

**COUNCIL OF THE DISTRICT OF COLUMBIA
COMMITTEE OF THE WHOLE
COMMITTEE REPORT**

1350 Pennsylvania Avenue, NW, Washington, DC 20004

DRAFT

TO: All Councilmembers

FROM: Chairman Phil Mendelson
Committee of the Whole

DATE: April 20, 2021

SUBJECT: Report on Bill 24 -1, the “Comprehensive Plan Amendment Act of 2021”

The Committee of the Whole, to which Bill 24-1, the “Comprehensive Plan Amendment Act of 2021” was referred, reports favorably thereon with amendments, and recommends approval by the Council.

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I. BACKGROUND AND NEED

On January 4, 2021, Bill B24-1, the “Comprehensive Plan Amendment Act of 2021” was introduced by Chairman Phil Mendelson. Bill 24-1 would make a number of text amendments to the Chapters 1 and 3 through 25 (chapters are referred to as elements) and the Implementation Table of the District Elements of the Comprehensive Plan (Comprehensive Plan), and amendments to the Generalized Policy Map and Future Land Use Map of the Comprehensive Plan to respond to public proposals and provide updates.

The 2006 Comprehensive Plan is the District’s 20-year blueprint for the city, laying the framework for the growth and development of the District. It contained over 600 action items and provides guidance on monitoring, evaluating and amending the document. It recommends a review and amendment process every four to five years. The first amendment, the Comprehensive Plan Amendment Act of 2010, was approved in 2011. The Office of Planning (OP) prepares the Comprehensive Plan and initiated the second amendment in March 2016. The amendment process included various public meetings and other outreach and an Open Call for the public to propose

amendments, initially from March 24 to May 26, 2016, and then extended to June 23 in response to requests from Advisory Neighborhood Commissions and other community groups. Over 3000 amendments were submitted, significantly more than what was submitted in the first amendment cycle.

The Mayor submitted the Framework Element, Chapter 2, as a stand-alone piece of legislation in a two-phased approach to amend the Comprehensive Plan. The Council conducted a public hearing and received extensive testimony, reflecting broader community concerns regarding affordable housing, equity, and the overall direction for accommodating anticipated growth. Initially submitted as Bill 22-663, the Council passed B23-1 on October 8, 2019.

OP released the remaining elements and maps for public review in October 2019. Following numerous requests, the public comment periods were extended so that 88 days were provided for general public comment, and 123 days provided for Advisory Neighborhood Council (ANC) responses. Public meetings were held in each ward. While all public comments were reviewed by OP, OP only respond to the 33 ANC resolutions in writing. The proposed amendments incorporate over 40 plans produced by District agencies, including five Small Area Plans.

The Mayor subsequently submitted the remaining Elements of the Comprehensive Plan, including the Generalized Policy Map (GPM) and the Future Land Use Map (FLUM) and it was introduced on April 23, 2020 as Bill 23-736. It was reintroduced by Chairman Mendelson on January 4, 2021 as Bill 24-1. The attached Bill reflects the proposed amendments to the remaining Elements, the Implementation Table, and two maps, the GPM and FLUM, with the purpose of correcting technical errors, providing updated information, reflecting current District planning priorities and best practices, and changing designations on the two maps. The previously approved Framework Element together with the remaining Chapters will comprise the complete Comprehensive Plan.

The Council conducted online public hearings over two days on November 12 and 13, 2020. In addition to the oral and written testimony of over 160 public speakers, the Council received extensive written submissions to the written record.

The notable issues in the Comprehensive Plan Amendments are described below. At a high level, the public discussion around the amendments considered how to include equity and racial equity considerations; encouraging affordable housing production and preservation; and committing to public engagement and planning first.

Changes from 2006 to 2021

When the Comprehensive Plan was fully updated in 2006, the District was beginning to experience growth after decades of population decline. The plan's strategies sought to maintain and stabilize neighborhoods, while encouraging economic development and directing future growth to the downtown and large sites around the city. Since that time, the District has experienced significant population and economic growth, resulting in concerns about housing and affordable housing, and gaps in income, wealth, and access to opportunity, particularly from a racial equity perspective. Technology is transforming how we live, work, and play, and the District has sought to incorporate sustainability and resilience principles into development.

The impact of these changes is reflected in the enormous public interest and debate around the second amendment cycle to the Comprehensive Plan. Several areas were of particular interest: housing production and housing affordability, including displacement concerns; debates over accommodating growth citywide while maintaining neighborhood stability; an increase in appeals of Planned Unit Developments (PUDs), an important method for discretionary development; and the need to address systemic racial inequities, including long-standing patterns of land use and programs that have restricted access to housing and opportunities.

The 2006 Comprehensive Plan was grounded in a vision for an inclusive city. The challenge today is to align that vision with today's needs and commitments to equity and resilience. The result of significantly amending an existing plan written to address other issues and priorities is a document that is awkwardly organized, repetitive, overly long, and struggling to make fifteen-year-old policies fit today's needs. The Committee has specified in the plan a target of 2026 to begin a full rewrite of the Comprehensive Plan developed through meaningful, equitable public participation. Further, the Office of Planning is strongly encouraged to develop a shorter, clearer, and more usable comprehensive plan.

Accommodating Growth

The proposed amendments were submitted to Council at the beginning of the pandemic. The impacts of COVID-19 are broad and affect land use, housing, economic development, transportation, and community services, among other issues. The lasting impacts of the pandemic have yet to be determined, and if impacts are positive or negative. The proposed amendments provide a limited amount of information regarding the pandemic, including references to public health emergencies and new and strengthened language around resilience, which seeks to anticipate shocks and stresses as part of the planning process. The Committee notes that comprehensive plans are long-term, high-level guides that anticipate the possibility of both growth and decline. While some public testimony encouraged waiting on the proposed amendments until the impacts of COVID were better understood, the Committee believes that the proposed Comprehensive Plan represents a stronger tool for guiding development than the current version. The Committee's revisions direct a full rewrite of the Comprehensive Plan that considers COVID-related impacts and new Census information. As had occurred during the Framework Element hearing, many public comments also raised concerns over the growth estimates used by the Office of Planning. The Committee notes that the Council approved those growth estimates when the Framework Element updates were adopted, and these are intended for long-range planning considerations. Advancing the proposed amendments, which offer updated, current information and policies, is appropriate at this time.

The proposed amendments continue the approach used in the current Comprehensive Plan to accommodate future growth in the central core, at large sites, and at transit stations and corridors. Since 2006, many large sites have or are slated for development, and emerging neighborhoods around the core such as NoMa or the Capitol Riverfront have absorbed new growth. To address anticipated future growth, the proposed text amendments and changes to the Future Land Use Map (FLUM) seek to increase densities and encourage mixed uses in many of these locations, and further, to direct growth to transit stations and along transportation corridors that extend further into District neighborhoods, including Connecticut, Wisconsin, Georgia,

Minnesota, and New York Avenues and Benning Road. An expanded Central Employment Area has been mutually agreed upon with the National Capital Planning Commission.

The proposed amendments to the FLUM map set the stage for future zoning requests that would result in greater density. The Committee notes that the proposed amendments do not alter the processes used for discretionary development review and public input into those processes, although the proposed text amendments and map changes provide a stronger argument when requesting additional density or uses. The choice by developers to pursue matter-of-right development, map amendments, or PUDs will remain influenced by many factors.

The Mayor included a number of amendments to policies in the Land Use Element and others that sought to provide greater flexibility in accommodating growth in lower density neighborhoods, and to encourage greater and more equitable housing, particularly affordable housing, production. The Committee finds that the Mayor's approach overstepped in seeking to use the amendment process to enact changes, rather than conduct the necessary public engagement and planning processes to help neighborhoods shape this new direction. The Committee notes a continuing interest in sustaining the District's lower and moderate density neighborhoods, while recognizing that every neighborhood will need to develop appropriate ways to accommodate infill development and additional density for the District to grow equitably. The Committee's amendments acknowledge the need to accommodate growth District-wide and explore new approaches to add moderate increases in density to lower-density neighborhoods of the city following public engagement and appropriate planning. In addition, the Committee found that new and existing language in the Land Use and Urban Design elements regarding transitions between areas where higher density growth is directed and adjoining lower density areas is important and sought to further clarify this language.

The Office of Planning submitted a report on single family zoning as requested by Council that noted the development characteristics of Washington, DC's residential development that distinguishes it from other U.S. cities, as well as historic and current racial inequalities leading to segregated development patterns and access to housing. The report notes that this amendment cycle is not the appropriate place to consider significant changes in low density residential zoning. The Committee directed additional studies to address structural land use inequities.

Housing and Affordable Housing

Housing and affordable housing production and preservation emerged through the amendment process as key issues for the public and for Council. The Housing Element establishes the production of moderate- and lower-income housing as a civic priority. The Mayor's proposed amendments to the Housing Element set short and long term goals for new housing and affordable housing production, set goals to produce a minimum percentage of new affordable housing in each planning area of the District to further fair housing objectives, prioritize resources towards new affordable housing production in more expensive, high-opportunity locations that have little affordable housing, and prioritizing resources towards preserving affordable housing in these high-opportunity areas and in areas that serve a greater proportion of low-income households. Based on public testimony, there is strong support to increase affordable housing, and a willingness to support growth if it results in substantial increases in affordable housing.

The Committee's revisions clarify affordable housing goals in the Housing Goal and are further intended to reinforce affordable housing production and preservation. Affordable housing as used in the plan refers to housing available to households earning 80 percent or less of the regional median income using 30 percent of their income. The Committee recognizes that increasing market rate and affordable housing supply are both important components to address District needs. The Committee strengthened language to encourage housing for families, seniors, and vulnerable populations, New policies support land trusts and new actions encourage affordable housing production from non-profits and faith-based institutions. The Committee's revisions provide a discussion of racial equity issues such as the gaps in income and wealth and barriers to housing and financing faced by communities of color, as well as the disproportionate representation of people of color in lower income categories and in vulnerable populations and how this magnifies housing challenges that stem from historic and current systemic racism. The Committee strongly encourages incorporation of racial equity analyses in future efforts to establish housing targets and policies.

A significant public concern was displacement, particularly of lower income residents and people of color as the District's population has grown. The Mayor's proposed amendments include a new section describing economic, cultural, and physical displacement and include policies seeking to minimize displacement. In addition, the proposed amendments expand the strategies set for the New Communities Initiative (including 1:1 replacement, build first, and tenant right to return) to apply to all dedicated affordable housing redevelopment. While these are strategies and not requirements, and may not be achievable on all sites, the Committee further revised this language into a policy.

Equity and Racial Equity

The Council carefully and intentionally amended the Framework Element to add language on equity and racial equity, including defining language around equitable development. While the proposed Comprehensive Plan received from the Mayor includes new amendments referencing equity, the document falls short in several areas. Data and analyses are often presented broadly and are not disaggregated in a way to look at impacts specific to communities of color. While recognizing that the Mayor's proposed amendments are updating a 2006 document developed to address inclusion and not with the present focus on racial equity, the text, policies and actions of that document are not centered around racial equity, did not specifically address the needs of communities of color, and did not adequately acknowledge or address historic and current inequities.

The Committee worked closely with the Council Office of Racial Equity (CORE) to review and include language in the Comprehensive Plan addressing racial equity, focusing on the District-wide elements that are the most critical to shaping development activities, including the Land Use, Housing, Economic Development, and Implementation Elements. CORE started in January 2021 and began its review of the document immediately. The Committee notes that this review occurred at the end of a four-year public process around the plan, making it challenging to include more structural changes within the document. With that in mind, the Implementation Element includes various actions to address racial equity in planning and development review processes and directs strong consideration of equity and racial equity in the next full rewrite of the Comprehensive Plan. Some of the key additions to strengthen the plan's guidance on racial equity are:

- Inclusion of narrative text in several Elements to provide historic and current context around racial equity issues in the District.
- Numerous revisions and new additions were made to text, policies, and actions to highlight racial equity implications and focus efforts to reduce gaps or eliminate barriers.
- Specified collection and use of disaggregated data to support racial equity analyses, policy development, and implementation.
- Inclusion of a new policy on equitable public participation.
- Inclusion of new actions to develop racial equity review tools for all development-related processes such as planning, capital improvement programming, zoning codes development, and requiring the use of these tools by the Zoning Commission.
- Specified racial equity training to decision-makers and staff involved in the development review and planning process.

CORE found that the version of the Comprehensive Plan, as submitted by the Mayor, will exacerbate racial inequities. Further, it noted that the steps that the Committee took to address racial equity are largely positive, but on balance do not alter the status quo. CORE noted that opportunities exist to begin addressing racial equity through various implementation strategies and the development of a new comprehensive plan that is centered around racial equity.

The Committee notes that the no-action option would continue to use an outdated plan from 2006 that does not address racial equity at all. The overall updates to the Comprehensive Plan are an improvement as a tool to guide growth. The Committee recommends adoption of the Bill, with the understanding that the District must seek to implement a variety of the measures identified in the plan that advance the public dialogue around racial equity; collect, disaggregate, and analyze data to support racial equity considerations; and create tools to apply a racial equity lens to various planning, development review, policy, and capital improvement processes, while encouraging the development of a new plan.

Future Land Use Map Amendments

The FLUM uses color-coded categories to express public policy for future land uses across the District. The Mayor's amendments reflect changes proposed through the amendment process, almost exclusively to allow for increased density and expanded or changed land uses. As part of the amendment process, over 3000 amendments were considered, some developed by the Office of Planning and others submitted by property owners, developers, ANCs, civic associations, and the general public. Many of the proposed amendments reflect the Comprehensive Plan's broader strategy for accommodating growth in Washington's central core and adjacent emerging neighborhoods, at a number of larger sites; along corridors, and at transit stations and transit corridors. The amendments also considered recommendations from completed Small Area Plans and other planning studies. Office of Planning Director Trueblood provided testimony noting that OP reviewed all proposed amendments to the FLUM considering consistency with the Comprehensive Plan and its growth strategy, approved small area plans and other planning studies, and comments from ANCs.

The Committee proposes to adopt the FLUM amendments as submitted by the Mayor on January 4, 2021 on a map, and makes ## additional amendments, many developed in coordination with other Councilmembers and described in the Bill in more detail.

Several sites proposed for FLUM changes have been the subject of Zoning Commission decisions and litigation and have ultimately been approved. The Committee supports advancing the approved development at the McMillan site. The Committee changed the proposed FLUM designation (#1691) on the northern portion of McMillan back to the current mixed-use designation that includes Moderate Density Commercial, noting that these designations were sufficient to receive approvals and reflect the anticipated development at the site, which will be the land use in place for years to come.

The Committee supports the approved development at the Brookland Manor site. The proposed FLUM designation of Medium Density Residential on the northern half of the Brookland Manor site (#2191) is supported, although the proposal to expand Moderate Density Commercial across the site is rejected. The Committee notes that any proposals for additional development afforded by the FLUM change would occur through the Planned Unit Development process and must reflect the interests of the community in providing substantial affordable housing available to a range of low- and very low-income households, and family-sized housing units.

The northern portion of the Barry Farm site (#9825) has proposed FLUM designations of Commercial Medium Density / Residential Medium Density. These designations will support a request for map amendments from the Zoning Commission to advance a proposal consistent with the 2006 Small Area Plan. The Committee supports this development proposal and the proposed FLUM request. Additional policy language was included in the Far Southeast and Southwest Element to direct continuing, meaningful public engagement with the residents, neighborhood and stakeholders as the Barry Farm development moves forward.

Generalized Policy Map

The GPM is used to categorize how different parts of the District may change through 2025. It highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow up plans, to manage this change. The Committee proposes to adopt the GPM amendments as submitted by the Mayor on January 4, 2021 on a map and makes ## additional amendments.

