

**Testimony of Spenser Balog**  
**Conservation Planner**  
**Casey Trees**  
**March 18, 2020**  
**Performance Oversight Hearing for the Office of Planning**  
**Committee of the Whole**

Good morning. My name is Spenser Balog, Conservation Planner at Casey Trees. Thank you for the opportunity to testify.

Casey Trees is a D.C. based nonprofit with the mission to restore, enhance and protect the tree canopy of our Nation's capital. We achieve this mission by planting trees; educating the public about trees, their preservation and care; and advocating for the preservation of trees and green space.

Thank you for focusing on tree protection and improvement in the newest version of the Comprehensive Plan. This update adds tree canopy protection and improvement to the various environmental elements of the newest Plan, reflecting current law and helping to advance the District's environmental agenda.

**Small Area Plans for All Neighborhoods**

The Comprehensive Plan is moving toward completion, with a renewed emphasis on sustainability, resiliency and land conservation which Casey Trees strongly supports. As a second step, we ask that OP refocus efforts on creating Small Area plans, neighborhood-level supplements to the Comprehensive Plan, with similar levels of environmental emphasis.

**Set Aside Lands for Conservation**

The District is developing at a rapid pace, and it risks losing greenspaces that ultimately add to the health of all its residents. Work with ANCs, community groups and other stakeholders to identify underutilized green spaces – especially those that are District-owned and work collaboratively with these groups and the landowner(s) to come up with a protection plan to make these areas “forever green.”

**Require developments going through the PUD process to work more collaboratively with the surrounding community.**

In the updates to the Comprehensive Plan, OP encourages developers to meet with, and receive project feedback from, community members as soon as possible in the development process. While well intended, this language will invariably lead to underrepresentation from the individuals impacted most. Requiring engagement will ensure that significant development projects meet tree and greenspace standards expected by the surrounding community.

Thanks once again for the opportunity to testify. I welcome any questions you may have.

Performance oversight hearing  
DC Office of Planning  
March 18, 2021

Testimony from Sarah Jane Shoenfeld, Prologue DC, LLC/Mapping Segregation in Washington DC

My name is Sarah Shoenfeld and I am member of the Brookland Manor Coalition. As a co-founder of the digital public history project Mapping Segregation in Washington DC, I am also a historian of racist land use practices in the District. One of the themes that our project addresses is the serial displacement of Black DC residents over the course of the 20<sup>th</sup> century. What is happening at Brookland Manor fits squarely into the history that we have documented, and represents the continued enactment of spatial violence against Black residents today.

I urge you to reject the proposal by MidCity to amend DC's Future Land Use Map to allow for increased density around what is currently Brookland Manor. As you know, such map amendments will allow for developers to maximize density as a matter of right, rather than in exchange for provisions such as affordable housing, infrastructure improvements, or decent jobs for neighborhood residents. In this case, amending, or upFLUMing, the map, would allow for MidCity to renege on the existing Planned Unit Development for Brookland Manor, and to build more market-rate units without providing anything in exchange.

Why are we renaming streets and schools that are deemed to be named for racists while continuing to underwrite the removal of Black residents from the city in the midst of a national reckoning around systemic racism? If increasing density were the solution to making housing accessible to those who need it most, then Black and brown residents across the city would be advocating for this. Rather than consider that those most severely impacted by racist housing policies might be worth listening to, our city leadership continues to adhere to the theory that increasing supply will make housing cheaper. This is despite the fact that there are already between 10,000 and 30,000 vacant housing units across the city.<sup>1</sup>

In the History section of its website, MidCity prides its involvement in urban renewal initiatives that "stabilized many city neighborhoods," include Southwest DC. I would note that what MidCity refers to as stabilization resulted in the overall displacement of 23,000 residents from Southwest, the majority of whom were Black. It is widely known today that urban renewal was profoundly damaging to Black communities in DC and across the country. Yet we are doing it all over again, and no one at the Office of Planning seems to care.

Thank you.

