needed.
45/910.15	Policy UD-2.2.7: Infill Development New construction, infill development, redevelopment and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. <u>Big-box retail and large warehouse fulfillment centers should be prohibited.</u>
45/910.16/5	Policy UD-2.2.8: Large Scale Development Ensure new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. Incorporate existing assets such as historic buildings and significant natural landscapes into the design of redeveloped large sites. For sites that were originally planned as integrated complexes of multiple buildings, historic groupings of structures should be conserved where possible. <u>Big-box retail and large warehouse fulfillment centers should be prohibited.</u>

47/NEW	<p>Policy UD-2.2.10 Planning for Large Sites</p> <p>Ensure that urban design plans for large sites consider not only the site itself, but also the context of surrounding neighborhoods, including through the continuation and connection to existing street grids. <u>Big-box retail and large warehouse fulfillment centers should be prohibited.</u></p>
48/NEW	<p>Action UD-2.2.F: Design Guidelines for Large Sites</p> <p>Develop design guidelines as part of the review process for large site developments. Guidelines should address building appearance, streetscape, signage and utilities, parking, landscaping, buffering, protection of historic resources, compatibility of development with surrounding neighborhoods, and environmental sustainability. <u>Big-box retail and large warehouse fulfillment centers should be prohibited.</u></p>
51/911.10	<p>Action UD-2.3.B: Form-Based Zoning Codes</p> <p>Explore the use of form-based zoning codes on selected large sites as a way of establishing desired urban design characteristics without rigidly prescribing allowable uses. <u>Completed – See Implementation Table</u></p> <p><u>Disfavor use of form-based codes where the Comprehensive Plan’s vision for traditional neighborhood design might be negatively impacted by potential inclusion of big-box retail or large warehouse fulfillment centers.</u></p> <p>Note: While form-based codes can help streamline and enhance the predictability of the approval process, this type of regulation focuses on design opposed to use. For example, any retail use could be permissible as long as it adhere to certain pre-determined standards. The recommendation is to oppose any form-based code that does not take use into account. See Nashville, TN for examples of hybrid systems that synthesize form-based codes with zoning districts.</p>
57/NEW	<p>Policy UD-3.1.4: A City of Markets</p> <p>Use public spaces and parks to support the creation of temporary markets and vending to both <u>support the Comprehensive Plan’s vision for commercial retail land use,</u> expand opportunities for small and local businesses, and encourage more active use of public spaces.</p>
62/NEW	<p>Action UD-3.1.I: Digital DC Public Realm Initiative</p> <p>... improve access to amenities and <u>small-scale,</u> local businesses ...</p>
64/NEW	<p>Policy UD 3.2.1: Social & Community Meeting Spaces</p>

	New Planned Unit Developments and other large-scale developments should provide for a mix of social and “third spaces”—for example, schools, <u>small-scale, neighborhood-serving</u> retail stores, cultural and community spaces . . .
73/NEW	Acton UD-4.1.C: Review of Zoning Requirements Adjust the processes and requirements for planned unit developments, site plans in the R-5-A zone districts, and large tract reviews in order to strengthen design amenities, <u>support the Comprehensive Plan’s vision for traditional neighborhood design,</u> and promote higher design quality.

Our rationale for adding the language is to clarify that the vision for retail in this element is small neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city’s vision.

Very truly yours,



G. Macy Nelson

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January 10, 2020

J [REDACTED]
Joshua Ghaffari
Comprehensive Plan Program Manager
District of Columbia Office of Planning
1100 4th Street SW, Suite 650 East
Washington, D.C. 20024

**Re: Comments regarding the Draft Comprehensive Plan
for the Capitol Hill Area Element**

Dear Mr. Ghaffari:

We are submitting on behalf of UFCW Local 400 these comments regarding the Draft Comprehensive Plan for the Capitol Hill Area Element. Local 400 represents workers in Washington, D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community in the commercial areas throughout the Capitol Hill Area. This includes creating thriving, livable mixed-use communities with neighborhood-serving ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings while preserving architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Capitol Hill Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
18/1508.7	Policy CH-1.1.6 Inappropriate Commercial Uses Prevent the proliferation of fast food outlets, self-service gas stations, convenience mini-marts, and other "drive-through"

Letter to Joshua Ghaffari
January 10, 2010
Page 2

	businesses along Capitol Hill's commercial corridors. The commercial corridors of Capitol Hill are part of the historic L'Enfant Plan, contribute to the national image of the Capital City, and provide a walkable neighborhood environment. In <u>appropriate</u> and automobile-oriented uses <u>such as big-box stores</u> should be prohibited.
--	--

Our rationale for adding the language is to clarify that envisioned retail in this element is small neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few, but making the language slightly more exacting would better facilitate the city's vision.

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[REDACTED]

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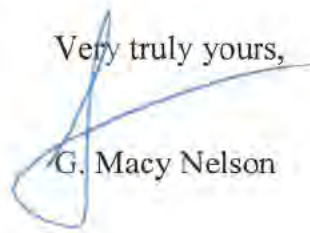
“national retailers”, which needs further definition in the document so as not to be at odds with the above expressed and expounded-upon vision for the area. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
17/1608.2	Policy CW-1.1.1: Promoting Mixed Use Development Central Washington should be strengthened as a dynamic employment center, a high-quality regional retail center, an internationally-renowned cultural center, a world-class visitor and convention destination, a vibrant urban neighborhood, and the focus of the regional transportation network. New office and retail space, hotels, arts and entertainment uses, housing, and open space should be encouraged through strategic incentives and preservation so that the area remains attractive, exciting, and economically productive. <u>Retail included in this mixed use development should serve the vision for the area with attention to architecture and urban design and encouraging high quality retail and not big-box retail.</u>
18/1608.7	Policy CW-1.1.6: Capturing Visitor and Employee Spending Capture a greater share of the demand for goods and services generated by the 475,531 persons working in Central Washington, and the millions of tourists who visit the area each year by supporting additional <u>high-quality retail for the area with attention to architecture and urban design</u> and restaurant developments.
19/1608.10	Policy W-1.1.9: Neighborhood-Serving Retail in Central Washington Ensure that Central Washington’s retail uses serve not only the regional market, but also the local neighborhood market created by residential development in the area. This should include <u>neighborhood-serving stores providing</u> basic consumer goods like drug stores, hardware stores, and grocery stores, to supplement the major anchors and specialty shops, <u>but not big-box stores, in order to best serve the planning visions for this neighborhood.</u>
34/1611.6	Policy CW-2.1.1: Strengthening the Retail Core Large scale retail and entertainment uses should continue to be strongly encouraged as buildings in the Downtown Retail Core are adaptively reused, and as new infill development takes place. <u>However, big-box retail should not be encouraged as big-box retail does not serve the Comprehensive Plan’s vision for this</u>

	<u>neighborhood.</u>
37/1612.6	Continue to promote Gallery Place and 7th Street area as a pedestrian-oriented arts and entertainment district, with nightlife and restaurants, theaters, galleries, and independent and national retailers <u>that serve the Draft Comprehensive Plan's vision for this neighborhood, but not big-box retail, which does not.</u> Continuous ground floor retail, arts, and entertainment uses should be encouraged along 7th Street between Mount Vernon Square and Pennsylvania Avenue.

Our rationale for adding the language is to clarify that envisioned retail in this element is a mix of small neighborhood businesses and medium-sized retail businesses. However, retail development in this area should serve the Draft Comprehensive Plan's vision for the area by providing high quality retail with attention to architecture and urban design. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

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**Re: Comments regarding the Draft Comprehensive Plan
for the Far Southeast and Southwest Area Element**

Dear Mr. Ghaffari:

We are submitting on behalf of UFCW Local 400 these comments regarding the Draft Comprehensive Plan for the Far Southeast and Southwest Area Element. Local 400 represents workers in Washington D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community in the commercial areas throughout the Far Southeast and Southwest Area. This includes creating thriving livable mixed-use communities with neighborhood-serving development and neighborhood-serving, ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings, while preserving architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Far Southeast and Southwest Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
16/1808.8	Policy FSS-1.1.7: Retail Development

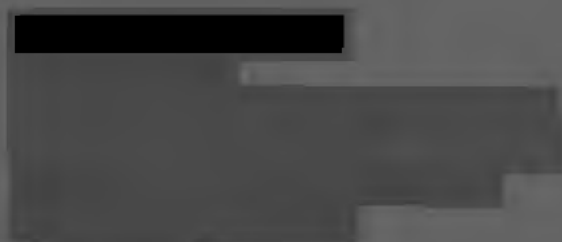
	Support additional <u>small-scale, neighborhood-serving</u> retail development within the Far Southeast/Southwest, especially in Historic Anacostia, and in the neighborhood centers at Malcolm X/Martin Luther King Jr. Avenue and South Capitol/Atlantic. Projects which combine upper story housing or offices and ground floor retail are particularly encouraged in these three locations.
16/1808.9	Policy FSS-1.1.8: Grocery Stores and Services Attract additional supermarkets, a variety of food retail, sit-down family-style restaurants, full-service gas stations, and general merchandise stores to the Far Southeast/Southwest. The area's larger commercial sites should be marketed to potential investors, and economic and regulatory incentives should be used to attract <u>neighborhood-serving</u> businesses, especially grocery retail, farms, and other fresh food producers. The upgrading and renovation of the area's existing auto-oriented shopping centers, <u>including any large-scale retail</u> is strongly encouraged to reflect Washington, DC's community development and sustainability goals, <u>including bicycle and pedestrian retail</u> .
23/1811.4	Policy FSS-2.1.1: Historic Anacostia Revitalization Encourage the continued revitalization of Historic Anacostia as a safe, walkable, and attractive neighborhood, with restored historic buildings and compatible, well-designed mixed-use projects. New development should serve a variety of income groups and household types and should restore needed <u>small-scale, neighborhood-serving</u> retail services to the community.
27/1812.4	Policy FSS-2.2.1: St. Elizabeth's East Campus Redevelop the East Campus of St. Elizabeth's Hospital as a new community containing a mix of uses including mixed density housing, <u>small-scale, neighborhood-serving</u> retail shops, offices, a comprehensive mental health care facility, a new hospital, entertainment uses, urban farms (including on the rooftops) and parks and open space. Mixed-use development, including <u>small-scale, neighborhood-serving</u> retail and service uses, should be promoted along Martin Luther King Jr. Avenue, should face the street, and should be open to the public.
27/1812.6	Policy FSS-2.2.3: Relationship to Nearby Uses Ensure that future development on St. Elizabeth's enhances the surrounding neighborhood. It is particularly important that the site's reuse is coordinated with planning for the nearby Anacostia and Congress Heights Metro Stations, Poplar Point, Barry Farm, and the Martin Luther King Jr. Avenue/Malcom X shopping

	district to <u>include small-scale neighborhood-serving retail establishments that serve the Draft Comprehensive Plan's vision for this neighborhood, providing quality and attractive retail.</u>
32/1815.3	Policy FSS-2.5.1: Martin Luther King Jr./Malcolm X Business District Encourage a major new commercial node at medium density in the shopping area at Martin Luther King Jr. Avenue and Malcom X Avenue <u>which includes a mix of small- and medium-scale neighborhood-serving retail.</u> Strengthen this area as the commercial hub of the Congress Heights neighborhood <u>to provide a sense of community and identity</u> and upgrade the mix of uses to been meet neighborhood needs. Enhance the opportunities to grow existing businesses in the area and offer incentives for <u>the establishment of</u> new small and local businesses.
34/1816.4	Policy FSS-2.6.1: Neighborhood Shopping Improvements Encourage new <u>quality, small-scale, neighborhood-serving</u> commercial development and adaptive reuse of existing commercial buildings in the South Capitol/Atlantic Streets commercial district. Development should provide improved commercial retail goods and services to the surrounding Bellevue and Washington Highlands neighborhoods.

Our rationale for adding the language is to clarify that the vision for retail in this element is small neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

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	<u>neighborhood's identity and lending community spirit to the area.</u>
20/305.5	Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites ... enhance equity and inclusion, provide large and significant new parks including wildlife habitat, enhance waterfront access, improve resilience, and improve Washington, DC's neighborhoods. <u>Note that reuse of large publicly owned sites does not include that they be developed commercially.</u>
22/305.7	Policy LU-1.2.2: Mix of Uses on Large Sites The mix of new uses on large redeveloped sites should be compatible with adjacent uses and provide benefits to surrounding neighborhoods and to Washington, DC as a whole. <u>Land uses included in the development should be compatible in scale with the surrounding development and should help to define the identity of the neighborhood and help create community spirit and not include big-box stores which interrupt the land use fabric and interfere with the above.</u> The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning should be compatible with adjacent uses, but need not be identical.
23/305.13	Policy LU-1.2.8: Large Sites and the Waterfront Use the redevelopment of large sites to achieve <u>waterfront-</u> related urban design, open space, environmental, resilience, equity, accessibility, and economic development 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. <u>Development in these areas should help define the identity of the neighborhood and create community spirit.</u>
23/305.15	Encourage cultural, residential, open space, job creation, recreational, and retail to advance mixed-use neighborhoods, even if the site is designated as high-density commercial on the District of Columbia Comprehensive Plan Future Land Use Map. <u>To encourage livability, commercial development should be neighborhood-serving, low-scale, pedestrian- and bicycle-accessible, and should help define the identity of the neighborhood and create community spirit.</u>
27/306.10	Policy LU-1.2.1: Station Areas as Neighborhood Centers The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to provide housing

	opportunities at all income levels, improve air quality, increase jobs, provide a range of <u>neighborhood-serving</u> retail goods and services . . .
28/306.11	Policy LU-1.3.2: Development Around Metrorail Stations In developments above and around Metrorail stations, emphasize <u>pedestrian- and bicycle-accessible</u> land uses and building forms which <u>that</u> minimize the necessity of automobile use.
30/306.18	Action LU-1.3.A: Station Area and Corridor Planning Plans should also address joint public-private development opportunities, urban design improvements, <u>pedestrian and bicycle facilities</u> , transportation demand and parking management strategies, integrated bus service and required service facilities, capital improvements <u>respecting the scale of the surrounding development</u> , neighborhood conservation and enhancement <u>including only small-scale and neighborhood-serving commercial</u> , and recommended land use and zoning changes.
30/306.19	Action LU-1.3.B: Zoning Around Transit Developments around transit stations and transit stops should optimize the potential for pedestrian- <u>and bicycle-oriented</u> urban villages <u>including only small-scale neighborhood-serving commercial</u> ; should consider coordinated and/or shared parking and loading; and should be designed to help integrate the transit facility with <u>the existing</u> neighborhood character <u>and help create a sense of community</u> .
31/307.2	Infill development on vacant lots is strongly supported in the District of Columbia, provided that such development is compatible with its surroundings and consistent with environmental protection and public safety objectives. Opportunities for change from vacant to vibrant are in residential and commercial areas. In residential areas, infill sites present some of the best opportunities for family housing and low-to-moderate-density development, as well as community gardens and pocket parks. In commercial areas, infill development <u>should respect the scale of the surrounding built form, and</u> can fill gaps in the streetwall and create more cohesive and attractive neighborhood centers. Vacant lots in such settings may also present opportunities for public uses.
33/309.1	Strong neighborhoods are key for continued livability in a growing and changing city. Land use policies must ensure that all neighborhoods have adequate access to <u>appropriately scaled, neighborhood-serving</u> commercial <u>goods and</u> services, parks,

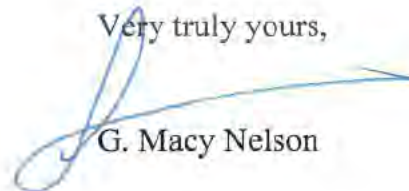
	educational and cultural facilities, share in economic mobility, and sufficient and accessible housing opportunities while respecting their rich historic and cultural legacies.
34/309.6	<p>What Makes a Great Neighborhood?</p> <ul style="list-style-type: none"> • Easy access to <u>small-scale, neighborhood-serving retail</u> shops and services meeting day-to-day needs, such as child care, groceries, and sit down restaurants;
38/319.18a	<p>Policy LU-2.1.14: Planned Unit Developments in Neighborhood Commercial Corridors</p> <p>Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high-quality developments <u>with high quality architecture and urban design</u> with the active ground floor <u>activated by the inclusion of</u> designs that provide for neighborhood-<u>serving</u> commercial uses, vibrant pedestrian <u>and bicycle facilities</u>, spaces and public benefits including housing, affordable housing, and affordable commercial space.</p>
43/311.4	<p>Policy LU-2.3.2: Mitigation of Commercial Development Impacts</p> <p>Before commercial development is approved, establish appropriate requirements for transportation demand management and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid possible adverse effects of the benefits of <u>appropriately scaled</u> commercial development in <u>serving and</u> enlivening neighborhoods, generating taxes, and creating jobs.</p>
48/312.5	<p>Policy LU-2.4.1: Promotion of Commercial Centers</p> <p>Promote the vitality of <u>appropriately scaled</u> commercial centers and provide for the continued growth <u>sustained vitality</u> of commercial land uses to <u>be neighborhood-serving</u>, meet the needs of residents, expand employment opportunities for residents, accommodate population growth, and sustain the city's role as the center of the metropolitan area. Commercial centers should be inviting, <u>pedestrian- and bicycle-accessible</u>, and attractive places, and should support social interaction and <u>provide</u> amenities for nearby residents. <u>Historic buildings should be restored where appropriate and adaptively reused in commercial centers. Attention should be paid to quality architectural design in new buildings. The architecture and urban design of the area should help create a sense of identity for the neighborhood and foster a sense of community. Continuous retail at the street level should enliven the street.</u></p>
48/312.6	Policy LU-2.4.2: Hierarchy of Commercial Centers

	Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Activities in each type of center should reflect the center's intended role and market area, as defined in the Framework Element. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. <u>Big-box retail works against the vision of the Comprehensive Plan and should not be allowed.</u>
48/312.7	Policy LU-2.4.3: Regional Centers Promote equitable access to regional shopping by; encouraging the continued development of the emerging regional centers at Minnesota-Benning and Hechinger Mall in a manner that is consistent with other policies in the Comprehensive Plan. <u>Focus on enhancing existing regional shopping centers rather than creating new ones with the understanding that big-box retail works against the vision of the Comprehensive Plan and should not be allowed.</u>
49/312.10	Policy LU-2.4.6: Scale and Design of New Commercial Uses Develop new uses within commercial districts at a height, mass, scale, and design that is appropriate for a growing, densifying city, and that is compatible with surround areas. <u>The scale and design of new commercial areas should be human-scale, making the area pedestrian- and bicycle-accessible, including continuous ground-floor commercial to enliven the street and create an identity for the neighborhood and a sense of community spirit. Both urban design and architecture should be carefully handled so as to be both functional and aesthetically pleasing. The scale and design of new commercial uses should support the identity and spirit of the area.</u>
51/312.17	Policy LU-2.4.13: Commercial Uses Outside Designated Centers Not all commercial uses can be appropriately sited within designated neighborhood, multi-neighborhood, and regional centers. For example, automobile sales, nurseries, building supply stores, large night clubs, hotels, and similar uses may require locations near parking and major roads. Retain and support such uses and accommodate them on appropriately located sites <u>if the use does not disturb the land use fabric, the identity of the neighborhood and the connectivity that makes it a community.</u>
52/314	LU-3.1 PUBLIC WORKS AND PRODUCTION, DISTRIBUTION, AND REPAIR (PDR) LAND USES <u>Large scale distribution centers, such as an Amazon</u>

	<u>Fulfillment Center, are may be permitted by right in the PDR zone. Large warehouses serving as fulfillment centers will likely dominate the retail market in coming decades. The development pattern is clear. Large internet-based retailers are building facilities larger than 1,000,000 square feet across the country. These facilities have many unique adverse impacts. It is well established that internet-based retailers cause local brick and mortar stores to close. That effect conflicts with goals of the draft Comprehensive Plan. The City must carefully plan to limit and regulate these large fulfillment centers.</u>
56/314.13	Policy LU-3.1.7: Cottage Industries and Makers Support small-scale, neighborhood-serving , low-impact “cottage industries” and “makers” in neighborhood commercial districts and on appropriate industrial lands.

Our rationale for adding the language is to clarify that envisioned retail in this element is small, locally owned, neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city’s vision.

Very truly yours,



G. Macy Nelson

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January 10, 2020

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Joshua Ghaffari
Comprehensive Plan Program Manager
District of Columbia Office of Planning
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Washington, D.C. 20024

**Re: Comments regarding the Draft Comprehensive Plan
for the Lower Anacostia/Near Southwest Area Element**

Dear Mr. Ghaffari:

We are submitting on behalf of UFCW Local 400 these comments regarding the Draft Comprehensive Plan for the Lower Anacostia/Near Southwest Area Element. Local 400 represents workers in Washington D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community in the commercial areas throughout the Lower Anacostia/Near Southwest Area. This includes creating thriving livable mixed-use communities with neighborhood-serving development and neighborhood-serving, ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings, while respecting architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Lower Anacostia/Near Southwest Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. Suggested changes to better support the above expressed goals are outlined in the following chart.

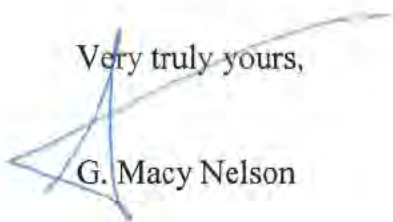
Page/Section	Suggested Changes
14/1908.3	<p>Policy AW-1.1.2 New Waterfront Neighborhoods</p> <p>A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. <u>Commercial retail development in the New Waterfront Neighborhoods should be scaled to its surrounds, neighborhood serving and should be targeted to help develop an identity and provide a sense of community for the area.</u></p>
15/1908.4	<p>Policy AW-1.1.3: Waterfront Area Commercial Development</p> <p>Encourage commercial development in the Waterfront Area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia Waterfront as well as space for government and private sector activities, such as offices and hotels. A mix of high-density commercial and residential development should be focused along key corridors, particularly along Maine Avenue and M Street Southeast, along South Capitol Street, and near the Waterfront and Navy Yard Metrorail stations. <u>Commercial retail development should be predominately located on the ground level, enliven the street, be neighborhood-serving, seek to help develop an identity and provide a sense of community for the area. New development should be appropriately scaled so that it fits both with its surrounds and its history. Attention should be paid to architectural form and massing, the quality of architectural design as well as the provision of adequate and safe facilities for pedestrians and bicyclists, as well as other aspects of the urban design of the streetscape.</u></p>
1911.4	<p>The mix of market-rate and affordable residential units and commercial development, with retail, restaurants, and entertainment offerings, has created a vibrant new waterfront destination and regional attraction <u>best suited for metro and pedestrian/bicycle accessibility, with automobile traffic and parking carefully handled, retail scaled to its surrounds and serving the burgeoning identity of the Wharf area and serving its largely newly created and developing residential neighborhood.</u></p>
21/1911.7	<p>Policy AW-2.1.1: Mixed Use Development</p> <p>Support the redevelopment of the Southwest Waterfront with medium to high density housing, commercial and cultural uses, and improved open space and parking. The development should be</p>

	designed to make the most of the waterfront location, preserving views and enhancing access to and along the shoreline. Commercial retail included in the development should be neighborhood-serving, properly scaled and help foster the new identity of the area and serve its residential population.
24/1912.5	<p>AW-2.2: South Capitol Street</p> <p>Over the coming years, South Capitol Street will continue to transform into a waterfront gateway with new mixed-use development, green space, broad sidewalks, and a beautiful new and realigned Frederick Douglas Memorial Bridge. High-density office, housing, and retail uses are envisioned along the corridor between I-395 and the shoreline. The Nationals Ballpark has become the centerpiece of a new entertainment district that includes cultural attractions, retail, restaurants, rowhouses, and high-density housing in the Capitol Riverfront/Navy Yard area. Near the foot of the reconstructed Frederick Douglass bridge, an oval traffic rotary is planned to create a green “commons” for a future national memorial. Further south in Buzzard Point, the opening of Audi Field, the new stadium for DC’s professional soccer team, is leading the transformation of this formerly industrial land into a new waterfront neighborhood with multiple mixed use residential and commercial development planned or under construction. <u>Commercial retail included in the development should be neighborhood-serving, properly scaled and help foster the new identity of the area and serve its residential population.</u></p>
25/1912.8	<p>Policy AW-2.2.2 Ballpark Entertainment District and Capitol Riverfront</p> <p>Leverage the success of the Washington Nationals Ballpark and Audi Field, the new professional soccer stadium, drawing residents, workers, and visitors to the Capitol Riverfront/Navy Yard area to catalyze additional development of the South Capitol Street corridor with retail, high density residential, entertainment, and commercial uses. <u>Commercial retail included in the development should be neighborhood-serving, properly scaled and help foster the new identity of the area and serve its residential population.</u></p>
27/1913.4	The Near Southeast Urban Design Plan, as part of the Anacostia Waterfront Initiative, envisioned M Street SE as a great urban boulevard with high-density offices and apartments activated by ground-floor retail space, restaurants, and civic uses. <u>Ground</u>

	<u>floor retail should be small-scale, neighborhood-serving and help activate the street.</u>
28/1913.6	Additional residential buildings, retail, and other amenities are currently planned or under construction. <u>Such retail should be neighborhood-serving and support the burgeoning identity of the area and its sense of community.</u>

Our rationale for adding the language is to clarify that envisioned retail in this element is small to medium, neighborhood businesses rather than large-scale retail businesses and that the retail should be in keeping with the burgeoning identity and sense of community in the area. We acknowledge that developable parcels and lots in this element are few, but making the language slightly more exacting would better facilitate the city's vision.

Very truly yours,



G. Macy Nelson

Howard Town Center. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
17/2008.2	Policy MC-1.1.1: Neighborhood Conservation Retain and reinforce the historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and walkable neighborhood shopping districts <u>containing small-scale businesses that help reinforce a sense of community.</u>
18/2008.5	Policy MC-1.1.4: Local Services and Small Businesses Support the small businesses and essential local services that serve Mid-City. Encourage the establishment of new businesses that provide these <u>goods and</u> services in areas where they are lacking, especially on the east side of the Planning Area.
19/2008.7	Policy MC-1.1.6: Mixed Use Districts Within mixed use (commercial/residential) areas, such as Mount Pleasant Street and Columbia Road, encourage <u>small-scale, neighborhood-serving</u> commercial uses that do not adversely impact the established residential uses.
26/2011.5	Policy MC-2.1.1: Revitalization of Lower Georgia Avenue Encourage continued revitalization of the Lower Georgia Avenue corridor. Georgia Avenue should be an attractive, pedestrian-oriented “Main Street” with <u>appropriately scaled, neighborhood-serving</u> retail uses, local-serving offices, mixed income housing, civic and cultural facilities, and well-maintained public space.
27/2011.10	Action MC-2.1. B. Howard Town Center Develop a new mixed-use neighborhood center on land to the west of Howard University Campus. This should include not only the planned Howard Town Center site (with housing, <u>appropriately scaled</u> retail <u>supportive of the Howard Town Center concept,</u> and structured parking) . . .
29/2012.5	. . . Strengthening of the 11th Street neighborhood commercial district, located several blocks east of Columbia Heights <u>as an urban residential street,</u> also should continue to be encouraged, <u>including assuring that adequate facilities are provided for pedestrians and bicyclists, that local ownership</u>

	<u>is encouraged and facilitated, that ground floor retail is included to enliven the street and that quality architecture and urban design enhance its physical design.</u>
29/2012.7	Policy MC-2.2.1: Columbia Heights Metro Station Area Development Maintain the Columbia Heights Metro Station area as a thriving mixed-use community center, anchored by mixed income housing, <u>small-scale</u> , community serving retail <u>responding to the neighborhood's diversity</u> , offices, civic uses, and public plazas.
30/2012.11	Policy MC-2.2.5 11th Street Commercial District Retain the 11th street corridor between Kenyon and Monroe Streets as a <u>pedestrian- and bicycle-accessible</u> , neighborhood-serving shopping district. Preserve the mixed-use character of the corridor and encourage <u>small-scale</u> , local-serving retail businesses and housing.
30/2012.12	Policy MC-2.2.6: Mid-14th Street Commercial District Build on the momentum of development in Columbia Heights by extending enhanced streetscape elements into this area <u>including pedestrian and bicycle facilities</u> . Improve the commercial district by supporting the recommendations of the Retail Action Strategy including façade improvements, technical assistance, enhanced public infrastructure, and other measures to sustain a thriving business community that serves the surrounding neighborhood. <u>Encourage ground floor retail to enliven the street and to help instill a sense of identity and pride, as well as a sense of community.</u>
33/2013.5	Policy MC-2.3.1: Uptown Destination District Encourage the growth and vibrancy of U Street between 6th Street and 12th Street NW, and Georgia Avenue/7th Street between Rhode Island Avenue and Barry Place NW as a mixed use residential/commercial center, with restored theaters, arts and jazz establishments, <u>small-scale, pedestrian- and bicycle-oriented</u> restaurants, and shops, as well as <u>and</u> housing serving a range of incomes and household types, <u>refining the area's identity and creating a sense of community.</u>
33/2013.10	Policy MC-2.3.6: Small Business Retention Incorporate small business retention and assistance programs in

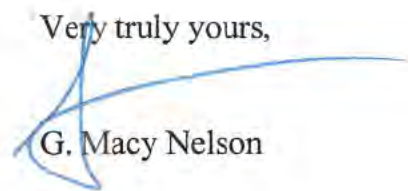
	the Uptown District's revitalization, possibly including zoning regulations, tax relief, and other measures which assist small businesses <u>and help define the neighborhood and create a sense of community</u> as redevelopment along U Street, 9th Street, and 7th Street takes place. <u>Attention should be paid to both streetscape and facades/architecture as redevelopment goes forward to best serve the area's revitalization.</u>
36/2014.6	Policy MC-2.4.2: Preference for Local <u>Neighborhood-Serving</u> Businesses Enhance the <u>small-scale, local neighborhood-serving, pedestrian- and bicycle-oriented,</u> multi-cultural character of the 18th Street/Columbia Road business district. Encourage small businesses that meet the needs of local residents, and an appropriate mix of establishments that both neighbors and visitors to the area can enjoy.
37/2014.7	Policy MC-2.4.3: Mixed Use Character Encourage retention of the older mixed-use buildings along 18th Street and Columbia Road and facilitate infill projects which complement them in height, scale, and design. Discourage conversion of existing apartment buildings in the commercial area to non-residential uses, <u>such as big-box stores,</u> and ensure that the long-term viability of these <u>existing uses and any compatible mixed-use infill development that is added</u> is not threatened.
37/2014.9	Policy MC-2.4.5: Reed-Cooke Area Support existing housing within the Reed Cooke neighborhood, maintaining heights and densities at appropriate levels and encouraging small-scale, <u>neighborhood-serving, pedestrian-oriented</u> business development that does not adversely affect the residential community.
38/2014.14	Action MC-2.4.D: Local Business Assistance Explore the feasibility of amending tax laws or developing tax abatement and credit programs to retain neighborhood services and encourage small, local <u>neighborhood-serving, pedestrian-oriented</u> businesses space along 18th Street and Columbia Road. Identify technical assistance needs and priorities of Hispanic, Asian, and African American owned/operated businesses in the neighborhood and recognize the benefits <u>and</u>

	<u>sense of identity and community</u> that naturally arise from cultural variety among tenants.
39/NEW	Action: Design Guidelines Develop design guidelines for Adams Morgan including commercial, residential, and open space areas. Highlight and identify the principles of compatible design, <u>including respecting the existing small scale of development</u> , and preserving neighborhood character.
43/2016.9	Policy MC-2.6.5: Scale and Mix of New Uses Development of the site should consist of residential, retail, office, and recreational uses. Residential development should include a mix of units for persons of various incomes and housing types; <u>retail should be small-scale, neighborhood-serving, and pedestrian-oriented in order to help create a sense of community and identity for the development</u> ; new buildings . . .
45/2017.4	Policy MC-2.7.1: Commercial Revitalization Revitalize <u>the small-scale, neighborhood-serving</u> commercial areas, including retail, dining, and small office space. Upgrade the commercial district at Florida Avenue/North Capitol/New York Avenue, restoring vacant storefronts and streetscapes <u>including pedestrian and bicycle facilities</u> to active use and accommodating compatible neighborhood-serving infill development.
45/2017.5	Policy MC-2.7.2: Neighborhood Character Preserve and retain the architectural integrity and cultural resources of Mid-City East neighborhoods, and encourage compatible rehabilitation and improvement of the area's row houses. <u>New architecture in the neighborhood should be compatible in scale and architectural style to existing buildings.</u>

Our rationale for adding the language is to clarify that envisioned retail in this element is small neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

Letter to Joshua Ghaffari
January 10, 2020
Page 6

Very truly yours,

A handwritten signature in blue ink, consisting of a large, stylized 'G' followed by a horizontal line that extends to the right and then curves back down to the baseline.