A new feature in the GPM is Future Planning Analysis Areas, nine large, roughly bounded designations that “lasso” areas for more detailed planning studies. The Analysis Areas are described in the Mayor’s proposal as follows: “Areas of large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable growth. Planning analyses generally establish guiding documents including, but not limited to, Small Area Plans, development frameworks, technical studies, retail strategies, or design guidelines. Such analyses should precede any significant zoning changes in this area. The planning process should evaluate current infrastructure and utility capacity against 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.”

The language describes a two-step process: detailed planning first, then zoning requests. As written, this language is ambiguous: the commitment to conduct planning in advance is weak, it is not clear what would constitute sufficient planning to then enable zoning requests to advance,

and “significant” is undefined. The Committee, in its revisions, seeks to establish a very strong commitment to conduct planning in advance of zoning changes, to clarify what constitutes appropriate planning prior to zoning (which includes Planned Unit development proposals and approved master plans); and allow some types of development requests given the first two considerations, which may be accomplished by reducing the Analysis Areas. Detailed planning requires resources, and it will take time to conduct this planning. In the Implementation Element, language was added requesting preparation a list of proposed Small Area Plans and other studies and how they will be equitably prioritized to reflect District goals.

The Implementation Element provides language consistent with the Framework Element that makes clear that Small Area Plans, once approved by Council via resolution, are used as additional guidance but do not supersede the Comprehensive Plan. If the Small Area Plan is inconsistent with the Comprehensive Plan, the Comprehensive Plan prevails. The to incorporate Small Area Plan recommendations (and specifically those that may be inconsistent) the Comprehensive Plan must be amended.

While some designated Analysis Areas have significant “upflumming,” such as the Analysis Areas around Connecticut and Wisconsin Avenues NW, other Analysis Areas are identified for more detailed study to achieve different objectives, such as more efficient and appropriate allocation of transportation infrastructure and open space to improve connections, provide more usable open space, and create areas for future use. The type of studies needed in these areas may differ from the planning analyses in other Analysis Areas. The Committee recommends that the Office of Planning provide greater clarity regarding the intent of each Analysis Area.

Plan Language

The Mayor’s amendments included document-wide changes to directive language, generally removing words such as “ensure/shall/must” and replacing with “should.” Similarly, the words “protect/preserve” were often changed to “respect.” These changes weaken the intent of the language and were a source of concern for some members of the public and CORE. Where the document has been universally edited to replace various terms, it often resulted in a number of inaccurate applications and oddly phrased sentences. The 2006 Comprehensive Plan was written with a more stylistic approach to language. The Committee reviewed and selectively reinstated directive language in many of the District-wide Elements, considering whether the language involved regulations or requirements, public engagement, protection of resources, racial equity, and housing production. In addition, the Committee restored the original language of “protect” in many cases, particularly in the Historic Preservation Element. The Committee does not believe that reverting the language back to the original plan text will have significant bearing on the document’s use in the development review process. The Comprehensive Plan is a guide. While consideration is given to mandatory rather than discretionary language in weighing policies and text, recent appeals were driven primarily by the need for the Zoning Commission orders to fully and carefully explain their decision-making and demonstrate how policies were weighed.

The 2006 Comprehensive Plan uses terms such as “neighborhood character,” “historic character,” and “established or stable neighborhoods” and these terms are carried through in the document proposed by the Mayor. These terms are included in many policies and actions and are

frequently referenced in the development review process. They are not defined in the document. There is value in finding ways to discuss the distinctive characteristics of the District's many neighborhoods. The Committee is, however, mindful that these terms were and are frequently used to signal primarily racial exclusion, as well as exclusion of other groups. The Committee emphasizes that these terms must be used in the Comprehensive Plan primarily through the context of design, layout, and setting, and not in terms of the characteristics of the people in the neighborhood.

In future rewrites of the Comprehensive Plan, the Committee strongly encourages the Office of Planning to develop standards for language use and clearly define and share terms at the beginning of the process for consistent use and application.

PDR Lands

The Committee finds that industrial lands, generally identified as Production Distribution and Repair (PDR), are essential to the District's daily and long term and economic well-being. Asphalt and concrete plants are essential to construction activities within the city. Municipal facilities provide critical daily services. Warehousing and distribution are increasingly important in an on-demand economy. District law requires ABC distributors to house products within the District. The District must retain and preserve the limited areas of industrial land that remain. However, the Committee is concerned that the policy direction in the Comprehensive Plan and the proposed changes to the FLUM that convert some PDR designated areas to a mix of PDR, commercial, and housing uses will result in further erosion of PDR land and space – and therefore greater difficulty to meet the District's current and long-term need for industrial land. Introducing a mixture of uses into PDR areas, particularly residential, creates potential conflicts and is likely to increase market pressures in ways that make it harder to operate new and existing industrial uses.

The Committee recognizes that PDR sites present opportunities for housing production, that adjacent residential neighborhoods may prefer other uses, and that most of the District's PDR land is concentrated in Wards 5 and 7, raising racial equity issues. There is interest and opportunity in encouraging new kinds of industrial operations, mixing industrial uses with other uses, and encouraging greater efficiencies in design and operation. These interests, however, must be balanced against the need to retain enough PDR land to meet the District's needs and the near impossibility for finding new areas for PDR uses. The Committee consolidated several overlapping policies related to industrial lands from the Economic Development Element into the Land Use Element, revised these policies to emphasize retention of industrial lands for long term needs, and requires a study on this topic (section 4 of the Bill).

Educational Facilities

The Committee provided revisions in two areas. First, the Educational Facilities Element references the 2018 Master Facilities Plan (MFP) in multiple places. While the data in this plan is appropriate to use, the Council disapproved the 2018 MFP, noting that it failed to provide strategies to address the District's over- and under-capacity school facilities, and an approach to build new, and renovate existing, schools to meet those needs. Language in this Bill amends existing code to stipulate that following disapproval, an updated MFP addressing Council concerns must be prepared and submitted for Council approval. In addition, the Mayor's revisions strongly

encouraged co-location of DC Public Schools and charter schools; the Committee revisions are neutral to this approach, which should be evaluated on a case-by-case basis.

Implementation

The Committee views the Implementation Element as a critical component to incorporate racial equity, strengthen public participation and additional planning, including regular progress reports, and chart the course to a full rewrite of the comprehensive plan and future amendment cycles, and required. The Implementation Element was significantly revised by the Committee to include these components, many of which are discussed above.

Conclusion

Bill 24-1, as refined in the Committee Print, contains important updates to District of Columbia Comprehensive Plan that provide current information, reflect approved plans and studies, updated policy direction, and actions to implement the Comprehensive Plan to further the development goals for the District. The Committee therefore recommends approval of Bill 24-1 as reflected in the Committee Print.

II. LEGISLATIVE CHRONOLOGY

April 23, 2020	Bill 23-736, the “Comprehensive Plan Act of 2020” is introduced by Chairman Mendelson at the request of the Mayor.
May 1, 2020	Notice of Intent to Act on Bill 23-736 is published in the <i>District of Columbia Register</i> .
May 5, 2020	Bill 23-736 is referred to the Committee of the Whole.
August 28, 2020	Notice of a Public Hearing on Bill 23-736 is published in the <i>District of Columbia Register</i> .
November 12, 2020	The Committee of the Whole holds a public hearing on Bill 23-736.
November 13, 2021	The Committee of the Whole holds a public hearing on Bill 23-736.
January 4, 2021	Bill 24-1, the “Comprehensive Plan Act of 2021” is introduced by Chairman Mendelson at the request of the Mayor.
January 5, 2021	Bill 24-1 is referred to the Committee of the Whole.
January 8, 2021	Notice of Intent to Act on Bill 24-1 is published in the District of Columbia Register.
April 20, 2021	The Committee of the Whole marks-up Bill 24-1.

III. POSITION OF THE EXECUTIVE

Andrew Trueblood, Director, Office of Planning, testified on behalf of the Executive at the Committee's public hearing on November 13, 2020 in support of the Bill.¹

IV. COMMENTS OF ADVISORY NEIGHBORHOOD COMMISSIONS

The Office of Planning solicited resolutions from Advisory Neighborhood Commissions on a draft of the proposed Comprehensive Plan amendments. They reviewed 33 official resolutions submitted prior to making final edits to the Mayor's proposed amendments and responded to each of the ANCs. The Committee reviewed those resolutions², which are available online. Several ANC Commissions submitted these resolutions to the Committee as part of the written record.

V. SUMMARY OF TESTIMONY

The Committee of the Whole held two online public hearings on Bill 23-736 on Thursday, November 12, 2020 and Friday, November 13, 2020. The testimony summarized below is from that hearing. Copies of written testimony are attached to this report.

Cheryl Cort, Coalition for Smarter Growth, testified in support of the bill, noting that the amendments encourage affordable housing, racial equity, and housing opportunities around transit. She encouraged the Council to act on the bill by the end of 2020, noting that extensive and appropriate public process has been conducted on the amendments, and further delay would negatively impact proposals for housing production. She also noted that new inclusionary zoning requirements were in progress.

Alex Baca, Coalition for Smarter Growth, testified in support of the bill and encouraged the Council to act on the bill by the end of 2020, noting that the proposal is a plan amendment, not a full rewrite, and the language, while not perfect, is serviceable. She encouraged procedural reforms to clarify when the Comprehensive Plan is rewritten or amended and the related process, and to begin a full rewrite in 2022.

Ellen McCarthy, The Urban Partnership, LLC, testified in support of the bill and encouraged the Council to adopt the amendments by the end of 2020. She noted that the FLUM amendments for upper Connecticut and Wisconsin Avenues would appropriately encourage more housing and mixed use development following more detailed planning. She also recommended a FLUM change to stripe the WMATA site for mixed use development to encourage redevelopment of the Friendship Heights area. She encouraged affordable housing in high-opportunity areas of the District.

¹ Andrew Trueblood, written testimony provided at the November 13, 2021 hearing and available at <http://chairmanmendelson.com/cow/compplan/>.

² ANC resolutions are available at plandc.gov/page/anc-resolutions-and-responses.

Garrett Hennigan, Public Witness testified in support of the proposed amendments, in support of greater housing density and affordable housing, particularly in high opportunity areas, and to approve the amendments by the end of 2020.

Susan Kimmel, Ward3 Vision, testified in support of the bill and encouraged the Council to act swiftly, noting the extensive public process and that the proposed amendments address existing inequities, further better urban places, and provide a more sustainable, equitable and resilient approach to recovery and growth. She noted her support for the proposed FLUM and text amendments specific to the Rock Creek West area and to the Housing Element as important steps to encourage housing and commercial development near transit and in high opportunity areas.

Bob Ward, Cleveland Park Smart Growth Steering Committee, testified in support of the bill and specifically endorsed the proposed FLUM changes on Connecticut Avenue between Porter and Macomb Streets to a mix of moderate density commercial and high density residential, noting that the area is also controlled by historic preservation designations. He broadly supported the proposed changes in the Rock Creek West, Land Use, Housing, and other elements.

Corey Holman, Public Witness, spoke in support of the proposed amendments, noted the extensive public process, and encouraged acting on it as soon as possible. He noted two areas in While not speaking on behalf of ANC 6B, he noted that he chairs ANC 6B's planning and zoning committee and the ANC has submitted a resolution in support of the proposed amendments.

Dan Winston, Public Witness, spoke in support of the proposed amendments, and encouraged passing the amendments as proposed, as soon as possible.

Adam Kent, Local Initiatives Support Corporation, spoke in support of the proposed amendments, and encouraged passing the amendments as proposed, as soon as possible. He noted that the city's recent growth has brought positive changes, but also extreme loss of affordable housing, disparities in health, wealth, and housing and increased displacement, particularly on Black residents and residents of color, and the amendments address these issues.

Scott Bruton, Coalition for Nonprofit Housing and Economic Development testified in support of the proposed amendments, noting that the existing plan is outdated and the proposals will address racial inequities, prioritize housing, health, and economic equity, and encourage affordable housing production.

Melissa Bondi, Enterprise Community Partners noted Enterprise's investment in affordable housing in the District, and supported enactment of the proposed amendments as soon as possible. She noted the extensive public process and the amendments' focus on racial equity, housing affordability and improved quality of life for District residents

Stephanie Liotta-Atkinson, MidCity Financial Corporation generally supported the proposed amendments, offered recommendations to encourage production incentives and reduce regulatory burdens; require a housing affordability impact statement for new statutes, regulations, or policies; and recommended and amend language relating to redevelopment of existing affordable housing to target just publicly owned housing.

Taalib-Din Uqdah, 14th Street Uptown Business Association, requested that OP propose a zoning map classification for the 4600-4700 blocks of 14th Street, supported the moderate density designation for this area in the FLUM, and testified against WMATA's potential redevelopment and continuing use of the Northern Division Bus Garage as a garage site.

Meg Maguire, Public Witness testified in opposition to the amendments. She specifically noted that changes to directive verbs reduce resident opportunity to participate meaningfully in development reviews, supported the Grassroots Planning Coalition housing priorities rather than the language in the amendments, and requested removing HP1.6.5, which encourages digital billboards in designated entertainment areas.

Parisa Norouzi, Empower DC testified against the amendments as proposed, which she described as more like a rewrite, and offered the Grassroots Planning Coalition Housing Justice Priorities as an alternative approach to fortify existing affordable housing programs and require community led equitable development strategies. She requested additional public process.

Andrea Rosen, Public Witness, testified in opposition to the amendments, noting the changes to directive language limit community participation in the development process, and that "up-FLUMing" will encourage development that will contribute minimally to affordable housing needs. She noted concerns about growth projections, and the impacts of the pandemic on livability, particularly for low-income residents. She submitted proposed Housing Element language changes related to rent stabilization.

Reginald Black, Public Witness requested additional language to address data and issues related to homelessness, displacement, public housing loss, and affordable housing, and recommended using language from the Interagency Council on Homelessness and additional outreach to affected communities.

Caitlin Cocilova, Washington Legal Clinic for the Homeless, testified against the amendments as proposed, and supported the Grassroots Planning Coalition Housing Justice Priorities as an alternative. She specifically rejected the weakened language, asked for more language around specific housing asks, and more analysis of needs and current housing stock.

Nick DellaDonne, Dupont East Civic Action Association testified against the amendments as proposed, raised concerns about displacement and lack of attention to homeless and extremely low income households and supported the Grassroots Planning Coalition Housing Justice Priorities. He spoke to the issue of plan enforceability.

Barbara Kahlow, West End Citizens Association, testified in opposition to the bill. She noted that changes to the FLUM will result in widespread upzoning, raised concerns that a revised CEA boundary would eliminate environmental reviews or IZ applications, and recommended retaining certain language protecting certain parkland in Foggy Bottom.

Kirby Vining, Committee of 100 on the Federal City, testified in opposition to the bill and recommended it be returned to the Office of Planning. He raised concerns with the accuracy of

growth projects, particularly given the pandemic, and excessive focus on the Mayor's Housing Initiative. He noted that language changes ("must" to "should", "protect" to "respect") weaken the protective language in the plan and reduce citizen involvement.

Dennis Williams, Tenleytown Neighbors Association, testified in opposition to the bill, citing overly optimistic population projections and failure to address the pandemic's impact. He specifically noted that proposed FLUM changes in the upper Wisconsin Avenue area would therefore encourage risky high density development.

Matthew Frumin, C4DC proposed changes to the Education Facilities Element to address capacity assumptions, remove policies encouraging co-location of charter and DCPS schools, and support investment in existing schools.

Meridith Moldenhauer, Cozen O'Conner, testified on behalf of the property owner of 500-520 Florida Avenue, requesting a FLUM change for this light industrial site to medium density residential and high-density commercial.

Eric DeBear, Cozen O'Conner testified on behalf of testified in support of encouraging development in low and moderate density neighborhoods, and generally encouraged family-sized housing and suggested changes to the Housing Element.