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<sup>1</sup> Per the DC CFO, there were 10,000 vacant units in 3,000 buildings as of November 2019 (see <https://v2vr.info>). The U.S. Census American Housing Survey for 2019 listed 30,176 vacant units in DC (see <http://www.dc4reason.org/updates/523>).

# The Committee of 100

on the Federal City



## **Testimony of the Committee of 100 on the Federal City Before the Council Committee of the Whole, Performance Oversight Hearing on the Office of Planning, Thursday, March 18, 9am, virtual.**

Thank you, Chairman Mendelson. I am Kirby Vining, Chair of the Committee of 100 on the Federal City. We appreciate the opportunity to testify on the performance of the Office of Planning during this past year. We will focus our testimony on OP's advancement of density changes throughout the city through map amendments to the Comprehensive Plan.

OP reviewed hundreds of proposals for map amendments to the Future Land Use Map (FLUM) during Open Call and accepted 150 of the proposed amendments. Of these, 68 of the amendments were proposed by OP, 25 by the law firm Holland & Knight, and 15 by Goulston & Storrs on behalf of clients. The most successful submitter that was not a law firm was Ward 3 Vision with 16 accepted FLUM amendments. These four groups account for 75% of the accepted FLUM amendments.

Looking only at the FLUM amendments proposed by OP, 12 recommend High Density Residential uses – a category rarely applied outside of Central Washington. Half of these amendments add residential where it isn't currently designated. Are these amendments the result of community planning? We can't find any references to the map amendments in the Area Elements, which is where the face of the map states that information will be provided. Stating that a Small Area Plan exists is the most residents get from OP – there is no linking of amendments to actual Small Area Plan provisions where a plan exists. The OP staff report accompanying the transfer of the amendments to the Council in April 2020 states that the FLUM land use changes follow small area planning decisions but none of the amendments link to a specific Small Area Plan and the provision that anticipates the change in use or density. This must be corrected.

Twenty-seven map amendments proposed by OP to the FLUM create or increase residential density to medium and 10 of these are paired with increases in commercial density to medium. According to the amended Framework Element, these zones would permit 90 to 110 ft buildings before applying any Inclusionary Zoning bonuses. Did any community planning underpin these map amendments?

In addition, OP states that the amendments are focused on adding density at Metro stations and along corridors – but again there appears to be no planning to determine where this growth is appropriate as the Land Use Element policies recommend. In some cases, OP is recommending high density near low density residential areas and in other cases adjacent to industrial land. Are there standards being applied, were the neighborhoods consulted or asked to participate in determining if these map amendments are appropriate?

The Office of Planning's amending of the Generalized Policy Map doesn't appear to be a serious effort. It has created Future Planning Analysis Areas which are largely the same areas where it is proposing or has accepted significant map amendments to the FLUM. Since when do you authorize upFLUMing that sets in motion upzoning followed by a planning effort to determine if it was warranted and wise? By its

selection of these areas OP is announcing that these areas will see a change in density and intensity of use. No kidding! The FLUM amendments make that clear. There is no need for these Future Planning Analysis Areas because 1) OP can organize Small Area Plans now, and 2) there is nothing future about it since OP has already proposed density and use changes on the FLUM.

The Committee of 100 has been very critical of the Office of Planning's handling of this Comprehensive Plan amendment cycle. We think it is antagonistic to neighborhoods, historic preservation, low income residents, residents of color, and any resident who isn't ready to fall into line with its development vision. But we have focused on the maps today because they highlight how little OP has engaged with the citizens and how casual OP is about land use planning. OP demonstrates through these map amendments that it is a development-centric agency looking for quick ways to reward developers with land speculation or profitable development opportunities.

We urge the Council to reject OP's FLUM amendments that it cannot persuasively connect to a Small Area Plan provision and we further ask that the Council spend time this year examining how OP operates from its staffing of the Zoning Commission to its control of the small area planning process to its superficial assessment of development impacts. There is a reason that so many residents rail against the Office of Planning. It wouldn't take much delving below the surface to understand why.

Thank you.