G. Macy Nelson

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January 10, 2020

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Joshua Ghaffari
Comprehensive Plan Program Manager
District of Columbia Office of Planning
1100 4th Street SW, Suite 650 East
Washington, D.C. 20024

**Re: Comments regarding the Draft Comprehensive Plan
for the Near Northwest Area Element**

Dear Mr. Ghaffari:

We are submitting on behalf of UFCW Local 400 these comments regarding the Draft Comprehensive Plan for the Near Northwest Area Element. Local 400 represents workers in Washington D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community in the commercial areas throughout the Near Northwest Area. This includes creating thriving, livable mixed-use communities with neighborhood-serving ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings while preserving architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Near Northwest Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. The most significant retail areas, which compose 9.2 percent of the land area, are along linear corridors such as Wisconsin Avenue and M Street, Connecticut Avenue, and 14th St. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
18/2108.5	Policy NNW-1.1.4: Neighborhood Commercial Success and Stability Support the success of the neighborhood shopping areas along 7th, 9th, 11 th , 23rd and North Capitol Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses <u>that fit in to the existing land use fabric and are compatible in terms of quality and scale, and</u> that provide needed goods and services to area residents, should be attracted. <u>Such new uses should aspire to the diverse, unique, pedestrian oriented shopping streets that make up the other stable commercial areas (M Street, P Street, U Street, Wisconsin Avenue, Connecticut Avenue, Florida Avenue, 18th Street NWA, 17th Street NW, and 14th Street NW).</u>
27–28/2111.9	Policy NNW-2.1.5: 7th and 9th Street Corridors Support and sustain retail development within the Shaw/Convention Center in a manner that best serves residents, creates the best environment for businesses to succeed, and uses land already zoned for commercial uses. Continuous ground floor, <u>small-scale, neighborhood-serving</u> retail uses should be encouraged along sections of 7th and 9th Streets as designated in the 2005 Strategic Development Plan to create a traditional pedestrian-oriented Main Street pattern and establish a unified identity for the community. These corridors should attract convention-goers, residents, and visitors, and should include both new and existing businesses.
31/2112.1	NNW-2.2: Dupont Circle Commercial and residential infill development and renovation are anticipated to continue, creating economic opportunities and concerns about the displacement of local services by national chains and region-serving retail uses. <u>Neighborhood-serving, small-scale retail should be retained because it supports the well-established mixed-use land use pattern in this historic district. Regional retail uses should be discouraged.</u> The healthy mix of commercial and residential uses necessitates careful management and balance of parking, public safety, and noise to maintain a high quality of life.
32/2112.5	Policy NNW-2.2.3: Q Street Plaza Maintain the Dupont Circle Q Street Metrorail entrance as a civic Plaza that is compatible with the adjacent mixed-use neighborhood. Encourage restoration of storefronts as active <u>neighborhood-serving, small-scale</u> retail uses along Connecticut Avenue from Q Street to the Circle.
34/2113.5	Policy NNW-2.3.2: 14th Street Mixed Use

	Promote the development of art galleries, lofts, and business incubators for the arts along 14th Street, along with the establishment of cultural facilities and street level <u>small-scale, neighborhood-serving</u> retail and neighborhood service uses, such as restaurants and local-serving professional offices.
37/2115.5	The expansion of George Washington University has been an ongoing issue of significant concern in Foggy Bottom and the West End, with neighbors expressing great concerns about the loss of housing stock and the changing character of the community. Continued <u>ground-floor, neighborhood-serving</u> commercial, hotel and institutional expansion—coupled with increased regional commuter traffic—has caused major traffic and parking problems and concerns about air quality and disruption of the quality of life.

Our rationale for adding the language is to clarify that the vision for retail in this element is small neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

Very truly yours,



G. Macy Nelson

	neighborhood shopping and services in those areas designated for commercial or mixed uses on the Future Land Use Map.
20/NEW	Policy RCE: Vibrant Local Shopping Streets Encourage a vibrant mix of <u>small-scale</u> commercial businesses, including local, <u>neighborhood-serving</u> retail options, so as not to have excessive concentrations of liquor stores on local shopping streets.
27/2211.7	Policy RCE-2.1.2: Strategic Public and Private Investment in Takoma Target public investment in the Takoma Central District area in ways that can be leveraged to improve private investment and create public benefits. This should include streetscape and building façade improvements, partnerships with neighborhood and business organizations <u>to support small businesses</u> , and the development of key public properties.
27/2211.9	Policy RCE-2.1.4: Takoma Central District Retail Strategy Concentrate retail activities on key sites along Carroll Street and 4th Street through requirements that mandate ground floor retail space within the established business district. Continuous street walls and active <u>small-scale</u> ground floor retail should be encouraged in these areas, consistent with the Small Area Plan. Inappropriate uses, such as storage yards, auto sales, and warehouses, should be strictly limited <u>prohibited from being expanded or newly established in the Takoma Central District</u> .
29/2212.5	Policy RCE-2.2.1: Development Character Design transition between large <u>medium</u> -scale and small-scale development to ameliorate the appearance of overwhelming scale and to relate to context of lower scale of surrounding neighborhoods.
29/2212.7	Policy RCE-2.2.3: Limiting Undesirable Uses in Petworth Discourage uses deemed undesirable along Georgia Avenue, such as liquor stores, used car lots, <u>big-box stores</u> , <u>large warehouses</u> , and automobile repair shops. Provide flexibility for <u>small, neighborhood-serving</u> businesses with desirable uses that would like to expand their services and facilities. Such measures will help strengthen the economic vitality of the corridor, retain businesses, and serve the shopping needs of the surrounding neighborhoods.
30/2212.11	Action RCE-2.2.C Petworth Overlay Zone – Indicated as “Completed - See Implementation Chapter” <u>The list of “new uses deemed undesirable” along the corridor in the overlay should be expanded to include large warehouse fulfillment centers and big-box retail.</u>

30/2212.12	<p>Action RCE-2.2.D: Georgia and New Hampshire Avenue Intersection</p> <p>This intersection is the hub of Petworth and requires crosswalk improvements and other changes to create a more desirable <u>neighborhood-serving</u> shopping district <u>including small businesses, as well as</u> and a favorable climate for new investment.</p>
31/2213.2	<p>...The corridor has the potential to attract significant redevelopment, potentially supporting new retail, housing, and mixed use activity. It has many assets that are attractive to investors, including its historic building stock and proximity to a diverse community with significant purchasing power and a wide range of retail interests. <u>Small-scale retail, especially on the ground floor where it activates the streetscape and helps build a sense of community, should be encouraged.</u></p>
32/2213.5	<p>Strategies for Upper Georgia Avenue must be coordinated with ongoing redevelopment of the Walter Reed Army Medical Center campus, further described below, which will buoy the corridor and expand the market for small, <u>ground-floor</u> businesses, <u>which will in turn help create a sense of community.</u></p>
32–33/2213.7	<p>Policy RCE-2.3.1: Upper Georgia Avenue</p> <p>Encourage development that reinforces this nodal pattern, with new retail or local <u>small, neighborhood-serving retail or</u> office development clustered at key locations and new housing or mixed use development on underutilized commercial properties in between.</p>
33/2213.8	<p>Policy RCE-2.3.2: Pedestrian and Transit Improvements to Upper Georgia Avenue</p> <p>The development of upper Georgia Avenue as one of Washington, DC's prominent commercial gateways should <u>retain and where appropriate expand existing and</u> encourage new <u>appropriately scaled</u> retail and infill that is pedestrian and transit oriented.</p>
34/2213.10	<p>Action RCE-2.2.A: Upper Georgia Avenue Area Plan – Indicated as “Completed - See Implementation Chapter”</p> <p><u>The list of “new uses deemed undesirable” along the corridor in the overlay should be expanded to include large warehouse fulfillment centers and big-box retail.</u></p>
35/NEW	<p>Action RCE: Retail Strategies for Upper Georgia Avenue</p> <p>Complete market studies of Upper Georgia Avenue to assess unmet retail market demand, evaluate strategies for retaining local retailers <u>and help them to expand,</u> identify potential locations for new neighborhood serving retail—<u>encouraging small businesses—</u>and develop strategies for attracting and retaining an appropriate mix of</p>

	retail in each area-, in order to best serve a sense of community.
35/2214.2	Kennedy Street is evolving into a more vibrant mixed use area, with new local-serving businesses and restaurants. <u>Small, businesses should be encouraged in this respect as they help create a sense of community and enliven the streetscape.</u> The success of existing businesses should also be encouraged as this revival occurs.
35–36/2214.3	Existing services . . . new mixed-use development, <u>including small scale, neighborhood-serving, retail activating the street,</u> with street activated uses and mixed-income housing above, will catalyze revitalization along the corridor.
36/2214.4	Policy RCE-2.4.1: Kennedy Street Improvement . . . locally oriented neighborhood shopping street, <u>including small, ground-level, commercial retail.</u>
36/2214.5	Policy RCE-2.4.2: Housing along Kennedy Street Encourage moderate density mixed-use projects along Kennedy Street, including <u>small, ground-level, commercial retail.</u>
36/2214.6	Policy RCE-2.4.A: Kennedy Street Strategic Development Plan The Plan should identify the potential for new and expanded residential, <u>small, ground-level</u> commercial <u>retail,</u> and mixed-use development . . .
37/2215.4	The prospect of redevelopment creates exciting opportunities but also has raised community concerns about the scale of development, provisions for open space, traffic and environmental impacts, effects on visual and historic resources, adding affordable housing, <u>the appropriateness of the scale of commercial retail development,</u> and the compatibility of the development with the surrounding neighborhoods.
38/2215.7	Future private use redevelopment at AFRH should create a new well-integrated mixed-use neighborhood that can contribute to the vibrancy of Washington, DC and help the city meet major priorities such as new housing opportunities for its growing population, including affordable housing; new <u>appropriately scaled, neighborhood-serving, pedestrian-accessible</u> commercial and retail spaces that generate new jobs; and supportive infrastructure for multimodal transportation.
40/2215.12	Action RCE-2.5.A: AFRH Master Plan Coordination Coordinate with the AFRH, NCPC, and General Services Administration to amend the AFRH Master Plan with the goal of integrating new private <u>mixed-use</u> development into adjacent neighborhoods and city systems, with a focus on servicing infrastructure; <u>pedestrian, bicycle, and vehicular</u> transportation

	connectivity and capacity; social services; employment opportunities; and new amenities.
41/NEW	Implementing the plan's vision will expand housing, transportation, <u>small-scale, neighborhood-serving</u> retail, and service choices in an amenity-rich, walkable neighborhood.
42/NEW	Policy RCE-2.7.1: Central 14th Street Nodal Development <ul style="list-style-type: none">• Intermediary "Node Two" (Webster to Decatur Streets) can become a neighborhood-serving retail area with <u>small, ground-level businesses, and</u> potential for additional uses in conjunction with the reconstruction of the existing bus barn.
43/NEW	Policy RCE-2.7.4: Small Business Opportunities Strengthen opportunities for <u>expansion of</u> existing, and <u>creation of</u> new, small businesses along the Central 14th Street corridor, <u>Encourage retail on the first floor of buildings to enliven the street, help create a sense of community, e</u> Enhance their marketing and advertising <u>of retail businesses</u> to increase neighborhood patronage.

Our rationale for adding the language is to clarify that envisioned retail in this element is small, neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

Very truly yours,



G. Macy Nelson

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January 10, 2020

J [REDACTED]
Joshua Ghaffari
Comprehensive Plan Program Manager
District of Columbia Office of Planning
1100 4th Street SW, Suite 650 East
Washington, D.C. 20024

**Re: Comments regarding the Draft Comprehensive Plan
for the Rock Creek West Area Element**

Dear Mr. Ghaffari:

We are submitting on behalf of UFCW Local 400 these comments regarding the Draft Comprehensive Plan for the Rock Creek West Area Element. Local 400 represents workers in Washington D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community throughout the Rock Creek West Area. This includes creating thriving livable mixed-use communities, with neighborhood-serving ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings, while preserving architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Rock Creek West Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. Commercial land uses occupy just two percent of the area. Major commercial centers are located around the five Metro Stations, in walkable shopping districts along the avenues, and in neighborhood shopping centers like Spring Valley. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Changes
17/2308.2	RCW-1.1.1: Neighborhood Conservation Future development in both residential and commercial areas must be carefully managed to address the existing <u>small-scale, neighborhood-serving function of commercial land use</u> , and <u>the historically residential</u> character of these neighborhoods.
18/2308.5	Policy RCW-1.1.4: Infill Development ...encourage mixed-use projects that combine housing, including affordable housing, neighborhood-serving retail, and commercial uses. <u>Big-box retail should be prohibited for infill development.</u>
18/2308.6	Policy RCW-1.1.5: Preference for Local-Serving Retail Regardless of scale, retail development must be planned and designed to mitigate traffic, parking, and other impacts on adjacent areas. <u>Big-box retail uses are inappropriate for local-serving retail.</u>
21/2308.17	Action RCW-1.1.A: Commercial Zoning Assessment Such zones should promote pedestrian-oriented development, be responsive to community concerns about building height, buffers, and transitions between uses, while promoting locally-owned businesses and mixed-use development. <u>They should not permit the incursion of big-box retail usage where land assemblage might allow it.</u>
30/NEW	Policy RCW: Cleveland Park Retail Enhancement Support retail enhancement strategies for Cleveland Park to grow and strengthen the local business association, continue to attract and serve local residents, <u>provide small-scale neighborhood-serving commercial retail establishments that define the neighborhood and help create a sense of community</u> , capture a larger share of the Connecticut Avenue commuters as business patrons, and attract more visitors from outside neighborhoods.
31/2311.12	Action RCW-2.1.A: Large Hotel Sites Future proposals for the Omni-Shoreham and Marriott Wardman Park hotels should include analysis of <u>and seek to avoid negative</u> impacts on adjacent residential and commercial areas, prepared by property owners.
32/2312.4	The Tenleytown and Friendship Heights Metro stations are important multi-modal transit hubs, that serve as termini for crosstown bus lines, as well as private institutional shuttles. Both station areas offer opportunities for transit-oriented

	redevelopment, to improve streetscapes, create convivial public spaces, diversify the shopping experience <u>to better define the neighborhood identity and create community spirit</u> , and create new housing, including affordable housing.
33/2312.6	Any redevelopment along the corridor should <u>be small-scale, contain quality retail, promote walkability and biking, and create a more active and attractive street environment by including retail on the first story.</u>
33/2312.7	Urban design improvements can make the Tenleytown Metro station area a more attractive and better-connected community hub in the future. With busy public schools, parks, a library, <u>neighborhood-serving, small-scale</u> commercial uses, and new residential projects, the pedestrian, bicycle, and vehicular connectivity throughout the Tenleytown Metro station area remain an urban design challenge.
34/2312.9	Policy RCW-2.2.2: Tenleytown and Friendships Heights Metrorail Station Areas b. Enable merchants to upgrade existing businesses, attract new customers and new <u>small-scale</u> business establishments, and provide <u>quality</u> neighborhood <u>goods and services</u> ;
35–36/2312.15	Action RCW-2.2.C: Zoning and Design Measures Zoning techniques should be considered to break up the auto-oriented commercial appearance of much of Wisconsin Avenue and instead create a more pedestrian-oriented street, distinct in function and visual character from adjacent residential areas <u>with neighborhood-serving, small-scale, ground-floor commercial included in new buildings to enliven the street.</u>
37/NEW	Policy RCW: Retail in Van Ness Support Van Ness Main Street and the ANC in efforts to develop a more cohesive and vibrant <u>small-scale, pedestrian- and bicycle-accessible, ground-floor, high-quality</u> retail environment, focusing on creating top quality retail space near the Metro station, and developing a coordinated marketing approach for Van Ness.
37/NEW	Policy RCW: Commercial Opportunities in Van Ness New building construction and major renovation projects should produce <u>small-scale, high-quality</u> retail space <u>is pedestrian- and bicycle-accessible and</u> engages with the sidewalk, <u>activating the streetscape</u> and increasing housing near the Metrorail station where possible.

37/NEW	Action RCW: Van Ness Streetscape Improvements Improve the streetscape on Connecticut Avenue in Van Ness <u>to include pedestrian and bicycle facilities and</u> to support commercial revitalization of <u>small-scale, high-quality</u> , ground-floor retail, enhanced public life on the street, and reduce impervious area between building face and curb.
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Our rationale for adding the language is to clarify that envisioned retail in this element is small, neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

Very truly yours,



G. Macy Nelson

21219. Each is about 1,000,000 square feet. We set forth the Google Earth aerial image for the Sparrows Point Fulfillment Center below:



2010 Broening Highway, Baltimore, MD 21224

We recommend that the Upper Northeast Area Element address the recent changes in the retail market which have driven the rapid development of Amazon Fulfillment Centers or other large scale distribution centers. For purposes of our analysis and recommendations, we defined a Fulfillment Center as any warehouse and distribution facility greater than 400,000 square feet.

The New York Avenue corridor, of course, is within the Upper Northeast Element of the Comprehensive Plan. We believe that nothing in the Draft Comprehensive Plan articulates a policy against allowing a warehouse of approximately 1,000,000 square feet. We believe that there are several reasons why an internet retailer like Amazon would consider constructing a Fulfillment Center on the New York Avenue corridor. First, Amazon has already constructed at BWI Airport a 200,000 square foot warehouse with 93 bays for loading and unloading trucks. Second, the New York Avenue corridor is close to the Capital Beltway. Third, the area already includes warehouse and distribution facilities. *Id.* Upper Northeast Element, 2402.4.

Additionally, the Future Land Use Map (“FLUM”) provides that the future land use for much of the New York Avenue corridor is Production, Distribution, and Repair (“PDR”). The Economic Development Element expressly recognizes that “same day delivery services are seeking fulfillment centers in close proximity to customers” in the PDR zone. Economic Development Element, Section 711.1, p. 51. We set forth below the portion of the FLUM map for the New York Avenue corridor:



The purple area is zoned PDR.

The Comprehensive Plan should consider a Fulfillment Center as a unique use because it is likely that Fulfillment Centers will dominate the retail market in coming decades. The development pattern is clear. Large internet-based retailers are building facilities larger than 1,000,000 square feet across the country. These facilities have many unique adverse impacts. *See, e.g.,* Scott Shane, *Amazon’s Expansive, Creeping Influence in an American City*, N.Y. TIMES, Dec. 1, 2019, at A1; *see also* David Streitfeld, *Town Feels Tech Giant’s Influence, but Tastes Little of Its Profits*, N.Y. TIMES, Dec. 28, 2019, at A1. It is well established that internet-based retailers cause local brick and mortar stores to close. That effect conflicts with goals of the draft Comprehensive Plan. Large internet retailers generate substantial truck traffic. Distribution Centers also require large impermeable surfaces. Those impermeable acres of land generate storm water runoff. Current land planning thinking advocates for plans that minimize storm water runoff.

A Fulfillment Center is likely permitted by right in the PDR zone. The Zoning Ordinance defines a warehouse as “[a]ny building or premises where goods or chattel are stored. The term ‘warehouse’ shall not include storage clearly incidental to the conduct of a retail business or other permitted use on the premises.” Title 11, Subtitle B, Section 100.2. Unlike many other zoning ordinances, the Zoning Ordinance does not define the traditional use, warehouse and distribution. A Distribution Center would likely fall within the Zoning Ordinance’s definition of warehouse. Title 11, Subtitle U (collectively, “Subtitle U”) Section 801.1 sets forth the by right uses in the PDR zone. The list of permitted uses includes “distribution” and a “storage establishment.” Subtitle U, Sections

801.1(u), (bb). In sum, these provisions read together appear to allow a Distribution Facility by right in the PDR zones.

We recommend that the Planning Office consider the following changes.

Policy : High Impact Warehouse and Distribution Uses. Prohibit a warehouse and distribution facility larger than 400,000 square feet because such a facility works against the Element's stated goals of promoting local businesses. See, e.g. Policy FNS-1.1.4; Policy FNS-2.2.6; Policy FNS-2.6.2; FNS-2.6.G

We recommend a threshold of 400,000 square feet because that is likely larger than upper limit of a standard warehouse and smaller than a Distribution Center.

II. Appropriate Retail for the Commercial Zones

Our comments support the Draft Comprehensive Plan's vision for creating a sense of community in the commercial areas throughout the Upper Northeast Area. This includes creating thriving livable mixed-use communities with neighborhood-serving development and neighborhood serving, ground floor retail activating the streetscape, providing safe space for pedestrians and bicyclists, and employing adaptive reuse of buildings, while preserving architectural character and historic connections, preserving historic resources, using distinctive architecture, discouraging monolithic architecture, limiting auto-dependent land uses, supporting small businesses, being concerned about the scale of buildings especially in the interface between the Upper Northeast Area and its surrounding neighborhoods, and being cognizant of the impact of new development on the adjacent neighborhoods. Suggested changes to better support the above expressed goals are outlined in the following chart.

Page/Section	Suggested Change
15/2408.4	Policy UNE-1.1.3: Metro Station Development The District will coordinate with WMATA to ensure that the design, density, and type of housing or other proposed development at these stations is compatible with surrounding neighborhoods, respects community concerns and feedback, and serves a variety of household incomes. <u>Retail development, if any, should be small-scale, neighborhood-serving, and pedestrian- and bicycle-accessible, with attention to quality streetscape and architectural design, serving the identity and sense of community of the neighborhood.</u>
15/2408.7	Policy UNE-1.1.6: Neighborhood Shopping Improve neighborhood shopping areas throughout Upper Northeast <u>as small-scale, pedestrian- and bicycle-accessible ground-floor retail</u>

	<p><u>establishments with attention to quality streetscape and architecture.</u> Continue to enhance 12th Street NE in Brookland as <u>one of these</u> a-walkable neighborhood shopping streets and encourage similar pedestrian-oriented retail development along Rhode Island Avenue, Bladensburg Road, South Dakota Avenue, West Virginia Avenue, Florida Avenue, and Benning Road. <u>This type of New</u> Ppedestrian-oriented retail activity also should be encouraged around the area's Metro stations.</p>
17/2408.8	<p>Policy UNE-1.1.7: Larger-Scale Retail Development Encourage additional community-serving retail development at the existing Brentwood Shopping Center (Home Depot-Giant), the Rhode Island Avenue Shopping Center (4th and Rhode Island NE), and Hechinger Mall. Encourage new large-scale retail development at Fort Lincoln. Design such development to complement, rather than compete with, the neighborhood-oriented business districts in the area. <u>Big-box retail works against the vision of the Comprehensive Plan and should not be allowed.</u></p>
17/2408.9	<p>Policy UNE-1.1.8: Untapped Economic Development Potential Recognize the significant potential of the area's commercially and industrially zoned lands, particularly along the New York Avenue corridor, V Street NE, West Virginia Avenue, and Bladensburg Road, and around the Florida Avenue Market, to generate jobs, provide new shopping opportunities, enhance existing businesses, create new <u>small-scale, neighborhood-serving</u> business ownership opportunities, <u>help define the area and create a sense of community,</u> and promote the vitality and economic well-being of the Upper Northeast community. The uses, height, and bulk permitted under the existing PDR zones are expected to remain for the foreseeable future.</p>
17/2408.10	<p>Policy UNE-1.1.9: Production, Distribution, and Repair Uses Retain the existing concentration of production, distribution, and repair (PDR) uses in Upper Northeast, but encourage the upgrading of these uses through higher design standards, landscaping, and improved screening and buffering. Emphasize a mixture of new uses to be co-located with the PDR uses, including retail and office space, that create jobs for Upper Northeast area residents, and that minimize off-site impacts on the surrounding residential areas. <u>Retail provided, however, should be neighborhood-serving, small-scale, pedestrian- and bicycle-accessible, ground-floor or single-story and support the identity and sense of community in the area.</u></p>
19/2409.5	<p>Policy UNE-1.2.5: In Creating Economic Opportunity Create new opportunities for small-scale, local, and minority</p>

	businesses within the Planning Area, and additional community equity investment opportunities as development takes place along New York Avenue, Bladensburg Road, Benning Road, West Virginia Avenue, and around the Metro stations. <u>Retail should be located on the ground floor or be single-story, be neighborhood-serving, pedestrian- and bicycle-accessible, and support the identity and sense of community in the area.</u>
20/2409.11	Action UNE-1.2.C: Main Streets/Great Streets Consider the designation of additional commercial areas as DC Main Streets including portions of Bladensburg Road. <u>Such commercial areas should include small-scale, neighborhood-serving, pedestrian- and bicycle-accessible, ground-floor or single-story retail which support the identity and sense of community in the area.</u>
25/2411.9	Action UNE-2.1.A: Florida Avenue Market Implement recommendations in the Florida Avenue Market Small Area Plan for revitalization and development of the Florida Avenue Market into a mixed use residential, commercial, and wholesale industrial destination, centered around a low-rise core of historic buildings. Implementation of redevelopment plans for the site shall be achieved through a collaborative process that involves the landowners and tenants, the project developers, the District Government, and the community. <u>Such development should include small-scale, neighborhood-serving retail compatible with the existing scale of the neighborhood and supportive of the identity and sense of community in the area. Streetscape and architecture should be thoughtfully designed.</u>
27/2412.5	Policy UNE-2.2.1: Mixed Use Development Along Benning and Bladensburg Pursue opportunities for additional pedestrian- <u>and bicycle-</u> oriented mixed-use development fronting these streets <u>with attractive architecture and a functional streetscape to enliven the streets,</u> including ground floor retail uses and upper floor housing. Housing opportunities should accommodate a mix of incomes, families, and other households.
27/2412.6	Policy UNE-2.2.2: Hechinger Mall Promote continued reinvestment in Hechinger Mall as a community shopping center. <u>Retail shops should be expressive of the local identity and should help express the identity of the area and create a sense of community.</u> Support additional <u>quality</u> development on the Hechinger site, creating a more urban and safer pedestrian- <u>and bicycle-</u> oriented streetscape and adding new uses

	such as housing.
31/2413.7	<p>Policy UNE-2.3.3: Infill Development</p> <p>Support infill development and redevelopment on underutilized commercial sites along New York Avenue. Particularly encourage <u>small-scale, neighborhood-serving</u> retail development that would provide better access to goods and services for residents, and sales tax dollars for the District.</p>
32/2414.2	<p>Additional townhomes, a shopping center, and offices or distribution facilities should follow in the coming years. The increased population presents an opportunity to revitalize the adjacent Bladensburg corridor, and bring back some of the <u>small-scale, neighborhood- and pedestrian-oriented</u> shopping that disappeared from the corridor years ago, <u>which could help define the identity of the area and create a sense of community.</u></p>
32/2414.3	<p>Policy UNE-2.4.1: Fort Lincoln New Town</p> <p>Fort Lincoln should be recognized as an important opportunity for family-oriented, owner-occupied housing, <u>large-scale</u> retail development, and additional employment. <u>Big-box retail works against the vision of the Comprehensive Plan and should not be allowed.</u></p>
32/2414.4	<p>Policy UNE-2.4.2: Upper Bladensburg Corridor</p> <p>Support additional <u>small-scale, neighborhood-serving</u> retail uses along the Upper Bladensburg Road corridor (from South Dakota Avenue to Eastern Avenue). Encourage the gradual transformation of this area from an auto-oriented industrial “strip” to a more pedestrian-<u>and bicycle-oriented</u> mixed-use area, <u>with an attractive and functional streetscape</u> providing services to the adjacent Woodridge, South Central, and Fort Lincoln neighborhoods, while retaining PDR uses.</p>
34/2415.4	<p>Policy UNE-2.6.4: Brookland’s 12 Street Corridor</p> <p>In consultation with property owners, community groups, and residents, use zoning, incentives, and other tools to facilitate mixed use projects with <u>small-scale, neighborhood-serving</u> retail and service uses at street level, and with residential and commercial uses on upper stories.</p> <p>[Note: 2415.4 appears twice in the current draft. We are referencing the second one.]</p>
34/2515.5	<p>Policy UNE-2.5.1: Rhode Island Avenue/Brentwood Metro Station</p> <p>Encourage the development of additional medium- to high-density mixed-use, pedestrian- and multimodal-friendly development around the Rhode Island Avenue Metro station, particularly on the surface</p>

	parking lots in the station vicinity. <u>This development should help define the identity of the area and help create a sense of community.</u>
34/2415.6	Policy UNE-2.5.2: Redevelopment of Older Commercial and Industrial Sites Encourage the long-term reuse of older commercial and industrial sites in the Rhode Island Avenue Metro station vicinity with mixed uses, including housing and production, distribution, and repair uses. Future mixed-use development should be neighborhood serving, small scale , pedestrian-oriented, with design features that encourage walking to the Metro station and nearby shopping.
34/2415.8	Policy UNE-2.5.4: Rhode Island Avenue Corridor Strengthen the Rhode Island Avenue corridor from 13th to 24th Street NE as a neighborhood-serving, small-scale , pedestrian-oriented mixed use district that better meets the needs of residents in the Brentwood, Brookland, Woodridge, and South Central neighborhoods. Infill development that combines neighborhood-serving, small-scale , ground floor retail and upper-story office and/or housing should be encouraged . . .
35/2416.3	Policy UNE-2.6.1: Brookland/CUA Metro Station Area Encourage moderate and medium-density mixed use development on vacant and underutilized property in the vicinity of the Brookland/CUA Metro station, including the parking lot east of the station. Special care should be taken to preserve and respect with the commercial development the existing low-scale residential uses east of 13th Street NE, retain the number of bus bays at the station, and develop strategies to deal with overflow parking and cut-through traffic in the station vicinity. <u>The development should help define the area's identity and help form a sense of community by providing quality streetscape and architecture.</u>
37/2417.4	Policy UNE-2.7.1: Fort Totten Metro Station Encourage the reuse of WMATA-owned land and other underutilized property in the immediate vicinity of the Fort Totten Metrorail station, focusing on the area bounded by the Fort Circle Parks on the west and south, Riggs Road on the north, and South Dakota Avenue on the east. This area is envisioned as a "transit village" combining high-density housing, small-scale, neighborhood-serving ground floor retail, local-serving office space, new parkland and civic uses, and structured parking.

We urge the Office of Planning to address in the discussion of the Upper Northeast Area Element reasonable limitations regarding warehouse and distribution facilities

Letter to Joshua Ghaffari

January 10, 2020

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larger than 400,000 square feet and, regarding general language, insert the suggested language to clarify that envisioned retail in this element is small, locally owned, neighborhood businesses rather than large-scale retail businesses. We acknowledge that developable parcels and lots in this element are few but making the language slightly more exacting would better facilitate the city's vision.

Very truly yours,

A handwritten signature in blue ink, appearing to be "G. Macy Nelson", written over a printed name.

G. Macy Nelson

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November 12, 2020

[REDACTED]
Committee of the Whole
Council of the District of Columbia
1350 Pennsylvania Ave., NW
Washington, D.C. 20024

Re: Comments regarding the Draft Comprehensive Plan

Dear Council:

We are submitting on behalf of UFCW Local 400 these comments regarding the current iteration of the Draft Comprehensive Plan. Local 400 represents workers in Washington D.C. Local 400 supports Washington, D.C.'s substantial efforts to enact a new Comprehensive Plan.

Our comments support the Draft Comprehensive Plan's vision for economic vitality throughout Washington, D.C., which includes sound land use planning principles aimed at creating a sense of community including creating thriving livable mixed-use communities, with neighborhood-serving development and small, locally owned, ground floor retail businesses activating the streetscape, providing safe space for pedestrians and bicyclists, employing adaptive reuse of historically significant buildings, while preserving architectural character and historic connections, requiring distinctive and not monolithic architecture, limiting auto-dependent land uses, being concerned about the scale of buildings, and being cognizant of the impact of new development on adjacent neighborhoods.