Randy Speck, Chair, ANC 3/4G, testified that the ANC supported the proposed FLUM changes to the Chevy Chase Gateway, with future zoning contingent on first completing a small area plan, and noted that OP included this area in a Future Planning Analysis area. He noted concerns about the plan's growth projections, the impacts of COVID, and the lack of any amendments requiring planning for infrastructure, all of which must be addressed in a full rewrite.

Glenn Engelmann, Dupont Circle Citizens Association, testified that the plan amendments should be delayed to incorporate better growth projections, pandemic impacts, fuller inclusion of equity and affordability considerations, restoration of stronger language, and more public benefits from development of District-controlled land. He requested limited FLUM changes in the Association's area.

Eric Fidler, Public Witness, testified in support of the plan amendments, and particularly endorsed the Expanding Housing Supply H-1.1 and map amendments for Howard University Hospital to change from institutional to mixed commercial, residential and institutional.

Mark Rosenman, Public Witness, spoke in opposition to the plan's proposed changes to Cleveland Park, which he thought introduced too much opportunity for density along Connecticut Avenue and changes in the neighborhood.

Charles Bien, Public Witness, testified in opposition since he thought the plan failed to respond to the anticipated impacts of COVID-19 on urban areas, and did not address the demand for public services and capital infrastructure.

Pamela McKinney, Public Witness testified in opposition, stating that the amendments weakened the plan language, removed language related to Southwest DC's goals of socioeconomic diversity. She requested stronger directive language, incorporating language for equitable housing priorities, and analyzing current housing conditions.

Doni Crawford, DC Fiscal Policy Institute testified in support of the plan amendments as a tool to help address racial and economic inequalities. In addition, any additional amendments should support both the DC Housing Priorities Coalition principles, and the DC Grassroots Planning Coalition principles. A full rewrite in the near future that is more accessible was encouraged.

Carol Aten, Public Witness testified in opposition to the bill. She indicated concerns with the public process, weakened language that diminishes certainty, an overly-expansive CEA, unrealistic growth projections, and concern that affordable housing is not the sole factor in equity.

Rick Nash, Cleveland Park Historical Society testified in opposition to the amendments, specifically related to Cleveland Park. He was concerned that the FLUM amendments and language would weaken the protections in the historic district, allowing out of scale development.

Rosie Hepner, Public Witness testified in support of the bill, including the FLUM changes, language addressing displacement, and increased density in Rock Creek West. She was concerned that currently, essential workers can't afford to live in the District, health inequities exist, and access to services varies, particularly for communities of color.

Payton Chung, Sierra Club testified in support of the proposed amendments, and noted support for inclusion of text and policies addressing climate adaptation, resilience, and language from various District plans. He also supported revisions to the Housing Element as they better balance jobs and housing. He encouraged a full rewrite in the near future.

Michael Whelan, Public Witness testified in support of the proposed amendments, and any other amendment that produces homes in all areas of the District.

Natalie Avery, Public Witness, testified in support of the proposed amendments and urged passage in 2020. She stated that increasing density supports neighborhood quality, amenities, and services, and the plan will further equity goals.

Japer Bowles, ANC Rainbow Caucus, testified in support of the plan amendments, including language requested by the Caucus, and urged additional language to improve access to support services for vulnerable communities and support housing needs of LGBTQ Youth, Seniors, and the Transgender/GNC community.

John Nelson, Public Witness spoke in support of a proposed new amendment to the FLUM at 500-520 Florida Avenue near Union Market to allow for a medium density residential/high density commercial/PDR designation. ANC 5D supports this request.

Gary Pearce Barnhard, Barnhard Family LLC, supported the plan amendments and requested Council support of related fine-grained planning efforts. He owns the property at Square 5 (2635-9 I Street, NW).

Emily Hamilton, Public Witness testified to encourage passage of the proposed amendments immediately; supported a full rewrite of the plan in the near future that encourages all neighborhoods to accommodate more residents and encouraged adopting a less prescriptive approach to determining what type of housing may be built in different neighborhoods.

Aidan Jones, Public Witness testified against the proposed amendments, noting that the amendments are based on flawed growth projections and skewed public processes, and fail to account for the pandemic's impacts.

Lisa Mallory, DC Building Industry Association, testified in support of the plan amendments, particularly the proposed FLUM changes. She requested consideration of several new items: a requirement for a housing impact statement before adopting any new statute, regulation or policy; incentivizing the market to meet demand for multiple types of housing at all income levels; focus on build first, onsite, or non-displacement approaches rather than prioritizing preservation over increased supply; and acknowledging the importance of remaining economically competitive.

Peter Farrell, CityInterests Development Partners requested inclusion of the Parkside development in Ward 7 into the Central Employment Area (CEA) to enable consideration of that site by federal and District government agencies.

LaToya Thomas, Housing Association of Non-Profit Developers testified in support of the plan amendments, noting that the proposals encourage affordable housing across the District and the language incorporates a racial equity framework.

John More, Washington Interfaith Network, testified in support of the plan amendments, noting the interest of the Network in promoting affordable housing solutions.

Kerry Kemp, Public Witness testified in opposition to the plan, stating it was a major rewrite that did not include appropriate data, include meaningful public engagement, or follow required processes. She noted concerns about displacement, particularly of African American residents, gentrification, lack of an approach to create new parks, and a lack of mechanisms to achieve the plan vision.

Coy McKinney, SW DC Action testified in opposition to the plan amendments, and supported the Grassroots Planning Coalition's Housing Justice Priorities. He criticized language changes ("should," "encourage") rather than clear, direct language, and encouraged production of shared equity units and housing to meet the needs of the historically underserved.

Samuel Leone, Public Witness testified in support of the proposed amendments, noting that increasing housing supply can help make housing affordable, more housing helps the regional economy, and infill development is a tool to fight climate change.

Zachari Curtis, Public Witness testified on the challenges faced by residents, particularly Black residents, in Far Northeast/Far South East regarding racialized economic and structural barriers, the impacts of COVID, gentrification and noted that the plan amendments as written do not address these inequities. He recommended further analyses, strengthened language, and improved public process.

Laurence Caudle, Hickok Cole testified in support of the Bill and urged passage by the end of 2020. He stated that the amendments will promote healthier, more vibrant neighborhoods for all ages and households.

Scott Parker, Spring Valley West Homes Corporation spoke in opposition to the proposed FLUM changes (5009) at 49th, 50th and Yuma Streets and Massachusetts Avenue, NW to add a Moderate Density Residential designation. He noted the limitations imposed by prior agreements on the site, and the impacts of redeveloping these properties on surrounding neighborhoods and current users.

Karen Gaal, Public Witness, proposed changes to the Bill to address issues of housing affordability, housing for the homeless, and mobility needs, including bike lanes improvements, and workforce investments.

Gordon-Andrew Fletcher, ANC5A requested consideration of changes previously proposed by the ANC to the Upper Northeast Element but not included in the Bill. These include strengthened language, inclusion of recommendations from the 2009 Area Development Plan; a land use transfer; and various changes to, or support for, language in the Transportation, Housing, Economic Development and Parks Elements.

Grant Giel, Law Offices of G. Macy Nelson on behalf of UFCW Local 400, offered language amendments to multiple elements of the Comprehensive Plan. Generally, the proposals restrict or prohibit big-box or large scale retail and large warehouse fulfillment centers in favor of smaller neighborhood-serving businesses.

Barbara Kraft, WIN Ward 3 Affordable Housing Work Group, noted that the work groups is comprised of various faith institutions collaborating in support of more affordable housing units in Rock Creek West and other high-opportunity areas, and requested a higher proportion of deeply affordable and affordable new homes, particularly for publicly-owned sites.

Nancy MacWood, Public Witness testified in opposition to the proposed amendments, specifically in regard to the Cleveland Park area, stating that the proposals threaten neighborhood stability. She requested rejecting the proposed Future Planning Analysis area and various FLUM changes along Connecticut Avenue.

Jeremiah Montague, ANC 5C07 urged the Council to provide thoughtful review of the bill, noting that the proposed amendments do not clearly answer how the plan brings meaningful benefits, equitable, affordable communities, adequate infrastructure, and accessible transportation for all residents, now and in the future.

Martin Welles, Ward 2 Education Council raised concerns regarding language for shared use of District park spaces that benefit private sector entities at the expense of public schools and residents. He also noted concerns about dog parks, inappropriate tree plantings, and advocated for a District-serving indoor recreational complex.

Kate Jentoft-Herr, Public Witness testified in support of the bill and expressed support for any other amendments that address racial inequalities. She supported more housing, but done in a manner that avoids displacement. She also supported an improved future process for the plan amendments.

Sebrena Rhodes, Friends of Crummell testified against passing the bill and in support of the recommendations of the Grassroots Planning Coalition to strengthen the plan to serve the needs of low income housing and community led equitable development. She discussed development in and around Crummell School and the lack of community engagement.

Richard Hinds, Citizens Association of Georgetown raised concerns regarding language changes that negatively impact historic preservation in Georgetown and across the District. He proposed language changes.

Jean Stewart, Public Witness testified in opposition to the proposed amendments, noting that the while the changes increase density and market rate housing, they do little to address affordability, further hastening gentrification and impacting vulnerable residents. She supported retaining stronger language (“ensure” rather than “promote”).

Ann Mladinov, Public Witness spoke in opposition to the bill, noting that the growth projections and COVID-19 impacts are not addressed, that the District needs to focus on the needs of existing residents for affordable housing, and a full rewrite of the comprehensive plan should be undertaken.

Daniel del Pielago, Empower DC spoke to the needs of the Barry Farm residents, the impacts of long-delayed redevelopment, and raised concerns about recent zoning changes. He recommended language that would require one for one replacement, the right to return, and preservation of existing public housing stock. He supported more amenities, more deeply affordable housing and use of other housing tools, and support for meaningful resident involvement at Barry Farms.

Jeff Utz, Goulson and Storrs, LLC testified in support of the bill and supported the testimony of DC BIA. He requested inclusion of a “housing affordability impact statement” requirement. He noted that the plan downplays the importance and benefits of growth and investment and suggested strengthening the Land Use Element. He supported the FLUM changes.

He disagreed with changing the “should” back to “musts” noting that the changes are appropriate and that the Zoning Commission would better be able to reconcile conflicting provisions.

Emily Morris, EKM Law provided testimony on behalf of her small developer clients, noting that the complexity of current government entitlement and approvals disincentivizes proposals that would provide additional housing. She recommended language in the Housing Element to provide additional flexibility with zoning requirements.

Sandra Moscoso, Public Witness testified in opposition to Section 1203.4 which calls for co-location of public charter schools within significantly underused DCPS facilities. She requested language recommending completion of a comprehensive education plan by relevant District agencies. She recommended striking 805.12 regarding shared use of District green spaces.

Ruth Hamilton, Westminster Presbyterian, testified in support of the bill, noting that it will assist in Westminster’s affordable housing development. She noted that their efforts stemmed from the Southwest Small Area Plan that supported the site’s rezoning.

Thomas Hutcheson, Public Witness, testified in support of the plan, noting that it will advance economic development, address the interests of poor people, and increase the chances for DC statehood.

Geri McClain, Concerned Residents and Friends for Better Air Quality and Environmental Justice for Buzzard Point Residents and the Old Southwest Community, noted her concerns about the ongoing impacts of construction activity, including poor air quality, lack of parking, and traffic congestion. She recommended language to better address environmental justice issues, public engagement, and displacement of existing residents.

Shizuka Hsieh, Academics in Air Quality and Health, requested that the District should strive for air quality guidelines that are more protective of human health, and recommended changes to the Environmental Protection Element that would better address hot spots, resident education, and pollution sources other than transportation.

Elan Sykes, Public Witness spoke in support of the amendments. As a recent District resident, he appreciated the access to services, job opportunities, and amenities in the District and thought the amendments addressed structural inequities and increased housing and affordable housing opportunities.

Beth Wagner, Public Witness raised concerns about the public process for the amendments, noted that although new housing has been added, there has been significant displacement of Black residents, and the current tools such as Inclusionary zoning only produce near-market rate housing.

Minnie Elliott, Brookland Manor Brentwood Village Residents Association raised concerns that this neighborhood, which provides affordable housing, is not well maintained and is under pressure to be redeveloped, resulting in displacement, less family housing, and more market-rate housing.

Ben Bergmann, Public Witness testified in support of the plan amendments and noted the need for more housing, and more affordable housing, and the need to streamline the development process to focus on better outcomes, rather than blocking projects.

John Farrell, Cushman and Wakefield, testified in support of the plan amendments. He offered his professional observation on areas that impact the supply of housing and affordable housing: the need for incentives, such as flexible zoning and expedited review; the District's need to remain focused on regional competitiveness to attract real estate dollars; and regulatory consistency, noting that uncertainty can discourage investment.

Sheldon Clark, Douglass Community Land Trust testified in support of the goals of the comprehensive plan to address racial and economic equity, while offering suggestions for improvement that include community-led involvement, and better-defined affordable housing income levels and deeper affordability language. He requested reinstatement of language to support community land trusts, provide clarity on affordability time restrictions, and include language on other shared equity housing approaches.

Charles Stodghill, Victory Village Development Corporation offered testimony from Shiloh Baptist Church in support of the bill. He specifically supported changes to the FLUM that would designate the Shiloh property at 1500 9th Street, NW to Mixed use medium density Commercial and Medium Density Residential to implement redevelopment plans allowing for greater height and density.

Tracy Hadden Loh, Public Witness recounted her challenges in finding family sized rental housing when returning to the District, and supported the proposed amendments as a tool to improve these conditions.

Mo Pasternak, ANC 2B04 Commissioner testified in support of the plan amendments, and supported efforts to expand access to affordable housing, particularly west of Rock Creek Park, and to improve the regularity of future plan updates.

April Gaines-Jernigan, Xi Omega Chapter, Alpha Kappa Alpha Sorority testified in support of the proposed FLUM map amendment changing the designation for the chapter headquarters building at 4411 14th Street NW to Mixed Use Moderate Density Commercial/Medium Density Residential to facilitate redevelopment of the site into new senior affordable housing and a Xi Omega center, enabling the chapter to continue its service activities.

Derrek Niec-Williams, Howard University offered support for the plan amendments and spoke specifically in support of specific amendments to the FLUM, which expand areas from institutional to a mix of use and related Generalized Policy Maps affecting Howard University's West Campus at 2900 Van Ness Street.

Patrick McAnaney, Somerset Development Company, testified in support of the plan amendments, noting that he had been involved throughout the process. He supported the plan's prioritizing walkable, transit-oriented neighborhoods, environmentally responsible development, and preserving and producing affordable housing. He supported development in Rock Creek West,

noting that the FLUM changes along with Inclusionary Zoning updates will allow public re-capture of land value. He recommended bolder actions in future rewrites.

Chris Otten, DC for Reasonable Development, testified against the proposed amendments and called for rejecting the changes, citing concerns that the amendment process was flawed, data is missing or inadequate, language changes reduce predictability and clarity, and the proposal is a rewrite, rather than a major amendment. He noted concerns about displacement of Black families and communities and supported the DC Grassroots Planning Coalition Housing Justice Priorities.

Cathy Reilly, Senior High Alliance of Parents, Principals and Educators recommended additional amendments to elements related to schools that would recommend shorter leases to maintain DCPS' ability to expand, limit public and charter co-location, prioritizes and protect public school facilities and green space and establish dates to complete DCPS modernizations.

Daniel Schramm, Brookland Neighborhood Civic Association identified goals for Brookland in the comprehensive plan and requested three corrections to the FLUM to meet those goals. He does not support the designation of the Howard Divinity Campus and the Franciscan Monastery for future mixed use development. The plan fails to designate the Brookland Green as "park space" which is inconsistent with the Brookland CUA Small Area Plan and an agreement for park protection. All of the area along Reed Street is proposed for high density development, rather than a tiered approach.

Naima Jefferson, Shepherd Park Citizens Association recommended rejecting the bill, which she characterized as a wholesale rewrite, noting also the lack of required progress reports. She did not find that increased development would result in more affordable housing. She did not think the plan effectively addresses issues of racial inequity or the current public health emergency.