We had previously submitted general comments for various elements to the Office of Planning, though by our review of the current version of the Comprehensive Plan, the Office of Planning did not incorporate any of our suggested revisions. What we present to

you instead is a general suggestion of how to improve the Comprehensive Plan's language so as to better facilitate small, locally-owned business and implement mixed use planning that will help create and foster the desired sense of community and economic vitality. Most generally, we would recommend adding in language throughout the Comp Plan, clarifying instances of "ground floor retail" or "shopping district" to include aspirational language such as "neighborhood-serving" and "small and/or locally owned businesses." We also wanted to see more language advocating for "ground floor retail" to create lively streetscapes and "pedestrian- and bicycle-friendly" to provide a more livable and organic environment: a concern made more acute by Washington, D.C.'s limited real estate and inability to expand into suburban developments.

Similarly, where the Comprehensive Plan forbids or discourages particular types of businesses with language such as "discourage undesirable uses," we would suggest adding the words "big box stores", "warehouses", "last mile hubs", and "distribution centers" (the latter two are discussed further below) as these are uses that typically snake their way into technically acceptable zones while nevertheless undermining the Comprehensive Plan's clearly stated goals of wishing to develop more integrated and community-oriented uses. We would like to especially avoid seeing sprawling warehouse districts such as the warehousing/wholesaling establishments on the border of NoMa and alongside the Upper Northeast, where the majority of PDR zones are located.

We would also caution against a new type of joint use that has been arising in recent months around the greater D.C. area and throughout Maryland and Virginia. The recent increase in e-commerce purchases, likely influenced by COVID-19, has incentivized some retailers such as Amazon to push for a new paradigm of shipping wherein million-plus square-foot "Distribution Centers" sort and reallocate goods to smaller, approximately 200,000 square-foot "Last Mile Hubs" where they are again sorted and distributed by vans or private vehicles. Such retailers have taken to trying to classify the Distribution Centers and Last Mile Hubs as warehouse uses, though the traffic and activity at these buildings—particularly at Last Mile Hubs—far exceeds any projected activity at even large warehouses. They operate 24/7 and create trip generation not historically associated with warehouse operations.

Our position on such uses is that they are flatly incongruent with warehouse uses generally, and yet, because they are relatively new uses from a land use perspective, many governments do not yet have language in their regulatory tools to accurately define them. The e-commerce operators endeavor to put them into zones that permit warehouses warehouse classifications as by-right uses. These new uses are even less cohesive with community-focused planning goals than are traditional warehouses or big box stores. We

had previously offered our comments with the Distribution Center uses in mind, particularly in the Urban Design, Economics, and Land Use elements of the draft Comprehensive Plan, but because Last Mile Hubs have become so prominent in recent months—there are now at least five such projects at some stage of development in southern Maryland alone¹ as well as several accompanying Distribution Centers in the greater DC area²—we think that Washington, D.C. should act proactively and decisively to make sure these uses are properly defined and categorized and, if the city allows them at all, they should be rigidly constrained and located in PDR-zoned areas by special exception only, where they are least likely to impact traffic congestion, intersection strain, or citizen maneuverability via foot traffic or bicycle.

Currently the Zoning Ordinance only defines “large format retail” and “warehouse or wholesaler use” in Chapter 1, Section 100.2, and as such, there is no defined gradation of types of warehouses or subcategories that would suggest an awareness of the built form of e-commerce, nor an attempt to regulate these uses and mitigate their off-site impacts. The PDR zone itself has gradations to differentiate between types of warehouses, but “warehouses” broadly can be approved as special exceptions in MU Group G per Chapter 5, Section 518.1(n). Absent a clear discussion in the Comprehensive Plan, we are concerned that these uses will slide in as standard warehousing, when they are jointly a newly evolved use and should be treated and evaluated as such. Ideally, we do not believe these uses should be allowed at all, since the 24/7 operations massively affect off-site impacts regardless of their location in the city. They exist contrary to planning ideals that D.C. is striving toward and that we support and wish to bolster. However, absent a moratorium on the uses, it is imperative that D.C. at least makes sure they’re properly defined and permitted only in the PDR and only by special exception, such that they would have the least possible negative impact. More ideally, they’d be constrained to the higher-intensity categories of PDR, PDR-6 and PDR-7, and thus constrained to the Fort Circle Park area. This could require minor amendments to the Zoning Ordinance to then be congruent with the Comprehensive Plan, particularly by clarifying or adding these uses as something auxiliary to, or wholly distinct from, the ambiguous “warehouse” use.

In conclusion, we wish to see the Comprehensive Plan more readily embrace citizen-friendly ideals with focuses on walkability, local ownership, thriving mixed-use

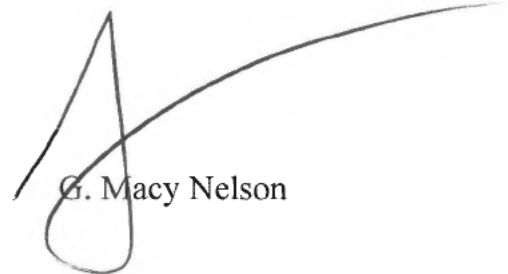
¹ Amazon Last Mile Hub projects are currently unfolding at 1000 Prince George’s Blvd, Upper Marlboro, MD; 7100 Holladay Tyler Rd., Glenn Dale, MD; 9 Jay Gould Ct., Waldorf, MD; 5801 Columbia Park Dr., Cheverly, MD; and 10100 Willowdale Rd., Lanham, MD.

² 5000 Commerce Way, Petersburg, VA; 1901 Meadowville Technology Pkwy., Chester, VA; 281 Woodbine Rd. Clear Brook, VA; 2010 Browning Hwy., Baltimore, MD; and 1700 Sparrows Point Blvd., Sparrows Point, MD.

Letter to Committee of the Whole
November 12, 2020
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communities and integrated ground-floor retail. We also suggest that the new Last Mile Hub use, alongside its larger cousin the Distribution Center, be treated similarly to large scale retail and only permitted in the PDR at most and, if they are allowed at all, only by special exception or other discretionary approval, such that they will be assured to receive proper scrutiny and/or conditional development in order to mitigate their potentially profound off-site impacts.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by a long, sweeping horizontal line that curves upwards at the end. The signature is positioned over the printed name 'G. Macy Nelson'.

G. Macy Nelson

**Testimony of Barbara Kraft on Bill 23-736,
On behalf of the WIN Ward 3 Affordable Housing Work Group**

Chairman Mendelson and Councilmembers, thank you for this opportunity to testify in support of more affordable housing in Ward 3, as contemplated by the proposed Comprehensive Plan changes before you. We urge Council to act now to approve these changes. Delay will stall new housing development and inhibit investment needed for an equitable economic recovery.

My name is Barbara Kraft and I am co-chair of the WIN Ward 3 Affordable Housing Work Group. I also chair Temple Sinai's WIN (Washington Interfaith Network) Core Team and have lived in Ward 3 almost 10 years. Jamie Butler, a 36-year Ward 3 resident and social justice leader at Adas Israel Congregation, is also a co-chair of our WIN Ward 3 Affordable Housing Work Group.

Our work group comprises activists from Adas Israel, Temple Sinai and National United Methodist Church, and includes our clergy and social justice leaders. All three congregations are members of WIN, a group of about 40 congregations across the city who act together to accomplish positive change. Virtually all our Ward 3 work group members live in northwest DC.

Many of us have been members of our congregations, and residents of Ward 3, for decades. Today we live in neighborhoods whose rents and housing prices are out of reach for almost all but the affluent. Our neighborhoods boast excellent libraries, schools and other infrastructure, all presenting opportunities and conferring advantages to those of us living here

Affordable housing, meanwhile, is inequitably distributed across DC. The Office of Planning has identified 15,000 dedicated affordable units in the Far Southeast and Southwest planning regions; in Rock Creek West, in contrast, there are only 500 dedicated affordable units.

Now we are prepared to take, and our city must take, what Ibram X. Kendi calls **antiracist action** to rectify the long history of segregation in northwest DC. Our ANCs have researched and reported on how restrictive covenants in Chevy Chase

DC, for example, prevented Black families from buying homes and how a citizens association worked to drive Black families out of the neighborhood. Since then, exclusionary zoning laws that were explicitly racist in the early 20th century have continued to keep Black families out of suburbs and high-opportunity neighborhoods like ours.

Our WIN Ward 3 Affordable Housing Work Group is committed to creating more affordable housing units in Rock Creek West and other high-opportunity areas and to supporting the Mayor and the Council in making this happen. We want to see low and moderate-income residents of color have access to the neighborhood services and social, educational and economic opportunities we enjoy.

We support the Office of Planning's recommendations for higher density and increased affordable housing in Ward 3 corridors. In fact, we and WIN are asking for a **higher proportion** of deeply affordable and affordable new homes – 1/3 for people with incomes 0-30% of AMI, 1/3 for incomes 30-60% of AMI, and 1/3 for incomes higher than 60% of AMI. We have made this demand to the Deputy Mayor for Planning & Economic Development in connection with Reservation 13/Hill East and any future development of the RFK stadium site. WIN and WIN Ward 3 congregations will continue to press this ratio as the Comp Plan process moves forward.

The Comp Plan revisions are not perfect, but they are a first step to address long-standing racial inequities in high-opportunity neighborhoods like ours in Ward 3. We urge the Council to act on the Comp Plan without delay.

Barbara Kraft
2947 Upton St., NW

[REDACTED]

[REDACTED]

Addendum to Testimony of Nancy MacWood, ANC 3C09

District of Columbia Council, Committee of the Whole

Hearing on B-23-736, DC Comprehensive Plan Amendments Act of 2020

This is an addendum to my testimony. Please consider the following comments on specific policy amendments submitted to B-23-736:

LAND USE ELEMENT:

Restore existing language of **LU-1.4.1: Station Areas as Neighborhood Centers** and insert affordable housing as a goal of TOD in the second sentence.

Restore the exiting language of **LU-1.4.2: Development Around Metrorail Stations**.

Restore existing language of **LU-1.4.7: TOD Boundaries** so that historic districts and conservation areas are not downgraded as significant considerations in developing TOD zoning regulations and making regulatory decisions about appropriate development in TOD areas.

Redraft **Action LU-1.4.C: Metro Station and Inclusionary Zoning** to delete the weak language and replace with “Amend the Inclusionary Zoning program to maximize affordable housing around metro stations while respecting the appropriate density and height limits for the area.”

Restore **LU-1.4.5: Edge Conditions Around Transit Stations**, and add a policy for Development Along Corridors, which states that priority transit and multimodal corridors may provide development opportunities, but the General Policy Map and Future Land Use Map must guide appropriate levels of development and uses rather than the existence of bus routes, which respond to the needs of residents to use public transit to get to jobs, education, retail, and other essential services and do not necessarily and should not be viewed as denoting unmet development opportunities.

Redraft the amendments to **Action LU-1.4.B: Zoning Around Transit** to add “should provide adequate parking and loading facilities, taking into consideration that many neighborhood stations do not have the land capacity to absorb large developments that create the need for essential accessory structures for such uses as loading and parking. Development must be right sized to absorb the impacts they create.”

The amendment to **LU-1.4.6: Parking Near Metro Stations** should be partially deleted to remove the last sentence and replace it with “if existing parking assets are redeveloped or if there is new development with parking requirements, the supply and demand for parking in the area, including the parking needs of new residents, surrounding residents, and businesses must be considered before reducing or waiving parking requirements.”

Restore **LU-1.4.3: Zoning of Infill Sites** as this is important guidance for zoning bodies to ensure that new development is compatible with existing development and that existing patterns are not ignored.

Add “safe and healthy environment” to the list of attributes of a strong neighborhood at **310.1**, and replace “accessible housing” with “affordable and accessible housing.” Restore “protecting”

neighborhood historic and cultural legacies and add “that add richness to the story of DC or the nation and that do not harm or marginalize any segment of the population.”

The amendments preserve text that acknowledge that successful neighborhoods have certain assets and amenities and then downgrade the guidance that these attributes must be protected and created where they do not exist. “Protecting” rather than “respecting” these attributes should be restored at **310.1 and 310.2**.

Action LU-2.1.B: Study of Neighborhood Indicators should be rewritten to “update social and economic neighborhood indicators for the purpose of targeting investment to neighborhoods with the greatest needs as documented by the indicators.”

In **LU-2.1.1: Variety of Neighborhoods**, the amendments strike the type of housing that epitomizes low-density and high-density residential neighborhoods. This is an intentional deletion of single-family homes as typical in low-density areas and signals amendments to come that seek to end single-family zones. A further amendment encourages infill and adaptive reuse with no requirement for compatibility with existing housing patterns. This amendment would permit any type of development in a neighborhood if it can be linked to population growth and affordability. There is no evidence that there is a link between new development and affordability – in fact, there is much evidence that there is no link. The policy should provide that any infill development will be compatible with existing housing patterns and will require affordable housing options in areas where they are lacking. Delete the amendment.

LU-2.1.2: Neighborhood Revitalization includes an amendment that would redirect public funds from areas most in need to “projects that advance equity and opportunity for disadvantaged persons.” The language is vague and seems to provide a rationale for not focusing public resources in areas of greatest need where many disadvantaged persons live. This seems to be the opposite of equity, especially if its intent is to use public resources for market rate projects in areas where they already exist rather than adding market rate housing where it does not exist and where the inclusion of new housing could help to revitalize a neighborhood, as long as displacement is prevented. Delete the amendment or redraft to link public incentives to significant affordable housing rather than market rate housing.

LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhood should be premised on balancing goals to increase the supply of affordable housing, which should be expressed as the housing priority throughout these amendments. The goal to protect neighborhood character should not conflict with providing affordable housing so the replacement of “protect” with “respect”, which is a meaningless concept, should be deleted. Similarly, the original language using the Generalized Policy Map designation of conservation to distinguish neighborhoods that don’t need revitalization should be restored. Conservation has a larger meaning and distinguishes neighborhoods that don’t need the level of government resources that neighborhoods identified for revitalization need.

LU-2.1.5 has the confusing title **Neighborhood Support**. The existing title is **Conservation of Single Family Neighborhoods**. The existing language should be restored. The amendments strike all language related to preserving single-family neighborhoods and managing development of vacant land with new language that reframes the policy as a general statement about using vacant land for housing. This is another amendment that aims to eliminate a policy that recognizes the value of single-family zones and that low-density neighborhoods should be preserved. The amendments should be deleted and the

Council should make it clear that single-family zones provide a type of housing that meets the needs of many District residents and that represents an important proportional share of District housing types and also provides homeownership opportunities, which are critical to providing generational wealth building for many District families .

LU-2.2.1: Code Enforcement as a Tool for Neighborhood Stabilization includes amendments that state code enforcement enhances neighborhoods rather than protects them. The stronger statement that links enforcement to protecting neighborhoods should be restored. Similarly, ensuring that health and safety hazards are promptly corrected is a stronger statement than the amendment language. Restore the stronger language.

LU-2.3.2: Mitigation of Commercial Development Impacts is critical in guiding how neighborhood impacts from development are handled. The amendments substitute transportation management plans (TMP) for traffic in the list of recurring issues that should be addressed with requirements when planning any development, which means that there is an assumption that all traffic conditions can be solved with a TMP. These DDOT-approved plans are generally lists of actions, like publishing bus schedules, that may have a positive effect on traffic and parking, but that don't directly deal with those issues. Thus, in order to protect a community from traffic and parking impacts, traffic should be specifically mentioned. The added sentence at the end of this policy that extols the benefits of commercial development should be deleted as it has nothing to do with mitigation and seems intended to downgrade the concerns that this policy aims to address.

LU-2.3.3: Buffering Requirements is another example of amendments striking stronger language that protects neighborhoods and replaces it with weaker language. Buffers should be ensured. Restore the existing language.

LU-2.3.4: Transitional and Buffer Zone Districts is another example of amendments being used to weaken neighborhood protections from inappropriate development. Restore existing language.

LU-2.3.5: Institutional Uses guides how these uses should be integrated into residential neighborhoods when they are not a matter of right. The policy language that leaves it up to the institution to design buildings and operate in a way that is sensitive to neighborhood concerns and interest. The stronger existing language should be restored.

LU-2.3.7: Non-Conforming Institutional Uses is amended to downgrade the importance of ensuring these uses are compatible in a neighborhood and replace it with promoting compatibility, which carries no accountability or reliable outcome. Restore existing language.

Restore existing language in **LU-2.4.8: Addressing Commercial Parking Impacts**. Residents rely on zoning requirements regarding traffic and parking as controls on development and uses overwhelming a neighborhood. The amendments replace ensuring these regulations exist with zoning "should" consider these impacts on development and uses.

LU-2.4.12: Commercial Uses Outside Designated Centers. The amendments would permit high impact uses that current policy states should only be near highways to any location near parking and major roads, which would include any arterial roadway and perhaps lesser designated roads. This policy authorization could have devastating consequences for neighborhoods in terms of introducing

inappropriate and intense uses, as well as preventing more optimal community-oriented land uses. Restore the existing language.

LU-3.3.3: Non-Profits, Private Schools, and Service Organizations would be amended to change the existing language that ensures that expansion of these uses is not permitted if it would cause serious adverse effects on the neighborhood to permitting them if there were commensurate benefits. This amendment assumes any neighborhood objections can be overruled with a proffer from the institution. The amendment further states that neighborhoods must accept more intense or increased use and that there will have no Land Use Element policy to refer to in objecting. The deleted language should be restored.

ROCK CREEK WEST AREA ELEMENT:

RCW-1.1.3: Conserving Neighborhood Commercial Centers and RCW-1.1.6: Metro Station Areas. The amendments delete strong statements about not including large office buildings in these areas. The inference is that OP is planning to support large office buildings in neighborhood commercial areas and does not want this area element policy obstacle. Restore the language.

RCW-1.1.3: Conserving Neighborhood Commercial Centers. The amendments add moderate-income housing and affordable housing as a new use. In order to ensure more affordable housing, language specifying that a percentage of units, such as 20% or 30% or more, must be affordable per the IZ program should be adopted and a new policy creating a program to require moderate-income housing should be included.

RCW-1.1.4: Infill Development. The amendment calling for affordable housing in mixed use projects but there is no mention of requiring more units than IZ currently provides. To meet the affordable housing need the IZ program should be reformed and that guidance should be included in this policy.

RCW-1.1.6: Metro Station Areas amendments is the only policy in RCW that calls for prioritizing affordable housing but like the previous policy there is no meat on the bone. Without more, the only affordable housing likely to be built will be part of a mixed-use development that actually prioritizes market rate housing. Council should adopt a consistent policy that states that affordable housing provided by private development will provide a much greater proportion of affordable units (and state that percentage) than is currently required by IZ.

RCW-1.1.8: Managing Institutional Land Use has been amended to remove guarantees and replace it with hopes. This is taking the Comprehensive Plan backwards. Institutional uses and expansion can be controversial in residential areas and have intense impacts on livability, and it's important to maintain a balance of interests when institutional use in a residential area is not a matter of right. The amendments alter the balance and encourage institutional development that won't be opposed because the Comprehensive Plan will no longer support residents' interest in controlling institutional creep. The original language should be restored.

RCW-1.1.10: Conservation of Historic Estates contains policies about uses and development. The amendments lessen or remove constraints on development by deleting "must be sensitive" and replacing it with "should be sensitive" to resources, such as natural areas and historic resources, that could be harmed by unchecked development. The amendments remove adjacent low-density residential areas from any consideration. The current policy should be maintained.

RCW-1.1.12: Reduce Single Occupancy Vehicle Trips has replaced **Congestion Management Measures**.

The amendments delete a requirement for traffic studies that identify mitigation measures for traffic congestion as part of a planned unit development application. Instead, the amendments stress accommodation for non-vehicle travel. The most noteworthy deletion is the statement that suggests that traffic studies and mitigation measures consider the cumulative impact of all projects on traffic and safety. This is a recurring issue when development projects are proposed. This sentence should be restored.

RCW- 1.1.13: Parking has a notable deletion of “on street public parking should not be removed within these districts.” It refers to commercial districts where parking is generally in short supply unless there are off street parking spaces. Parking is a critical resource for area businesses and if other policies are encouraging development without increasing the parking supply, the current supply must be maintained. Restore this sentence.

RCW-1.2.4: Cultural and Tourist Attractions includes an amendment to delete protecting these sites, including the Cathedral, the Zoo, and the C&O Canal, and substitutes preserving these sites. The amendments also delete language that calls for strictly enforcing measures at these sites so as not to disrupt the quality of life of nearby residential areas and substitutes language to ensure that tourist activity blends positively with quality of life of nearby residents and to implement and maintain measures like parking management plans and visitor hours. The amendments change the context so that residents could no longer object to uses disrupting quality of life. Maintain existing language.

RCW-1.2.5: Historic Resources includes a significant amendment that suggests that intense development in the vicinity of historic resources in RCW neighborhoods could be proposed and when that occurs adverse impacts should be mitigated to “respect” the character of the historic property and to provide appropriate transitions between the historic resource and surrounding areas. This is a troubling amendment because the long list of potentially affected areas has been deleted. The list includes Tregaron, Greystone, historic districts, the Kennedy-Warren, the Chevy Chase arcade, the Avalon and Uptown Theaters, and the Spring Valley Shopping Center and many other areas. (Similar lists have been retained or expanded in other area elements.) The assumption that there could be “more intense development” is vague and on its face seems incompatible with every other policy to protect these areas from inappropriate development. This amendment should be rejected as vague and conflicting with the Comprehensive Plan. The Council should also consider that similar policies in other area elements retain the stronger language.

RCW-1.2.7: Fire and EMS Services amendments delete language ensuring that the number of stations must be adequate to serve the needs of residents and substitutes “should be sufficient” to serve the needs of residents. Restore the stronger language.

RCW-1.2.8: Schools and Libraries. The amendments delete consideration of local school capacity in any consideration of a residential development. This language should be maintained. In addition, the statement that specific measures should be pursued to “ensure” that overcrowding is addressed is deleted and replaced with pursuing these measures “so that” overcrowding is addressed. Maintain existing language.

RCW-1.2.B: Recreation Center and Pools policy is shown as implemented. There is no other policy addressing recreation centers in RCW. Since several are quite small and have not been renovated, such

as the Macomb Recreation Center, an amended policy that makes a broader statement about the quality and the intended service area for a recreation center and any unmet needs in RCW, is needed.

RCW-2.2.1: Housing Opportunities inserts stronger language to “pursue” opportunities for additional housing, but rather than emphasize affordable housing the amendment qualifies housing as including affordable and moderate-income housing. As explained above, the amendment will encourage market rate housing with only a minimal number of affordable units. This amendment and others like it will exacerbate the cost of living in RCW, incentivize expensive projects in RCW where they are not needed and potentially divert projects from parts of the city that might benefit from market rate projects, as long as they do not displace current residents. In addition, there is no program to require moderate-income housing. The District needs affordable housing, particularly for the lowest income households; the emphasis should be on producing those units, both rental and homeownership, and not adding to the surplus of market rate housing. The amendment also would delete the current policy that development should be compatible with existing residential neighborhoods. Redraft.

RCW-2.2.5: Land Use Compatibility along Wisconsin Avenue amendments delete ensuring that future development is compatible with adjoining residential neighborhoods and is scaled appropriately given the lot depths, widths, and parcel shapes. The substitute amendment language states that development should be architecturally sensitive to adjoining residential neighborhoods. Restore original language.

URBAN DESIGN ELEMENT:

At **910.3** a new paragraph promotes infill with contrasts in height and scale which reverses the current policy guidance that would be deleted, along with **910.4-910-5**. It has long been Comprehensive Plan policy, as found in the Land Use Element, Housing Element, and Historic Preservation Element, to recommend infill that is compatible in scale and height with existing neighborhoods. The plan has numerous policies, many of which the Office of Planning seeks to eliminate, that discourages contrasts in height and scale. No reason has been offered in the amendments why these policies should change. Restore the deleted paragraphs.

UD-2.2.1: Neighborhood Character and Identify has been amended to delete consideration of scale. Restore the current language.

UD-2.2.6: Maintaining Façade Lines has been amended and moved to **UD-4.2.3** where it is retitled **Continuity and Consistency of Building Frontages**. The current policy was the basis for zoning regulations that require new residential construction to honor the prevailing front yard setback. The current policy and the ensuing zoning regulations prevent additions or new construction from creating awkward and disconcerting structures in open front yards. Front yards are promoted throughout the Comprehensive Plan for providing stormwater retention and a pleasing aesthetic. The amendment deletes the language to avoid violating the established pattern unless the streetscape is already characterized by such patterns. The replacement language calls for avoiding construction extending beyond the existing façade line “unless it significantly benefits the public life of the street.” This condition is vague and would surely result in horizontal pop-outs. Retain the existing language.

UD-2.2.7: Infill Development includes an amendment that introduces spatial and visual qualities of the surrounding neighborhood, particularly roof lines and setbacks, as features that new development should respond to and complement. This is a vague and unpredictable policy that would replace language that states the opposite and emphasizes compatibility of adjacent properties. The current

language provides that “regardless of neighborhood identity, avoid overpowering contrasts of scale, height, and density, as infill development occurs.” The current language should be retained.

UD-2.2.8: Large Site Development policy has been changed to **Large Scale Development** which has a different meaning and reach even though this policy refers to neighborhood lots. The amendments weaken the policy by deleting “ensure” and substituting “should be integrated” in guiding how new development complements adjacent sites. The amendments add language that historic buildings and landscapes should be incorporated into the design of redeveloped large sites and for those sites that were planned “as integrated complexes of multiple buildings” future design should incorporate that pattern “where possible.” This appears to include historic districts although the language is vague. The Council should rewrite this policy to clarify if it refers to large scale or large site development.

Council of the District of Columbia, Committee of the Whole
Hearing on B23-736, Comprehensive Plan Amendment Act of 2020

Testimony of Nancy MacWood, ANC 3C09

November 12, 2020

I am Nancy MacWood, an ANC commissioner from Cleveland Park. I am stunned by the Mayor and Office of Planning's attempts to use the Comprehensive Plan amendment cycle to upend the stability of this community.

Despite the fact that our area is adding scattered infill development and that the majority of the land is residential where no change is anticipated, the Office of Planning has included the Cathedral Heights, McLean Gardens, and parts of the Cleveland Park historic district neighborhoods into the future planning analysis area for the Friendship Heights and Tenleytown Metro Station Areas. The area element states that the focus area terminates at Van Ness Street. The most northern part of McLean Gardens is more than ½ mile from the nearest metro station, and the other neighborhoods are farther away. Yet, these neighborhood conservation areas are part of a planning effort to change the density and intensity of use or introduce major use groups not currently permitted into this area. There is no population growth, the city has a surplus of new, expensive housing, more is being built right here, our planned city has an intentional variety of housing types, so why would OP want to risk the stability of an area that is one of the few places with family-sized housing, the 3rd most children of any ward, almost equal homeownership and rentals, and an inventory of detached, attached, garden apartments, and small to large apartment buildings – many affordable due to rent control? I urge the Council to reject it.

The Council should also reject the proposed future planning analysis area that includes all of Connecticut Avenue from Macomb St. to the Maryland border. What is this all about? Is the District no longer interested in unique neighborhoods with different scales and architecture? Is historic preservation no longer valued? What is the Office of Planning's vision? Is it intent on reshaping our neighborhoods?

The Office of Planning has also changed the designation of the Connecticut Avenue commercial area in Cleveland Park from Neighborhood Serving Area to a Main Street Area. The former designation describes the small town, neighborhood serving character of the area. The Office of Planning followed this change on the policy map with a proposed change from low density commercial to high density residential on the Future Land Use Map. This extraordinary proposal would permit the Zoning Commission to zone for matter of right buildings up to 100 feet with an additional 20-foot penthouse.

I can't find any other low density area where this dramatic change is proposed. No other metro station area is proposed to jump three density levels, in fact, I can't find any that would increase more than one level. The only metro station area outside of downtown where high density is proposed is at Ward 5's Rhode Island Metro Station, which is surrounded by industrial land, and is already designated for medium density.

What is going on? All the proposed changes are aimed at benefitting market rate housing developers who will build more of the expensive housing that low income and often middle income residents cannot afford and that drive up property assessments and taxes for local businesses and homeowners.

The neighborhood sees the inequities around the city and the threats to rent control housing that adds immeasurably to the affordability of Cleveland Park. We have sought greater percentages of affordable housing at our infill developments without success. We would welcome Comprehensive Plan policies that flip the incentives to favor affordable housing but that isn't what is being proposed. Please reject these map proposals.



Advisory Neighborhood Commission 5C07

Government of the District of Columbia

2914 25th Street NE

Washington, DC 20018-2510

November 9, 2020

Statement of Testimony

To: The Chairman and Council of the District of Columbia
Via Secretary of the Council
1350 Pennsylvania Avenue NW
Washington, DC 20001

Re: Comprehensive Plan Amendment Act of 2020 (B23-736)

Members of the Council, fellow participants, and observers,

We have a new President-Elect, new and returning members of the Council, new and returning ANC commissioners, as well as, other elected officials. I offer my congratulations to all.

I believe, today is a good day to be in the District of Columbia, and City of Washington, despite the ongoing public health emergency.

Before us, today, is the matter of the modifications to the Comprehensive Plan for the District of Columbia, beyond the framework adopted in April 2020. The Executive (EOM) and the Office of Planning within, offer this Comprehensive Plan, in their words, as a “high-level guide for future growth and development, used to inform public decision-making including more detailed planning efforts, zoning regulations and capital budgeting”. To that end, I applaud the effort undertaken, and the voluminous results produced therefrom.

However, I am unable fully embrace the work in total at this time. I hold that while well intentioned, its messaging glosses over deficiencies remaining within, which threaten in the longer term the very communities, these amendments propose to cure. ANC’s were engaged during the process as were many community advocates, but pushback and we know better wafted in the air too often. Director Trueblood did an outstanding effort staying on message for the Executive because he truly demonstrated he believes in the work, and conveyed an openness for discussion. I say again, he stayed on message.

However, for the average resident, their comprehension of the plan remains unwaveringly personal. Most see the work is a step in the right direction. Nevertheless, many feel it needs “everyday refinements”, thereby creating a vision comprehensible to every person. It must comfortably address those impacted by its outcomes, to be fully accepted. There it falls short, creating an unnecessary tension relating to its implementation going forward.

Now, for the council, its acceptance should demand; the plan answers the following questions;

1. What does this mean to me?
2. Does it clearly demonstrate everyday long-term benefits, meaning, how life will get better for the community and myself, or will it run-over ultimately displacing me.
3. Will “equitable” mean unimpeded access to amenities, mobility, fair wage employment, and enjoyment where I am?
4. Will it bring affordability to where I am and for whom?
5. Will the march of progress and sustainability run over me, or allow me age in place free from threat?

While it has taken some time to reach our current place in this process, I am increasingly uncomfortable with the urgency the Executive demands that the council pass this legislation before the end of 2020. This purportedly will allow the Office of Planning and other agencies to move forward to implement plans using this guide for our building our futures within what they promote as a vibrant, equitable, sustainable city. Regardless, I find myself asking what underlies the Executives urgency. What is the real agenda?

Maybe wrongly, I have come to realize that, I believe, the underlying the “Five Themes” promoted, the overarching goal is to build a framework for a vibrant, equitable, sustainable City-State, Douglass Commonwealth. While it will may stand to improve the general circumstances of the present District of Columbia. However, the benefits accruing to the District of Columbia appear as incidental in the march toward a sustainable statehood.

I implore the Council to insure that building an equitable “Five Themed”, existence, does not mean trampling over those who remained enduring throughout the turbulence, and are the bedrock foundations of the city’s resiliency. For them, the Comprehensive plan appears a little indifferent, as we sprawl to the eastern line adjusting regulations easing the crawl.

Many years ago, a fellow resident, in a more affluent part of the city, once told me the he believed the city could not survive the pull of the poor without building a more sustainable tax base, drawn from higher wage earners. I bristled as this suggestion. Time has proven that the evolving District unevenly prevails. That is not to say that getting here was an easy walk in the park.