Milton Shinberg, Public Witness testified about neighborhood discussions regarding proposed amendments for the Howard University Law School site on Van Ness and requested that these proposals be removed (retaining the existing FLUM) until future planning occurs. He also requested that existing open space on the site remain in that condition and provided a map.

Chris Williams, Southwest Voice shared his concerns that existing development in Southwest has already had negative impacts to renters, public housing residents, and people of color. He requested an amendment that would assess racial impact and gentrification, particularly in this area, and recommended other changes, including changes to zoning west of Rock Creek, and measures to ensure greater affordability and preventing vacancy of new housing units.

Lee Schoenecker, Public Witness testified in support of the proposed amendments. He strongly supports the recommendation to create a DC Public Facility Plan in the Community Services and Facility Element.

Thomas Houston, Medici Road testified in support and recommended that the Housing policies include a housing affordability impact statement and a racial equity impact statement that considers current and future impacts for legislative actions. He also supported incentives for the

RF-1 zone to create more affordable housing. He provided five recommendations for the Far Northeast Element.

Jimmy Lennox, Public Witness spoke to the District's history of segregation through land use policies and zoning, and recommended steps to encourage more housing, particularly for "missing middle" housing, by reducing lot sizes and parking.

Tiera Fletcher, Public Witness testified to the needs of Ward 7 for access to retail and social amenities, adequate infrastructure, and the need to effectively reuse vacant and abandoned homes to strengthen neighborhoods. When considering affordable housing, these conditions should also be considered.

Salim Adofo, 8C07 Commissioner requested additional public process and examination of the plan amendments, and requested additional plan language to address rent control, public housing, and subsidized housing to preserve and expand these areas and ensure lifetime affordability, and to end housing instability and help the unhoused. He recommended amendments in support of community led equitable development. Ward 8

Judy Berman, Capitol Hill Village requested additional plan language to address the demographics of the District's growing population of older residents and provisions to address housing choices, workforce development, facilities, services, and programs for this group. She also noted that Reservation 13 offers opportunities to include older residents. Ward 6

Edward Garnett, Public Witness supported the proposed amendments and the need for more affordable housing. He proposed amendments to increase publicly accessible green space at institutions and public facilities in Edgewood and Ward 5. He supported proposed amendments in Section 2416 related to Brookland and recommended a specific reference to the Brookland Livability Study. Ward 5

John Wheeler, Public Witness testified in support of the amendments and specifically encouraged additional development in Tenleytown adjacent to the Metro that would provide multifamily housing. Ward 3

Brian Hanes, Public Witness testified in support of the amendments, noted that he has been a renter and now a homeowner,, and that the amendments help address housing costs, for both groups. He supported passage by the end of the year, and any amendments that increase housing production. Ward 3

Jose Barrios, DC for Democracy provide his organization's request for changes to the Housing Element to support more housing production for lower income households, to gather data on racial and income equity, to strongly support preserving existing affordable housing, and keep in language regarding land trusts, and recognize the importance of land value recapture.

Judy Estey, The Platform of Hope testified in support of the Grassroots Planning Coalition Housing Justice priorities, and the need to meet affordable housing while addressubg displacement and disparities, particularly for low income residents, and people of color, and their neighborhoods.

Rashida Brown, Commissioner ANC 1A testified in support of the bill. She specifically supported plan amendments for the Park Morton site and related areas, noting that ANC1A supports the Park Morton redevelopment and the temporary park space as the Build First site given the project's housing production for seniors, 60 % AMI households, and Park Morton replacement units.

Michael Wray, Commissioner ANC 1A testified in support of the proposed amendments. He noted that six of nine ANC 1 recommendations were incorporated into the plan, and they increase density on corridors and at underused sites.

Jason Clock, Commissioner ANC 1A urged passage of the bill, and noted the need for various transportation, safety, and park improvements.

Christine Miller, ANC 1A requested a correction to allow left turns from northbound 16th Street onto westbound Park Road. She noted this was part of the Mt. Pleasant/Columbia Heights Transportation study listed as "complete", but this issue has subsequently been an issue due to the elimination of left hand turns on 16th Street proposed by the 16th Street NW Transit Priority Planning Study.

Kay Pierson, Community Reinvestment Division, United Planning Organization spoke in support of proposed amendments and the position of the Housing Priorities Coalition. She noted the plan proposes affordable housing in all areas of the District, which begins to address racial disparities in access. She also noted passage of the bill would assist other developments advance.

Peyton Gibson, Public Witness testified in support of the plan, noting it addresses safety issues, promotes equity, and enhances quality of life. Ward 2

Adjoa Aiyetoro, NCBL Unhoused Collective requested greater substance, specificity, and higher priority in the plan regarding the goal of "ending homelessness." He noted support for the Grassroots Planning Coalition priorities.

Gale Black, Chair, ANC 4A08 testified in opposition to the bill. She encouraged more attention to the ANC recommendations; inclusion of streets, bridges and alleys in the Infrastructure element; more focus on environmental issues, especially stormwater impacts for Rock Creek East; conserve neighborhoods; address inconsistencies in converting public land for private use; and consider the example of the city of Paris.

Kamolika Das, Public Witness testified in support of the plan amendments and noted the importance of more opportunities for housing and affordable housing in Ward 3.

Rebecca Miller, DC Preservation League testified in opposition to the proposed bill, noting that the proposed amendments undermine the District's historic preservation law, stating that affordable housing and historic preservation are compatible. She was concerned with language changes replacing "protect" with "respect" in regards to historic resources, as well as other changes removing directive language creating a "word soup."

Jim Schulmann, Alliance for Regional Cooperation testified that the bill is not ready for adoption. He supported the Grassroot Planning Coalition's Housing Justice Priorities. He noted several concerns including a lack of specific approaches to address equity, infrastructure buildout in relation to zoning capacity, directive language changes, and retention of District controlled lands.

Marc Poe, Public Witness testified in support of protecting the Bruce Monroe Community Park and against the proposed amendments related to this site and the Park Morton development.

Suzanne Wells, Ward 6 Public Schools Parent Organization spoke to the Education Facilities Element and offered five suggestions for improvements. These include goals, concern about excess school capacity, modernizing and maintaining schools, a net zero energy goal for new schools, impact studies for location decisions, and removing 1208.15 which encourages co-location of charter schools in underenrolled DCPS schools.

Carlene Reid, Ward 8 Education Council requested changes to the Education Facilities and Far Southeast and Southwest Elements, noting varied responses by OP to ANC requests. These changes addressed community engagement, equitable development, vocational programming, school co-location and fund allocation.

Guy Durant, 200 Footers testified in opposition to the proposed amendments that affect the 901 Monroe site and requested that they remain as currently listed, and spoke in opposition to the proposed development at the site.

Lorenz Wheatley, Public Witness noted his role as petitioner in the Josephite Seminary PUD case, where the court did not respond to his concerns regarding gentrification as a significant issue. He testified in opposition to the bill, provided suggestions, and supported the Grassroots Planning Coalition priorities.

Ari Eisenstadt, Audubon Naturalist Society testified that the plan amendments address the climate crisis and environmental sustainability, but that true environmental justice is where these healthier, sustainable communities are available to all. He encouraged strategies to address long-standing patterns of racial displacement, including community led engagement and equitably implementing strategies to increase housing density.

Frederika Kramer, Commissioner, ANC6D05 stated on behalf of the ANC that the plan amendments do not fully capture the goal of the Southwest Area Plan as a model of equity and inclusion that prioritizes affordable housing, including subsidized housing, family housing, and use of District-controlled parcels to gain 20-30% affordable housing, raising concerns that there are insufficient commitments and tools to achieve these goals.

Samantha Lee, Public Witness testified against the bill as written. She did not think it sufficiently addressed displacement, racial equity, community leadership, or address the need for deeply affordable and public housing. Ward 1

Adom Cooper, Public Witness testified in opposition to the bill as proposed. He recommended strengthening directive language, analyzing real housing needs, and using the proposals of the Grassroots Planning Coalition. He noted the reported displacement of Black residents, the lack of maintained, adequate housing for the most vulnerable District households.. Ward 6

Emily Vaias, Ballard Spahr presented a request to modify the FLUM for the Comubia Plaza property at 2400 Virginia Avenue, NW for high-density commercial. She also supported permissive language as consistent with the plan's use as a guide, the need to recognize economic development as an asset, and the regional need for more housing. Ward 2

Diane Quinn, Public Witness testified against the bill as written, and recommended that the plan need to be strengthened by language to fortify existing housing programs, require more deeply affordable housing development, and require community led equitable development strategies to further racial equity.

Robert Miller, Miller Development submitted a request to amend the FLUM for 711 Edgewood Street, NE (currently PDR) to a Mixed Use PDR/Moderate Density Residential/Low Density Commercial designation, and to change the Generalized Land Use Map to show this as a Land Use Change Area. OP did not advance this request, submitted earlier. Ward 5

Faith Wheeler, Public Witness spoke to the inflection point created by COVID-19, the need to address the underlying conditions creating inequity, addressing stable, safe and affordable housing while also addressing all of the issues necessary for equity, the need to address global warming. Citing these issues, she recommended rewriting the proposed amendments. Ward 5?

Terry Gould, Public Witness requested greater commitments to maintain, preserve, redevelop and build public housing and spoke in support of the Grassroots Planning Coalition's Housing Justice Priorities. He expressed concerns over proposed inclusionary zoning requirements, supported greater accountability and transparency, and supported community led equitable development models.

Gerry Widdicome, Downton Business Improvement District, submitted testimony in support of the proposed plan amendments, noting that it will encourage housing and affordable housing production, improve the tax base, and provide clearer guidance to the Zoning Commission. Ward 2

Benjamin Preis, Public Witness testified in support of adopting the proposed amendments without change by the end of 20202.

Jason Spencer, Property Group Partners testified in support of the proposed bill and noted the importance of growth and development. He also encouraged careful consideration as to how the amendments support the Planned Unit Development process, noting the benefits from this approach with projects such as Capitol Crossing.

Timothy Freeman, Trinity AME Zion Church requested a change to the FLUM to designate their property on Meridian Street, NW as Medium Density Residential. This would help them develop the site with affordable housing. Ward 1

Ari Theresa, Stoop Law testified in opposition to the proposed bill. He raised concerns that the plan is a continuation of practices for new development to displace existing Black neighborhoods.

Robyn Diener, Public Witness testified in opposition to the proposed bill, noting it is too long and cumbersome. She proposed various strategies to achieve more affordable housing, including fuller use of public lands, use of a public bank, converting office to housing uses, stronger directive language, ADU's, public facility co-location, use of vacant units, and more small area planning.

Ann Hoffman, Public Witness testified in opposition to the proposed plan amendments, stating that it does not address public housing needs, rent control, ending homelessness, or addressing the impacts of COVID 19. Further, it does not address racial equity, directive language should be re-instated, and the growth projections need revising.

John Healy, Public Witness testified in opposition to the proposed plan amendments noting flaws in growth projections, the impacts of COVID 19, the lack of infrastructure and service provisions, and insufficient direction for affordable, and deeply affordable housing.

Robyn Russell, Public Witness testified in support of the proposed bill, as well as any amendments that encourage additional housing, particularly in the western side of the city, and language that improves comprehensive planning procedures. Ward 5

Judith Kennedy, Public Witness testified against the proposed bill, and specifically provisions relating to Cleveland Park. She stated that the language weakens historic preservation provisions and would allow excessive density. Ward 3

Tom Quinn, Commissioner, ANC3E04 testified on behalf of the ANC in general support of the plan, noting that the Tenleytown and Friendship Heights areas have some of the most significant FLUM changes. The ANC was actively involved in the amendment process and supported increased density but had proposed modifications and requested a small area plan, described in attached resolutions. They requested consideration of comments OP did not incorporate, as well as an expedited small area plan.

Wanda Thomas, Public Witness testified that the plan must retain directive language, especially for deeply affordable housing; respond to rent control, rent stabilization, and public housing needs; address vacancies; and aggressively act to prevent displacement of long-time residents. She spoke to the need for grocery stores in Ward 8 and requested public roundtables and community led public processes, particularly for Ward 8 residents.

Aaron Sege, Public Witness testified in support of the proposed amendment, noted the need for greater affordable housing, and encouraged OP to begin rewriting the plan by 2022.

The Committee also received extensive written submissions for the record.³ These can be broadly categorized as follows: individuals testifying in opposition to proposed developments; individuals testifying in support of the position of the Grassroots Planning Coalition; and individuals testifying to advance the Comprehensive Plan quickly and as submitted by the Mayor. Other submissions requested various changes to the FLUM designations and/or text amendments, or spoke to specific issues related to housing, the environment, transportation

VI. IMPACT ON EXISTING LAW

Bill 24-1 repeals and replaces Chapters 1, 3 through 25, the Implementation Table, the Future Land Use Map and the Generalized Policy Map of the District of Columbia Comprehensive Plan Act of 1984, effective April 10, 1984 (D.C. Law 5-76; D.C. Official Code § 1-306.01 *et seq.*) The attached Bill reflects the proposed amendments to the District of Columbia Comprehensive Plan with the purpose of completing a second amendment cycle to update maps, update and provide new policies, establish new actions to advance the Comprehensive Plan policies, correct technical errors, provide current data on a variety of planning topics, incorporate information and guidance from adopted District plans, small area plans, studies, other documents, and various initiatives relating to planning topics, and reflect current District planning priorities and best practices.

VII. FISCAL IMPACT

The attached April 20, 2021 fiscal impact statement from the District's Chief Financial Officer (CFO) states that xxx.

VIII. SECTION-BY-SECTION ANALYSIS

- Section 1 States the short title of Bill 24-1.
- Section 2 Amends the District of Columbia Comprehensive Plan Act of 1984, effective April 10, 1984 (D.C. Law 5-76; D.C. Official Code § 1-306.01 *et seq.*), to repeal and replace Chapters 1 and 3 through 25 and the Implementation Table along the Future Land Use Map and the Generalized Policy Map, with the attached District Elements of the Comprehensive Plan and maps as submitted by the Mayor on January 4, 2021, as further amended by the Council, and passed on xx.
- Section 3 Amends Section 1104 (a) of The School Based Budgeting and Accountability Act of 1998 (D.C. Law 12-175, effective March 26, 1999; D.C. Official Code 38-2803 (a)) to provide additional direction on

³ The written testimony, transcribed testimony, and views submitted for the record are available at a <http://chairmanmendelson.com/cow/compplan/>.

submitting the Master Facility Plan for public education facilities for Council approval.

Section 4 Direct the preparation of a Production Distribution and Repair Land Retention Study by the Office of Planning.

Section 5 Provides a publication requirement exemption.

Section 6 Establishes that the District Elements shall not apply until review by the National Capital Planning Commission is complete, pursuant to the National Capital Planning Act and the District of Columbia Home Rule Act.

Section 7 Fiscal Impact Statement.

Section 8 Establishes the effective date by stating the standard 30-day Congressional review language.

IX. COMMITTEE ACTION

On April 20, 2021, the Committee met to consider Bill 24-1, the “Comprehensive Plan Amendment Act of 2021.” XXX

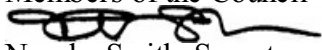
X. ATTACHMENTS

1. Bill 24-1 as introduced.
2. Written Testimony.⁴
3. Fiscal Impact Statement for Bill 21-334.
4. Legal Sufficiency Determination for Bill 24-1.
5. Racial Equity Impact Analysis for Bill 24-1.
6. Comparative Print for Bill 24-1.
7. Committee Print for Bill 24-1.

⁴ Available as part of the public record of Bill 23-736 at <https://lims.dccouncil.us/Legislation/B23-0736>.

COUNCIL OF THE DISTRICT OF COLUMBIA
1350 Pennsylvania Avenue, N.W.
Washington D.C. 20004

Memorandum

To : Members of the Council

From : Nyasha Smith, Secretary to the Council
Date : Monday, January 4, 2021
Subject : Referral of Proposed Legislation

Notice is given that the attached proposed legislation was introduced in the Office of the Secretary on Monday, January 04, 2021. Copies are available in Room 10, the Legislative Services Division.

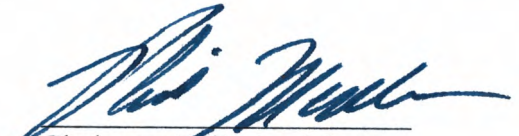
TITLE: "Comprehensive Plan Amendment Act of 2020", B24-0001

INTRODUCED BY: Chairman Mendelson as submitted by the Mayor

The Chairman is referring this legislation to Committee of the Whole.

Attachment

cc: General Counsel
Budget Director
Legislative Services


Chairman Phil Mendelson
as submitted by the Mayor

1
2
3
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7 A BILL
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12 IN THE COUNCIL OF THE DISTRICT OF COLUMBIA
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16 To amend the District of Columbia Comprehensive Plan Act of 1984 to establish and update a
17 broad range of goals, policies, and actions to guide public decisions by both District and
18 federal agencies.
19

20 BE IT ENACTED BY THE COUNCIL OF THE DISTRICT OF COLUMBIA that this
21 act may be cited as the “Comprehensive Plan Amendment Act of 2020.”

22 Sec. 2. The District of Columbia Comprehensive Plan Act of 1984, effective April 10,
23 1984 (D.C. Law 5-76; D.C. Official Code § 1-306.01 *et seq.*), is amended as follows:

24 (a) Chapters 1 and 3 through 25 of Section 3 (10-A DCMR §§ 100.1 *et seq.* and
25 300.1 through 2500.1 *et seq.*) are repealed and replaced by the District Elements of the
26 Comprehensive Plan for the National Capital submitted by the Mayor to the Council on XX,
27 2020. The text and graphics of the submittal are incorporated into and deemed a part of this act
28 as if contained herein.

29 Sec. 3. Publication requirement exemption

30 Notwithstanding section 9 [*effective date*], subsection 308(b) of the District of Columbia
31 Administrative Procedure Act, effective March 6, 1979 (D.C. Law 2-153; D.C. Official Code §
32 2-558(b)), and section 204 of the District of Columbia Administrative Procedure Act of 1975,

1 October 8, 1975 (D.C. Law 1-19; D.C. Official Code § 2-602), the text, maps, and graphics of
2 the District elements of the Comprehensive Plan for the National Capital, as amended by this act,
3 need not be published in the District of Columbia Register to become effective.

4 Sec. 4. Applicability.

5 No District Element of the Comprehensive Plan for the National Capital shall apply until
6 it has been reviewed by the National Capital Planning Commission as provided in section 2(a) of
7 the National Capital Planning Act of 1952, approved June 6, 1924 (43 Stat. 463; D.C. Official
8 Code § 2-1002(a)), and section 423 of the District of Columbia Home Rule Act, approved 24,
9 1973 (87 Stat. 792; D.C. Official Code § 1-204.23).

10 Sec. 5. Fiscal impact statement.

11 The Council adopts the fiscal impact statement in the committee report as the fiscal
12 impact statement required by section 602(c)(3) of the District of Columbia Home Rule Act,
13 approved December 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(3)).

14 Sec. 6. Effective date.

15 This act shall take effect following approval by the Mayor (or in the event of veto by the
16 Mayor, action by the Council to override the veto), a 30-day period of Congressional review as
17 provided in section 602(c)(1) of the District of Columbia Home Rule Act, approved December
18 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(1)), and publication in the District of
19 Columbia Register.

**EVEN IF SPECIAL LEGISLATION AND ORGANIZED
RELIEF INTERVENE, FREEDMEN ALWAYS START LIFE
UNDER AN ECONOMIC DISADVANTAGE WHICH
GENERATIONS, PERHAPS CENTURIES,
CANNOT OVERCOME.**

- W.E.B. Du Bois

**Achieving a racially equitable society requires policies and actions
that intentionally disrupt structural and institutional racism.**



BILL 24-0001
RACIAL EQUITY IMPACT ASSESSMENT
COMPREHENSIVE PLAN AMENDMENT
ACT OF 2020

TO: The Honorable Phil Mendelson, Chairman, Council of the District of Columbia
FROM: Dr. Brian McClure, Director, Council Office of Racial Equity
DATE: April 19, 2021

A handwritten signature in black ink, appearing to read "Brian McClure", is written over the "FROM:" line.

COMMITTEE

Committee of the Whole

BILL SUMMARY

Bill 24-0001, the “Comprehensive Plan Amendment Act of 2020,” establishes and updates a broad range of guidance, policies, and actions concerning the District’s short and long-term growth.

CONCLUSION

As introduced, Bill 24-0001 will exacerbate racial inequities in the District of Columbia.

The Committee Print, the draft amended by Chairman Mendelson’s office and under consideration by Council, makes impactful and significant changes to the Comprehensive Plan. These changes elevate racial equity as a policy priority and state that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan’s sheer size reduces the impact of the Committee Print’s positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Comprehensive Plan, as introduced, fails to address racism, an ongoing public health crisis¹ in the District. As introduced, it appears that racial equity² was neither a guiding principle in the preparation of the Comprehensive Plan, nor was it an explicit goal for the Plan’s policies, actions, implementation guidance, or evaluation. These process failures laid the groundwork for deficiencies in policy: proposals are ahistorical, solutions are not proportionate to racial inequities, and directives are concerningly weak or vague.

The Committee Print makes positive changes, perhaps the most impactful of which are to process—significantly multiplying their impact. In the Print, Small Area Plans should be conducted using a racial equity lens and the Zoning Commission must develop a process to consider all cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. However, in sum, the Plan’s size reduces the impact of the Print’s positive changes. Despite the Plan’s commitment to eliminating racial inequities, the document before us perpetuates the status quo.

This assessment intends to inform the public, Councilmembers, and Council staff about how land use decisions impact Black communities and other communities of color. While CORE’s final assessment does not represent our opinion of whether the bill should proceed, we hope it 1) fosters dialogue on the Print and 2) is used to move towards a more racially equitable *administration* of the Plan by residents, the Zoning Commission, executive agencies, and the Council. This would lay the foundation for a more racially equitable 2026 rewrite of the Plan which—both in process and in substance—must lead with racial equity.

¹ Resolution R23-0602, the [Sense of the Council to Declare Racism A Public Health Crisis in the District of Columbia Resolution of 2020](#), Effective from December 1, 2020. Published in the [DC Register](#) Volume 67, page 1406.

² For reference, see glossary of terms following the Appendix.

BACKGROUND

Structural and institutional racism led to stark racial inequities between the District’s Black and white residents. These racial inequities are among the worst in the country. In 2017, thirteen percent³ of Black residents were [unemployed](#), over four times the rate of white residents. In that same year, the median [hourly wage](#) for Black residents was \$23, while it was \$39 for white residents. Forty nine percent of white households in DC [own a home](#), while only thirty five percent of Black households and thirty percent of Latinx households are homeowners. Further, since the Comprehensive Plan last passed in 2006, at least 20,000 Black residents [have been displaced](#) from the District.

Since 2006, the [poverty](#) rate increased for Black residents. [Jobs](#) and [schools](#) remain highly segregated. Black residents [experience homelessness](#) at a rate disproportionate to the racial makeup of DC, [educational gaps](#) persist across racial and ethnic groups, and [the net worth](#) of white households in DC is eighty one times higher than that of Black households.

In 2020, COVID-19 added a public health emergency on top of the existing public health crisis of racism. These two crises exacerbated existing racial inequities and have created new ones: both COVID-19 and its impact have disproportionately devastated [Black communities](#) and [other communities of color](#).⁴ In the District, Black residents [are dying](#) of COVID-19 at a rate [disproportionate](#) to the racial makeup of DC. Nationally, Black [life expectancy](#) dropped by three years. Black owned businesses are [closing at higher rates](#) and have received less federal and [local government assistance](#). The [learning loss](#) that followed the transition to online learning in March of 2020 also disproportionately affected Black students.

It is also critical to consider [changes to the District’s population](#) over time. At its peak, Washington, DC was over seventy percent Black, leading George Clinton of The Parliament and others to refer to the nation’s capital as “Chocolate City.” In 2015, for the first time in decades, the Black majority [dropped below](#) fifty percent. The DC Policy Center and Council Office of Racial Equity (CORE)’s [DC Racial Equity Profile](#) highlights how since 2010, the District gained over 104,000 residents. Through 2017, most of this growth was in-migration of mainly young white people with advanced degrees, alongside a decline in the share of DC’s population that is Black (Figure 1).⁵ Moreover, the District remains highly racially and economically segregated, with most of the District’s Black, Latinx, and Asian and Pacific Islander residents living in Wards 1, 4, 5, 7, and 8.

It is against this backdrop that CORE reviewed the guidance, policies, and actions proposed in the Plan.

³ CORE aims to center accessibility in our writing. While this REIA’s approach towards accessibility is not exhaustive, you may find that we intentionally examine patterns such as spelling out statistics and interrogating the use of hyphenation in our writing habits.

⁴ When CORE talks about “communities of color,” we are referring to Black, Indigenous, Latinx, Asian American, Pacific Islander, and Native Hawaiian populations. We do so while acknowledging that each community of color has a unique history and experience of racism in the United States, and particularly, in the District of Columbia. While it is sometimes more efficient to reference “communities of color” in narrative text, policies and actions must respond to the [historical trauma](#) each community has faced by naming individual communities.

⁵ Between 2010 and 2017, the District’s Black population [increased by](#) 14,000 people. Native Americans’ population growth in the District declined over this period. Compared to all other racial groups, however, Black in-migration occurred at a much slower pace.

FIGURE 1

The proportion of Black residents has decreased since 2000, while most other racial groups have experienced population proportion increases.

RACE/ETHNICITY	POPULATION			PERCENTAGE POINT CHANGE FROM 2000 TO 2019
	2000	2010	2019	
WHITE	30.78%	38.48%	42.52%	↑ 12
BLACK	60.01%	50.71%	45.44%	↓ 15
HISPANIC	7.86%	9.10%	11.26%	↑ 3
ASIAN	2.13%	3.65%	4.07%	↑ 1
AMERICAN INDIAN OR ALASKAN NATIVE	0.30%	0.35%	0.27%	↓ 0
NATIVE HAWAIIAN OR PACIFIC ISLANDER	0.06%	0.05%	0.03%	↓ 0
TWO OR MORE RACES	2.35%	2.88%	3.30%	↑ 1
OTHER	3.84%	4.05%	4.37%	– 0

↑ Increase ↓ Decrease – No Change

NOTE Race categories identify percentages of the population that selected a single race, or a single race and Hispanic.

SOURCE The US Census Bureau

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WHAT IS THE COMPREHENSIVE PLAN?

- **The Comprehensive Plan guides the District’s long-term growth by setting policies on topics such as land use, housing, economic development, infrastructure, and the environment.**
- **The document is used by the District’s Zoning Commission—their decisions must be found to be *not inconsistent* with the Comprehensive Plan.**
- **The Plan is also used by stakeholders such as the Office of Planning, other District agencies, developers, and residents to ensure the District moves forward collectively.**
- **The latest Plan was written in 2006 and amended in 2011. The Office of Planning began its most recent public amendment process in 2016. After gathering public input, the Office of Planning transmitted its proposal to the Council in April 2020 as Bill 23-0376.**
- **In 2021, the bill was reintroduced as Bill 24-0001.**

The Comprehensive Plan guides the District’s long-term growth, shaping many aspects of residents’ lives. For example, the Plan describes how the District should balance competing demands for land, encourage retail expansion, use schools to meet nonacademic needs in their neighborhoods, and support efficient and environmentally friendly transportation choices.

This sweeping document is written every twenty years and is amended during the years between. The latest Comprehensive Plan was written in 2006 and amended in 2011. In 2016, the Office of Planning (OP) began another amendment process. The agency’s amendments—also referred to as the introduced version or

Mayor’s Proposal—were submitted to the Council of the District of Columbia in April 2020. After public hearings on the proposal in November 2020, the proposal was further amended by Chairman Mendelson. This version—the Committee Print—is the version currently before the Council in spring of 2021.

The Plan has 25 chapters (called elements) and two maps—the Future Land Use Map (FLUM) and the Generalized Policy Map (GPM). The elements are as follows:

ELEMENT	ELEMENT TYPE	DESCRIPTION
1	INTRODUCTION	This element covers the plan’s legal basis, outlines its history and role in planning, and provides an overview of its content.
2	FRAMEWORK ELEMENT	This element was introduced in 2018. Its second and final reading was in October 2019, and it passed independently of the rest of the Comprehensive Plan in February 2020. It is the plan’s foundation. It describes the forces driving change in the city, describes the District’s growth forecasts and projections, ties the Plan to the “Vision for Growing an Inclusive City,” and provides an overview of the plan, the plan’s role, and the attached maps.
3-14	CITYWIDE ELEMENTS	These elements address District-wide topics such as land use, transportation, housing, educational facilities, historic preservation, environmental protection, and economic development, among others.
15-24	AREA ELEMENTS	These elements describe the history, land use composition, demographics, housing characteristics, planning and development priorities, and policies specific to the District’s ten planning areas. For example, these include Upper Northeast, Far Northeast and Southeast, Near Northwest, and Rock Creek East, among others.
25	IMPLEMENTATION ELEMENT	This element “describes how the Comprehensive Plan’s recommended actions are to be carried out, and by which government agencies.” ⁶ This element also includes time frames indicating whether an action is ongoing or should be completed immediately, in the short-, medium-, or long-term, or is complete or obsolete.
MAP #1	FUTURE LAND USE MAP	The Future Land Use Map, often referred to as the FLUM, shows “anticipated future land uses.” These could align with current land uses or they could be different. For example, this could show an area change from a “residential-moderate density” zone to a “residential-moderate density” <i>and</i> “commercial-moderate density” zone.
MAP #2	GENERALIZED POLICY MAP	This map highlights future areas of resilience and planning analysis.

HOW DID CORE REVIEW THE COMPREHENSIVE PLAN?

This Racial Equity Impact Assessment (REIA) primarily evaluates how the Comprehensive Plan’s proposed policies and actions will improve outcomes for Black residents and other communities of color, exacerbate racial inequities, or maintain the racially inequitable status quo.

CORE customized our approach given the Comprehensive Plan’s unique qualities. The customized approach builds on [our typical practices](#), but tailors to the document’s length, number of topics covered, role in the District’s zoning decisions, and the timing of our assessment.

⁶ [Introduction Element](#), Mayor’s Comprehensive Plan Update Proposal.

CORE assessed the Committee Print in comparison to the introduced version of the bill.

Since 2006, there have been three versions of the Comprehensive Plan. The first version was passed in 2006 and slightly amended in 2011. The creation of the second version was led by the OP. The Office of Planning submitted this draft to the Council in April 2020 on behalf of Mayor Muriel Bowser’s Administration. This version was “introduced” as Bill 23-0736. Chairman Mendelson and his staff further edited this draft to create the third Comprehensive Plan update proposal, known as the Committee Print. The Committee Print was shared internally with Councilmembers and Council staff on April 14, 2021 and is the draft under consideration by the Council.

Our REIA process began with assessing the introduced version of the bill (the proposal led by the OP). We considered how the introduced version does, does not, or could advance racial equity. We provided the Chairman with a preliminary racial equity impact analysis of the

introduced version, which is summarized in detail in the Appendix of this document. We then reviewed the Committee Print in comparison to the introduced version. Both our preliminary analysis of the introduced version and our assessment of the Committee Print are included below. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Our analysis is based in historical context.

To understand the present, we must contextualize it in our past. We consult history to understand why racial inequities exist. What policies, decisions, actions, and sentiments explain how different racial groups experience life today?