Further, I recently had the opportunity to listen to prior Directors of Planning on their thoughts of the proposed plan, the evolution of over twenty years, and the future the 2020 plan forecasts for our city. No panelist disputed the need to rectify the inequities occurring in earlier plans, nor their root causes. They embrace the opportunities to enliven Washington. However, they did point to two glaring needs, the plan insufficiently addresses. They are; 1) the needs of the physical infrastructure to support proposed land use, and 2) the lack of incorporation of robust transportation guidance. Given the need to draw wage earners to in-city employment hubs, the plan falls woefully short, in emphasizing the need for mobility and accessibility, beyond the metro. Buses still seem as some undesirable nuisance, relegated to moving the less affluent. I remind the council that when the Circulator was free that affluent packed them, abandoning them when the \$1 fare resumed. Circulators do no reach areas of Upper Northeast, and regular bus service is difficult and indefensibly unreliable. Here is where the Comprehensive Plan could step up its guidance in land use and policy.

To its detriment, the plan obfuscates a pertinent issue, with potentially dire consequences. It proposes higher density near transit hubs, but offers little in guidance of fulfilling physical infrastructure needs long neglected, and only addressed in relationship to PUD’s or small area development plans which OP severely limits, citing the lack of resources to expand.

Additionally, No Zoning is to be inconsistent with the Comprehensive Plan, I believe the edict reads. Thus, the Comprehensive plan guides future land use and policy through its incorporated maps. However, zoning revisions refer back to the Comprehensive Plan. In practice, zoning and zoning adjustment regulations act to constrict and limit dissent and objection to development, nearly giving carte blanche to developers, speculators, and investors. After all, the Executive set lofty goals of 35K homes by 2025. Developers read this, and acted upon it as a clear message to build as 'my right' even when lacking such. This is in clear evidence in the 1000 blocks of Bryant Street NE, and Rhode Island Avenue NE., as well as in other parts of Upper Northeast. Disappointingly, too often ignored is little known historical significance considerations, and development reach extends beyond the core.

One unfortunate casualty is the 3,000 plus amendments appear cast aside as bellicose intrusions interfering with the development of "the Plan". To mitigate unfavorable optics, a crosswalk evolved which provided backward referral of proposal to "like" inclusion it came proposing that such outlying amendments are better suited for implementation rather than in a broader generalized plan document. Incorporated were those consistent with the plan under development, and thus, the discarded will die perceived as unimportant or as irrelevant. The castaways were important impactful statements from community elements demanding acknowledgement of where they see their needs accommodated relating to any plans for the city, regardless its future form.

Again, while making some accommodation, this Comprehensive Plan as presented too often ignores historical significance in land uses outside those well recognized. This occurs, as the developing staff is too unfamiliar with areas it proposes generalized policy and land use goals. This cascades into the regulations [the implementations] regarding Board of Zoning adjustments which demand being more expansive in consideration of impacts. Requiring Office of Planning reports in such matters be more in depth. Require the building permit review process consider not only the project at hand, but also those immediately and nearby affected before approval.

I urge the council, as I expect it will, to give judicious review and consideration, to this Comprehensive Plan before its adoption. Please require that all planning, zoning, and budgetary considerations provide and well document, the cost of and expenditures toward, Resiliency, Sustainability, Equity, Affordability, and Transportation,

Jeremiah Montague, Jr.
Commissioner ANC-5C07



From: [Montague Jr., Jeremiah \(SMD 5C07\)](#)
To: [Committee of the Whole \(Council\)](#); [REDACTED]
Cc: [Montague Jr., Jeremiah \(SMD 5C07\)](#); [ANC 5C Office \(ANC 5C\)](#)
Subject: Testimony, B23-736, ANC 5C07 Jeremiah Montague Jr
Date: Monday, November 9, 2020 1:06:31 PM
Attachments: [2020-11-09 - ANC-5C07_JMontagueJr_CompPlanTestimony.pdf](#)
Importance: High

Chairman, and members of the Council,

Please find attached a copy of my written testimony relating to B23-736, Comprehensive Plan Amendment Act of 2020. I have already registered to provide live testimony and received acknowledgement. I could not find a way to attach this to that registration.

Thank you for this opportunity to testify on this important matter.

Jeremiah Montague, Jr.
Vice-Chair, Treasurer ANC 5C
Commissioner ANC 5C07



Jeremiah Montague, Jr
Commissioner ANC-5C07
2914 25th Street NE
Washington, DC 20018-2510
[REDACTED]

For the latest information on the District Government's response to COVID-19 (Coronavirus), please visit coronavirus.dc.gov.

Public Testimony of
Martin R. Welles, Esq.

Comprehensive Plan

November 12, 2020
Virtual Zoom Call

John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Prepared: November 11, 2020

Good afternoon Chairman Mendelson and Members of the Council.

My name is Martin Welles and I am a parent of 3 children who attend Hardy Middle School and Wilson High School. My children have also attended Amidon-Bowen Elementary School and Appletree Charter School. I am an active volunteer and have served on the Jefferson Middle School SIT (school modernization team), Amidon-Bowen and Payne Elementary LSAT teams, and on the Board of Directors of Hardy PTO as Vice-President Civic Engagement, the Board of Directors of Capital Community Partners as Treasurer, and on the Board of Directors of Capitol Hill Little League as Treasurer. I am now the President *Pro Tem* for the newly formed Ward 2 Education Council.

DPR Oversight of DCPS Fields

805.12 Action PROS-1.2.C: Park Spaces on District Properties Encourage shared-use agreements for green spaces owned by District government and DCPS so that these areas are available and accessible to residents for recreational purposes. 805.12

DPR has failed to demonstrate proper stewardship of our public parks by entering into long-term, multi-year leases with Private entities. For example, DPR entered into a 55-year lease with a private corporation for Brentwood Hamilton field granting that private corporation priority access from 8:00 a.m. to 7:00 p.m. every day for up to 55 years. (Attachment A) Then, this summer DPR announced that they are renovating Brentwood Hamilton Field by installing Bermuda grass. Since one corporation has literally all of the day light hours on the field, why is DPR spending resources renovating that field, when there are other fields available to all residents that are in dire need of repair?

Section 805.12 will take fields away from DCPS student athletes and auction them off to the highest bidder or entities which can persuade DPR to enter into multi-year leases. In another

case of mis-management, DPR entered into a 999-year lease for property in Ward 8. DPR is unable to manage the fields in their own inventory, and yet they claim that they will be able to manage DCPS fields. DCPS is the best steward of their fields and should decide whether “community use” agreements work for their schools.

Furthermore, DPR is only looking for shared-use agreements from DCPS fields, but not Charter School Corporations. When I spoke with a representative from DPR as to why this piece of the comprehensive plan did not include shared-use agreements for Charter School Corporations, the answer was that they “didn’t know what assets charter schools had.” Admitting to incompetence is not reassuring. If DPR wants to exercise “shared-use” agreements, they should identify the available inventory at various Charter School businesses and make those spaces available to the community. If we are going to go down this “shared-use” arrangement, DPR should be prohibited from entering into multi-year leases, existing leases should be rescinded, and DCPS should have priority access to its fields from 8:00 a.m. to 7:00 p.m. each day.

804.5 Figure 8.1: DPR-Managed Parks, Recreation, and Open Space Amenities 804.5

Dog Parks – Why does DPR have so few dog parks? According to figure 8.1 there are only 13 dog parks in the entire District of Columbia. That’s less than 2 per Ward. Because there are a lack of dog parks, dog owners use athletic fields – and try getting a park ranger to remove a dog from a park. Part of the problem stems from the rules and regulations in place from the Department of Health to build a dog park. The “rule book” is nearly an inch thick of printed paper. Dog parks must be 5,000 square feet and have a space for large and small dogs – Why? Dog parks must have multiple layers of soil, sand and charcoal to absorb urine and a water

source. The rule book on dog parks is thrown at anyone who attempts to advocate for a dog park as a deterrent. More dog parks – less restrictions.

Jefferson Field

In what I will characterize as an overzealous desire to plant trees at any open space, DPR has allowed trees to be planted on Jefferson Field which will be in place 100 years from now and the branches and roots of which will extend into the field of play, causing tripping hazards and disruption to the field of play. To its credit, DPR admitted more than a year ago that the trees were in the wrong place and they would be removed or cut down. However, DPR is now trying to save the trees and transplant them somewhere else. Transplanted trees do not always survive, so it seems the better course of action would be to remove them and plant some new trees in a different location.

Multiplex

The new Fields at RFK have been a wonderful addition to the play spaces available to District of Columbia and Maryland residents. I include Maryland residents because it seems that most of the cars in the parking lot have Maryland tags. Nevertheless, Maryland has the PG County Sports and Learning Complex which has indoor track, swimming, gymnastics, fitness and basketball venues. Virginia has the St. James Complex at Springfield, VA. It combines expansive turf fields, two ice rinks, an Olympic-size swimming pool, gleaming hardwood courts and more, all under one roof of 450,000 square feet.

DC needs an indoor complex of equal or greater stature to PG County and No. VA. There is the perfect space near the Fields at RFK – stretching from Benning Road, NE to C Street, NE. DPR could easily fit 6 indoor turf fields, 12 basketball courts, an indoor track, hockey rinks,

swimming pools, childrens’ zone and health center. An indoor facility could be used year-round and provide a place for all residents to use. Revenue could also be generated from club sports and non-residents. The comprehensive plan must account for a multiplex.

Sincerely,

Martin R. Welles, Esq.

Parent of 3 Children at Hardy MS and Wilson HS
President *Pro Tem* Ward 2 Ed. Council
Vice President, Hardy Middle School PTA
Member, Student Assignment and Boundary Committee
Member, Chancellor’s Parent Advisory Cabinet
Board of Directors, NSCP – Treasurer
Board of Directors, Capitol Hill Little League - Treasurer

LL.M. Georgetown University Law Center – Taxation
LL.M. George Washington Law School *with Highest Honors* – Litigation
J.D. Loyola New Orleans – International Law
M.A. Loyola New Orleans – Communications
B.A. Viterbo University
A.A. University of Wisconsin – La Crosse

Appendix A

DPR Property	Ward	Partner	Type of Agreement	Year Executed	Status	Relationship
Fort Dupont	7	Friends of Fort Dupont	DGS Ground Lease and DPR MOA	2013	Dec 31, 2023 or three 10 year renewal options	Site Manager
Ryan Zimmerman Field	6	Washington Nationals/UA	DPR Sponsorship Agreement (MOA)	2015	2025 Expires with one year options in DPR's discretion	Priority Hours to Capitol Hill LL (15 hours per week)
Kipp Brentwood/Hamilton	5	KIPP	DGS Ground Lease	2014	2044 with one 25 year option	Priority to KIPP 8-7 PM
Kipp Trinidad	5	KIPP	DGS Ground Lease	2013	2043 with one 25 year option	Priority to KIPP For Field 8-5 PM
Kipp Bundy Field (O St. NW)	6	KIPP	DGS Ground Lease	2011	2021 with two 5 year options (parties?)	Priority to KIPP For Field 8-7 PM
Bryce Harper Field	4	Washington Nationals/UA	DPR Sponsorship Agreement	2018	Expires 2028 with one year options in DPR's discretion	Priority Hours to Cap. City LL
Deanwood	7	Kiddie University	DGS License Agreement	2019	2024 with ten one year options	Daycare User
Arthur Capper	6	TOTH	DGS License Agreement	2018 executed 2019 one year extension	Annually	Daycare User
Chevy Chase	3	Northwest LL	DPR Sponsorship Agreement	2019	Annually	Site Maintenance
WTEF NorthEast	4	WTEF	DGS Ground Lease and DPR MOA	2009	Expires 2049 with two 15 year options	Site Manager
Jelleff	2	Maret	DGS Easement	2009	Expires 2020/June 2029 Option Executed	Priority Hours to Maret (15 hours per week)
Capitol Riverfront	6	Capitol Riverfront BID	DPR Grant Agreement	2018	Annual renewal no options	Park Manager
Franklin Park	2	Downtown BID	DPR Sponsorship Agreement (MOA)	2019	10 year renewal with 4 options	Park Manager
THEARC	8	Building Bridges, Inc.	DGS Lease	2001	Expires July, 3000	Site Manager

Good afternoon Chairman Mendleson and members of the Committee, my name is Kate Jentoft-Herr and I'm a life-long resident of Ward 1. I am here today to ask you to pass the office of planning's amendments to the Comprehensive Plan intact by the end of 2020, and to express my support for other amendments that address the racial inequalities embedded in the city's zoning laws.

For far too long, the focus of the Comprehensive Plan has been to guide growth in a way that preserves "neighborhood character" rather than building a city where all neighborhoods are accessible to residents of all income levels. We now have a city that has become unaffordable to people who have called it home for decades, some even for generations, and where our housing policy has ensured that the neighborhoods with the highest opportunity have the least amount of affordable housing. This city can and must do better.

I am here today because I believe that cities will play an important role in our ability to mitigate climate change, but I refuse to accept a reality in which urbanization continues to result in displacement. We need to allow for and build more housing across the city, so that new people can move here without displacing longer-term residents.

Building more housing on its own is not a panacea, but it is a necessary step to ensuring we are able to address the affordable housing crisis in the city, and it is essential that new housing be prioritized in neighborhoods like Rock Creek West and Capitol Hill, that have not built their fair share of housing.

Lastly, I would also like to ask you to direct some attention to reforming this process. A long-term document like the Comprehensive Plan has utility, but it is not well situated to meet the changing needs of a rapidly changing city. We need to have more flexibility to adapt and amend this plan as things change in real time, and it serves no one well to have a process in which it takes 3 years to make amendments.

I love this city so much and I want everyone who wants to live here to be able to regardless of who they are and how much money they make. The current comprehensive plan makes that impossible, and so I am asking you once again, to pass the office of planning's amendments intact by the end of the year, so we can build a better future for all residents of this city.

Thank you for your time and consideration,
Kate Jentoft-Herr



TESTIMONY FOR THE RECORD OF THE HEARING OF THE COMMITTEE OF THE WHOLE - [Bill 23-736](#), the “Comprehensive Plan Amendment Act of 2020”

November 12, 2020

Submitted by Sebrena Rhodes, Commissioner-Elect ANC 5D01

Chairman Mendelson and Councilmembers,

My name is Sebrena Rhodes, I am a resident of the Ivy City community in Ward 5 and I was recently elected to serve as the next Commissioner for ANC 5D01.

I am here today to testify **against** the passage of the Comprehensive Plan as amended by the DC Office of Planning, and to support the recommendations of the DC Grassroots Planning Coalition to strengthen the plan towards serving the needs of low income housing and community-led equitable development.

I live within feet of Ivy City’s cherished historic landmark, the Alexander Crummell School. Everyday I see our neighborhood children playing in the street, dodging traffic, while the Crummell School and its two-acre site is fenced off from public use. I know the kids pretty well because Monday-Friday I serve them free meals at the Ivy City Clubhouse, which was opened by Empower DC this summer. We have also worked since April to distribute free groceries and fresh produce to our families, seniors and homebound residents each Saturday.

I am very active in my community. So it comes as a great surprise to learn that the Office of Planning has changed the Future Land Use Map for three properties – a full city block of land that sits in the middle of our community– without any discussion or planning for the future of our neighborhood. Are we creating DC to reflect the developers or the people?

This is a prime example of developer-driven planning. The developers had their attorneys submit these amendments and the Office of Planning approved it – without regard to the impact it would have on our community.

We are not against development, DC is mixed with development, shops, history, government, art, music and musicians, culture, and diversity. But we want

community-led equitable development. That's what we modeled when our community created a development proposal for the Crummell School. The Mayor rejected our community proposal and selected something that does not respect our community's needs and wishes. Now four years later we are at a standstill.

We oppose the FLUM changes for Crummell School and the adjacent properties because doing so undermines our rights as residents to participate in a PUD process and negotiate community benefits. Instead of trying to cut us out of the process, OP should be advocating for a Small Area Plan so that Ivy City residents can work together to address future development and ensure we address longstanding community needs. Only the residents of our neighborhood can identify issues and help provide solutions when given a chance. We all should be at the table, we all should be the decision-makers. The residents that make up our communities know just what kind of conditions we want to live in, not the developer.

The Crummell School and its two-acre site are very sacred to the Ivy City community. The city harmed our community by closing the school in 1977, and then again by fencing it off to build a bus depot in 2013, and again by awarding it to a development team that ignored our needs in 2016. Enough is enough.

Please reverse these FLUM changes, recommend a Small Area Plan for Ivy City, and strengthen policies that stop the displacement of residents, promote green space, and advance community-led equitable development before final passage of the Comp Plan.

Ivy City and the Crummell School site is historic and should not be subject to business and developer takeover as if we do not matter.

Thank you.

Sebrena Rhodes

Comments of the Citizens Association of Georgetown on Bill 23-736, Comprehensive Plan Amendment Act of 2020

November 9, 2020

The Citizens Association of Georgetown (CAG), which represents over 1200 residents of Georgetown, has the following comments on the proposed amendments to the Historic Preservation Elements of the Comprehensive Plan. Georgetown is a National Landmark Historic District and a DC Historic District. For almost 100 years CAG has sought to protect and preserve the historic architecture of Georgetown as an historic resource that is part of the cultural heritage of the District of Columbia and the Nation. Visitors to DC want to see the historic port town that gave rise to the Nation's Capital and the residents appreciate it as a pleasant place to live. For CAG historic preservation is an ongoing effort to preserve our architectural history. We are therefore concerned with certain portions of the proposed amendments that seek to elevate development over historic preservation and threaten historic integrity not only of Georgetown but all DC Historic Districts.

1000.12

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Delete "Preservation standards should be reasonable and flexible enough in their application to accommodate different circumstances and community needs."

And add:

"Preservation standards should be consistent with generally recognized standards for the rehabilitation of historic structures to preserve the characteristics unique to each part of Washington, DC."

Explanation: Preservation standards should be applied in a consistent manner. Trendy "public goals" of the moment should not be allowed to override preservation of our cultural heritage.

1007.10 Policy HP-1.5.4: Voluntary Preservation

Delete "to the rights of property owners and the interests of affected communities"

and substitute

"to the views of property owners and the affected communities." in Sect.1007.10:

"Engage property owners and communities in designation efforts, and encourage voluntary preservation. Seek consensus on designations when possible, and apply designation criteria with sensitivity ~~to the rights of property owners and the interests of affected communities~~ to the views of property owners and the affected communities."

Explanation: The criteria are objective and should be applied objectively, taking into account the views expressed by property owners and affected communities as to the applicability of the criteria.

1009.1

Delete “enhancement” and substitute “rehabilitation: in section 10009.1 which states:

“Preservation protections help to ensure that building renovations and new development respect the architectural character of historic landmarks and districts. Because the District’s preservation law specifically encourages ~~enhancement~~ rehabilitation of historic properties and adapting them for current use, preservation review procedures also promote high-quality new construction that improves the condition and setting of historic properties and neighborhoods.

Explanation: Rehabilitation not “enhancement” is what the law encourages.

1011.10

Delete “respectful of” and retain “preserves” in Section 1011.10:

“Preserving the Natural Escarpment Protect Preserve views of and from the natural escarpment around central Washington, DC. Work with government and landholders to encourage new development at Saint St. Elizabeth’s Hospital, the Armed Forces Retirement Home, McMillan Reservoir, and similar large sites in a manner that is harmonious with the natural topography and preserves ~~respectful of~~ important vistas over the District.”

Explanation: Preserves is the correct standard. Respectful is a vague term designed to weaken protection of important vistas.

1014 Review of Rehabilitation and New Construction

1014.1

Delete “At the same time, more work needs to be done to ensure that these requirements do not unduly burden property owners, especially resident homeowners.” In Sect 1014.1:

“Historic properties have generated record levels of rehabilitation and construction activity in Washington, DC in recent years, and this trend is expected to continue. Whether these projects are modest home improvements reviewed by HPO as a day-to-day customer service, major development projects involving extensive HPRB review (see text box), requests to certify work for tax credits, or monumental new federal buildings, all involve the application of similar preservation and design principles. These principles recognize that historic environments need to grow and evolve as cities constantly

change. They also recognize that solutions need to be practical and affordable, and the review process responsive and efficient. ~~At the same time, more work needs to be done to ensure that these requirements do not unduly burden property owners, especially resident homeowners.~~ Better access to more specific design guidelines for common home alterations, identifying a range of appropriate treatments, would improve the management of this process.

Explanation: The deleted sentence contains a vague suggestion that generally accepted preservation and design principles are unduly burdensome for which there is no evidence. It is the review process itself that could be improved, as the rest of the section suggests.

1014.4

Delete “basic” in the following sentence as unclear and confusing:

Compatibility does not require matching or copying the attributes of historic buildings, but rather means that additions and new construction should achieve harmony with the historic surroundings through ~~basic~~ good design and close attention to the characteristics and design principles of the historic environment. Good contemporary architecture can fit within this context; in fact, it is necessary in an evolving and dynamic District city and is welcomed as an expression of our contemporary times.

1014.11 Preserving Historic Building Integrity

Delete “treatments like facadism” in the following sentence in Sect 1041.11:

~~“Discourage treatments like facadism or~~ relocation of historic buildings, or relocation of historic buildings, allowing only when there is no feasible alternative for preservation is feasible, and only after a finding that the treatment is necessary in the public interest. “

Explanation: Facadism is a pejorative term to describe the construction of a tall building immediately behind an existing historic structure. It is never an appropriate design so suggesting it should be “discouraged” is inadequate.

Testimony
of
Jean Stewart
before the
DC Council Committee of the Whole regarding Bill B23-736, the “Comprehensive Plan
Amendment Act of 2020”

Thank you Chairman Mendelson and Council Members for the opportunity to testify in opposition to the proposed amendments to the Comprehensive Plan. My name is Jean Stewart, and I have been a resident of Ward 1 for over 50 years. I have seen my neighborhood, Adams-Morgan, gentrify rapidly, with so much of the vibrancy that attracted me to Adams-Morgan in the first place being lost as so many of my Black, Latinx, and multinational neighbors have been displaced. Increasing density has not produced more affordable housing; in fact it has resulted in a luxury hotel and unaffordable apartments, generally too small to house families, and more upscale businesses. As a retiree on a largely fixed income, I wouldn't still be here if I weren't fortunate enough to live in a rent-controlled apartment. I see this same pattern across DC, where all those big construction cranes mean more high-priced small apartments and businesses directed to the privileged, e.g. the Wharf, Navy Yard. Rapid gentrification is spreading to Wards 7 and 8, with the likelihood of similar displacement of many historic Black communities. Even though I'm White, I have over all these years enjoyed and valued living in a city with so many richly varied communities, and having neighbors and friends of every race and ethnicity. It breaks my heart to see this cultural and social diversity trampled by deep-pocket developers and their advocates still arguing that more density brings more affordability when experience shows how wrong that is.

The OP amendments to the 2006 Comprehensive Plan are designed to hasten growing displacement and inequity. The proposed changes to the Future Land Use Map (FLUM) include increasing density on 6% of city-owned land but make no provision for affordability other than the limited number of Inclusionary Zoning (IZ) units, many of which remain out of reach of lower and even middle income residents. There is nothing in the proposed changes to the Comp. Plan that will further racial equity and build the housing the city needs. The Mayor's goals of 36,000 units of new housing, with 12,000 being affordable, will not be realized for at least another 5 years, when the needs for housing for our more vulnerable citizens are now. DC faces a tsunami of evictions of renters once the temporary moratorium on rent increases is lifted. Many of our public housing residents have already been displaced, with many more facing rebuilding of public housing projects in ways that will not accommodate families, nor allow rights of return, and will likely include market-rate units as part of rewards to developers.

Further, these amendments were developed around projections of rapidly increasing population in DC. It should be noted that even before the pandemic, many of the high-cost new units remain vacant. The proposed amendments do not address the ongoing vacancy rate, and do not include smart planning to accommodate the recent increase in vacancies due to the pandemic. Re. current and future vacancy rates, how many of the newer DC residents, many of whom are young and in the early stages of their careers, can continue to pay the elevated costs of living here? How many want to start families, but see little or no accommodations to those needs? They may have moved in, but many will likely move out. Assuming ever-increasing population growth is not intelligent planning.

I am also deeply disappointed that the Office of Planning decided to reject all of our requests for clear and directive language, choosing instead to replace mandatory language such as “shall”, “require” and “must” with vague, fuzzy terms such as “encourage” and “should”. One example

is in Section 500.2 of the Housing Element that strikes out “Ensuring” and replaces it with “Promoting”, to say “Promoting housing affordability across all incomes and household sizes.” There is no accountability with such gauzy terms, including when Council Committees hold performance oversight reviews: what kind of performance can be evaluated by “promoting” or “encouraging”? This change of language, calling the Comp Plan just a “guide”, is designed to prevent concerned residents to appeal developments approved by the unelected Zoning Commission, thus further opening the door to still more of the inequitable development we’ve seen over the last 20 years. The Zoning Commission will be fully empowered on housing decisions, leaving no voice for we who live here, and who are the ones affected by these decisions.

I urge the Council to incorporate strong language into the Comp Plan that prevents displacement, protects public housing, expands rent control, expands low income housing and subsidies, and promotes community-led equitable development.

**WRITTEN STATEMENT OF ANN LANE MLADINOV
ABOUT B23-736 PROPOSED AMENDED COMPREHENSIVE PLAN
BEFORE DC COUNCIL COMMITTEE ON THE WHOLE
NOVEMBER 12, 2020**

My name is Ann Mladinov. I've been participating with several citywide groups working on achieving greater social equity and improving services and economic opportunities for District residents across the city, including affordable housing. I have Master's in City and Regional Planning as well as Policy Analysis and Public Administration, all fields relevant to the District Comp Plan. I'm also an ANC Commissioner in ANC3B serving Glover Park-Cathedral Heights.

As a planner, I know the Comp Plan is a foundation for all planning in the District, and a guide shaping the physical design and look and function of the entire city for now and the future.

You've heard more than 80 witnesses already and have 35 more on the list today and another 86 on the witness list tomorrow. You heard 9 hours of testimony in March 2018. Each of us has our individual perspectives. I just want to make a few basic points.

The current draft amended Comp Plan is part of the amendment cycle that was due in 2016. That target is pretty much moot. We are four years behind schedule, on a 5-year cycle. We've missed the chance to meet that goal.

In January 2018 the Mayor presented the first 60+ page Framework Element of the Comp Plan. After held a marathon hearing that March to get comments and commissioned a team to revise the Framework Element, taking into account a range of comments. A year ago in October 2019 you approved the revised amended Framework Element. OP then released an amended version of the rest of the 1000 pages or so of the Comp Plan

Some supporters contend that all you need to do now is to approve those 1000 pages and we'll be all set. But there were already many questions about both the forecasts underlying the draft Comp Plan and the changes OP had made in the language to try to meet those forecasts. But as you know, many of the "action words" in key sections have been replaced so there would be flexibility for almost anything to be placed almost anywhere with few grounds for residents and neighborhoods to raise questions.

Then the COVID-19 pandemic hit. Now every forecast of population and economic growth has been thrown into question. Fewer people are moving into the District. International migration has slowed to a trickle. Young people who drove much of the growth in previous years have been leaving. Forecasters do not expect the District or other cities to get back even to previous levels of rentals and economic activity for 3 to 5 years or more. For some households and some communities, the trajectory will be permanently changed; they will never get back to where they were.

Should we just accept what OP has put together and move forward? Closing your eyes and stepping on the gas is not generally the best approach when you can't see where you're going and there are solid reasons for thinking the bridge may be out ahead.

The executive has been saying since last year that there are important things that OP and the city need to do, and they have to have the amended Comp Plan in place to be able to do those things.

But they are not saying what those things are. What does the city need to do in the way of land use and development that cannot be done right now?

Is the objective an open field for developers--Any project they put forward will be approved, regardless of any concerns or community opposition? That does not sound like planning.

While many development projects are on the back burner and experts are saying the market for housing and commercial/office buildings in the District is overbuilt, this is the ideal opportunity for some rethinking.

This is the time when the District needs to focus much more on what current residents need—not future residents who may never materialize. We have thousands of residents right now who do not have safe shelter or are in sub-standard housing, and it does not appear that the District has plans to assure that they will have adequate housing.

The Mayor's stated goal is the District will create 12,000 new or repurposed units that will be affordable, out of a total of 36,000 new units by 2025. That means 1/3 of the units produced in the coming 4 years will have to be affordable and dedicated to residents with specified incomes. Inclusionary zoning and community agreements for PUDs call for 10% to 12% affordable units, so relying on those approaches will not be sufficient, particularly if construction is slowing down.

Every year the people of the District could use 12,000 affordable units, as rapid rehousing, permanent supported housing, or other subsidized housing. We need to preserve and improve existing affordable housing and build new affordable units around the city, not just at 80% of AMI but at every level including for severely low income residents. Under current plans and current zoning, Ward 3 has a number of major developments in process that will add several hundred affordable units. But we need to make a concerted effort to do more.

In 2019, the Mayor said the District had created 6,000 affordable units in the previous 4 years so even the stated goal of 12,000 will require major effort. This is like the vote count—If you have to get a certain share of the votes to catch up, and every time a new batch of votes come in, you are continuing to get a lower share of the total, you are never going to make the goal. It's just arithmetic. We have already lost tens of thousands of affordable units in the past 20 years, and pushed tens of thousands of people to move away because they couldn't find economical housing in the District.

With the effects of the pandemic becoming more pronounced week to week, we need to concentrate on filling the needs of the people who are living in the District already, and making sure they have safe, quality affordable housing. We can't let private developers take all the prime properties available for construction of market-rate housing or people who want to stay in the District -- families that have lived here for decades, essential workers, residents who are part of the community and want to remain here -- will not be able to stay because there will not be enough economical housing in the District.

As the Council, you have the opportunity to get our city on course. This is a very important inflection point for the city. The Washington Area Council of Governments will be preparing new population forecasts in 2021, and the District will be participating. With your support, we can build plans based on realistic forecasts of population and economic growth, and together create a Comp Plan that guides the District to a future that the people want and need.

2021 is the year that an actual rewrite of the Comp Plan is supposed to be prepared, with full public engagement on the people's vision and priorities for the future shape of their city and their neighborhoods.

Let's get back on a solid foundation for this vital process and do a real rewrite of the Comp Plan based on up-to-date forecasts and the people's perspectives on what the District should be aiming to be in the years to come.

Thank you for your consideration.

**WRITTEN STATEMENT OF ANN LANE MLADINOV
ABOUT B23-736 PROPOSED AMENDED COMPREHENSIVE PLAN
HEARINGS OF DC COUNCIL COMMITTEE ON THE WHOLE
NOVEMBER 12-13, 2020**

My name is Ann Mladinov. In recent years I've been participating with several citywide groups working on achieving greater social equity and improving services and economic opportunities for District residents across the city, including affordable housing. I have my Master's in City and Regional Planning as well as Policy Analysis and Public Administration, which are all fields relevant to the District Comp Plan. I've worked in strategic planning, transportation policy, program design and evaluation, and economic and regulatory analyst in the federal government and non-profit sector. I'm also an ANC Commissioner in ANC3B serving Glover Park-Cathedral Heights.

As a planner, I know a city's Comprehensive Plan ("Comp Plan") is a foundation for all planning in the District, and a guide shaping the physical design and look and function of the entire city for now and the future.

At the hearing on November 12-13, the Committee had over 200 public witnesses sign up to offer oral testimony, along with the Director of the District's Office of Planning (OP), Andrew Trueblood. The Committee also heard from hundreds of witnesses through 9 hours of a hearing on the Framework Element of the Comp Plan testimony in March 2018, ending with previous OP Director Eric Shaw. Each witness brought particular knowledge and experiences, and we each bring our own values and perspectives. Virtually all the witnesses testified that they wanted to contribute to improving the quality of life for future residents, and most said that they want to see more affordable housing available in the District, whether for current or future residents. As the Council Chairman aptly noted, from those points of common interest, the witnesses diverged sharply on what they thought the proposed amendments to the Comp Plan would mean for achievement of those goals; those opposing and those favoring the proposed amended plan OP has put forward both asserted that their position would achieve the goals and the other position would not. I think we all agree that the witnesses cannot all be right. Someone has to make a determination of which views to believe or at least which assessments provide the best foundation for moving forward. In this process, the Committee of the Whole is where the ultimate responsibility rests to decide which amendments to accept in the current cycle.