Our analysis evaluates policies using the “Groundwater Approach.”

The [Groundwater Approach](#) aims to treat systems,⁷ not just problems at the individual level. The approach is grounded in three ideas: 1) that white supremacy ideology operates the same across systems; 2) socioeconomic difference does not explain racial inequity; and 3) inequities are caused by systems, regardless of people’s culture or behavior. Using the Groundwater Approach, a city in a housing crisis would not only

DATE	EVENT	VERSION
2006	The most recent full rewrite of the Comprehensive Plan is published.	1
2011	Minor amendments are made to the Comprehensive Plan.	
2016	The Office of Planning begins the Comprehensive Plan amendment process.	2
FEBRUARY 2020	The Framework Element (Chapter 2 of the Plan) is signed into law.	
APRIL 2020	The Office of Planning submits their proposed amendments to the 2006 Comprehensive Plan on behalf of Mayor Muriel Bowser’s administration. This submission is referred to as the introduced version of the bill and is numbered Bill 23-0736: Comprehensive Plan Amendment Act of 2020 .	
NOVEMBER 2020	The public testifies before Council on November 12th and 13th about the introduced version of the Plan.	
JANUARY 2021	The Plan is re-introduced in Council Period 24 as Bill 24-0001: Comprehensive Plan Amendment Act of 2020 .	
APRIL 2021	Chairman Mendelson releases the Committee Print for review by the Committee of the Whole.	3

⁷ These systems include structural and institutional racism. [Structural racism](#) is a system in which public policies, institutional practices, cultural representations, and other norms work in various, often reinforcing ways to perpetuate racial group inequity. It identifies dimensions of our history and culture that have allowed privileges associated with “whiteness” and disadvantages associated with “color” to endure and adapt over time. [Institutional racism](#) refers to policies, practices, and procedures that work better for white people than for people of color, often unintentionally.

provide temporary shelter to individuals experiencing homelessness. Rather, the city would *also* seek to understand and address the underlying—or groundwater—issues that sustain and cause homelessness.

Our analysis evaluates policies through a racial equity lens.

In addition to considering how history led to present conditions, we analyze proposed policies through a racial equity lens, which can be thought of as a prism. Looking through different sides of this prism could mean asking one, several, or all the following questions:

RACIAL EQUITY ANGLE	POSSIBLE QUESTIONS
EXPERIENCES OF EACH RACIAL AND ETHNIC POPULATION	How does each racial and ethnic group currently fare given the outcome this policy aims to improve? Which racial and ethnic groups would be most affected by this policy? Does the policy address these differences? If so, does the policy consider each community differently or are groups incorrectly lumped together? How proportionate is the policy to the inequities faced by each racial and ethnic group?
HISTORICAL LEGACIES OF RACISM AND RACIAL TRAUMA	Why do different racial and ethnic groups fare differently when we examine the outcome of interest? Which of these historical legacies continue to be implicated today, either via the policy at hand or in how the policy might be perceived?
RACIALLY EQUITABLE REPRESENTATION AND ENGAGEMENT	Who does the current feedback system favor? Who was “at the table” when decisions were made and who was at the table but did not have institutionally or socially recognized power to influence decisions? Who wasn’t but should have been? Who could have feasibly been there? Who was proactively invited? Whose lived experience was centered? Whose lived experiences are ignored? What advantages and disadvantages do different parties have when they are “at the table” and how do those parties look from a racial and ethnic perspective?
ASSESS DIFFERENT FORMS OF DISCRIMINATION	What do the eligibility and application processes for services and programs look like? In what ways are they inclusionary, in what ways are they exclusionary, and to whom? How are these processes being monitored for bias?
DIFFERENCES IN OUTPUTS⁸ FOR RACIAL AND ETHNIC GROUPS	What are the outputs of interest (or progress indicators) for this policy? What could the outputs be for each affected racial and ethnic population? Might the outputs be different across groups? Why? Does the policy indicate that outputs will be monitored and addressed?
DISPARATE RACIAL AND ETHNIC OUTCOMES	What could be the impact of this program or policy on each affected racial and ethnic population? Might the impacts be different across groups? Why? Is there an indication that outcomes will be monitored and addressed?

Framework adapted from [The State of Equity Measurement](#) (The Urban Institute) and [Using a Racial Equity Scorecard for Policy and Programs](#) (Bread for the World Institute).

If we determined that a policy exacerbates racial inequity (or has the potential to), we explain why. We then provided direction on how to revisit or analyze the policy with a racial equity lens.

⁸ An “output” is an easily measurable indicator related to a program or policy’s activities. An “outcome” is the true goal of the program or policy. For example, a student attendance program would measure the number of days a student is in school as an *output* to better understand how the program is affecting the *outcome* of better school performance. Policymakers and implementers must keep an eye on both.

Our analysis focused on the Plan’s most critical elements.

Every element in the Comprehensive Plan has the potential to impact Black residents and other residents of color. However, we focused on elements that 1) could have the most *profound* impact on Black residents and other residents of color and 2) were the most influential given the Comprehensive Plan’s role in zoning. These guidelines led the CORE team to conduct an in-depth, line-by-line analysis of the following elements (chapter numbers in parentheses):

- Land Use (3)
- Transportation (4)
- Housing (5)
- Environmental Protection (6)
- Economic Development (7)
- Parks, Recreation, and Open Space (8)
- Educational Facilities (12)
- Infrastructure (13)
- Implementation (25)

SUMMARY OF RACIAL EQUITY IMPACT THEMES

Several recurring themes prevent the Comprehensive Plan (as introduced) from advancing racial equity. We hope that these themes can be used as a resource by Councilmembers, the public, and the executive in applying a racial equity lens to review the Committee Print. The eight themes are listed below and are elaborated on over the following pages.⁹

P O L I C Y	1	As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.
	2	As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.
	3	As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.
	4	Vague and ambiguous language leaves room for interpretation that may widen racial inequities, harming the District’s Black residents and other residents of color.
P R O C E S S	5	As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.
	6	As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.
	7	As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.
	8	As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.

⁹ Please keep in mind the examples below are based on the introduced version and illustrate how we arrived at the stated themes. In many instances, these examples have been modified in the Committee Print.

HISTORICAL AND COMPREHENSIVE CONTEXT

ISSUE

As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.



The Plan oversimplifies, glosses over, omits, and disguises defining moments in history. The continued displacement of and discrimination against Black residents and [other communities of color](#) is largely ignored. Policies stemming from this inaccurate context will not—and cannot—address racial inequity.

BEST PRACTICE

Achieving racial equity requires acknowledging and accounting for historical trauma. In addition, to address racial inequities, we must acknowledge the full context of our present.



The past explains why Black communities and other communities of color experience widened racial divides to this very day. Recount history fully—especially when the truth is tough—and take a comprehensive look at our present when beginning the policymaking process.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 512.2

As introduced, this section reads, “in the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.” The section mentions redlining—which is critical when discussing housing policy—but then [omits that home loan funds](#) were withheld from Black residents and people of other ethnicities. Ignoring the past will not erase [its audacities](#); this policy [impacts Black residents to this day](#).

ADDITIONAL EXAMPLE | PARKS, RECREATION, AND OPEN SPACE ELEMENT

There is a lack of consideration for the unhoused population who utilize parks and open spaces in the District. The Parks, Recreation, and Open Space Element fails to mention the [unhoused population](#), many of whom encamp in District parks. In fact, eighty six percent of the [unhoused population in the District](#) are Black, although only forty seven percent of the District’s population is Black. Still, the element does not account for their experiences or needs.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

Section 312.1 of the Land Use Element ignores how [discriminatory government sanctioned practices](#) led to DC being one of the most segregated cities in the nation. The section only notes that, “many of Washington, DC’s neighborhoods were developed before 1920 when its first zoning regulations were applied.” This overlooks how prior to the 1920s, wealthy property owners and developers used [racially restrictive covenants](#) and the courts to wield tremendous influence in designing the District. This often unchecked

power was reinforced by court rulings such as [Costin v. Washington](#) and paved the way for [restrictive covenants post-1920](#) to become commonplace.¹⁰

HOW THE COMMITTEE PRINT ADDRESSES HISTORICAL AND COMPREHENSIVE CONTEXT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s efforts to include a more historically informed and comprehensive narrative in the Comprehensive Plan.

Initially, the introduced version was ahistorical, neglecting to mention or fully discuss critical moments and patterns that shaped the District. The Committee Print now discusses the role of highways in displacing Black communities (Section 400.11), the discrimination inherent in the creation of Metrorail (400.11), and the District’s role in reducing affordable housing options (510.3). In addition, the investment in the area around the Columbia Heights Metro station was portrayed as a pure “success story” without mentioning the displacement of Black and Latinx residents, but the Committee Print now adds this missing context (506.3).

The Committee Print also added a new action to the Land Use Element (Action LU-2.1.C) requiring additional study, public engagement, consideration of the District’s history of systemic racism and distinct land use and housing patterns. The purpose of this study is to help provide policymakers with a better understanding of how policies have created inequities, best practices to address land use inequities, and encourage more equitable development objectives.

The introduced version was also selective in the context it provided about the present. Now, the Committee Print’s Economic Development Element addresses income and wealth gaps (700.6*¹¹, 703.2).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹⁰ *Costin v. Washington* (Case No. 3,266) – Oct. Term, 1821 – [The Federal Cases: Comprising Cases Argued and Determined in the Circuit and District Courts of the United States](#), accessed April 2021.

¹¹ If a section number is marked with an asterisk, it denotes a new section that was added in the Committee Print. Please note that as the Print was drafted, section numbers may have shifted.

RACE NEUTRAL POLICIES

ISSUE

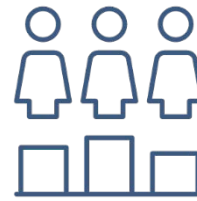
As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.



Passing race neutral policies today perpetuates the past. Simply, if racist policies have led to white communities having “more” and communities of color having “less,” treating everyone the same today will not change that inequity. Unfortunately, the introduced Plan does just that: its proposed solutions are not in proportion to racial inequities and focus on equality and inclusivity.

BEST PRACTICE

Tailor policies to address racial inequities by [acknowledging](#) how Black communities and other communities of color have their own distinct history, experiences, and relationship to white supremacy.



When designing policies, consider how different racial groups may be affected based on their history and current experiences. Write policies with [community- and circumstance-specific](#) solutions that treat communities equitably rather than equally (by providing everyone the same solution). Ensure that relevant outputs and outcomes are monitored for disparate impacts.

ILLUSTRATIVE EXAMPLE | ECONOMIC DEVELOPMENT ELEMENT | SECTION 703.15

This policy cites the District’s goal to “support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance” and a range of other tools. This policy would provide the same level of support to *all* local entrepreneurs—despite the fact that Black owned businesses [make up less](#) than fourteen percent of total businesses in the District, while Black residents make up forty five percent of the population. (In contrast, seventy one percent of businesses are white owned, and about fifteen percent of businesses are owned by Asian or Pacific Islanders.) This policy also ignores that between 2016-2018, less than twenty six percent of [contracts awarded](#) in the District went to minority owned businesses. It also ignores that since COVID-19, forty one percent of [Black owned businesses have closed](#) compared to seventeen percent of white owned businesses (due to the pandemic).

ADDITIONAL EXAMPLE | TRANSPORTATION ELEMENT | SECTION 415.7

Section 415.7 considers the use of roadway pricing, where drivers would be “charged via electronically read debit cards for entering the central portion of the District.” Congestion pricing is likely to have a disparate income on Black residents without explicit recognition and reflection of the [income differences](#) between racial groups in the District. This policy consideration is even more troubling given how many Black residents commute [via car](#) because they have been pushed to the outer edges—and outside of—the District due to rising housing costs.

In addition, this section assumes that all drivers have debit cards. As noted in [the Council’s Committee Report for Bill 23-122](#), “one percent of white households are unbanked, in contrast to twenty one percent of

Black households. Another thirty six percent of Black households are underbanked,” illustrating the consequences and shortcomings of a race neutral lens.

HOW THE COMMITTEE PRINT ADDRESSES RACE NEUTRAL POLICIES

Based on a sampling of sections—although the Committee Print takes steps in the right direction—CORE remains discouraged by the Committee Print’s race neutral approach. We are strongly encouraged by the Committee Print’s Economic Development Element. However, in other elements such as Housing, Land Use, and Transportation, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan.

Initially, the Economic Development Element largely ignored structural inequity, the racial wealth gap, and any centering of businesses owned by Black residents and other residents of color. Now, the Committee Print addresses what a racially equitable economy looks like (Section 700.6*) and contemplates policies and actions that center the experiences of the Black community and other communities of color.

The Print includes policies that actively advance racial equity. New language calls on the District to advance racially equitable economic development by “disrupting systems that perpetuate income and wealth inequality.” Section 703.20 (Action ED-1.1.A) now requires the Economic Development Strategic Plan to “identify approaches that provide recruitment and opportunities to participate by small and minority-owned businesses, and approaches to close the racial income and wealth gaps in the District.”

In addition, Section 703.15 (Policy ED-1.1.4) initially talked about providing support for *all* District residents seeking entrepreneurship opportunities. This section omitted the fact that Black owned businesses in the District are [struggling](#), [closing](#), and receiving [technical assistance](#) at inequitable rates. The Committee Print addresses this concern by adding language to provide support to [equity impact enterprises](#) (small, local businesses that are likely to be owned by Black residents or other residents of color).

However, in other elements, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan. For example, Land Use Section 307.15 (Policy LU-1.4.6) deals with parking near Metro stations. Below, we analyze an instance where the Committee Print takes strides, but more steps could be taken to truly address racial inequity.

	INTRODUCED VERSION	COMMITTEE PRINT (change in bold)
PLAN TEXT	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters, while considering the commuting characteristics of District residents, such as access to transit stations and mode use, to provide equitable outcomes. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.
ANALYSIS	This section unilaterally discourages parking and deprioritizes the needs of all-day commuters without considering why some commuters may be driving. “There is a deep racial divide in commuting modes ,” according to the DC Policy Center. 47 percent of Black or African American residents drove to work in 2015, compared to about 28 percent of white residents. This is because of proximity to transit and employment of opportunities, which are deeply intertwined with race.	The Committee Print takes a step toward acknowledging commuting differences, but the core policy remains unchanged in the Print. The referenced study specifically speaks to racial disparities in driving to work, but it is important to be mindful of racial inequities in commuting modes and we must consider the specific needs of all-day commuters. If this policy took a groundwater approach, it would ask, “what is the racial makeup of all-day commuters parking at Metro stations? What does the data tell us about who they are? What would the outcome be if the needs of all-day commuters were deprioritized?”

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE STRENGTH

ISSUE

As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.



Bill 24-0001 significantly weakens the language of the 2006/2011 Plan. The introduced version often expresses the District’s aspirations rather than its commitment and obligation to policies or actions.

BEST PRACTICE

Policies that are straightforward, enforceable, and account for racial inequities advance racial equity.



Binding language is clear to follow. It leaves little room for interpretation, improving the likelihood that policies are executed as intended. Strong directives also hold the government accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 511.7

Previously this policy read, “ensure compliance with the Community Investment Act of 1977, which prohibits the practice of redlining local neighborhoods.” As part of the 2020 amendments, the section was updated to say that “redlining...*should be prohibited*.” Given the racist history and [enduring legacy](#) of redlining practices, full compliance with fair housing laws must be fully enforced and complied with.