Each of us approaches the issues from a different starting point. I have worked for many years as a public servant and I try to be an objective observer, balancing all the information available, the law and the context, and attempting to come up with policy recommendations that will be best for the public I service. As an ANC Commissioner, I affirm at the beginning of my term that "I will exercise my best judgement and will consider each matter before me from the viewpoint of the best interest of the District of Columbia, as a whole," and that is my objective in each issue I consider. That is why I have been named an at-large member rather than a representative of my ANC or my Ward on several groups. I cannot say I have no biases; we all have biases, consciously or unconsciously. I am a white female, child of the 1960s, born and raised in the United States (in Washington State not in the District of Columbia), granddaughter of poor immigrants, and trained to be a public servant, an economist, a policy analyst, and a planner who serves the people and does not advocate for my own interests or point of view. Each of those elements and others give me values and perspectives that may be biased in one direction or another. But I have tried to look at this very complex and important matter of the Comp Plan through a lens of fairness, justice, and a goal to contribute to the overall interest of this jurisdiction for the longer term future.

Mr. Trueblood and the other planners I have worked with in his office are well trained, capable professional planners devoted to serving the District. I have spoken to Mr. Trueblood at several discussions sessions organized for ANC members and also for residents. He has been quite candid in

conversation that the process that OP pursued in the early years of this amendment cycle did not include the necessary and legal required public review and comment period; the timetable was cut short in order to get the proposed Framework Element to the Council in early 2018. OP did not submit the mandated reports evaluating how the existing Comp Plan was working or not working. The people never were asked to share their vision for their neighborhood or for the city as a whole. There have not been forums ward by ward, ANC by ANC, or citywide where informed OP staff have described what the proposed amendments are written to do--what they would change, and why the changes are needed. If the Director and his staff had to do it again, he would start over and do all those things that are both required and advised for a true update of the District Comprehensive Plan for the District.

We cannot go back and undo what's been done. The Council has to work with what it is given, which at this point is an almost unmanageable 1500-page red line draft with additions, edits, and strike-outs on virtually every page. No one I have heard has explained what the intended or expected effect would be of any one change much less a set of changes to a particular section or element, part of the city, or aspect of the District's plans for the years ahead.

But there are some facts and myths that are important to acknowledge:

1. A Comp Plan is not supposed to do everything or plan for everything in the city; it is a framework, and a source of guidance. It is also not supposed to allow everything, or in other terms, to allow "just anything" to be built or changed. That is not planning. Providing so much flexibility that there are virtually no standards at all is the opposite of guidance.
2. As the Chairman noted during the hearing, a city needs for some areas to be devoted to warehousing and industrial uses (PDR). A city also needs areas for parks, schools, residences, hospitals, government and public buildings, transportation, office, commercial and retail activities. Some uses can be "mixed," and others cannot practically be safely or constructively combined on the same property or in the same vicinity. Future Land Use Maps (FLUM) are designed to provide guidance for making some of those decisions, based on informed and thoughtful balancing of how various functions work in the District and how they relate or could relate more effectively to each other. The Comp Plan and FLUM do not have to make all the decisions but they should guide the planning for those functions and assure that specific decisions can be made that will meet the city's needs in each area without unduly restricting or reducing the chances for other functions and needs to be fulfilled.
3. The FLUM has not typically been used to identify where affordable housing should be located or constructed in the city. In fact, affordable housing is not singled out as a specific category of land use or zoning in any official planning documents, which is appropriate. Affordable housing should and can be provided throughout the city and can be included in mixed use buildings and mixed use development projects, in multi-unit buildings with mixed income residents, in publicly provided and privately provided housing, and residential neighborhoods all over the District. But with affordable housing such an important and actually essential goal for the District in planning and housing and economic development and social policy, the Comp Plan should offer or discuss some concrete guidance and tools to allow the District to achieve the goals. Allowing every private property owner to determine how a lot or structure will be used could lead the vast majority of new projects and existing properties to be used for high cost housing and commercial development, to the exclusion of lower cost housing that would be affordable to current and future District residents from severely low income through every other "band" of annual income or potential rent or purchase payments, whether defined by Area Median Income or some other standard.
4. The Mayor has adopted a goal of "creating" 36,000 new housing units by 2024, with 12,000 of them considered "affordable," which is exactly 1/3 of the total. Outside the Comp Plan, OP is advocating

extending Inclusionary Zoning, which calls for up to 11% of units in a project to be “affordable.” Planned Unit Developments are also being developed with community amenities negotiated with the local ANC, including affordable units. Some recent PUDs in my area include 10-12% affordable units. I raise the analogy of the vote count in the 2020 election because it became quite familiar in November. If a candidate needs to get 50+% of the vote and currently has only 40% of the vote, then depending on what share of votes remain to be counted, the candidate needs to get more than 50% of each newly counted batch of votes or the candidate is never going to catch up. As the number of uncounted votes goes down, the percentage the candidate needs to receive continues to go up. And at some point it becomes clear that if the candidate is only getting 40% or 50% of each newly counted batch of votes, the candidate cannot get a majority. With affordable housing, if the goal is 1/3 of all new units (33 1/3%), then projects that only include 10-12% of the units will never get to the goal. Some projects will have to have a far higher proportion of affordable units, even 100% affordable units, especially since many projects in rapidly developing and/or in-demand areas often include no affordable units at all. The same goes for units for families. If projects covered by IZ only offer a handful of 3-bedroom units and the demand is for half the affordable units to accommodate families with several children, the city is only going to fall farther and farther behind.

Note that the District Department of Housing and Community Development (DCHD) has said that for Ward 3 to meet its allotted goal of 1,500 newly created housing units, the city is going to rely primarily on using Housing Choice Vouchers to allow lower income households to rent apartments in existing buildings, usually previously rent-controlled units. This may meet some interests of landlords, because the vouchers cover a higher rent than the prior tenants may have been paying, removing the units from rent control. But those transactions do not add to the total supply of housing units; they merely transfer the units to other tenants. And they also remove what had been relatively “affordable” market-rate units from the market for other would-be residents, who now may not be able to find housing meeting their ability to pay.

5. Increasing density does not automatically drive down average housing prices. If the housing that is built is high-end housing, the increasing number of units actually increases the average housing price. Some witnesses say this is a matter of supply and demand, but supply and demand is not that simple. To start, there is not just a single market for housing in the District or any other city; there are markets for larger units, there are markets for higher-end units, there are markets for homes with particular amenities. The markets may overlap, but the prices are not the same. And the number of units that could be considered “competitive” for a particular share of the market is so large, reaching to other states and jurisdictions, so the addition of new density in the District is not likely to have a major effect on the average price for the particular category of housing in the city or across the area. Other forces are far more powerful, as we know from COVID-19.

6. The Comp Plan for a city should be based on credible forecasts for growth. Even if the planning horizon is 25 years out, the fact that the District has not been adding substantially to population for years through net in-migration and the current population trends have been so shaken by the COVID-emergency that this is an ideal time to reassess already out-of-date forecasts. Planners who would push ahead with a major rewrite of the Comp Plan, ignoring dramatic changes in the forecasts of population and economic growth that underlie everything in the plan, have to be questioned as to their motivation. Rushing to meet a due date already 5 years in the past is not a reasonable justification.

What can the Council do?

If the Council wants a concise, useful document that will be relevant today and tomorrow but also will help get the city to a sound complete rewrite in 5 years:

1. The Council could write or require OP to assist in writing a short concise summary that pulls together all the new principles, values, and changes, and describes why the changes are being made.

One key question they should answer is: What projects or developments or other goals cannot be met under the existing Comp Plan and why? We keep hearing that there are things OP and DCHD must do as soon as the Comp Plan is released. What are they?

2. Ask OP to put together a red line version showing only the amendments that were considered technical corrections and updates required to match zoning, changes in law, changes in Small Area Plans, or other agency actions. Could those be adopted, but not all the proposals from developments and individuals?

3. Require OP to conduct a Small Area Plan for any area where there has not been one in recent years, before making a change in their map or Area Element.

4. Put together a list of all the “shall” statements (made into “should” in the amended plan). What are they? Can they fit together, be prioritized, or weighted together. In zoning, the BZA or ZC has to consider a wide set of requirements for a particular project and balance them. Why could that not be done in planning?

OTHER POINTS FROM MY TESTIMONY

The current draft amended Comp Plan is part of the amendment cycle that was due in 2016. That target is pretty much moot. We are four years behind schedule, on a 5-year cycle. We’ve missed the chance to meet that goal.

The amendment cycle started with an Open Call for language in the 2006 Comp Plan that required technical amendments to match Small Area Plans or other changes in plans or zoning that had been adopted since the 2011 amendment cycle. It was a request for changes, not assessments of what was working or not working, not an open dialogue on the people’s priorities and vision for the future. The Office of Planning (OP) was overwhelmed by amendments not so much from agencies but from developers. OP ended up making significant changes on the vast majority of pages and fundamental provisions of the Comp Plan that it is much closer to what OP would do in a rewrite cycle than in an amendment cycle.

In January 2018 the Mayor presented the first 60+ page Framework Element of the Comp Plan. The Office of Planning had skipped the required public review and comment phase and taken the draft straight to the Council for quick approval.

After considerable controversy at the hearing on the Framework Element in March 2018, the Council did not approve the Framework Element. You commissioned planners to revise the Framework Element, taking into account a range of comments. A year ago in October 2019 you approved the revised amended Framework Element. OP then released an amended version of the rest of the 1000 pages or so of the Comp Plan

OP asked for public comment within the next couple of months and ANC comments a few weeks later. OP did not go around the District explaining what specifically the amended plan would do and what it could mean in people’s communities. OP has still not done that. Nobody has really done that.

OP asked for responses to a short survey on which of the Mayor’s priority values people liked best. That is a common tactic for the executive, but it is not a substitute for outreach on what people want to see in their city and their neighborhood and what direction they would like the District to go in terms of land use

and physical development patterns in the future. OP says the amended Comp Plan is “our vision.” It is OP’s vision; it is not truly the people’s vision.

In the comment period last winter some residents, ANC’s and community groups supported the Comp Plan as amended. Some opposed. Others offered mixed reviews. My ANC complimented OP on some aspects, pointed out weaknesses in others, and asked for changes in others. Our requests were largely rejected, or OP claimed it was already doing enough in the areas we questioned. In some cases, OP denied our requests for edits when it had agreed to accept the same language in other elements where other ANC’s had made a similar request.

On a factual basis, last January and February multiple parties commented that the forecasts of population growth had not been adjusted to reflect the slowdown in population growth in the District in the past few years. The forecasts underlying the Comp Plan showed the rate of growth in population and economic development that was projected in 2016, including the forecast that the District population would reach one million by 2045, though we had already fallen off that track by the time of the first hearing on the Framework Element.

Then the COVID-19 pandemic hit and every forecast of population and economic growth was thrown into question. We have not had a crisis of this nature in a century. Far fewer people are moving into the District. International migration has slowed to a trickle. Young people who powered much of the growth in previous years have been leaving. Forecasters do not expect the District or other cities to get back even to previous levels for 3 to 5 years or more. For some households and some communities, the trajectory will be permanently changed; they will never get back to where they were.

Some people are saying OP has put in so much time and effort to get to this point, let’s just accept what OP has put together and move forward.

Closing your eyes and stepping on the gas is not generally the best approach when you can’t see where you’re going and there are solid reasons for thinking the bridge may be out ahead.

Other people are saying that there are important things that OP and the city need to do, and they have to have the amended Comp Plan in place to be able to do those things.

But nobody is saying what those things are. What does the city need to do in the way of land use and development that cannot be done right now?

The amendments change so much about the Comp Plan, the result appears to be that it would be difficult for anyone to oppose any up-zoning or any project plans, based on the Comp Plan. That is what some developers have said the Mayor committed in 2018: No development project would ever again be denied on the basis of the Comp Plan.

Does that mean a Free for All for developers--Any project they put forward will be approved, regardless of any concerns or community opposition? That does not sound like planning.

It’s important to recognize that many development projects are on the back burner right now. Experts are saying the market for housing and commercial/office buildings in the District is overbuilt already. It may be hard to find tenants, reduce vacancy rates, and keep up revenues at a lot of buildings.

This is the time when the District needs to focus much more on what current residents need—not future residents who may never materialize. We have thousands of residents right now who do not have safe

shelter or are in sub-standard housing, and it does not appear that the District has plans to assure that they will have adequate housing.

The Mayor's stated goal is that by 2025 the District will create 12,000 new or repurposed units that will be affordable, out of a total of 36,000 new units overall by that time. In other words, 1/3 of the units produced in the coming 4 years will have to be affordable. Inclusionary zoning and community agreements for PUDs call for 10% to 12% affordable units, so depending on those approaches will not be sufficient, particularly if construction is slowing down.

Every year the people of the District could use 12,000 affordable units, as rapid rehousing, permanent supported housing, or other subsidized housing. We need to preserve and improve existing affordable housing and build new affordable units around the city, not just at 80% of AMI but at 60% AMI, 30% AMI, for severely low income residents. Under current plans and current zoning, Ward 3 has a number of major developments in process that will add several hundred affordable units. But we need to make a concerted effort to do more.

In 2019, the Mayor said the District only created 6,000 affordable units in the previous 4 years so even the stated goal of 12,000 will require major effort. Relying on the marketplace is not going to be enough. This is like the vote count—If you have to get a certain share of the votes to catch up, and every time a new batch of votes come in, you are continuing to get a lower share of the total, you are never going to make the goal. It's just arithmetic. We have already lost tens of thousands of affordable units in the past 20 years, and pushed tens of thousands of people to move away because they couldn't find economical housing in the District.

With the effects of the pandemic becoming more pronounced week to week, this is a time when we need to focus our attention on meeting the needs of the people who are living here right now, and make sure they have safe, quality affordable housing. We can't let private developers take all the prime properties available for construction of market-rate housing or people who want to stay in the District -- families that have lived here for decades, essential workers, residents who are part of the community and want to remain here -- will not be able to stay because there will not be enough economical housing in the District.

As the Council, you have the opportunity to get our city to take that course. This is a very important inflection point for the city. The Washington Area Council of Governments will be preparing new population forecasts in 2021, and the District will be participating. With your support, we can build plans based on realistic forecasts of population and economic growth, and together create a Comp Plan that guides the District to a future that the people want and need.

Now we are almost to 2021, which is the year that an actual rewrite of the Comp Plan is supposed to be prepared, with full public engagement on the people's vision and priorities for the future shape of their city and their neighborhoods.

Andrew Trueblood and the many solid and devoted planners working on the Comp Plan. They know all these things.

Let's get back on a solid foundation for this vital process and do a real rewrite of the Comp Plan based on up-to-date forecasts and the people's perspectives on what the District should be aiming to be in the years to come.

Thank you for your consideration.

11-12-2020

Daniel del Pielago

Empower DC

Organizing Director

Good morning Councilmembers,

My name is Daniel del Pielago and I am an organizer with Empower DC, part of my work has been focused in supporting the Barry Farm Tenants and Allies Association from the Barry Farm neighborhood. For years now, Barry Farm residents have been promised a redevelopment that will improve their quality of life. Because of this promise, the better part of the neighborhood has been demolished and all the resident have been displaced all over the city. To date, residents do not know when they'll return, to what they'll return to and if they have the actual right to return.

Recently we have learned that the Office of Planning has introduced a plan with the Zoning commission to create the Barry Farm Zone, an action that would circumvent the PUD process and further disengage Barry Farm residents and their neighbors.

Now we see the proposed changes in the comp plan re-write which put Barry Farm residents in a further predicament. First, the plan makes quite a few accommodations for the New Communities Initiative, which for 15+ years now has not delivered anything but the displacement of long-time Barry Farm residents. For that matter NCI, has not created or held on to much needed public housing which can be seen in what's currently happening at Park Morton. Why is planning for the future of the city still making accommodations for a failed redevelopment program.

One for One replacement should not be a goal but a requirement, we need to hold on to all of the public housing units we have and not lose anymore. In any of these redevelopments, displaced residents need and actionable right of return, as it stands now, residents don't know if they will be able to return if and when a redevelopment happens.

We feel that the revitalization of Barry Farm must include:

- additional opportunities for deeply affordable housing on the site, by prioritizing the creation of additional public housing and subsidized units, limited equity cooperatives and utilization of community land trust to preserve housing affordability
- new amenities such as community facilities, parks, subsidized child development centers, incubation of resident-owned businesses, and improved access to the Anacostia River and Anacostia Metro Station.
- honoring the significant history of the Barry Farm community and it's many residents who have contributed to DC's culture through academia, sports, music and the struggle for the liberation of African Americans through placement of historic markers, installations, memorials, exhibits, or through other means

- Lessening the adverse impact of rising rents and gentrification in the surrounding area by maintaining traditional public housing, subsidized via Federal or local subsidy, on publicly owned and controlled land in perpetuity, with no market rate or luxury housing units permitted
- respecting the self-governance and leadership of subsidized tenants by recognizing and supporting resident-led organizations and initiatives, respecting resident input and influence over decision making, and ensuring that no two-tiered system of residency rights and responsibilities is created whereby subsidized tenants are treated differently or have lesser access to amenities than their nonsubsidized counterparts.

While some increase in density will be required to meet the one-for-one replacement requirement, densities must remain in the moderate to medium range with ample green and open space.

In closing, planning must center the experience of those directly affected and not the whims of developers.

Testimony of the Jeff Utz for Goulston & Storrs, PC

Before the

Committee of the Whole

Chairman Phil Mendelson, Chair

Public Hearing

on

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Virtual Hearing

November 12, 2020 | 10 am

Good morning Chair Mendelson, members of the Committee, and staff. My name is Jeff Utz, and I am a Director with the law firm of Goulston and Storrs. I'm also the co-chair of the Public Policy and Regulation Committee and a Board member of DCBIA so would associate myself with the DCBIA comments made previously.

Goulston is deeply involved in a variety of land use efforts throughout the City so the Comprehensive Plan amendment process is of great importance to us. We believe that the amendment is a timely opportunity for the City to reset a balanced set of goals that blend together concepts of growth and investment with equity and inclusiveness.

We also want to mention our deep appreciation of the amount of time and effort that OP has put into this. Their work, engagement, and vision has been tremendous.

Similar to comments made earlier today, we support an expedited review and implementation of the Comprehensive Plan.

As for my specific comments I wanted to focus on 5 things:

- **First** – We believe that the City's focus on housing and particularly affordable housing as an essential civic priority is wise policy. All decisions

and further statutory initiatives should be made with that priority in mind.

We must be purposeful in our actions to produce the universally shared goal for more affordable housing. We must also acknowledge the impact of regulations and policies on housing costs and slowing or stopping the production of residential units. As such, the Council should include a concept in the Comp Plan requiring a “housing affordability impact statement” prior to the passage or implementation of any new statute, regulation or policy. This “affordable housing impact statement” would assess the effect of such change on the production of affordable housing in DC, similar how a fiscal impact statement is required for any Council legislation.

- **Second** – Much of the language in the Comp Plan has been reframed in a manner that downplays the importance and benefits of growth and the positive impact of investment. For decades, the City struggled to obtain investment and it has been successful more recently in part due to growth-supportive policies. That success has led to fiscal strength and enhanced public resources, among other benefits. The City should not now assume that these investments will continue as a foregone conclusion. There is additional sensitivity on this point where we as a City must get back to where we were before the pandemic started. So the Comp Plan’s language,

particularly the Land Use Element, should be enhanced to ensure that economic development is not taken for granted and that growth and investment is fostered – specifically crafted to live alongside concepts of equity and inclusivity.

- **Third** - We strongly support the proposed Future Land Use Map changes. These have been mindfully selected to be located close to Metro stations and mass transit, along specific corridors and on larger sites that present meaningful infill opportunities. We specifically support the proposed FLUM changes in parts of the City that were identified as priority areas for more affordable housing in the Housing Equity Report.
- **Fourth** – We are aware that opponents to the currently proposed Comp Plan claim that there are too many language “changes from must’s into should’s”. We strongly disagree with the concept that these language changes should be rolled back. The use of “should” or similar language in the Plan is precisely the type of language that should be included. This language will mean that the strong preference of the Plan is clear and a concept that “should” be implemented likely will be, but the governmental decision makers (i.e., the Zoning Commission) will have the ability to consider the Plan holistically and determine if, based on case-specific evidence presented to it, conflicting provisions can be rectified. Further, if there are two “musts” within the

document that conflict, this would lead a government decision maker to a conflict that would not be resolved within the Comp Plan's very language.

Thank you for the opportunity to testify. I am happy to answer any questions you may have.



Testimony of the Emily K. Morris

Before the

Committee of the Whole

Chairman Phil Mendelson, Chair

Public Hearing

on

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Virtual Hearing

November 12, 2020 | 10 am

Good morning Chair Mendelson, members of the Committee, and staff. My name is Emily Morris, and I am solo attorney EKM Law, PLLC. My practice focuses on real estate transactions, District government processes, and landuse matters. I have been a resident of the District of Columbia for over 14 years, and am a current homeowner and resident of Ward 5. I have been an active member of DCBIA since I founded EKM Law, PLLC in 2014.

Prior to founding EKM Law, PLLC in 2014, I had the honor of serving District residents as an Assistant Attorney General. My last 6 years with the District were supporting Deputy Mayor for Planning and Economic Development on large scale real estate development transactions – including early stage planning of some the District’s current redevelopments of Saint Elizabeths and Hill East. I was also involved in the drafting of the initial affordable housing covenants in the early 2000s.

I am testifying today on behalf of my small developer clients. While I also represent larger scale clients on real estate transaction developments, I find that the District planning requirements disproportionately impact the decision making of my smaller developer clients. Specifically, I have observed that smaller scale developers shy away from seeking government approvals or entitlements that could easily produce additional housing, especially recently given the government delays posed by COVID. For example, a current client of mine is looking to redevelop a large alley lot in Ward 5 that could easily support upwards of 4 units or more if it were

not an alley lot and restricted by 20 foot, 2 story height and single unit limitations. District policies, regulations and timelines led my client to take the least risky option that produced less housing units.

Another client elected not to seek entitlements to build 4th unit on a large lot within an existing accessory structure because additional relief was expensive, both in time and money, and would have had the added frustration on being designated an IZ unit. Had the District provided incentives through relief from height, density, lot occupancy, and setbacks, rather than imposing frustration and costs through the building and entitlement process, I am confident that my client would have elected to build the 4th unit as an IZ unit.

The categoric prohibition on IZ unit being the bottom unit actively acts as a deterrent to building additional units on residential lots that could easily support 4 units. While I understand the intent of the policy, the economics of the policy is creating an incentive to build less, rather than more, affordable and inclusive housing in smaller scale and less dense development areas.

I have been fortunate to have extensive legal experience both inside and outside of the District government. In my experience, empowering District government officials and bodies with the flexibility to support its private sector counterparts in review processes and landuse options is key creating more housing, both affordable and market rate, in the District.

I feel strongly that the District should adopt language that encourages the use of broad array of tools to make the development more efficient to meet housing production goals and to give agencies more capability to facilitate housing production. Specifically, the housing element need to include language that creates flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.

In summary, if the District wants to meet its goal of producing more and inclusive housing, the District should be focusing on creating frameworks and policies that incentivize and reward developers for building more housing.

Thank you for the opportunity to testify. I am happy to answer any questions you may have.

Testimony of Sandra Moscoso – [REDACTED]
Committee of the Whole Hearing on B23-736, Comp Plan
November 12, 2020 @ 10am

Good morning Chairman and Councilmembers. I am Sandra Moscoso, a parent of two students School Without Walls and president of the school's Home and School Association, I am secretary of the Ward 6 Public Schools Parent Organization, a member of the Ward 2 Education Council, and a former Capitol Hill Montessori and former BASIS DC charter parent.

I am here to discuss education facilities and express opposition of section **1203.4, which calls for co-location of “public charter schools within significantly underused DCPS facilities.”**

The Comprehensive Plan is based on the Deputy Mayor for Education's 2018 Master Facility Plan (MFP), which in turn is based on recommendations from the DME's 2018 study.

However, not the DME study, nor the 2018 MFP are supported by any kind of comprehensive education plan inclusive of DCPS and charter sectors. While we can predict needs for seats via population projections, without a strategy or coordination about how to fill those needs, any facilities planning is nonsensical and reactive - just like the proposed co-location.

I urge Council to insist that the DME work with DCPS and the DC Public Charter School Board on a Comprehensive education plan and only after that is in place, address the role of facilities in supporting citywide education objectives.

As stated in section 1200.24, the Comp Plan should ensure “that investments in schools promote equity and excellence, serve the needs of all students, and provide access to educational skills and development opportunities across all eight wards through matter-of-right neighborhood schools and Districtwide public schools.”

Vulnerable DCPS should be adequately funded, so they can support their existing communities and programming.

These schools should not be asked to bear the burden of lack of planning by our city.

And on a personal note, my children were enrolled in a co-located for 5 years. I can

confidently share that co-location introduced difficulties around design and scheduling of shared spaces, in particular when pedagogy was not aligned across programs. It's not worth it. Please strike section 1203.4.

A second concern I would like to raise with the Comp Plan is the risk of loss of access to green space by DC Public Schools students under section 805.12, which **"Encourages shared-use agreements for green spaces owned by District government and DCPS."**

We all saw how played out last year with Jelleff field, where a private school who can afford to pay, received years of priority access of a public space during peak after school hours.

This also happened when Ellington Field was moved out of DCPS' control to be managed by DPR, opening it up to shared use agreements and creating a situation where public school students risk competing with private entities over the use of DC Public School space. It is worth noting that DC charter outdoor spaces are not subject to these "shared-use" agreements.

Please strike section 805.12.

Thank you for your time.



400 I Street SW
Washington DC 20024

www.westminsterdc.org

Honorable Councilmembers,

I am Rev. Ruth Hamilton, 25-year Co-Pastor of Westminster Presbyterian in SW DC, better known as the Jazz & Blues Church.

Our church is a good representation of SW today, with about 50-50% white and persons of color across the full spectrum of incomes. (Proposed Comp Plan 1903.35) Westminster has sought to serve the SW neighborhood as more than just a church with a strong commitment to putting our faith into action for social justice.

During the SW Small Area Plan process we worked hard to ensure the commitment to a Build First model for the proposed redevelopment of Greenleaf and we will always fight for that. We also asked our community to support our desire to rezone our lot from its current moderate density to medium density. The community agreed to include this proposed change in the SW Small Area Plan.

In 2015, the same year this Council approved the SW Small Area Plan, Westminster sought and selected a team to help it create a redevelopment plan that will result in a new larger community serving church building, 99 market-rate residences, and 123 senior affordable apartments for those earning under 60% MFI. We hope to include affordability at the 30-50% of MFI if the funding is available. (Policy AW-2.5.4: An Equitable and Inclusive Southwest Neighborhood, 1914.7)

In this long process, we have learned how expensive and hard it is to build affordable housing in this city and I support any amendments in the mark-up period that will make that easier; that will give more incentives to build affordable units that we all know are so needed. Imagine if every church in this city could be assisted in building affordable housing.

Our new facility will also allow us to increase our work of preserving the District's great jazz and blues legacy. We will also include art and recording studios as we understand that equitable, affordable access to the arts is critical for the continued diversity in SW and the District. Westminster will be able to continue to serve the SW community by providing a facility to host community, government, and art programs. (Policy AW-2.5.8: Southwest Arts and Culture, 1914.11)

I trust you will be able to get through the mark-up period in a timely and equitable way and move on to passage of the Bill. Westminster's effort to build affordable housing will move more easily with your passage of it. Thank you.

Rev. Ruth W. Hamilton

Westminster Federal EIN 53-0205898

Rev. Ruth W. Hamilton- Co-Pastor - [REDACTED] cell - [REDACTED]
Rev. Brian E. Hamilton- Co-Pastor - [REDACTED] cell - [REDACTED]





400 I Street SW

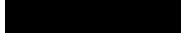
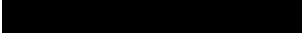
Washington DC 20024



www.westminsterdc.org

Westminster Federal EIN 53-0205898

Rev. Ruth W. Hamilton- Co-Pastor -  cell - 

Rev. Brian E. Hamilton- Co-Pastor -  cell - 

From: [Thomas L. Hutcheson](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Testimony transcript Thomas Hutcheson
Date: Thursday, November 12, 2020 11:54:24 AM

Thank you, members of the Committee, for this opportunity to testify.

I am an economist with more than forty years of experience in economic development, mainly overseas. In those years I have seen the potential for economic development to make possible (although not to guarantee) lifting up the poorest and most vulnerable. I believe that the Comprehensive Plan will advance economic development in the District of Columbia and so advance the interests of poor people, both by creating market opportunities, but also by raising fiscal resources that can be used to lift others.

Nevertheless, I want to add another perspective. A thriving, prosperous, well governed city, which I believe the Comprehensive Plan advances, increases the chances of DC statehood. And statehood is important not only for us DC residents but for America. Full representation of DC (and Puerto Rico) in Congress will help redress the over-representation of rural, low density areas in the Senate.

RE: Committee of the Whole, Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Good morning Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak today. My name is Geraldine McClain. I am a long-time resident of DC Ward 6 and am representing Concerned Residents & Friends for Better Air Quality & Environmental Justice for Buzzard Point Residents & the Old Southwest Community.

I am here to share our concerns about the Comp Plan amendments, to prevent injustices that our community is currently experiencing.

For over a decade we have had non-stop construction. I feel like a prisoner in my own home. I wake up to the sound of hammers banging, power drills and sautering irons. I can't open my windows because of clouds of dust and engine exhaust fumes from idling construction vehicles. Sometimes it smells like something is burning. Traffic is horrific with the construction vehicles and the normal everyday traffic. After the workers go home, I open my window and turn on my air filter machine and the indicator goes directly to red. This indicates air pollution. When I look out my window, I look straight at a high rise under construction blocking out the skyline. Rodents are running through our yards because of the digging of the ground. Parking is impossible. If we leave to go anywhere when we come back we can't even find a space to unload our groceries. The construction workers come to work early to commandeer the residential parking spaces. High rise buildings and hotel projects are a constant, with our homes being sandwiched in between.

Through this process, some families have been forced out of their homes. The community is feeling suffocated and disenfranchised.

Whenever plans are made, we as a community are the last to be notified. Developers and the city ask our opinion. They give the impression that residents have a choice. But in reality the project is already a done deal when it is presented to the neighborhood. They make presentations of proposed projects, and the neighborhood rejects them, but they get approved anyway. We have no say in these projects but we are the people that are affected.

The Comprehensive Plan needs to address these kinds of injustices. Our group will be submitting written comments with additional concerns and specific recommendations on

environmental justice and affordable housing through the public comment period. I will now read some concerns, as prepared by our group.

- Environmental justice should be integrated throughout the entire planning process, and not as a separate issue.
- Current EMF and toxic industrial facility hazards need to be addressed.
- The Housing Element fails to acknowledge that tens of thousands of Black residents have been displaced. We need stronger language to directly say to the Zoning Commission that equity should be as equally valued as land use.
- We support zero displacement of public and subsidized housing residents, including those in Greenleaf. If the District can give away so much public land and tax subsidies to developers, then it can invest in providing affordability for the Greenleaf redevelopment.
- Residents have ongoing concerns about the city's low level of engagement and lack of transparency with respect to redevelopment. The approval process has to be more responsive to community concerns.
- In the last few months, we have protested, organized, and marched because Black Lives Matter. We feel that there is nothing in these amendments that would fundamentally change the course of events that is displacing Black residents in SW.
- We need stronger language saying that use of public land should produce overwhelmingly affordable housing. We need churches to be dissuaded from redevelopment to only produce overwhelmingly expensive market housing.
- We would like for you to consider NOT changing land use maps in SW without public input. Changes should be responsive to community needs, such as hospitals, school, gas stations and amenities that make communities livable.

Thank you for your time and consideration.

Re: Committee of the Whole, Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Dear Chairperson Mendelson and Members of the Committee,

First, thank you for the opportunity to comment on this extraordinary document, which details the many steps taken already to promote environmental sustainability. This amendment outlines specific comments and concerns regarding the Environmental Protection Element of the Comprehensive Plan from a group of professors in the DC area. We share an interest in the environment and environmental health; many of us members of the DC Area Colleges and Universities Environmental and Occupational Health Consortium. We applaud the parts of the Comprehensive Plan that prioritize equitable environmental protection for DC’s residents. Specific changes we recommend to further ensure equity are as follows:

602 E-1: Adapting to and Mitigating Climate Change

602.5 List heat illness prevention among vulnerable community members as well as outdoor workers as an explicit goal. Include a goal to provide public access green space within one-half mile of each resident in all wards.

603 E-1.1 Preparing for and Responding to Natural Hazards

603.6 Policy E-1.1.2: Urban Heat Island Mitigation. Remove “Wherever possible,” and replace with “**Establish metrics and requirements to** reduce the urban heat island effect...”.

610 E-3: Conserving Natural Resources

613 E-3.3 Reducing Solid Waste Disposal Needs

613.1 For sustainable materials management practices and policies, purchasing plans will also encourage the development of more environmentally friendly cement for use in all construction projects.

613.7 Policy E-3.3.3: Organic Waste Diversion. Consider setting explicit targets for grocery stores and restaurants to donate food immediately prior to expiration.

614 E-4: Promoting Environmental Sustainability

618 E-4.4 Reducing the Environmental Impacts of Development. Stronger measures for equity are especially important for neighborhoods facing multiple projects that when combined create significant environmental impact.

618.3 Policy E-4.4.1: Mitigating Developmental Impacts. Do not eliminate stronger language (“ensure” and “shall”), and do not replace it with the weaker “should.”

618.4 Policy E-4.4.2: Transparency of Environmental Decision-Making. Do not eliminate stronger language (“ensure”) with the weaker “should.” Define “meaningful opportunity to participate” with specifics. Change text to read,

“Discussions and decisions regarding environmental impacts and mitigation measures ~~should~~ **shall** occur through a transparent process in which the public is kept informed **in a timely manner** and given a meaningful opportunity to participate **before decisions are made, so that their input can be factored into decision-making.**”

618.5 Policy E-4.4.3: Environmental Assessments. There are two places where “should” needs to be replaced, to ensure essential aspects of environmental assessment. The current language fails to recognize cumulative impacts from multiple projects and the need for specifics that make the information available to the public in a meaningful way. Change text to:

(1) “The environmental review ~~should~~ **shall** include... information about existing conditions, **projected conditions due to concurrent projects**, projected impacts and mitigation measures.”

(2) “The process ~~should~~ **shall** ensure that such information is available... to the public... before any decision is made, **with sufficient time for the public to use the information to inform their participation in the decision-making process.**”

[Formerly 616.8] Action E-4.4.B: Strengthening Environmental Screening and Assessment Procedures. Do not strike out this action. Striking this action eliminates protections for residents’ ability to review and comment on environmental standards and procedures.

E-5: Reducing Environmental Hazards

620 E-5.1: Reducing Air Pollution. While air quality in DC has indeed been improving dramatically, not all residents feel that their air quality has improved. Many have pollution localized in their neighborhoods. Because many pollutants concentrate within several hundred meters of their source, equity requires addressing air pollution in potential hot spots.

620.1 Examples of disparities have been documented in DC, for example in “Monitoring Neighborhood Concentrations of PM_{2.5} and Black Carbon: When Using Citywide Averages Underestimates Impacts in a Community with Environmental Justice Issues” (doi.org/10.1089/env.2019.0026) and “Seasonal spatial and temporal distribution of daytime inhalation-level particulate matter in Washington, DC” (https://csuepress.columbusstate.edu/bibliography_faculty/1043/). Consider modifying this section to recognize disparities in air quality by adding, **“While air quality overall has improved, DC still has inequities in air quality, largely due to neighborhood-level sources.”**

620.12 Policy E-5.1.3: Evaluating Development Impacts on Air Quality. Evaluating is not sufficient for protecting human health if there is no mitigation. Addressing dust alone is not sufficient. For example, there were times during the Audi Field Stadium construction when action levels, as determined by real-time monitoring, were exceeded sometimes not due to dust but to diesel emissions from trucks. Change the heading to, **“Evaluating and Mitigating Development Impacts on Air Quality,”** and add monitoring as an essential part of effective mitigation, by changing the text to, “These measures should include **monitoring**

that informs construction controls to that reduce airborne dust and other construction-related air pollution, such as emissions from trucks and other equipment.

620.13 Policy E-5.1.4: Stationary Sources. Eliminating monitoring weakens the ability to determine whether compliance is actually occurring and whether compliance is effective. Elimination of refrigeration plants needs to be more clearly explained, as refrigerants are powerful greenhouse gases. Monitoring is a way to detect leaks and prevent unnecessary, wasteful emissions. Instead of adopting strikeouts, change text to, “Maintain controls, **including monitoring to inform mitigation**, on gaseous and particulate emissions from stationary sources of air pollution..., such as boilers, generators, **power plants, and refrigeration plants.**”

620.17 Policy E-5.1.8: Air Quality Education. Consider adding text that outlines how education will address disparities in air quality and be responsive to community needs, with “Increase use of innovative technological outreach, such as a bench monitoring station, **to address areas of community concern and provide real-time data to communities.**”

620.22 Action E-5.4.1.D: Air Quality Monitoring. Consider adding text so that monitoring is used to identify and mitigate disparities in air quality. Put the focus on human health rather than only following federal standards. Federal standards are only as good as the Administration. There is no reason that DC needs to limit itself to federal standards, when the World Health Organization (WHO) and states such as California have more protective guidelines. One example is PM₁₀, for which US EPA standards are three times higher than those for the WHO. Extend this section with, “... and take corrective actions in the event the monitors detect emissions or pollution that exceed federal standards **or those set by DOEE to be more protective of human health.**” Add, “**Expand existing monitoring to better capture disparities in air quality across the District.**”

E-6: The Link Between Land Use, Transportation and Air Quality

624 E-6.3: Managing Hazardous Substances and Materials

624.6 Policy E-6.3.2: Hazardous Building Materials and Conditions. This section presents an opportunity to recognize the hazardous materials in buildings that are about to be removed, so that the public is not exposed during the demolition process. Inclusion of demolition somewhere in the plan is essential, especially as DC prepares to demolish the old South Capitol Bridge. Consider adding text to address demolition, “...and other hazardous materials from the build environment, **including structures prior to demolition**”. The phrase “where necessary” is vague and should be replaced with specific criteria. The sub-heading would then be changed to, “**Hazardous Building Materials, and Conditions and Demolition**”

624.7 Policy E-6.3.3: Accidental Spills and Releases. Extend “education and awareness” to include monitoring and communication of data to residents with, “Improve public education, **public availability and communication of any monitoring data**, and awareness of these requirements....”.

624.9 Policy E-6.3.5: Clean Up of Contaminated Sites. Maintain stronger language, so that it still reads, “**Ensure that the necessary steps should be taken....**” Data needs to be publicly available and communicated to the public in a meaningful way. Add, “**Data from investigations shall be made publically available and communicated to residents**” So residents can better protect themselves with real-time information, add, “**within a time frame that gives residents sufficient time for quick action to minimize exposure.**”

624.15 Action E-6.3.C: Reducing Exposure to Hazardous Building Materials. This is an example of a place where community and ANC involvement can help to identify problem areas, as in 608.7 *Action E-2-4.A: Expand Tree and Slope Protection*. Add, “**Leverage community partners and ANCs to ensure that the programs reach residents most likely to live in properties with asbestos and lead paint.**” Also add stronger language so that it reads, “District programs ~~should~~ **shall** provide technical and financial support...”.

627 E-6.6: Other Hazards and Pollutants. This section notes the area around the Naval Observatory as a place of particular concern for light pollution. Are there parallel areas of concern for electromagnetic fields (EMF)? This could also be recognized with, “**The second hazard has been raised by communities, such as Buzzard Point in the southeast quadrant, near electrical substations.**”

627.2 Policy E-6.6.1: Prudent Avoidance of EMF Impacts. Use stronger language for mitigation measures, “...~~should~~ **shall** be designed using **implemented following designs that use** methods to mitigate involuntary public exposure to potential adverse effects.” Include measures for those currently living in areas with EMF sources.

628 E-6.7: Achieving Environmental Justice

628.2 The goal that “low-income and minority communities... should enjoy clean, and safe places to live...” has multiple components, one of which is the ability to continue living in their communities. To recognize this, add “**It is equally important to ensure that residents can continue to live in their neighborhoods even when those areas have become cleaner and safer.**”

628.2 “Fair and meaningful opportunity to participate” requires definitions. Add, “**Fair and meaningful opportunity includes engaging residents before decisions are made and with sufficient advance notice.**”

628.3 This section is a second place to emphasize how a “forward-looking approach to environmental justice” ensures that residents who have fought hard to clean up their neighborhoods can still afford to live in those neighborhoods. Add at the end, “**and to ensure that those vulnerable communities can afford to live in their improved environment.**”

628.4 Policy E-6.7.1: Addressing Environmental Injustice. Include other sources of environmental injustice with, “...adverse effects of industrial uses, **construction and demolition**, particularly when proximate...”. Also include enforcement of solutions and mitigation measures, with, “Continue to develop and refine, refine, **implement and enforce**...”.

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Original testimony (November 12, 2020)

Greetings, Chairman Mendelson and Members of the Committee. I am a chemistry professor at Trinity Washington University. My name is Shizuka Hsieh, and I am here to represent a group of academics from universities in the area in the fields of Air Quality and Public Health. After I signed up to testify, others from the larger Environmental Health community have joined the group. We include faculty at Georgetown, the George Washington University, Howard and the University of Maryland. The full list of academic experts will be in the amended written testimony that we will submit before December 3. Today I speak to the section on Reducing Air Pollution (E-54.1). Our written testimony will include comments on the entire Comprehensive Plan Environmental Protection Element.

DC should strive for air quality guidelines that are more protective of human health. Section 602.22 about air quality monitoring focuses solely on detecting exceedences of federal standards. Yet states such as California often follow stricter standards. Federal standards are only as good as the administration; for example, this year it failed to adopt stricter particulate matter (PM_{2.5} and PM₁₀) standards (NAAQS). The PM₁₀ level acceptable in the US is three times higher than WHO (World Health Organization) guidelines and more than three times higher than European Union standards. DC should not limit itself to federal standards and instead be at the forefront by adopting air quality standards consistent with other parts of the world.

Many air pollutants from industry and traffic deposit *within several hundred meters of their sources*, putting those in proximity at highest risk. These include particulate matter (PM), nitrogen oxides (NO_x), polyaromatic hydrocarbons (PAHs) and black carbon (BC), all of which are harmful to human health. **The air quality section needs to address local pollution hot spots that pose health hazards.**

DC's improvement in overall air quality has been remarkable. But not all neighborhoods feel that their air quality has improved. These neighborhoods are not represented when **the monitors that are used to determine the District's air quality are not positioned to capture areas with the worst air quality.** Residents suffer localized truck engine emissions because of zoning that places bus parking, trash transfer stations and other heavy vehicle traffic in their midst. Other sources in DC include concrete batching plants and industrial facilities located in neighborhoods.

An initial reading of the air quality section located only two places (620.12 on Development and 620.13 on Stationary Boilers) that address neighborhood-level sources. Section 620.2 states that "Emissions from local smokestacks and other stationary sources are fairly limited..." and focuses on motor vehicle emissions as the major source of air pollution in DC. Similarly, Section 621 focuses on traffic as the major source of two pollutant precursors of ozone, without addressing the substantial contribution (49% for NO_x and 69% for VOCs) that comes from neighborhood-level sources. **Sections 620.2 and 621 should be expanded to address (1) industry and (2) localized truck engine emissions that impact neighborhoods.** Section 620.12 should include engine idling and diesel emissions that come with development and construction.

Sections about neighborhood-level emissions sources should include monitoring. Specific monitoring requirements are needed for mitigating "possible adverse impacts" (620.12) and "achieving compliance" (620.13). Real-time monitoring alerts facility

operators about incidents of high pollution so that mitigation measures can be taken in a timely manner. Publically-available fenceline data inform residents whether compliance is being achieved. Neither mitigation nor compliance can be ensured without monitoring that helps polluters achieve emissions reductions. It is not advisable to strike out language requiring monitoring, as appears in section 620.13.

Education can be expanded to respond to resident concerns. Section 620.17 on Air Quality Education is one place where local pollution hot spots can be addressed, by specifying how innovative technological outreach can be used to address disparities in air quality. Innovations include local monitoring networks with data available to residents in real time. Making alerts and data available to residents is one way to make education meaningful to them and to provide opportunities for residents to use air quality information to protect their own health.

Thank you for your consideration.

Re: Committee of the Whole, Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Greetings, Chairman Mendelson and Members of the Committee. I am a chemistry professor at Trinity Washington University. My name is Shizuka Hsieh, and I am here to represent a group of academics from universities in the area in the fields of Air Quality and Public Health. After I signed up to testify, others from the larger Environmental Health community have joined the group. We include faculty at Georgetown, the George Washington University, Howard and the University of Maryland. The full list of academic experts will be in the amended written testimony that we will submit before December 3. Today I speak to the section on Reducing Air Pollution (E-54.1). Our written testimony will include comments on the entire Comprehensive Plan Environmental Protection Element.

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DC's improvement in overall air quality has been remarkable. But not all neighborhoods feel that their air quality has improved. These neighborhoods are not represented when the **monitors that are used to determine the District's air quality are not positioned to capture areas with the worst air quality.** Residents suffer localized truck engine emissions because of zoning that places bus parking, trash transfer stations and other heavy vehicle traffic in their midst. Other sources in DC include concrete batching plants and industrial facilities located in neighborhoods.

An initial reading of the air quality section located only two places (620.12 on Development and 620.13 on Stationary Boilers) that address neighborhood-level sources. Section 620.2 states that “Emissions from local smokestacks and other stationary sources are fairly limited...” and focuses on motor vehicle emissions as the major source of air pollution in DC. Similarly, Section 621 focuses on traffic as the major source of two pollutant precursors of ozone, without addressing the substantial contribution (49% for NOx and 69% for VOCs) that comes from neighborhood-level sources. **Sections 620.2 and 621 should be expanded to address (1) industry and (2) localized truck engine emissions that impact neighborhoods.** Section 620.12 should include engine idling and diesel emissions that come with development and construction.

Sections about neighborhood-level emissions sources should include monitoring. Specific monitoring requirements are needed for mitigating “possible adverse impacts”

(620.12) and “achieving compliance” (620.13). Real-time monitoring alerts facility operators about incidents of high pollution so that mitigation measures can be taken in a timely manner. Publically-available fenceline data inform residents whether compliance is being achieved. Neither mitigation nor compliance can be ensured without monitoring that helps polluters achieve emissions reductions. It is not advisable to strike out language requiring monitoring, as appears in section 620.13.

Education can be expanded to respond to resident concerns. Section 620.17 on Air Quality Education is one place where local pollution hot spots can be addressed, by specifying how innovative technological outreach can be used to address disparities in air quality. Innovations include local monitoring networks with data available to residents in real time. Making alerts and data available to residents is one way to make education meaningful to them and to provide opportunities for residents to use air quality information to protect their own health.

Thank you for your consideration.

Good afternoon, Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak to all of you today. My name is Elan Sykes, speaking as a resident of Ward 2 for the past 2 years. I'm here to urge the Council to pass the Office of Planning's amendments to the Comp Plan *intact* by the **end of 2020**.

Like many young college graduates, in 2018 I moved to DC with the hope of working in public policy after finishing school. I was lucky enough to find a job and an apartment on a shoestring budget, and I know **so many** other people living here with similar stories. It's been a blessing for me, personally, to live in this city and in Ward 2.

But it's too easy to think of DC as a place to come to fix the country or the world. It's too simple to think everyone in the city moved here for opportunities when many residents have lived here their whole lives, and these opportunities have never been available equitably to all the existing and potential residents of the District, especially longtime Black and Brown residents, immigrant communities, and first-generation or low-income college graduates. When local populations grow and newcomers move to a city that doesn't produce enough housing, these opportunities come at a cost.

It's a very good thing that people want to live in DC. But development is too slow and spread unevenly throughout the city when current systems and structures make it much easier to build in communities with less time and resources to oppose development. When DC doesn't build enough housing and access to vital services and retail across the city, development that the city desperately needs is directed only to those areas with fewer resources, and not the wealthier and whiter areas of the city, especially Northwest. When DC doesn't build enough housing, we only let the most privileged and wealthy come to live here, and it displaces or disproportionately burdens the poorest and most disadvantaged residents.

The Office of Planning's amendments to the Comp Plan help solve these problems. The Council has the power to adopt these amendments, developed and supported by officials and communities across the city, to address legacy structures that perpetuate the effects of old racist policies and outmoded planning frameworks to improve the lives of all residents and potential residents.

The OP amendments to the comp plan can start to help address structural inequities with disparate impacts on different racial and ethnic groups, increasing rent burdens, especially on lower-income and low-wealth households, increasing greenhouse gas emissions by pushing people away from walkable neighborhoods with transit and mobility access, and damaging public health by encouraging overcrowding of existing units.

Without having moved to DC I would never have had the opportunities I've had to engage with world-class experts in my field, meet people from around the world, live in a neighborhood where I can observe shabbat in a walkable Jewish community, and secure insurance and healthcare that saved my life in a bout of leukemia just a year ago at age 24. I don't know what my life would look like without everything DC has given me.

We who have the time and resources to dedicate effort to improving our city should spend those efforts making the District a more affordable, livable and welcoming place for all who wish to live here. The most important part of DC to preserve is not single-family houses or the character of exclusive neighborhoods, but rather the broad community and opportunities DC offers to everyone who wants to live here, and the Council can make these opportunities available to all of the District by adopting the Office of Planning's amendments, intact, as quickly as possible, and taking future measures to increase affordable and market-rate housing, allowing the whole city to get to work.

From: [Beth Wagner](#)
To: [Koster, Julia \(Council\)](#)
Subject: Re: Testifying at DC Council Hearing on B23-736, Comp Plan (11/12 at 10am)
Date: Thursday, November 12, 2020 4:37:03 PM

Here it is:

Before we get into the policy, it cannot be said enough how little effort to engage people was put into this process. The public can't even ask questions of the councilmembers during this hearing? Well, I have a few questions anyway about how this government engaged the public on this vital 1,500 page document that was so large we had to break the pdf apart and compress so it could be shared with people.

- Was the comp plan translated as required by the comp plan itself?
- Was the comp plan audio recorded for people who can't see or read?
- Were printed copies distributed for people who don't have computers?
- Was even 0.05% of the population engaged over the course of 4 years?

Director Trueblood told Taking Action radio that they wouldn't be translating the comp plan because the process needed to "move along." To which I say, it's not much of a process if it excludes 1 in 4 residents out of the gate. There is no meaningful participation in a sham process. But since we're here, let's talk about it.

- **It's not that you build it's how you build, and these amendments open the door for rampant development while stripping out specific protections for people.**
- **Build more:** It is tempting to treat housing as a physics problem, where adding volume alleviates supply, but this interpretation dangerously ignores the profit motive for real-estate development. As Chairman Mendelson rightly pointed out, DC has added at least 20,000 new units in the last decade. We have been living through an unprecedented level of development. Why then, as density rises, have an estimated 60,000 Black people been displaced from DC since 2000?
- **Engagement:** By 2006 standards, virtually no effort was put into engaging the community in this process. Despite being required by law, and having 4 years to do so, the comp plan was never translated, excluding 1 in 4 residents out of the gate.
- **Why amend?** The comp plan is being amended now because residents fighting

displacement have had success holding up damaging development projects in court using the comp plan's protections. This delays the highly lucrative real-estate speculation process. We are supposed to buy the developer's line (and clearly many people testifying today have) that holding up these projects is endangering affordable housing and perpetuating displacement. But we should start by asking why these residents, uniformly poor, predominantly Black, are spending years of their lives and opting in for harassment and legal intimidation by billion dollar corporations to oppose rampant development.

- **The answer** is because their communities have been intentionally destabilized by aggressive market-rate development. They know far better than the many people testifying to the theoretical benefits of "build more" that this is a failed policy. As Chairman Mendelson pointed out, the last 20 years of development in DC are unprecedented, and they correlate directly to the displacement of 60,000 people. If the problem is that we don't have enough housing units, why are there 30,000 vacant units in the District? Inclusionary zoning, which is the term for the affordable housing required in new development projects, serves families who make between \$60,000 - \$100,000/year. Calling this affordable is laughable.
- **Build more:** It is tempting to treat housing as a physics problem, where adding volume alleviates supply. As Chairman Mendelson rightly pointed out, DC has added at least 20,000 new units in the last decade. We have been living through an unprecedented level of development. Why then, as density rises, have an estimated 60,000 Black people been displaced from DC since 2000? It's because building more without explicit protections for Black and low-income people directly causes displacement.

On Thu, Nov 12, 2020 at 3:57 PM Koster, Julia (Council) <[REDACTED]> wrote:

I have Ms. Elliott's testimony, and please send me yours when you can.

Thanks.

From: Beth Wagner <[REDACTED]>
Sent: Thursday, November 12, 2020 3:56 PM
To: Koster, Julia (Council) <[REDACTED]>
Cc: Cash, Evan W. (Council) <[REDACTED]> Committee of the Whole (Council) <[REDACTED]>
Subject: Re: Testifying at DC Council Hearing on B23-736, Comp Plan (11/12 at 10am)

Thank you! we're in

Sent with [Shift](#)

On Thu, Nov 12, 2020 at 3:55 PM Koster, Julia (Council) <[REDACTED]> wrote:

We just put you both in the current panel, so you will be testifying in a few minutes.

From: Beth Wagner <[REDACTED]>
Sent: Thursday, November 12, 2020 3:54 PM
To: Cash, Evan W. (Council) <[REDACTED]>
Cc: Committee of the Whole (Council) <[REDACTED]> Koster, Julia (Council) <[REDACTED]>
Subject: Re: Testifying at DC Council Hearing on B23-736, Comp Plan (11/12 at 10am)

Hello,

Ms. Minnie Elliott and I missed our slot - can we join the next panel? We are both on now.

Best,

Beth Wagner

Sent with [Shift](#)

On Thu, Nov 12, 2020 at 10:14 AM Cash, Evan W. (Council) <[REDACTED]> wrote:

Please bear with us. We should be starting shortly.

From: Cash, Evan W. (Council)
Sent: Monday, November 9, 2020 6:00 PM
To: Committee of the Whole (Council) <[REDACTED]>
Cc: Koster, Julia (Council) <[REDACTED]>
Subject: Testifying at DC Council Hearing on B23-736, Comp Plan (11/12 at 10am)

Good evening,

You are receiving this email in response to your requesting to testify at the Committee of the Whole's upcoming hearing on **Bill 23-736, the "Comprehensive Plan Amendment Act of 2020"**

You should have just received a link from "Committee of the Whole" (no-reply@zoom.us) with your unique participation link for Thursday's upcoming hearing on the legislation (**do not share this link or you may not be able to testify**). If you did not receive the link, check your spam, and if it didn't come through, please respond to this email and we will send your link.

You requested this date or had no preference and have been added to the Thursday portion of the witness list. The draft witness list showing your place in the hearing will be sent tomorrow morning.

On Thursday, November 12, 2020, shortly before 10:00 AM you will use the link to log into Zoom. You will be in a waiting room until the hearing begins. When the Chairman gavels the hearing to order, you will be admitted to the hearing as a viewer only. When your panel to testify comes up, you will be promoted to the interactive portion of the hearing where you will be able to provide your testimony and answer any questions from Councilmembers. Witnesses will likely be called in panels of 10 and you should plan on 3 minutes to testify. Please make sure to mute yourself unless you are speaking, and please enable your camera when you are admitted into the interactive area. When your testimony is complete and any questions from Councilmembers have concluded, staff will change your role back to an attendee so you can continue watching the hearing in real time if you wish.

Please download the Zoom app prior to the hearing and familiarize yourself with its controls. (<https://zoom.us/download>)

You should be in Zoom and prepared to testify shortly before 10:00 AM or monitor the hearing's progress and ensure you are on the Zoom prior to your panel (it is impossible to predict the speed at which the hearing may move). The hearing will be broadcast on Cable channel 13, <http://www.dccouncil.us>, and <http://www.chairmanmendelson.com/live>.

Please contact me if you have any questions.

Evan Cash

Committee and Legislative Director

Committee of the Whole

Chairman Phil Mendelson

John A. Wilson Building

1350 Pennsylvania Avenue, NW

Suite 410

Washington, DC 20004

Tel: (202) [REDACTED]

<http://www.chairmanmendelson.com/cow>



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From: [BM/BV Residents Association](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Comp Plan Testimony Submission - Minnie Elliott
Date: Thursday, November 12, 2020 1:46:50 PM

Hello,

Please find Ms. Minnie Elliott's testimony below.

Best,
Brookland Manor/Brentwood Village Residents Association

DC Comprehensive Plan: Ms. Minnie Elliott's Testimony

- **Thank you** for the opportunity to speak today
- **Introduction:** 82, lifelong Washingtonian, great great grandmother, longtime community activist, marched with Dr. King and still fighting now.
- **I oppose these amendments and encourage the council to reject them because they weaken language protecting low-income residents and open us up even more to developers who are displacing us.**
- I am the **president of the Brookland Manor** residents association. The former owner told us we would always have a home here, for our children and their children, after we helped him save the property. But that backfired when the new owner decided to redevelop the property, building 3x as high. Now we have been fighting against displacement for six years. **It's not that we don't want them to build. We want them to build in a way where we can be included to be respected.**
- **Not Listening:** It's obvious that the people of DC, the ones who voted you into office, need to have more of a say about what's going on. There was no effort to engage my community in this process, so who are you listening to?
- **There's a crisis:** You are not taking this housing crisis seriously. When you walk around DC, you see people sleeping in tents or on sidewalks > you have New York Ave filled up with children and babies and it's getting worse.
- **That shows you that the people of DC did not have an input into this.**
-

You have made decisions as far as our community and many others who I work with, but you have never ever come out to see what was really happening.

- **Threatened when we stand up:** We have been fighting to be heard for years and we are threatened when we stand up. I've been harassed, bullied, bribed, and hit with lawsuits. Children are no longer allowed to play on the grass. Private police harass us and our young people so we have to stay inside.
- **This mistreatment is so luxury development can continue without us.** All of this so that MidCity can develop the property. I should be resting, but instead I am fighting for homes for our children and their children so they can have a future in this city.
- **People are crying out for help:** While you're focused on making it easier for developers, your people are crying out for you to protect us from them.
- **Edgewood Management**, which manages Brookland Manor, Arthur Capers Senior, and Abrams Hall Seniors Apartments, has been neglecting us. By the way, Andy Altma, former Director of the Office of Planning, works there now.
- **At Arthur Capers** older people almost burned up > it ended up that a gentleman was in there for the whole week before edgewood even sent anyone to check the building out. Where were our leaders?
- **At Abrams Seniors Apartments**, the seniors are crying out for help and not the Mayor, Anita Bonds, or anyone went to check on them. They reached out to me to see if I could help them with the mold and dangerous conditions they're living with. Where are our leaders?
- **Here at Brookland Manor** we have been dealing with harassment and dangerous conditions while fighting for our homes at Brookland Manor without the support of our leaders. Anthony Hood and Kenyan McDuffie, who we helped get elected, have turned their backs on us. Anita Bonds even lived at Brookland Manor at one time with her family. She doesn't take care of anything.
- **Public housing is another.** You're tearing things down and not giving people a chance to participate. Who is making these decisions except the Mayor and the rest of the people we elected. We as citizens of the District need to be

protected.

- **We will be heard:** I am going to be heard. I'm not going to be quiet. I will fight until the end and I will prove that all these things I'm saying are true.
- **All you have to do is reach out to the people who built Washington DC.** We aren't going to be quiet, not no more. Even if we have to get our seniors in wheelchairs down to the place. We want to be heard. They were raised here and they

We have groups who will march on some of these people come election time and make sure that Black people will not vote for them. **Black people are talking about coming up front.**

Sent with [Shift](#)

From: [Benjamin Bergmann](#)
To: [Committee of the Whole \(Council\)](#)
Subject: Testimony for Thursday Hearing on Comp. Plan
Date: Thursday, November 12, 2020 12:46:02 AM

Hello,

Apologies for sending this late. Below is my written testimony that I plan to give at the Thursday hearing.

Best,
Ben Bergmann

Good Afternoon,

My name is Ben Bergmann. I live in the Wesley Heights-area in Ward 3 and was elected two weeks ago to serve as an ANC Commissioner on ANC3D. Like many other Washingtonians concerned about rising demand for affordable housing, I am testifying today in support of the Office of Planning's amendments to the District's Comprehensive Plan. More generally, I would like to underscore my support, which I believed to be shared by many in my community, for policies and investments aimed at encouraging development of additional housing of all types in Ward 3.

For the past several months, as I campaigned for ANC Commissioner, I have talked with many of my neighbors about the need for more housing, including more affordable housing, in Ward 3. Residents in my community repeatedly affirmed that they wanted to see the District embrace smart growth policies and investments aimed at making our community more livable, dynamic, and affordable for all different kinds of people.

DC is a diverse, vibrant, and wonderful place to call home. We should all be happy about and welcome continued growth of the District's population in the years to come. But it is essential that the Council and other stakeholders, including ANC Commissioners, citizen associations, and individual homeowners, grapple with the fact that we need development. In fact, we need a lot of it. The tendency, particularly in neighborhoods west of Rock Creek Park to balk at projects—or the potential for projects—that might mildly densify an area must stop. It is my hope that amending the Comprehensive Plan with the proposed amendments will be an important step towards reducing the obstructionism and absolutism that can often define the conversation around development, re-orienting the focus away from whether a project should be delayed or blocked towards how the community can maximize benefits or improve a proposed project for everyone, including future residents.

I would just close with something that I discussed repeatedly with voters over the past few months: neighborhoods are living things. They change—and they must change. Failure to streamline the development process, incentivize affordable housing, or promote densification near metro stops and along major thoroughways will not “preserve” neighborhoods. It will simply price out more and more Washingtonians, leading to less diverse and dynamic communities.

I strongly urge the Council to pass the proposed amendments and take other steps to ensure

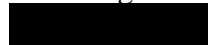
that the District can grow in a sustainable and inclusive manner.

Thank you.

--

Best,

Ben Bergmann



Yale Law School '16

Duke University '11

<https://www.linkedin.com/in/benjamin-bergmann/>

Testimony of John T. Farrell

Before the

Committee of the Whole

Chairman Phil Mendelson, Chair

Public Hearing
on

Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Virtual Hearing

November 12, 2020 | 10 am

Good afternoon Chairman Mendelson, members of the Committee, and staff. My name is John Farrell. I am a DC licensed commercial real estate appraiser, an MAI designated member of the Appraisal Institute, and I have been a Managing Director in Cushman & Wakefield’s Valuation & Advisory Group here in DC since 2016.

There is no place in the country that I’d rather live. It is for this reason and others that it is a great privilege to come before the committee again, this time on the subject of the Comprehensive Plan Amendment. I come today to offer my own expert

opinion on the potential impact on real estate generally and on the availability of affordable housing specifically and not to lobby on C&W's behalf.

To the extent that there is a lack of affordable housing in the area it is by definition a shortage and the most straightforward remedy to any shortage is increased supply. As such, while there are no doubt benefits to preserving existing affordable housing stock, a more holistic approach that seeks to stimulate and encourage construction of new housing units is likely to achieve even greater results.

Today I will limit my comments to three areas that impact that supply. These include the issues of incentives, regional competitiveness, and regulatory consistency.

DC is one of the most expensive and bureaucratically difficult jurisdictions in which to develop real estate. The residents of DC might be better served by the use of a broad array of tools to encourage housing construction. The inclusion of supply and production incentives, such as flexible zoning requirements and expedited entitlement review, could go a long way toward making development more efficient and responsive to meeting housing production goals.

Over the last few years, the District has increased regulations, policies, and processes, including increased commercial property and transfer and recordation taxes. I have actually testified in front of this committee among others on several such issues. These measures, though well intentioned, nevertheless serve to make DC not only less competitive vis-à-vis other metro areas but also DC's own suburban markets. While the full effects and duration of the Covid-19 pandemic are as yet still unknown, one thing is certain and that is that it has rekindled interest in the suburbs. It's in the face of this competitive headwind that DC might well be advised to refocus on competitiveness if it is going to attract its share of real estate investment dollars.