ADDITIONAL EXAMPLE | HOUSING ELEMENT | SECTION 510.16

In the introduced version of the Comprehensive Plan, Section 511.7 read, “tenants *should* be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.” Previously, the section *required* that tenants were provided information about their rights. The introduced version weakened this push for tenant rights, reverting from a requirement to an ideal.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE STRENGTH

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s return to the strong, strict, and clear language of the 2006/2011 Comprehensive Plan. In the Housing Element, for example, Sections 510.1, 506.11, 511.7, and 514.8 state the District’s intent clearly and strongly.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE CLARITY

ISSUE

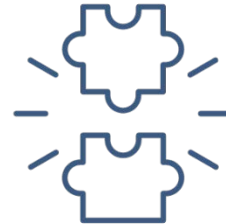
Vague and ambiguous language leaves room for interpretation that may widen inequities, harming the District’s Black residents and other residents of color.



Vague language like “greatest extent feasible” and “substantial share” lacks accountability. Similarly, ambiguous language like “neighborhood character,” “high need,” and “equitable” are used without contextual definitions.

BEST PRACTICE

Use clear and specific language to ensure all parties understand expectations and can be held accountable. Name specific racial and ethnic groups where possible and relevant.



Straightforward writing improves the likelihood that the policy will drive change instead of only offering platitudes. With clear policies, implementing agencies can also be held accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 510.12

This policy notes that “as affordable housing reaches the end of its functional life, [the District must] support the redevelopment of the site to the greatest extent feasible in line with the District’s goals and strategies regarding equity and inclusion.” Affordable housing is a limited but critical resource in the District, and this section is concerningly vague about what would happen when such housing becomes less viable. First, it is unclear what type of “affordable housing” is being referenced, which is important given how different funding sources (and potentially other factors) define “functional life.” (While the Committee Print does define how it uses the phrase “affordable housing,” the definition is limited to the tenants’ income threshold, not the funding source.) Second, it is unclear which “goals and strategies regarding equity and inclusion” apply and racial equity is not specifically mentioned. Third, it is unclear how the Zoning Commission will measure feasibility—financial, or something else? This phrasing leaves the future of affordable housing—and more important, the future of residents who reside there—at the discretion of the Zoning Commission’s interpretation.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

CORE strongly encourages the interrogation of the words we use, why we use those words, and what historical meanings are attached to words, even if they are terms of art. For example, the Land Use Element uses [amorphous](#) terms such as “preserve neighborhood character” and “established neighborhoods.” These terms are inherently biased and racially coded, and therefore should be defined to ensure clarity in how and why they are used. [Historically](#), such terms have been used to exclude Black residents in order to [maintain “exclusively” white](#) communities. Further, as drafted, the Comp Plan refers to more affluent, gentrifying communities as “established” and refers to predominantly Black or low-income communities as “emerging” or “underserved.” Such language stems from [racist language](#) that sent veiled signals to white residents about which communities were safe to rent or buy in.

Even if these terms technically do not have the same intent today, it is important to be mindful of the terms we use to characterize different communities.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE CLARITY

Based on a sampling of sections, CORE is unconvinced that the Committee Print’s changes respond to a call for language clarity.

For example, Section 506.9 (Policy H-1.4.4) called for public housing renovations to “minimize displacement and resident moves” in the introduced version. The Committee Print changes this to read, “*to the greatest extent possible, minimize temporary displacement and resident moves.*” It is unclear who is tasked with implementing this aspirational language. In addition, if the District’s goal is to end racial inequities, CORE believes the District should set guidance to prevent and eliminate displacement, rather than minimize it.

More broadly, the language used to define communities and racial equity is inconsistent throughout the Committee Print. This largely stems from the introduced version’s language choice—but nevertheless, the Committee Print falls short of correcting this problem throughout the Plan. “Communities of color” is often used instead of explicitly naming racial groups (Sections 403.13, 628.5), and “communities of color” is often used alongside “low-income communities,” blurring the hardships caused by racism and those caused purely by income (304.7, 400.11*, 500.31). In addition, we encourage readers to be mindful that we do not use “low-income” or other phrases as substitutes to mean Black.

Further, a commitment to “equity” is sometimes the focus of the Committee Print versus “racial equity” (400.3, 504.16). Where possible, the Plan should be clear when it is speaking about equity, when it is speaking about racial equity, and why. The Comprehensive Plan’s fundamental concern is land use—it should be the Comprehensive Plan’s fundamental goal to address the lasting impacts of racial discrimination in the District’s land use.

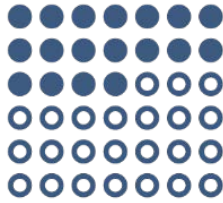
Finally, the Committee Print continues using “neighborhood character” and “historic character” despite their racist roots. The Committee Report discusses the Committee of the Whole’s evaluation of the issue, though the language remains in the Committee Print.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

DISAGGREGATED DATA

ISSUE

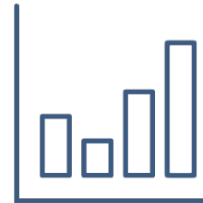
As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.



When aggregate statistics are used in policymaking, they tell an incomplete story and lay a mistaken foundation of the issue at hand. Put another way, aggregate statistics typically conceal the inequities experienced by Black communities and communities of color.

BEST PRACTICE

Disaggregating data by race exposes inequities, providing information necessary to deconstruct structural racism.



[Disaggregating data](#) by race highlights experiences faced by Black communities and other communities of color. Understanding these [differences](#) is critical to designing policies proportionate to racial inequities.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 513.1

This section reports the District’s homeownership rate as forty two percent for all residents (an *aggregate* statistic). [Disaggregated statistics](#) show that the homeownership rate is forty nine percent for white residents, thirty five percent for Black residents, thirty percent for Latinx residents, and thirty five percent for all residents of color. Ignoring racial disparities may lead to policies that increase the District’s overall homeownership rate, while ignoring (and perhaps exacerbating) the homeownership gap between white residents and residents of color.

ADDITIONAL EXAMPLE | LAND USE ELEMENT | SECTION 304.1

This narrative section notes that “since...2006, the District’s population has grown almost twenty 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 twenty percent increase in population is net growth—and doesn’t account for who has left the District and why. From 2000 to 2013, [20,000 Black residents](#) were displaced from the District of Columbia. DC was one of seven cities in the country that accounted for nearly half of the nation’s gentrification. Reporting aggregate data obscures these critical facts.

HOW THE COMMITTEE PRINT ADDRESSES DISAGGREGATED DATA

Based on a sampling of sections, CORE is encouraged by the Committee Print’s use of and call for the **disaggregation of data**. Section 513.1 and 513.2 now discuss the inequities in home ownership rates between racial groups. Section 415.8* notes the importance of “disaggregated data that identifies the mode use, ability, and access for communities of color” to inform “appropriate, equitable [Transit Demand Management] measures [and] minimize barriers to entry.”

However, there is room for improvement. In several elements, disaggregated data is mentioned in the beginning of a chapter, but not throughout the chapter. The Plan could pull in publicly available data disaggregated by race and ethnicity in additional instances. Ideally, the introduced version of the Plan should have made this effort throughout the amendment process given the length of the document.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMUNITY INPUT

ISSUE

As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.



Increasing community participation can support racially equitable processes by distributing the power of decision making and elevating the voices of those not “in the room.” Community involvement is critical in planning decisions, where impacts are far reaching and long term.

BEST PRACTICE

Follow [the Framework Element](#), which calls for “those most impacted by structural racism” to be proactively and “meaningfully involved” in the planning process. Create accessible processes that are accountable to community-driven priorities.



Racially equitable planning begins with listening to, recognizing the power of, and building with the community. The District needs [new strategies](#) and [innovative methods](#) to *proactively* elevate and authentically listen to voices that have historically been excluded from planning, implementation, and evaluation processes.

ILLUSTRATIVE EXAMPLE | FUTURE LAND USE MAP + LAND USE ELEMENT

As introduced, the Comprehensive Plan does not build on the goals laid out in the [Framework Element](#) (213.6) to build capacity of the most marginalized communities to “fully and substantively participate in decision-making processes.” As introduced, the Comprehensive Plan fails to: 1) clarify how existing land use and zoning processes work and intersect with the Future Land Use Map (FLUM); 2) envision new strategies to accomplish the Framework’s goal to encourage a more inclusive community input process; and 3) maintains an existing community input process that is both exclusionary and inaccessible.

Existing [law requires](#) continuous community input in every phase of the Comprehensive Plan’s development, from conception to adoption to implementation.¹² However, the current community input process for development decisions is often technical and unclear. This advantages privileged stakeholders who have the time and resources to understand and participate in [development reviews](#), [design reviews](#), and the [map amendment process](#).

There are [many tools](#) that can be employed to [disrupt the status quo](#) and encourage new ways for community input. CORE strongly encourages employing these methods [to map how a resident](#) would learn the various community input processes and use a structured approach to [reduce complexity](#) in understanding the processes—and within the processes themselves.

¹² Existing law calls for a variety of means to secure community input throughout each stage of development, which may include developing of Small Area Plans or testifying on text amendments, for example. This may include advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication.

ADDITIONAL EXAMPLE | PRESERVING + ENSURING COMMUNITY INPUT | DC CODE 1-306.04

DC Law requires a variety of means to secure community input.¹³ One way community input is weaved into the Implementation Element is through a required periodic review of progress reports. Although these progress reports are required at least once every four years, CORE has only found two since 2000: one published in [2010](#) and the other in [2012](#).

Further, the Mayor is required to “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.” OP maintains a [website](#) showing the progress of provisions, but this still does not meet the requirements spelled out by law. The Council has also not held or scheduled public hearings on those progress reports. Additionally, Council has not submitted its findings nor a copy of public testimony to the Mayor, both of which are required by law following each review period.

These provisions of the law were created to give the community a chance to weigh in on how actions in the existing Plan impact them. These reports and hearings would have also provided an opportunity for the public to see and give feedback on key projected implementation activities that will occur following the completion of the review period.

HOW THE COMMITTEE PRINT ADDRESSES COMMUNITY INPUT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s steps to clarify and strengthen community involvement. The Implementation Element now requires Small Area Plans and other planning studies be conducted using a racial equity lens (Section 2503.2). The element also requires that these and all other planning documents be evaluated using a racial equity impact analysis.

The Committee Print also adds a new policy that promotes full, transparent, and equitable participation that enables low income households, communities of color, older adults, and individuals with disabilities to participate fully and equitably. Second, it acknowledges the need to remove existing barriers which prevent equitable community participation. Some barriers include inequitable access to information and technology, availability of time, and resource constraints such as transportation.

The Committee Print takes important steps by requiring that District-led planning activities shall provide meaningful, accessible, and equitable opportunities for public participation early and throughout all planning activities. Additional language in the Print takes important steps to help residents gain clarity into navigating the various maps and review processes. New language in the Print calls for both the Future Land Use Map and the Generalized Policy Map to be evaluated for effectiveness in achieving District goals, appropriateness of categories, clarity, and ease of use. CORE is encouraged by these additions and strongly encourages racially equitable participation to help lead and shape how these goals are set and evaluated.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹³ This may include advisory and technical committees, community workshops, public forums, or other means of discussion to name a few.

INTERNAL PLANNING

ISSUE

As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.



While the Comp Plan is designed to set policies and provide guidance on land use decisions, it does not equip District Government staff and the Zoning Commission with the training, resources, and support needed to implement the Plan in a racially equitable way.

BEST PRACTICE

Proactively train staff on how to develop and use a racial equity lens in city planning. Ensure the diversity of the District is represented and reflected in all decision-making processes.



Use a variety of strategies, like [a racial equity toolkit](#), to ensure planning processes, land use decisions, and investment decisions are designed to close racial inequities. [Ensure](#) that communities and experts of color with lived and/or scholarly expertise participate *and* lead (or co-lead) decision making processes.

ILLUSTRATIVE EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2501.3

According to OP, the purpose of the [Equity Crosswalk](#) is to help the District to prioritize and target public investments, policies, and programs, particularly for those who have been most marginalized by systemic racism and structural inequity. However, it is unclear how the Equity Crosswalk will be used (and by whom) once the Comp Plan is passed into law. Nothing in the Crosswalk prepares agencies and agency staff to apply a racial equity lens to ensure programs, regulations, and operating procedures are implemented in a racially equitable way. In addition, of the ninety seven actions in the Crosswalk, the words “race” or “racial equity” are only mentioned three times. While the concept of the Equity Crosswalk is laudable, the policies and actions it contains do not focus on eliminating racial inequities.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.1

This section requires agency review of development proposals for impacts on public services and the natural environment. However, this section does not call for the Historic Preservation Review Board or other District staff to develop or be trained in racial equity assessment tools. Such tools are designed to measure and assess projects for their impacts on Black communities and other communities of color.

HOW THE COMMITTEE PRINT ADDRESSES INTERNAL PLANNING

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s updates. This includes updated language requiring District agencies to evaluate and implement the Plan’s policies through a racial equity lens (Section 2501.2). The Print also includes a separate new action item (Action IM-1.1.C) focused on providing ongoing racial equity training for development review decision-makers and

related staff. This includes staff and Zoning Commissioners, the Board of Zoning Adjustment, and the Historic Preservation Review Board.

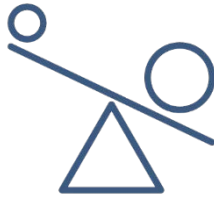
The Print also improves the Capital Improvement Planning (CIP) process by requiring the CIP to evaluate how major capital projects contribute to the goal of racially equitable development across the District (2509.3, 2509.5).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

EVALUATION THROUGH A RACIAL EQUITY LENS

ISSUE

As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.



The Comp Plan requires studies, evaluations, development reviews, environmental assessments, and progress reports—but a racial equity lens is not explicitly required. A racial equity lens would center the needs, leadership, and expertise of Black residents and other residents of color, paving the way for the elimination of racial inequities.

BEST PRACTICE

Disparate impact analyses and racial equity-focused evaluations must inform planning decisions.



Frequent racial equity-focused [evaluations](#) establish critical baseline data, support the development of goals based on that data, and normalize continuous monitoring of racial equity goals. Ideally, frequent evaluations would also inform course correcting actions between evaluations.

ILLUSTRATIVE EXAMPLE | LAND USE ELEMENT | SECTION 316.1

This section requires the District “to develop criteria for evaluating rezoning requests.” However, an evaluation methodology from a racial equity perspective is not offered in this section or in any other part of the Plan. As written, how rezoning requests may adversely or positively impact communities of color would be unknown and subject to chance.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.5

This section states, “to the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods...are assessed and adequately mitigated.” However, this section does not define what positive impacts are, how they can be maximized, and for whom these impacts are to be achieved for. Moreover, it also does not define or articulate what negative impacts are.

This is an opportunity to reinforce the District’s commitment to improving outcomes and eliminating racial inequities, specifically for communities of color. Further, the development review process and decisions coming from that process can and should establish a framework that applies a racial equity lens.

HOW THE COMMITTEE PRINT ADDRESSES EVALUATION THROUGH A RACIAL EQUITY LENS

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s incorporation of racial equity evaluations. In the Housing Element, racial equity evaluations are now embedded in a review of federal and local housing programs (Section 504.27) and the allocation of housing improvement funds

will consider historic barriers and existing racial gaps in housing access and opportunity (506.8). In the Economic Development Element, stricter monitoring of Opportunity Zones is now required (703.26).

The Implementation Element includes the most significant improvements, including perhaps the most consequential improvement to the Committee Print. A new action (2501.7*) requires that the Zoning Commission develop a process of evaluating all cases through a racial equity lens. In addition, racial equity tools are now required in the preparation of plans, zoning code updates, and the Capital Improvement Program (2509.3). Importantly, related racial equity training for staff is also required (2502.1).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMITTEE PRINT CONCLUSION

The Committee Print makes impactful and significant changes to the Comprehensive Plan, elevating racial equity as a policy priority and stating that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan's sheer size reduces the impact of the Committee Print's positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Zoning Commission must now develop a process to consider *all* cases through a racial equity lens.

Perhaps the Committee Print's most important changes appear in the Implementation Element. Now, Small Area Plans should be conducted using a racial equity lens and consider the use of a racial equity impact analysis (or similar tool). In addition, the Zoning Commission must now develop a process to consider *all* cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. These process changes will influence many plans and decisions into the future, significantly multiplying their impact.