One of the greatest disincentives to housing investment is regulatory uncertainty. A notable example is the potential expansion of rent stabilization or "rent control." Investors prefer stability and investment dollars gravitate towards business-friendly environments that have a history of a consistent regulatory climate. When developers and owners are concerned about new regulatory mandates and restrictions, it may discourage investment in both new and existing housing stock, which over an extended period of time can reduce available supply considerably and can therefore impact availability and affordability.

Investment is a choice and the city's economic growth is increasingly no longer a foregone conclusion.

Thank you for the opportunity to testify before the committee. I am happy to answer any questions you may have.

John T. Farrell, MAI, AI-GRS

Managing Director

Valuation & Advisory | Dispute Analysis & Litigation Support

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View my personal LinkedIn [profile](#)



December 3, 2020

Hon. Phil Mendelson
Chairman, Committee of the Whole
Council of the District of Columbia
1350 Pennsylvania Ave, NW
Washington, DC 20004
Via [REDACTED]

RE: B23-736, the Comprehensive Plan Amendment Act

Dear Chairman Mendelson:

Douglass Community Land Trust (Douglass CLT) thanks you for holding the hearing on B23-736, the Comprehensive Plan Amendment Act, on November 12 and 13. In addition to our testimony offered during the public hearing on November 12, 2020, we are pleased to offer additional commentary and alternative language for specific sections of the Comp Plan related to permanent affordability. We support passage of an updated Comp Plan as soon as is feasible to incorporate enhancements that have been/ will be submitted.

Some specific suggestions:

1) Restore and update policy support for land trusts

Currently deleted in April 2020 draft:

~~504.24 Action H 1.2.G: Land Trusts Support the formation of one or more community land trusts run by public, nonprofit, or other community-based entities. The mission of the trust would be to acquire land while providing long term leases to developers of rental and for sale units. This approach helps ensure that the units remain affordable indefinitely.~~ **Completed – See Implementation Table. 504.24**

Section 504.24 re Community Land Trusts was stricken from the amendment, noting that previous plan goal of establishing a community land trust was “Completed.” We can attest that this goal has not been completed, and operation of a CLT is an ongoing activity. The presumed reference is the significant funding to a local nonprofit provided by the District government to create permanently affordable housing. While commendable, it did not result in a community land trust, the operation is not community-based; and has not met the stated goals. We recommend restoring and updating this section to reflect that CLTs help to neutralize the negative impacts of gentrification and is a specific racial and economic equity lever the District can use. CLTs grew out of the civil rights movement in the US and are proven, with more than 250 operating across the US, including “hot markets” such as New York, Oakland, San Francisco. Further the section should be updated to reflect today’s reality that the Douglass Community Land Trust (Douglass CLT) has been incorporated to operate District-wide and is actively acquiring and managing property. Douglass CLT prioritizes community control and prevents displacement of current and future residents by creating community-held assets with non-stop affordability, while building assets/wealth for individuals and families.

While it's a major advance for the District to host a growing Community Land Trust, Douglass CLT needs continued official policy support in order to reach scale and deliver on its mission to provide lasting community assets and build assets for households, while supporting the District's affordability goals and drive toward racial and economic equity. Community Land Trusts should be regarded as an active tool to help fulfill the District's affordable housing and anti-displacement goals, rather than be considered a one-time action that has been completed. Successful CLTs operate in partnership with municipal government and restoring language around CLTs to the Comp Plan is fundamental to that partnership.

Revision: We recommend the restoration and updating of Action H-1.2.G:

504.24 Action H-1.2.G: Land Trusts

Support community land trusts (CLT) IN THEIR ONGOING EFFORTS TO PRODUCE, SECURE AND STEWARD AFFORDABLE RENTAL AND OWNERSHIP HOUSING AND COMMERCIAL SPACES THAT WOULD remain affordable IN PERPETUITY, PREVENTING THE DISPLACEMENT OF CURRENT AND FUTURE DISTRICT RESIDENTS AND BUSINESSES. CLTs PROMOTE RACIAL AND ECONOMIC EQUITY THROUGH THE ACQUISITION AND CONTINUED OWNERSHIP OF LAND, MAINTENANCE OF AFFORDABILITY BY COVENANT, OR SIMILAR LEGAL MECHANISM. A CLT HAS (1) A CHARITABLE PURPOSE CONSISTENT WITH ONE OR MORE OF THE CHARITABLE PURPOSES SET FORTH IN 26 U.S.C. § 501(C)(3); (2) A MEMBERSHIP OPEN TO LESSEES OF CLT PROPERTY AND TO COMMUNITY REPRESENTATIVES FROM THE NEIGHBORHOODS IT SERVES, AND ENTITLED TO ELECT A MAJORITY OF THE SEATS ON THE BOARD OF DIRECTORS AND APPROVE AMENDMENTS TO THE ORGANIZATION'S BYLAWS; (3) A THREE-PART BOARD OF DIRECTORS COMPOSED OF EQUAL NUMBERS OF (I) CLT LESSEES, (II) COMMUNITY REPRESENTATIVES; AND (III) ANY OTHER CATEGORY OF PERSONS DESCRIBED IN THE BYLAWS OF THE ORGANIZATION; AND (4) USES A MODEL THAT SERVES THE WIDEST GROUP OF LOW-MODERATE INCOME DISTRICT RESIDENTS AND PROMOTES THE EFFICIENT USE OF MUNICIPAL RESOURCES THROUGH ECONOMIES OF SCALE.

- 2) Refine definition for and more accurately reflect DC law, policy and practice for "long-term affordability restrictions."

Current language: for 509.9-510.9 Policy H-2.1.5: Long-Term Affordability Restrictions

~~Ensure that a~~ Affordable housing units that are created or preserved with public financing ~~are~~ **should be** protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by federal programs program requirements, affordable units should remain affordable for the life of the building **as long as possible and align with the length and magnitude of the subsidy. For land disposition and affordable housing tied to zoning relief, affordability should last for the life of the building,** with equity and asset build up opportunities provided for ownership units. ~~509.9 510.9~~

Comment: We recommend revising this language to better reflect current DC policy, law and practice. The affordability term for inclusionary zoning is "life of the development," and "in perpetuity" for affordable units in public land dispositions, as established in law. Further, in perpetuity is strongly prioritized in DHCD funding criteria. We recommend that this section also provide clearer references to shared equity approaches for homeownership, and landleases as long-term affordability restrictions currently used in DC as tools that should be supported and expanded.

The removal of the current IZ standard of "life of the building" and replacement with "as long as possible" is a retreat from current law and practice. We recommend not weakening and undermining current law and

practice, but affirming and building on it. The section introduces new qualifications for long-term affordability mechanisms which have already established in DC law, suggesting that the length of the affordability term be aligned with the “magnitude of the subsidy.” This new qualification undermines current law and practice that balances the goal of long-term affordability with the willingness of developers to agree to long-term affordability restrictions. The section further recommends that a land disposition last for the life of the building -- which contradicts current law enacted by the DC Council and Mayor, which requires that public land dispositions preserve the affordability of units for in perpetuity. As the proposed language undermines current DC law, policy and practice, we recommend that it be revised.

Revision: We recommend the following, using yellow highlights for our additions or restorations, ALL CAPS are new additions, and double strikethroughs for deletions.

509.9 510.9 Policy H-2.1.5: Long-Term Affordability Restrictions

~~Ensure that a~~ Affordable housing units that are created or preserved with public financing ~~are~~ **should be** protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by ~~federal programs~~ program requirements, affordable units should remain affordable for **the life of the building as long as possible and align with the length and magnitude of the subsidy. For land disposition and affordable housing tied to zoning relief, affordability should last IN PERPETUITY, for the life of the building OR A SIMILAR PERMANENT AFFORDABILITY TERM ACCORDING TO CURRENT LAW, POLICY OR BEST PRACTICE.** ~~with equity and asset build-up opportunities provided F~~ **FOR OWNERSHIP UNITS, INCLUDING FEE SIMPLE, LIMITED EQUITY CO-OPERATIVES, AND COMMUNITY LAND TRUST OWNERSHIP MODELS USING LANDLEASES, AND COVENANTS, SHARED EQUITY AND ASSET BUILDING OPPORTUNITIES SHOULD BE PROVIDED, IN ADDITION TO CONTINUED HOMEOWNER SUPPORT THROUGH THE PROVISION OF ONGOING STEWARDSHIP SERVICES.** 509.9 510.9

4. Improve policy support for co-operatives and co-housing

Current language:

Section 505.10 Policy H-1.3.4: Co-operatives and Co-housing

Encourage cooperatives, shared housing, and co-housing (housing with private bedrooms, but shared kitchens and common areas) as a more affordable alternative to condominiums. **Explore how both housing types might support multi-generational households. Such** housing ~~is~~ **should be** appropriately regulated to avoid adverse effects on surrounding residences and neighborhoods. 505.10

We strongly support shared equity housing approaches such as limited equity co-operatives, and believe they should be paired with technical assistance and capacity support, items not mentioned in Section 505.10. Rather it calls for them to be “appropriately regulated” to avoid “adverse effects on surrounding residences and neighborhoods.” This negative language suggests the District’s role in support of co-ops lies largely in enforcement. We suggest the policy take a more supportive tone to ensuring the success of co-operatives and co-housing.

Revision

Section 505.10 Policy H-1.3.4: Co-operatives and Co-housing

Encourage cooperatives, shared housing, and co-housing (housing with private bedrooms, but shared kitchens and common areas) as a more affordable alternative to condominiums. **Explore how both housing types might support multi-generational households. Such** housing is **should be** appropriately regulated to avoid adverse effects on surrounding residences and neighborhoods **SUPPORTED TO ENSURE THE SUSTAINABILITY OF THE QUALITY OF MODERATE AND LOW PRICED HOUSING, AND ITS VALUE AS A SHARED EQUITY INVESTMENT FOR MEMBER/OWNERS.** 505.10

Thank you for considering our proposed amendments.

Sincerely,

A handwritten signature in blue ink that reads "Ginger Rumph". The signature is written in a cursive, flowing style.

Ginger Rumph,
Executive Director



**Testimony of Sheldon Clark, President
Douglass Community Land Trust**

**Committee of the Whole Public Hearing on Bill 23-736, the “Comprehensive Plan
Amendment Act of 2020”**

Thursday, November 12, 2020

Good afternoon Chairman Mendelson and members of the Committee. Thank you for the opportunity to speak today. My name is Sheldon Clark, and I am the president of the board of directors of the Douglass Community Land Trust, a Ward 8 resident, architect and business owner.

The Douglass Community Land Trust (Douglass CLT) is a racial and economic equity membership nonprofit organized to secure permanent affordability for current and future generations of District residents, including homebuyers, renters, local business owners, and more. We feel an urgency to contribute solutions to address the intensity of displacement from gentrification. Our portfolio now includes 219 permanently affordable homes, including a 65-unit rental property and 144 ownership units, including limited equity cooperatives, condo units and single-family homes. Our work aligns with the District’s stated public policy goals of assuring long-term affordability and effectively stewarding limited District resources.

A Comp Plan update is critical to help prevent the displacement of DC residents, particularly black and brown residents of low-income. What we have now is not achieving that and so we fully support the *goal of the* Comp Plan Amendment to reflect strategies to achieve racial and economic equity. Structural racial and economic barriers must be confronted and disassembled; and we must acknowledge and address the scope of the housing crisis and meet it with a commensurate response.

That said, this is a monster of a document, and we certainly are not weighing in in totality, but do offer some reflections and specific enhancements.

First, exercise of community input and control is a key element of what it means to be “equitable.” Our DC Comp Plan should prioritize community-led/community- controlled development.

Douglass CLT affirms having more equitably- distributed affordable housing units across the District, but we also need to clearly define the income levels to be served and ensure deeper affordability.

Some specific suggestions:

We ask the Council to reinsert supportive language about Community Land Trusts, which was removed. Section 504.24 re Community Land Trusts was stricken from the amendment, noting that previous plan goal of establishing a community land trust was “Completed.” We can attest that this goal has not been

completed. The presumed reference is the significant funding to a local nonprofit provided by the District government to create permanently affordable housing. While commendable, it did not result in a community land trust, the operation is not community-based; and has not met the stated goals.

PER: RE: 504.24 Action H 1.2.G: Land Trusts

~~*Support the formation of one or more community land trusts run by public, nonprofit, or other community based entities. The mission of the trust would be to acquire land while providing long-term leases to developers of rental and for sale units. This approach helps ensure that the units remain affordable indefinitely.*~~ [Completed – See Implementation Table 504.24]
[https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/publication/attachments/Chapter%205 Housing April2020 0.pdf](https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/publication/attachments/Chapter%205%20Housing%20April2020%200.pdf)

We request that this section be restored to state “Continue support for the newly created and existing community land trusts run by nonprofit membership organizations.”

A CLT helps to neutralize the negative impacts of gentrification and is a specific racial & economic equity lever the District can use--they grew out of the civil rights movement in the US and are proven, with more than 250 operating across the US, including “hot markets” such as New York, Oakland, San Francisco. Douglass CLT prioritizes community control and prevents displacement of current and future residents by creating community-held assets with non-stop affordability, while building assets/wealth for individuals and families. We will be happy to provide specific language for inclusion in the Comp Plan.

We also suggest a revision to section 510.9 Policy H-2.1.5: “Long-term affordability restrictions” to better reflect current policy and practice and provide greater specificity.[3] Indicating that the properties should be affordable “as long as possible” is not a feasible or responsible metric. DC residents deserve more transparency and more evident method of planning. With dutiful planning and ongoing stewardship and compliance, properties can remain affordable in perpetuity – and therefore we advocate for affordability “in perpetuity” for public land dispositions and prioritized for DHCD-funded projects, and for the improvement and expansion of Inclusionary Zoning, which already operates under permanent affordability restrictions.

We strongly support other shared equity housing approaches such as limited equity cooperatives, and believe they should be paired with technical assistance and capacity support, items not mentioned in Section 505.10 Policy H-1.3.4: Co-operatives and Co-housing. Rather it calls for them to be “appropriately regulated” to avoid “adverse effects on surrounding residences and neighborhoods.”

We appreciate the time and effort that has gone into updating the Comp Plan – from the Office of Planning to the residents that have provided input and engaged in conversations thus far. We support passage of an updated Comp Plan as soon as is feasible to incorporate enhancements that have been/will be submitted.

Thank you for this opportunity to testify.

**Testimony of Charles Stodghill
Before The Committee of the Whole
Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”
Thursday, November 12, 2020
Zoom Hearing**

Introduction

Good morning, Chairman Mendelson, members of the Council and Council Staff. My name is Charles Stodghill and I am President of the Victory Village Development Corporation, a subsidiary of Shiloh Baptist Church and a long-term District of Columbia resident. Thank you for the opportunity to speak today. I appear today to express Shiloh’s strong support for Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”.

Shiloh Baptist Church is located at 1500 9th Street, NW in Ward 6. It was founded amidst the turmoil of the Civil War in 1863 by twenty-one former slaves and has become one of the most highly regarded religious institutions in Washington, DC and throughout the country. Since its inception, Shiloh has been an integral part of the surrounding community. The Church works to provide effective community outreach, with a focus on educational and social enrichment programs. Shiloh has played an important role in the life of the city and has been a catalyst for racial equality, upward mobility and achievement for all. Shiloh has always been at the forefront of improving the economic plight of the Shaw community and the greater Washington region. In 1982, Reverend Henry C. Gregory established and built the Shiloh Family Life Center, a multidisciplinary complex devoted to the addressing all areas of family life – spiritual, financial, physical, and social.

It is now time for Shiloh to reposition its property for the 21st century. As such, I am testifying today to urge the Council to pass the Office of Planning's amendments to the Comp Plan and specifically to include an amendment to the Future Land Use Map designation for the Shiloh property to Mixed Use Medium Density Commercial and Medium Density Residential. Currently, the property is a mix of Moderate Density Residential and Mixed Use Medium Density Commercial/Medium Density Residential and Local Public Facility. The proposed amendment is critical for Shiloh to implement its redevelopment plans for its property and to ensure Shiloh’s long-term viability and ability to continue its ministry and community service mission in the Shaw neighborhood and the District as a whole.

Impacts of the FLUM Amendment

The proposed FLUM amendment will impact the Shaw neighborhood specifically and the District of Columbia in general by allowing for additional height and density at a site that is specifically recognized for its potential to provide increased residential and commercial uses. Moreover, as set forth below, the FLUM amendment is consistent with several District planning principles and policies.

Benefits of the FLUM Amendment

Given the limited time for my testimony all of the benefits of the FLUM Amendment are too lengthy to detail now but the full discussion of the amendment request is attached to my written testimony. Most importantly, the proposed amendment will help to generate quality housing that will ensure that the Shaw community remains demographically diverse and will support future development of high quality housing including senior housing at the Site. The FLUM amendment will also enable development that supports the neighborhood “main street” of 9th Street to be upgraded and historic properties restored through sensitive renovation, redevelopment. Finally, the FLUM amendment will reinforce the importance of 9th Street as walkable, community-oriented corridor through the ability to construct higher density mixed-use projects at the Site. The Site is located approximately three blocks from the Shaw-Howard University Metrorail station, which will increase mobility through public transportation, improve connections between different transportation modes, and improve traveler safety and security.

The mixed-use designation will allow for infill development that fits in with and responds to the character of the existing community. New higher density housing will serve District residents, improve the neighborhood, and enhance surrounding properties to make the area more attractive and desirable. Thus, new development supported by the proposed FLUM amendment will improve the real estate market, reduce crime by putting additional “eyes and ears” on the street, and attract new uses and services that will best serve the needs of District residents.

Conclusion

In closing, I urge the Council to act favorably in approving Bill 23-736, including a change to the land use designation for Shiloh’s property to mixed-use Medium Density Commercial and Medium Density Residential Approval of the legislations will allow Shiloh to create new housing opportunities, mission and program space for the 21st century and to expand its reach and better serve the community where it has been located for over 40 years. Thank you Mr. Chairman for holding this hearing, and I would be happy to answer any questions that you may have.

Attachment

Shiloh Baptist Church

**Request to Amend Comprehensive Plan Future Land Use Map Designation
Square 365, Lots 2, 819-825, 833-835 and Square 397, Lot 30**

1. Brief Description of the Proposed Amendment.

Shiloh Baptist Church (“Shiloh”) seeks to have the Comprehensive Plan Future Land Use Map (“FLUM”) designation for its property changed as follows:

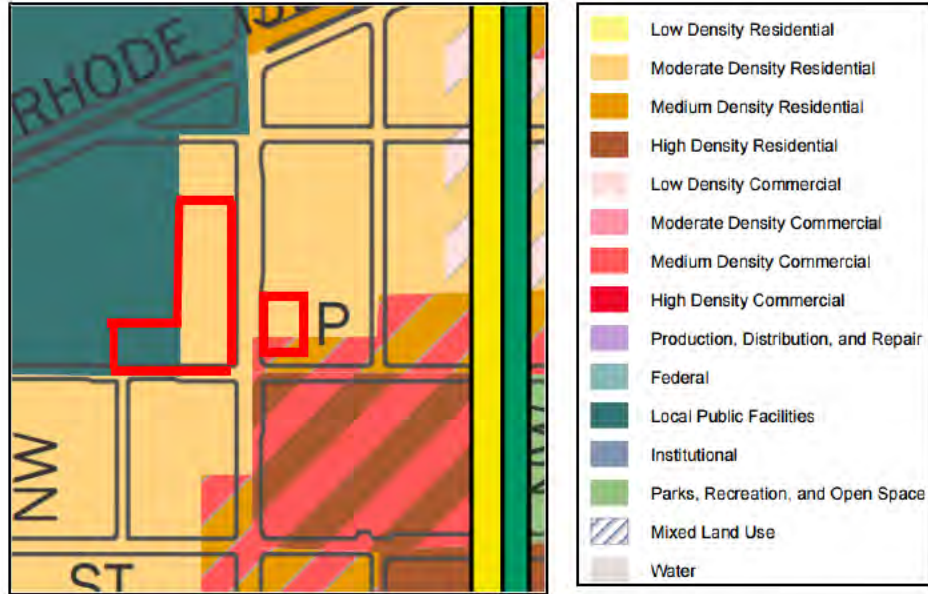
FROM: A mix of Moderate Density Residential; mixed-use Medium Density Commercial/Medium Density Residential; and Local Public Facility;

TO: All Medium Density Commercial and Medium Density Residential.

The request pertains to Lots 2, 819-825 and 833-835 in Square 365, and Lot 30 in Square 397 (collectively, the “Site”). The Site is located at the corner of 9th and P Streets, NW, with Lots 819-825 and 834-835 having frontage on the west side of 9th Street, NW; Lots 2 and 833 having frontage on the north side of P Street, NW, and Lot 30 having frontage on the east side of 9th Street, NW. The Site is presently improved with Shiloh Baptist Church and associated surface parking, the two-story Shiloh Child Development Center, and several three-story row houses. The Site is located approximately three blocks from the Shaw Metrorail station.

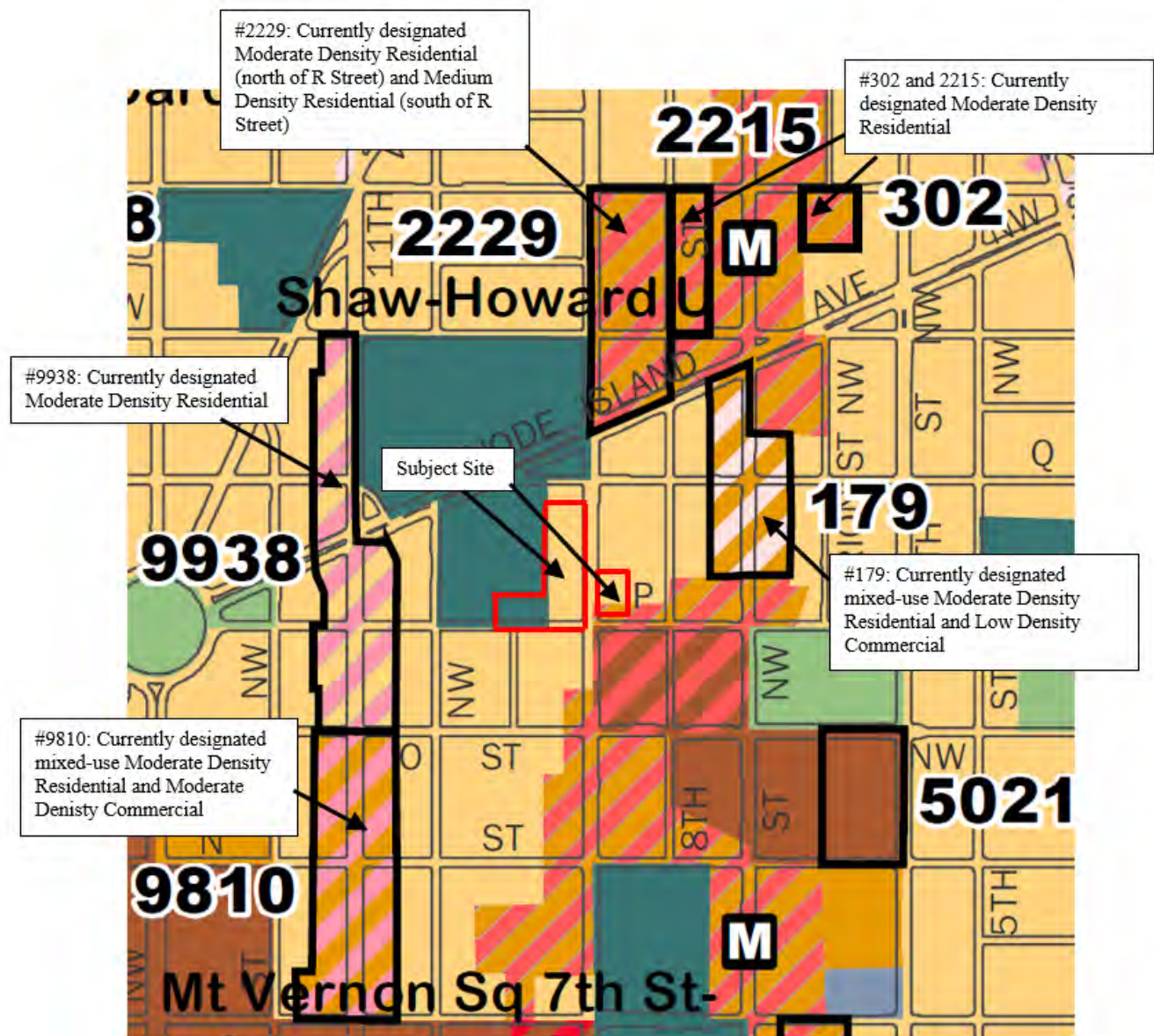
As shown on Figure 1, the current FLUM designates the majority of the Site as Moderate Density Residential and portions of the Site as mixed-use Medium Density Commercial/Medium Density Residential and Local Public Facility. The current FLUM designates properties directly to the south and east of the Site as mixed-use Medium Density Commercial and Medium Density Residential. Shiloh proposes to amend the FLUM by extending the Medium Density Commercial and Medium Density Residential designation along 9th and P Streets so that it applies to the entire Site and is consistent with the surrounding FLUM designations.

Figure 1: Current FLUM Designations for the Site



In addition, as shown in [Figure 2](#) below, the Office of Planning is recommending FLUM amendments for a number of properties in close proximity to the subject Site, including amendments that convert sites currently designated as Moderate Density Residential to mixed-use Medium Density Residential and Medium Density Commercial.

Figure 2: Office of Planning's Proposed FLUM Designations for Surrounding Properties



As set forth herein, the proposal to amend the FLUM is consistent with

- a. The Convention Center Area Strategic Development Plan, the Small Area Plan applicable to the Site;
- b. The Comprehensive Plan’s “vision for an inclusive city,” as defined by its Core Themes and Guiding Principles;
- c. The Comprehensive Plan’s Citywide Elements;

- d. The Comprehensive Plan's Near Northwest Area Element;
- e. The Comprehensive Plan's Shaw/Convention Center Policy Focus Area; and
- f. The Generalized Policy Map's designation for the Site.

A. Current FLUM Designations

As indicated in Figure 1, the majority of the Site is designated as Moderate Density Residential and as Local Public Facilities on the current FLUM. A small portion of the Site on the east side of 9th Street is designated mixed-use Medium Density Residential and Medium Density Commercial.

As set forth in the approved 2020 Framework Element, the Moderate Density Residential designation “is used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category, and other zones may also apply.” *See* Framework Element § 227.6.

As set forth in the approved 2020 Framework Element, the Local Public Facilities designation “includes land and facilities occupied and used by the District of Columbia government or other local government agencies (such as WMATA), excluding parks and open space. Uses include public schools including charter schools, public hospitals, government office complexes, and similar local government activities. Other non-governmental facilities may be co-located on site. While included in this category, local public facilities smaller than one acre - including some of the District's libraries, police and fire stations, and similar uses - may not appear on the map due to scale. Zoning designations vary depending on surrounding uses.” *See* Framework Element § 227.17.

The characteristics of the Medium Density Commercial and Medium Density Residential designations are described below.

B. Proposed FLUM Designations

Shiloh proposes to amend the FLUM so that the entire Site is designated Medium Density Commercial and Medium Density Residential.

As set forth in the approved 2020 Framework Element, the Medium Density Commercial designation “is used to define shopping and service areas that are somewhat greater in scale and intensity than the Moderate Density Commercial areas. Retail, office, and service businesses are the predominant uses, although residential uses are common. Areas with this designation generally draw from a citywide market area. Buildings are larger and/or taller than those in Moderate Density Commercial areas. Density typically ranges between a FAR of 4.0 and 6.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit

Development. The MU-8 and MU-10 Zone Districts are consistent with the Medium Density category, and other zones may also apply. *See* Framework Element § 227.12.

As set forth in the approved 2020 Framework Element, the Medium Density Residential designation “is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-3 Zone District is consistent with the Medium Density Residential category, and other zones may also apply.” *See* Framework Element § 227.7.

2. Impacts of the Amendment

The proposed FLUM amendment will benefit the Shaw neighborhood specifically and the District of Columbia in general by allowing for additional height and density at a site that is specifically recognized for its potential to provide increased residential and commercial uses. Moreover, as set forth below, the FLUM amendment is consistent with the following District plans and policies:

- a. The Convention Center Area Strategic Development Plan, one of the Small Area Plan applicable to the Site;
- b. The Comprehensive Plan’s “vision for an inclusive city,” as defined by its Core Themes and Guiding Principles;
- c. The Comprehensive Plan’s Citywide Elements;
- d. The Comprehensive Plan’s Near Northwest Area Element;
- e. The Comprehensive Plan’s Shaw/Convention Center Policy Focus Area; and
- f. The Generalized Policy Map’s designation for the Site.

The benefits of the FLUM amendment are set forth below.

A. The FLUM Amendment is Consistent with the Convention Center Area Strategic Development Plan.

The Site is located within the boundaries of the 2005 Convention Center Area Strategic Development Plan (the “Convention Center Plan”), which was prepared to help the District and the community guide development to realize several key objectives. Among those objectives is to (i) generate quality housing that will ensure that the community remains demographically diverse and offers a wide range of housing types, and (ii) strengthen neighborhood businesses by attracting new businesses in Shaw through capital investment that meets the needs of visitors and tourists and creates job opportunities and tax revenues for local services. *See* Convention Center Plan, p. 2.

Consistent with these stated objectives, the proposed FLUM amendment will support future development of high quality housing and affordable housing at the Site to ensure that the

community remains demographically diverse. The FLUM amendment will also enable future development that contains commercial uses, including new ground floor retail along 9th Street, NW, which is a street specifically prioritized in the Convention Center Plan for new mixed-use development. Moreover, higher density mixed-use development at the Site will strengthen the local economy by creating space for local retailers, generating job opportunities for District residents, producing additional tax revenue for the city, and providing goods and services to meet the needs of visitors and residents to the neighborhood.

The Site is located in “Sub-Area III: Retail Corridor” within the Convention Center Plan. The vision for this corridor is infill buildings with residential use above ground floor retail. Large projects should contain affordable units, and retail uses should be in traditional storefronts with shopping and restaurant activity expanded onto sidewalks. *Id.* at 34. The Convention Center Plan notes that this area should be “a mix of Moderate and Medium densities, both residential and commercial.” *Id.* (emphasis added).

The proposed FLUM amendment is consistent with the principles listed above because it will allow for medium density commercial and residential development with significant new housing and affordable housing on underutilized properties. Future development at the Site will be able to contain ground floor retail uses in traditional storefronts that engage the street and offer goods and services to neighborhood residents. Moreover, the Site is located at the intersection of several active, mixed-use streets, such that the density and height achieved through the proposed FLUM amendment will enable development that will reinforce existing architectural patterns, scales, and densities that are already found in the surrounding neighborhood.

Increased height and density at the Site will generate new development with ground floor retail that will reinforce and extend the traditional main street pattern of commercial use along 9th Street. Doing so will create a unified identity for the community and provide new opportunities for local businesses to thrive. Retail at the Site could be developed as either destination or neighborhood-serving retail, which will attract visitors from all parts of the region in addition to local residents of the immediate area. Consistent with the Convention Center Plan’s specific recommendation, the FLUM amendment will facilitate a successful retail environment within mixed-use developments.

B. The FLUM Amendment is Consistent with the Comprehensive Plan’s Guiding Principles.

The 2020 Framework Element identifies 40 underlying principles that acknowledge that the benefits and opportunities of living in the District are not available to everyone equally and that divisions in the city - physical, social and economic - must be overcome to move from vision to

reality. To grow equitably and achieve racial equity, equity-centered approaches that address the needs of underserved communities are necessary. *See* Framework Element § 218.3. The Guiding Principles are grouped into five core themes: Managing Growth and Change, Creating Successful Neighborhoods, Increasing Access to Education and Employment, Connecting the City, and Building Green and Healthy Communities. *See* Framework Element § 218.2. The proposed FLUM amendment is consistent with the Comprehensive Plan’s and Guiding Principles as follows:

i. Managing Growth and Change

The FLUM amendment acknowledges that change in the District is both inevitable and desirable, and that the key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives, such as poverty, crime and homelessness. *See* Framework Element § 219.2. Permitting higher density at the Site through the proposed FLUM amendment will allow for development of additional housing and affordable housing within the District, which is one of the District’s highest priorities, including housing for a diversity of incomes, family sizes, and housing types. *See* Framework Element §§ 219.3, 219.4. Moreover, the FLUM amendment will support mixed-use development that will benefit residents by creating jobs and employment opportunities and pathways for less affluent households to increase their income. *See* Framework Element § 219.5.

ii. Creating Successful Neighborhoods

Amending the FLUM at the Site will allow for the production of new housing and affordable housing, which is necessary to avoid a deepening of racial and economic divides in the city. *See* Framework Element § 220.5. The FLUM amendment will also enable development that supports the neighborhood “main street” of 9th Street to be upgraded and restored through sensitive renovation, redevelopment, and the updating of public facilities. *See* Framework Element § 220.6. Moreover, as part of this Comprehensive Plan Amendment process, and for any future development of the Site, the neighborhood will be an integral part of redevelopment decision-making. Public input will be incorporated into land use and development decisions in order to help create and maintain a successful and thriving neighborhood. *See* Framework Element § 220.10.

iii. Increasing Access to Education and Employment

The FLUM amendment will increase access to jobs for District residents by encouraging development at the Site that will lead to both temporary construction jobs and full-time employment and building management jobs for District residents. *See* Framework Element § 221.1. Consistent with the goal of focusing land development policies on creating job opportunities for District residents, the proposed FLUM amendment will enable mixed-use development that extends the 9th Street “job center” and creates a mix of new employment opportunities to meet the various needs of District residents. *See* Framework Element § 221.6. Moreover, increasing shopping and services for the neighborhoods surrounding the Site will help the District reach its full economic potential, and will create more opportunities for local entrepreneurs and small businesses to succeed. *See* Framework Element § 221.9.

iv. Connecting the City

The FLUM amendment will reinforce the importance of 9th Street as walkable, community-oriented corridor through the ability to construct higher density mixed-use project(s) at the Site and cluster economic development. *See* Framework Element § 222.3. Moreover, the Site is located approximately three blocks from the Shaw-Howard University Metrorail station, which will increase mobility through public transportation, improve connections between different transportation modes, and improve traveler safety and security. *See* Framework Element § 222.1.

v. Building Green and Healthy Communities

The proposed FLUM amendment will allow for development that enhances 9th Street as an important walkable mixed-use destination. Permitting higher density at this infill location will improve the health of District residents by establishing land use patterns and land uses that reduce air pollution and facilitate pedestrian and bicycle travel. *See* Framework Element § 223.5. Higher density and mixed-use development located adjacent to multiple public transportation options is key to reducing development of greenfields, preventing sprawl, and encouraging residents to walk and bike to nearby destinations.

C. The FLUM Amendment is Consistent with the Citywide Elements within the Comprehensive Plan.

The Comprehensive Plan includes 13 Citywide Elements, each addressing a topic that is citywide in scope. 10A DCMR § 104.4. The purposes of the Citywide Elements are to define the requirements and aspirations of District residents and influence development, guide executive and legislative decisions; promote economic growth and jobs for District residents; guide private and public development to achieve community goals; maintain and enhance the District's natural and architectural assets; and assist in the conservation, stabilization and improvement of each neighborhood. 10A DCMR § 102.6. Permitting greater density and a mix of uses at the Site through the proposed FLUM amendment is consistent with several of the Citywide Elements as follows:

i. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District. 10A DCMR § 300.1 These include enhancing neighborhood commercial districts, directing growth and new development to achieve economic vitality, and promoting and maintaining successful neighborhoods. 10A DCMR § 300.2.

As set forth below, the proposed FLUM amendment is consistent with many of the policies within the Land Use Element.

- *Policy LU-1.3.1: Station Areas as Neighborhood Centers - Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce*

automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide. This policy should not be interpreted to outweigh other land use policies which call for neighborhood conservation. Each Metro station area is unique and must be treated as such in planning and development decisions. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. 10A DCMR § 306.10.

Consistent with Policy LU-1.3.1, the proposed FLUM will encourage development in close proximity to the Shaw-Howard University Metrorail station, establishing it as an anchor for economic and civic development. Allowing for higher density at the Site will encourage mixed-use growth around the Metrorail station, thus reducing vehicle congestion and reliance on the automobile, improving air quality, increasing jobs and providing a range of retail goods and services, and enhancing neighborhood stability and creating a stronger sense of place. Moreover, additional private development will be able to capitalize on the higher density at the Site and its transit-oriented location, thus further stabilizing and enhancing the neighborhood.

- *Policy LU-1.3.2: Development Around Metrorail Stations - Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 10A DCMR § 306.11.*

The proposed FLUM amendment will support redevelopment near the Shaw-Howard University Metrorail station at a underutilized site that has great infill redevelopment potential. Therefore, new development at the Site will emphasize land uses that minimize the necessity of automobile use and maximize transit ridership.

- *Policy LU-1.3.3: Housing Around Metrorail Stations - Recognize the opportunity to build senior housing and more affordable “starter” housing for first-time homebuyers adjacent to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations. 10A DCMR § 306.12.*

Consistent with Policy LU-1.3.3, the proposed FLUM amendment will allow for development of additional housing and affordable housing at the Site in close proximity to the Shaw-Howard University Metrorail station. Development in this location will provide housing for populations that are less likely to own a private vehicle.

- *Policy LU-2.1.1: Variety of Neighborhood Types - Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. 10A DCMR § 309.5*

The proposed FLUM amendment will support the variety of neighborhood types envisioned by Policy LU-2.1.1. The land use change will enable development of a multi-family mixed use neighborhood that will contribute to the identity and character of the Shaw neighborhood.

- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods - Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. 10A DCMR § 309.8*

Consistent with Policy LU-2.1.3, the proposed mixed-use FLUM amendment will enable development that both increases housing supply and expands neighborhood commerce. This type of development will help to revitalize 9th Street, which is prioritized as a dense, mixed-use, and mixed-income corridor.

- *Policy LU-2.4.1: Promotion of Commercial Centers - Promote the vitality of the District’s commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, and sustain the city’s role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and ease of access for nearby residents. 10A DCMR § 312.5*

By allowing for a higher-density mixed-use land use designation, the proposed FLUM amendment will enable development that promotes the vitality of the Shaw commercial center and provides for the continued growth of commercial land uses. Doing so will help to meet the needs of District residents, expand employment opportunities, and sustain the District’s role as the center of the metropolitan area.

- *Policy LU-2.4.2: Hierarchy of Commercial Centers - Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Activities in each type of center should reflect its intended role and market area, as defined in the Framework Element. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. 10A DCMR § 312.6*

Consistent with Policy LU-2.4.2, the proposed FLUM amendment supports the Site’s designation as a Neighborhood Enhancement Area on the Generalized Policy Map. New development in Neighborhood Enhancement Areas “should improve the real estate market, reduce crime and blight, and attract complementary new uses and services that better serve the

needs of existing and future residents.” 10A DCMR § 223.8. The proposed FLUM amendment is consistent with these goals because it will support development that enhances the 9th Street commercial corridor. The proposed mixed-use designation on the FLUM will allow for commercial and residential development that will improve the real estate market and support economic and housing development in the neighborhood.

- *Policy LU-2.4.6: Scale and Design of New Commercial Uses - Ensure that new uses within commercial districts are developed at a height, mass, scale and design that is appropriate and compatible with surrounding areas. 10A DCMR § 312.10*

The proposed FLUM amendment will allow for densities at the Site that are appropriate for the Shaw commercial district and will enable the type of mixed-use, pedestrian-oriented development described above.

ii. Housing Element

The overarching goal of the Housing Element is to develop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia. 10A DCMR § 501.1. The Comprehensive Plan forecasts that by 2025 there will be approximately 311,800 households (698,000 people) living in the District, which is a 57,100-household (121,200-person) increase over the Comprehensive Plan’s 20-year forecast period. 10A DCMR § 215.2.

The Site is located in the Near Northwest Area Element of the Comprehensive Plan, which is forecasted to have approximately 43,200 households by 2025, which is a 6,100-household increase over the 20-year forecast period. 10A DCMR § 215.20. Therefore, the Housing Element places a strong emphasis on the construction of new housing and affordable housing to accommodate a diverse range of household types and incomes. The proposed FLUM amendment will support this goal by allowing for additional density at the Site, thus permitting more affordable residential units for a diversity of District residents.

As set forth below, the proposed FLUM amendment is consistent with many of the policies within the Housing Element as follows:

- *Policy H-1.1.1: Private Sector Support - Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 10A DCMR § 503.2*

The FLUM amendment will encourage the private sector to develop new housing at the Site, which will help to meet the needs of present and future District residents. Moreover, as described above, the Site is an ideal location for higher-density housing, given its location in close proximity to the Shaw-Howard University Metrorail station and along Shaw’s 9th Street commercial corridor.

- *Policy H-1.1.3: Balanced Growth - Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including*

the need for low- and moderate-density single family homes as well as the need for higher-density housing. 10A DCMR § 503.4

Consistent with Policy H-1.1.3, the proposed FLUM amendment will encourage the development of new housing on presently underutilized land. The FLUM amendment will ensure that the Site can be developed under a zone district that affords sufficient height and density to provide significant new housing and affordable housing for District residents.

- *Policy H-1.1.4: Mixed Use Development - Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. 10A DCMR § 503.5*

The proposed FLUM amendment to a Commercial and Residential designation will allow for mixed-use development at the Site, which is located in a neighborhood commercial center, within a Neighborhood Enhancement Area, and close to a major downtown Metrorail station.

- *Policy H-1.2.3: Mixed Income Housing - Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. 10A DCMR § 504.8*

Designating the Site for Medium Density Residential development will help to enable significantly increased affordable housing within mixed-use and mixed-income development projects.

iii. Economic Development Element

The overarching goal of the Economic Development Element is to strengthen the District's economy by sustaining its core industries, attracting new and diverse industries, accommodating future job growth, fostering the success of small businesses, revitalizing neighborhood commercial centers, improving resident job skills, and helping a greater number of District residents find and keep jobs in the Washington regional economy. 10A DCMR § 701.1.

The Comprehensive Plan forecasts that by 2025 there will be approximately 870,400 jobs in the District, which is a 125,000-job increase over the Comprehensive Plan's 20-year forecast period. 10A DCMR § 215.2. For the Near Northwest Area, the Comprehensive Plan forecasts that by 2025 there will be 93,300 jobs, which is a 3,900-job increase over the 20-year forecast period. 10A DCMR § 215.21. Therefore, the Economic Development Element places a strong emphasis on the construction of new commercial and office projects that can accommodate a diverse range of employment types in all areas of the District. The proposed FLUM amendment will allow greater density at the Site, which will in turn enable additional commercial uses to be constructed to accommodate anticipated job growth.

As set forth below, the proposed FLUM amendment is consistent with several of the policies within the Economic Development Element:

- *Policy ED-2.2.3: Neighborhood Shopping - Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences. 10A DCMR § 708.7*

Re-designation of the Site to Medium Density Commercial and Medium Density Residential will encourage development at the Site that creates additional shopping opportunities in one of the District's identified neighborhood commercial districts. Thus, the FLUM amendment will help to better meet the demand for basic goods and services for residents of the surrounding neighborhood.

- *Policy ED-3.1.1: Neighborhood Commercial Vitality - Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents. 10A DCMR § 713.5*

The proposed FLUM amendment will allow for mixed-use development that includes a commercial component. This type of development will attract new businesses and improve the mix of goods and services available to residents in the surrounding area.

D. The FLUM Amendment is Consistent with the Comprehensive Plan's Near Northwest Area Element.

The Site is located within the Near Northwest Area Element of the Comprehensive Plan. The proposed FLUM amendment would help to foster a number of the policies listed within the Near Northwest Area Element as follows:

- *Policy NNW-1.1.1: Residential Neighborhoods - Maintain and enhance the historic, architecturally distinctive mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, Foggy Bottom, Dupont Circle, Sheridan-Kalorama, Logan Circle, Mount Vernon Square, and Shaw. Ensure that infill development within these areas is architecturally compatible with its surroundings and positively contributes to the identity and quality of each neighborhood. 10A DCMR § 2108.2.*

The proposed FLUM amendment will allow for new residential development at the Site that will contribute to the Shaw neighborhood. Consistent with the goals of Policy NNW-1.1.1,

new development will be located on an infill site with architecture and open spaces that will be compatible with the existing surroundings.

- *Policy NNW-1.1.2: Directing Growth - Generally direct growth within the Near Northwest Planning Area to the eastern side of the Planning Area (Logan Circle and Shaw), given the strong market demand and limited land available on the west side, and the need for reinvestment and renovation on the east side. 10A DCMR § 2108.3.*

The FLUM amendment is consistent with this Policy's goal of directing growth to Shaw. Increased height and density at the Site will allow for development that appropriately responds to the area's strong residential market and need for reinvestment in this portion of the Near Northwest Area Element's planning area.

- *Policy NNW-1.1.4: Neighborhood Commercial Revitalization - Improve the neighborhood shopping areas along 7th, 9th, and 11th Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses that provide needed goods and services to area residents should be attracted. 10A DCMR § 2108.5.*

The proposed FLUM amendment will allow for development of the Site with mixed-use projects that contain neighborhood-serving retail uses on the ground floor facing 9th Street. This type of targeted retail development and use will create new opportunities for local businesses to establish in Shaw and provide easily-accessible goods and services to area residents.

- *Policy NNW-1.1.9: Affordable Housing - Protect the existing stock of affordable housing in the Near Northwest Planning Area, particularly in the Shaw and Logan Circle neighborhoods. Sustain measures to avoid displacement, such as tax relief and rent control, and to encourage the production of new affordable housing throughout the community. 10A DCMR § 2108.10.*

Additional density afforded by the proposed FLUM amendment will support development of increased residential units, including an increased number of affordable units.

E. The FLUM Amendment is Consistent with the Comprehensive Plan's Shaw/Convention Center Area Policy Focus Area.

In addition to being consistent with the Near Northwest Area Element generally, the proposed FLUM amendment is also consistent with the Shaw/Convention Center Area Policy Focus Area within the Near Northwest Area Element. As part of its description of this Policy Focus Area, the Comprehensive Plan references the Convention Center Plan, which is intended to guide private and public investment in the area. The Comprehensive Plan identifies several issues for the area, including the need to generate new quality housing, revitalize local businesses, improve sidewalks and public space, and upgrade parks and public facilities. 10A DCMR § 2111.3. Consistent with these goals, the proposed FLUM amendment will allow for development of the Site with quality

new housing and ground floor retail and service uses. Redevelopment will also incorporate public space improvements adjacent to the Site that will enhance the pedestrian experience.

The Comprehensive Plan establishes a number of policies in response to the goals and recommendations set forth in the Convention Center Plan. The Comprehensive Plan notes that the Convention Center Plan defines specific actions and municipal programs to preserve and enhance the quality of life for residents living in the study area. For example, the Convention Center Plan “calls for maintaining the current number of affordable housing units, targeting commercial development to sites where it is most likely to benefit the community, and providing a clear hierarchy of streets and public spaces.” 10A DCMR § 2111.4. The proposed FLUM amendment will enable these goals by allowing for development of additional affordable housing at the Site with neighborhood-serving retail use at the ground floor to benefit the community.

Moreover, the proposed FLUM amendment is consistent with a variety of policies within the Shaw/Convention Center Area Policy Focus Area of the Comprehensive Plan as follows:

- *Policy NNW-2.1.1: Affordable Housing - Protect existing affordable housing within the Shaw/Convention Center area, and produce new affordable housing and market rate housing on underutilized sites. Use a range of tools to retain and develop affordable housing in the study area, including tenant organization and public education, inclusionary zoning, renewing project-based Section 8 contracts, tax abatements, public-private partnerships, and including affordable housing when development on publicly owned land includes a residential component. 10A DCMR § 2111.5.*

The proposed FLUM amendment will allow for additional residential density at the Site, which will in turn enable the production of significantly more affordable housing units than would be permitted under the current land use designation.

- *Policy NNW-2.1.2: Reinforce Existing Development Patterns - Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is consistent with the neighborhood's character. 10A DCMR § 2111.6.*

Consistent with Policy NNW-2.1.2, the proposed FLUM amendment will allow for development of multi-unit building(s) located near the Shaw/Howard University Metrorail station.

- *Policy NNW-2.1.3: Shaw/Howard University and Mount Vernon - Square Metro Stations Encourage mixed-income residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots. 10A DCMR § 2111.7.*

As specifically recommended by Policy NNW 2.1.3, the proposed FLUM amendment will allow for development of mixed-income residential project(s) that could potentially include underground parking adjacent to the Shaw/Howard University Metrorail station.

- *Policy NNW-2.1.5: 7th and 9th Street Corridors - Locate retail development within the Shaw/Convention Center Area in a manner that best serves residents, creates the best environment for businesses to succeed, and uses land already zoned for commercial uses. Continuous ground floor retail uses should be encouraged along sections of 7th and 9th Streets as designated in the 2005 Strategic Development Plan to create a traditional pedestrian-oriented Main Street pattern and establish a unified identity for the community. These corridors should attract convention-goers, residents, and visitors, and should include both new and existing businesses. 10A DCMR § 2111.9.*

Consistent with the objectives of Policy NNW-2.1.5, the FLUM amendment will allow for retail development on land that is already partially zoned for commercial uses. Continuous ground floor retail could be provided along 9th Street, which will create a pedestrian-oriented “main street” experience and attract a variety of residents, visitors, and businesses to the area.

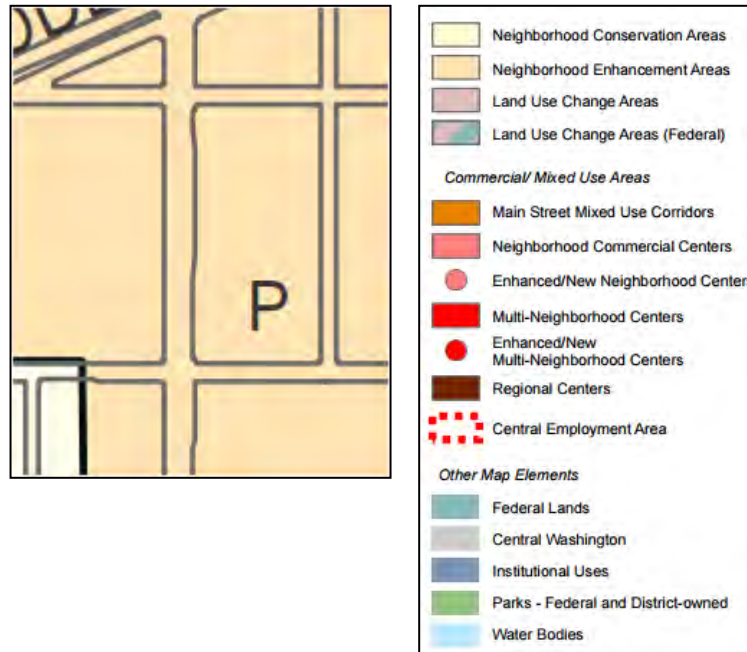
- *Action NNW-2.1.D: New Housing - Provide incentives for mixed-income housing above retail space on 7th and 9th streets, and encourage development of multi-family apartments and condominiums on parcels that are vacant or that contain buildings identified as non-contributing to the Shaw Historic District on 11th Street. 10A DCMR § 2111.16.*

Consistent with this Action element, the FLUM amendment will create an opportunity to develop mixed-income housing above ground floor retail on presently underutilized lots on 7th Street, NW.

F. The FLUM Amendment is Consistent with the Site’s Generalized Policy Map Designation.

As indicated on the Generalized Policy Map, the Site is designated as a Neighborhood Enhancement Area (*see* [Figure 3](#)).

Figure 3 – Current Generalized Policy Map Designation for the Site



Neighborhood Enhancement Areas are “neighborhoods with substantial amounts of vacant and underutilized land. They include areas that are primarily residential in character, as well as mixed-use and industrial areas. Many of these areas are characterized by a patchwork of existing homes and individual vacant lots, some privately owned and others owned by the public sector or non-profit developers. These areas present opportunities for compatible infill development, including new single-family homes, townhomes, other density housing types, mixed-use buildings, and, where appropriate, light industrial facilities. Land uses that reflect the historical mixture and diversity of each community and promote inclusivity should be encouraged.” See Framework Element § 225.6.

The guiding philosophy in Neighborhood Enhancement Areas is to ensure that new development responds to the existing character, natural features, and existing/planned infrastructure capacity. New housing should be encouraged to improve the neighborhood and must be consistent with the land-use designation on the Future Land Use Map and with Comprehensive Plan policies. The unique and special qualities of each area should be maintained and conserved, and overall neighborhood character should be protected or enhanced as development takes place. Publicly owned open space within these areas should be preserved and enhanced to make these communities more attractive and desirable.” See Framework Element § 225.7.

The proposed FLUM amendment is consistent with the policies and visions set forth for Neighborhood Enhancement Areas. The mixed-use designation will allow for infill development that fits in with and responds to the character of the existing community. New higher density housing will serve District residents, improve the neighborhood, and enhance surrounding properties to make the area more attractive and desirable. Thus, new development supported by the proposed FLUM amendment will improve the real estate market, reduce crime by putting additional “eyes and ears” on the street, and attract new uses and services that will best serve the needs of District residents.

3. Conclusion.

Based on the foregoing, the proposed FLUM amendment to mixed-use Medium Density Commercial and Medium Density Residential will allow for redevelopment of the Site that is fully consistent with the Convention Center Plan, the Comprehensive Plan, and the Generalized Policy Map's designation for the Site.

Testimony from Tracy Hadden Loh

Ward 3 resident

Re: Bill 23-736, the Comprehensive Plan Amendment Act of 2020

Greetings to the honorable members of this council, and thank you for taking the time to hear from folks today regarding this important bill. I am making the time myself to testify because it is personally very important to me the city adopt an amended comprehensive plan that will support the construction of more housing, especially in Ward 3 where I reside.

I was born in the 20015 zip code, and I attended Lafayette Elementary School, Alice Deal Junior High, and I am a proud graduate of Wilson High School. While I left the city to attend college and graduate school, and supported a New York career move for my husband in recent years, I moved back to my old neighborhood in the fall of 2019.

I wanted to move back to this exact neighborhood for two reasons: first, I have young children, and I rely on my parents to help care for them for financial, cultural, and emotional reasons. Second, my parents are in the 70s, and as they age I would like to be very close by to take care of them. With the current pandemic situation, I feel blessed and validated every day in prioritizing these issues – I was 100% right to give up other things in order to make this proximity happen.

But it shouldn't have taken quite so much sacrifice and been so hard. I am married and I have two children, and with our budget we had to be looking at three bedrooms or less, with a budget of \$3,000/mo. When I started looking for an apartment in September of 2019, there were exactly four two-bedroom units for rent in the neighborhood, and only ONE three-bedroom unit. That was the total inventory we had to choose from.

One three bedroom unit is not a choice.

I'm a flexible and resourceful person. But this is beyond ridiculous. The totally artificial scarcity of rental housing in 20015 and 20016 is inexcusable, and the city must adopt a comprehensive plan that will structurally reform the regulatory environment that has created these conditions.

Furthermore, such reform should not take decades. Children are being born and growing up while this Comprehensive Plan amendment process dawdles. I urge the Council to add language to the bill text to create better procedures to update this document and keep it – and our city – alive.

Moshe Pasternak
Regarding B23-736, Comprehensive Plan Amendment Act of 2020
November, 2020

Thank you for the opportunity to share this written testimony regarding B23-736, Comprehensive Plan Amendment Act of 2020. My name is Moshe (Mo) Pasternak and I am the commissioner-elect in ANC 2B04.

I ran, and won, on a platform promoting “Mo’ Housing” in Dupont Circle. In the entirety of ANC 2B, there are only 34 Affordable Housing Units. This is quite simply unacceptable and the Comprehensive Plan should promote increased construction of affordable housing with a particular focus on areas where there is currently a shortage.

The DC Fiscal Policy Institute helps explain the connection between higher density and expanded access to affordable housing:

“Because the financing for construction of affordable housing often requires a higher number of units in a multi-family configuration, changing Comp Plan zoning districts from lower to slightly higher density can help create affordable housing opportunities in expensive, high-opportunity neighborhoods that are traditionally restricted to two-story construction.”

I am urging you to pass the Office of Planning’s amendments before the end of the calendar year. Increased density will help confront climate change by reducing car dependency. However, density alone is insufficient if it does not promote equity. As you consider other amendments, I hope you will evaluate them on the basis of creating more housing in wealthier, whiter areas, especially those West of Rock Creek Park.

Lastly, I would encourage you to add language to improve the regularity of updates to the Comprehensive Plan. We should not have such a long gap between iterations.

There are many advocates, such as Alex Baca, who are better versed in the details than I am, and I urge you to listen to those experts who are fighting for greater density. I am submitting this testimony and highlighting my electoral success to help elucidate the *broad support* for increased housing density. Thank you for your consideration.

Moshe Pasternak

Regarding B23-736, Comprehensive Plan Amendment Act of 2020 - Near NW Area Element
November, 2020

Thank you for the opportunity to share this written testimony regarding B23-736, Comprehensive Plan Amendment Act of 2020. My name is Moshe (Mo) Pasternak and I am the commissioner-elect in ANC 2B04.

I ran, and won, on a platform promoting “Mo’ Housing” in Dupont Circle. In the entirety of ANC 2B, there are only 34 Affordable Housing Units. This is quite simply unacceptable and the Comprehensive Plan should promote increased construction of affordable housing with a particular focus on areas where there is currently a shortage.

I would like to specifically address a few amendments to the Near Northwest Area Element.

- 2108.2 - The addition of “while providing new housing opportunities, especially affordable housing options” is a positive edit and vitally important. Architectural compatibility should not be the only standard for new infill housing and the emphasis on affordable housing options is much needed in Near Northwest.
- 2108.108 - I am concerned by the deletion of specific measures, including rent control, that are designed to increase the affordability of housing. Given the rise in housing costs we have seen with measures delineated, I am concerned that this section will simply become aspirational without intentional policies. Although I am opposed to this edit, I remain generally supportive of the edits written by the Office of Planning.
- 2108.4210 - I believe this would be a good place to include mention of people with disabilities who need more to be done to create a safe environment for them to get around our neighborhoods.
- 2108.4815 - I support these edits and the description of multimodal is important. I also think it should include more forward thinking projects, rather than those that are at or near completion. One area that needs improvement is East-West transportation in residential neighborhoods.
- 2112.43 - The shift to encourage and addition of “sensitive” are edits that I strongly support. The “nature and character” of a neighborhood are abstract terms that will mean different things to different people and should not be used to constrain the construction of affordable housing, especially in a neighborhood that currently experiences a dearth of affordable housing.
- 2112.5 - I support this addition and believe it is important that we work towards a Dupont that is a great place to live at every stage in life and at varying income levels. That being said, the failure to address race beyond as a historical footnote is a failure of this document. I believe that as amended, there would be no 2112.6. Perhaps the Council could add a paragraph in that space that explicitly calls for anti-racism to be centered in conversations about the future of our neighborhood.

Thank you for your consideration.

From: [April Gaines-Jernigan](#)
To: [Committee of the Whole \(Council\)](#)
Cc: [April Gaines-Jernigan](#)
Subject: Witness List for Thursday/Friday Hearing on the Comprehensive Plan (B23-736)
Date: Wednesday, November 11, 2020 8:01:31 PM

Hello Mr. Cash,

Attached is the Xi Omega Chapter of Alpha Kappa Alpha Sorority's statement to the counsel. My verbal presentation at the hearing is an abbreviated version of this statement and is 2 minutes 30 seconds long. Let me know if you need any additional information

Testimony of April Gaines-Jernigan

Before The Committee of the Whole

Public Hearing on Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

Thursday, November 12, 2020

Zoom Hearing

Good morning, Chairman Mendelson, members of the Council and Council Staff. My name is April Gaines-Jernigan and I am President of the Xi Omega Chapter of Alpha Kappa Alpha Sorority and a long-term DC resident. I appear today to express Xi Omega Chapter's strong support for Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”.

Xi Omega was founded in 1923, and has provided almost one hundred years of significant community service to the residents of the District of Columbia. The Chapter has operated our headquarters, the Xi Omega Center, at 4411 14th Street, NW since 1981. With membership in our Chapter totaling more than 500, Xi Omega cares for the Washington, DC community through our successful programs and activities provided to the neighborhood and District residents.

Our Chapter is trying to redevelop our underutilized one story storefront property in order to expand our mission and the services that we provide to the community and low-income, underserved District residents. As such, I am testifying today to urge the Council to act favorably in approving the Office of Planning's amendments to the Comp Plan and specifically to request that the Future Land Use Map designation for the Xi Omega headquarter property be modified from Low Density Commercial to Mixed-use Moderate Density Commercial/Medium Density Residential in order to facilitate the redevelopment of our property into a new mixed-use senior affordable housing and Xi Omega Center.. This amendment is critical for our Chapter to be able to implement our redevelopment plans to ensure our long-term viability and ability to continue and expand our programs and community service in the Central 14th Street Corridor neighborhood and the District as a whole.

Thank you Mr. Chairman for holding this hearing, and I would be happy to answer any

questions that you may have.

Derrek Niec-Williams

Executive Director
Campus Planning, Architecture, and Development
Howard University
2244 10th Street NW, Suite 223
Washington, DC 20059

Comprehensive Plan Hearing (B23-736)

Testimony before the Committee of the Whole
City Council of the District of Columbia
November 12, 2020
(Witness # 113)

My name is Derrek Niec-Williams. I currently serve as Executive Director for Campus Planning, Architecture, and Development at my beloved alma mater – Howard University – a private, congressionally chartered institution of higher education which has called the District of Columbia its home since its birth here 153 years ago.

I am here today, on behalf of Howard, to offer testimony in support of the Office of Planning's proposed revisions to the Comprehensive Plan pertaining to the University's Central, East, and West Campuses, and to applaud the District for its ongoing management of this crucial, and herculean planning effort.

My specific comments are twofold, and are targeted at items 2353.1 and 2353.2, which are germane to Howard University's West Campus – 19 acres of private property located at 2900 Van Ness Street, NW which is currently home to the University's Law and Divinity programs. While many know us best for our Central Campus in Shaw, our institutional presence at the former Dunbarton College in Van Ness has endured for decades, and will continue to contribute to the character of the neighborhood and the District as a whole for decades to come.

First, we believe that the proposed GPM and FLUM amendments will benefit the neighborhood and the District of Columbia in general by retaining institutional use of the campus while also supporting new residential development within a safe, stable neighborhood that is located in close proximity to transit and neighborhood serving amenities. The opportunity for residential development on the campus has the potential to substantially assist the District in meeting the continuing demand for additional housing, particularly the growing demand for affordable housing.

In the proposed configuration, future development at the campus with institutional and/or residential uses can be achieved while also providing appropriate buffering on the north side of the campus along Rock Creek Park and Soapstone Valley Creek in order to advance the protection

of these important natural resources, an interest shared by the University, the District Government, and its citizens alike.

Given the size of the campus, proximity to transit and other amenities, the high density residential and commercial adjacencies to the west, the park buffer to the north, and the proposal to provide a low density residential buffer along the south, any impacts of the proposed GPM and FLUM amendments will be minimal, or capable of being mitigated.

Second, it is our firm belief that any potential impacts related to the physical development of the West Campus are most appropriately identified, addressed, and mitigated through the underlying West Campus Master Plan. In my experience, nationally, the District of Columbia has one of the best regulatory processes set in place regarding educational campus master plans. The Zoning Commission process ensures community input and engagement on future campus development plans, requires follow-up hearings for further processing of new construction, all while maintaining provisions for as-needed amendments and modifications.

The Office of Planning's proposed changes to the Comprehensive Plan will provide the University with the ability to move Howard Forward. It will provide us the flexibility to creatively approach our long-term campus master plan for the West Campus, while addressing a citywide need for increased housing.

[END OF TESTIMONY]