The Committee Print also makes encouraging changes to the introduced version's policies. The Print now reports disaggregated data, requires studies through a racial equity lens, and sets new goals to encourage equitable public participation. The Print infuses a focus on eliminating racial inequities in many elements, not just in the Framework. Throughout the elements, softer language was reverted to stronger directives to protect residents and hold implementing agencies accountable. A more honest historical context and depiction of the present is recognized in several areas. And in the Economic Development Element, equity impact enterprises are now highlighted.

While the Committee Print takes key steps in some areas to improve the introduced version, these changes do not appear in all relevant instances and throughout all elements. Language remains in need of clarification, racial inequities are hidden where the Plan uses aggregate data, and historical context and racial trauma are inconsistently recognized. These issues lead to inconsistently informed and race neutral policies. These policies, therefore, are often racially inequitable.

After analyzing legislation, CORE weighs its conclusions to determine [the impact of a bill](#). This methodology, however, is difficult to apply to the Comprehensive Plan. We had to consider how much weight to give to policies, to actions, and to general guidance, all of which can vary in size and scope. This makes it hard to determine any given section's possible impact. An assessment is never a simple comparison of the number of "racially equitable" policies to the number of "racially inequitable" ones, but the Comprehensive Plan's length, breadth, and role made it even more of an undertaking. Given the scope of the Comprehensive Plan, CORE adapted our assessment to account for some of these complexities.

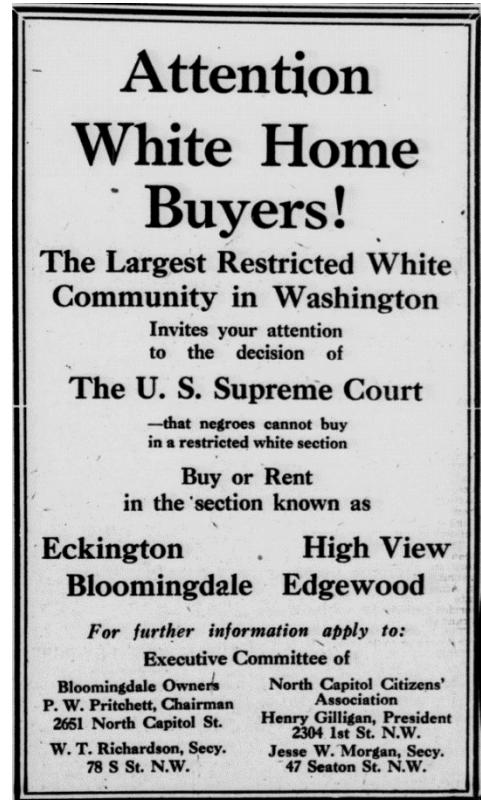
Despite the Plan's commitment to eliminating racial inequities, the document before us still perpetuates the status quo. Although the Plan primarily sets guidance, land use decisions impact every aspect of residents' social and economic wellbeing. These decisions influence housing prices, housing choice, rent burden, education, a resident's access to transit, proximity to necessities, amenities, commute time, and healthcare options.

While CORE's final assessment does not represent our opinion of whether the bill should proceed, we do hope that members, staff, and the public use it to inform debate, to improve upon the strides made by the Committee Print, and once passed, as a foundation to build upon during implementation. Specifically, this REIA aims to provide guidance on how land use decisions impact Black communities and other communities of color. It also intends to foster greater dialogue, particularly on issues related to race. We especially hope that it sparks conversation leading into the development of Small Area Plans, other long-term planning decisions, and into the 2026 rewrite.

RECOMMENDATIONS

The Comprehensive Plan document is only the guide to the District's growth. The actual growth will be determined by how residents, the Zoning Commission, Office of Planning, other executive agencies, and the Council choose to implement the Plan. Our hope is that this REIA is used as a framework to move towards a more racially equitable *administration* of the Comprehensive Plan. These implementation changes would also lay a foundation for a more racially equitable 2026 Plan (in both its drafting process and policies):

- On both the Executive and Council side, review the Comprehensive Plan law and **ensure future compliance**.
- **Restructure processes to empower communities of color with real planning and development decision-making authority.** New York, for example, uses [participatory planning and budgeting](#) to allow residents opportunities to not just participate in planning, but to have real authority to make decisions by sharing ideas, developing proposals, and voting on community projects. A similar concept can be applied locally to planning processes.
- **For the next Comp Plan rewrite, and to comply with existing law,** each Council committee should consider **holding both public hearings and community roundtables on the relevant element(s) under that Committee's purview.** This should include holding nontraditional hearings that accommodate the schedule and location needs of those with the least flexibility. This may also mean the facilitation of more informal community driven conversations such as Ramsey County's [Equity Action Circle](#), which was created to ensure the voice of the community is driving decision-making processes.
- **Review which administrative data** is collected on planning matters and how it can be used to understand how planning decisions are reducing or exacerbating racial inequities.
- Set up systems to collect and **track disaggregated data** by race and ethnicity on planning matters. Regularly evaluate disaggregated data to determine if and how decisions and policies affect outcomes for Black communities and other communities of color.
- **Establish definitive goals** to eliminate known racial inequities. These goals should be established through a racially equitable process.
- Require **specialized racial equity training** for all staff involved in planning decisions (including boards and commissions). Such training will equip staff to craft solutions proportionate to the racial historical trauma that Black communities and other communities of color in the District have faced. This training should be specific to planning in the District and include a review of the District's history (like the ad above). Lastly, this training should help staff understand how to apply a racial equity lens to the Plan's guidance, policies, programs to eliminate current racial inequities.



A 1926 ad published after racial covenants were deemed legal by the U.S. Supreme Court. ([source](#))

CAVEATS/CONSIDERATIONS

Alongside the analysis provided above, the Council Office of Racial Equity encourages readers to keep the following caveats and considerations in mind:

CORE acknowledges the Office of Planning's [efforts](#) to amend the Comprehensive Plan via community meetings, office hours, and online feedback.

Community engagement is critical to racially equitable policies and decision making. It is especially critical in planning decisions, where the impacts are far reaching and long lasting. To this end, OP held 100 community based office hours across all wards, reviewed 3,000 amendment proposals, and engaged ANCs.

In many ways, OP's planning efforts have deepened and refined the general guidance offered in the Plan. These efforts focused in on place-based planning and produced twenty-nine SAPs, strategic and long-term plans, and other planning documents such as *MoveDC*, *SustainableDC*, and *Climate Ready DC*. These growth strategies include a greater focus on affordable housing, the inclusion of resilience, and a focus on equity (although not racial equity). Collectively, these strategies are likely to accommodate growth and can generate positive outcomes for *many* residents.

However, these efforts, while commendable, do not replace the need for innovative, consistent participatory approaches that substantively and proactively includes Black communities and other communities of color early on in both planning and decision making processes.

Assessing legislation's potential racial equity impacts is a rigorous, challenging, analytical, and uncertain undertaking.

Assessing policy for racial equity is a rigorous and organized exercise but also one with constraints. It's impossible for anyone to predict the future, implementation does not always match the intent of the law, critical data may be unavailable, and today's circumstances may change tomorrow. In such a long document, there are also many policies, competing priorities, and diverse implementers. Our assessment is our most educated and critical hypothesis.

This assessment intends to inform the public, Councilmembers, and Council staff about the Comprehensive Plan through a racial equity lens.

As a reminder, a REIA is not binding. Regardless of CORE's final assessment, the legislation can still pass.

This assessment aims to be accurate and useful. It provides a representative look at the Plan but does not include a review of every element.

Given the complexity of racial equity issues, the length of the legislation, and CORE's decision to focus on the most critical elements, we have not raised *all* relevant racial equity issues present in the plan. Our hope is that by organizing this assessment into themes, we can better convey how to examine the document through a racial equity lens.

In addition, an omission from our assessment should not: 1) be interpreted as a section having no racial equity impact or 2) invalidate another party's concern.

This assessment is based on the introduced version of Bill 24-0001 and the Committee Print. It does not assess any versions that follow.

CORE reviewed the introduced version of the Comprehensive Plan and the Committee Print with a racial equity lens. Though the Committee Print will continue to be updated and amended through second and final reading, our analysis only covers the Committee Print circulated on April 14, 2021. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Racially equitable implementation is critical.

The Council legislates and the executive branch implements. Given this, part of CORE’s review centered around whether Bill 24-0001 provided the comprehensive guidance, tools, and resources necessary to implement the policies and actions using a racial equity lens. The Recommendations Section identifies key focus points to ensure racial equity is embedded throughout the implementation phase.

APPENDIX

Please note that this preliminary analysis was conducted on the Office of Planning’s introduced version of the Comprehensive Plan.

To arrive at the eight policy and process themes in the REIA, CORE reviewed nine of the Plan’s elements in detail, line-by-line.

These reviews began with research on the racial inequities that exist today in areas like transportation, housing, and education facilities. Next, CORE highlighted sections of concern within the element. Recurring concerns were converted to feedback themes. Feedback themes for each element are listed below in **BOLD UPPERCASE** letters, along with illustrative examples from the Comprehensive Plan (as introduced).

ANALYSIS: LAND USE ELEMENT

The goal of the [Land Use Element](#) is to “establish the basic policies guiding the physical form of the District.” The Land Use Element serves as the foundation of the Comprehensive Plan and “provides direction on a range of development, preservation, and land use compatibility issues.”

An analysis of the Land Use Element’s policy proposals must begin by acknowledging how government-sanctioned practices first led to the [forceful removal of Indigenous people](#) at the expense of [colonial expansion](#), land growth, wealth accumulation, and development. With that understanding, we then begin to examine the District’s current landscape and racial disparities. Land use decisions impact key social, economic, and wellbeing indicators—determining housing prices, housing choice, rent burden, a resident’s access to transit, proximity to necessities, amenities, commute time, and healthcare options. There are deep and pervasive racial inequities in each of these stated indicators.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

20,000

20,000 Black residents were [displaced](#) from the District of Columbia between 2000 and 2013.

40%

Forty percent of the District’s Black children are living in high poverty areas. 25% of *all* children were [living in areas of racialized concentrated poverty](#).

\$3,100

The [average monthly rent](#) for a DC two-bedroom was \$3,100 in 2020. Tenants must make more than \$132,000/year to pay twenty-eight percent or less of their income on rent.

The Land Use Element takes some important steps towards advancing racial equity, like speaking to the need for *permanent, affordable rental and for-sale multi-family housing adjacent to transit*. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in land use are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
307.9	<p>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.</p>	<p>THIS SECTION NOTES THAT THE “FUTURE LAND USE MAP (FLUM) EXPRESSES THE DESIRED INTENSITY AND MIX OF USES...” BUT OMITTS WHO DESIRES THESE INTENSITIES AND USES.</p> <p>The Framework Element explicitly calls for communities of color and “those most impacted by structural racism” to be “meaningfully involved in the creation and implementation of institutional policies and practices.” However, the Land Use Element does not actively encourage community participation in innovative ways, explicitly mention Black communities and other communities of color, or offer general guidance on methods to encourage community participation (see</p>

		<p>Framework Element, page 33). Since 2006, twenty-nine Small Area Plans have been completed. However, the SAP process should be more transparent, predictable, and used as an opportunity to foster greater public participation in a racially equitable way.</p>
<p>308.4</p>	<p>Infill development may also include the restoration of vacant and abandoned structures. In 2003, there were an estimated 2,700 vacant and abandoned residential properties in the District. While the number has declined since then, some parts of Washington, DC continue to have a relatively higher amount of vacant buildings.</p>	<p>CRITICAL PARTS OF HISTORY ARE OVERSIMPLIFIED AND ERASED.</p> <p>This section leaves the impression that vacant or abandoned structures are naturally occurring phenomena rather than outcomes of discriminatory federal and local practices, such as predatory lending, the housing bust and foreclosure crisis that exacerbated wealth inequities, and the devaluation of assets in Black neighborhoods.¹ By not acknowledging <i>how</i> these conditions came to be may explain the section’s failure to articulate <i>why</i> “some parts of the District continue to have a relatively higher number of vacant buildings” than other parts of the city. (Also see Sections 311.2 and 311.4.) According to American Community Survey data, Ward 8 has the highest vacant housing units at just over thirteen percent compared to Ward 3, which has the lowest at about six and a half percent.</p>
<p>310.6</p>	<p>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. This does not mean that all neighborhoods should become the same or that a uniform formula should be applied to each community. Rather, it means that each neighborhood should have certain basic assets and amenities. These assets and amenities should be respected and enhanced where they exist today and created or restored where they do not.</p>	<p>THE ELEMENT DEVIATES FROM THE GOALS OF THE FRAMEWORK ELEMENT.</p> <p>This section illustrates how the Land Use Element deviates from the goals set forth in the Framework Element. The Framework articulated the need to 1) target support to communities of color through policies and programs; 2) center and “focus on the needs of communities of color”; and 3) remove barriers so that such communities can participate and make informed decisions in the planning process.</p> <p>First, to only “strive for greater equity” is inconsistent with the Framework’s goal to eliminate racial inequities. Further, the focus must be on racial equity, not just equity. Second, language such as “greater equity across all neighborhoods,” fails to center the needs and experiences of communities of color in the District. Third, instead of “focusing on the needs” of communities of color we should leverage and cultivate the leadership and expertise that exists within Black communities and other communities of color. Next, language such as “assets and amenities should be respected” places the focus on assets and amenities instead of explicitly focusing on the residents of those neighborhoods where these assets and amenities should be restored or created. Finally, using the phrase “basic assets” is unclear. Who gets to determine basic? And giving Black</p>

¹ In 1956, the Federal Aid Highway Act, signed by President Dwight Eisenhower provided local municipalities with funding for highway construction costs. This Act created massive and hasty freeway projects. These projects displaced thousands of Black and brown residents, destroyed Black and brown neighborhoods, confiscated the homes of Black residents, and led to [decades of litigation](#). During that time, many of those homes sat vacant.

		communities “basic” amenities while other communities already have more will likely maintain or widen racial inequities.
310.22	Conduct an 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 .	PROVISIONS TO TRACK, EVALUATE, OR ASSESS ADVERSE IMPACTS ON BLACK COMMUNITIES ARE NOT INCLUDED. The policies and actions in the Comp Plan can only advance racial equity if the proposed policies and actions are “ specific, measurable, attainable, relevant, and timely .” This section is vague, does not mention racial equity considerations, or define what neighborhood diversity is. In addition, nowhere does the Land Use Element explicitly give directions to close racial inequities nor does it expressly call for the creation of, monitoring of, or direct reporting of measures that can gauge the impact of proposed policies and actions on achieving racial equity (for example, see Section 310.22).

ADDITIONAL ISSUES/CONCERNS

PRIVATE INVESTMENT IS HEAVILY RELIED ON: Although leveraging private investment is an important development strategy, at times the Land Use Element appears to heavily rely on that investment instead of encouraging innovative or proven public strategies and sustained public investment.

For example, section 315.4 notes how the goal is to “free up land” on the one hand but then proposes to make it available for *both* public and private investment. The section is also silent on how the plans to reorganize and consolidate would be executed, who helped develop the aforementioned plans, what the government’s role would be, and what the role of private developers would be.

AMBIGUOUS LANGUAGE, UNDEFINED TERMS, AND WEAKENED LANGUAGE ARE USED: The Land Use Element does not define terms such as “affordable housing” and “range of incomes” (among others) that may help the public, OP, and zoning commissioners implement and understand the policies. Much of the element’s language is weak—it more often expresses the District’s aspirations as opposed to their commitment and obligation to the stated policies or actions (For additional examples, see Section 310.8 (use of aspirational tones); 310.11 (which does not define what constitutes an “area characterized by vacant, abandoned, and underused older buildings), and Sections 313.14 and 306.13 (which strike stronger existing language for weaker language).

ANALYSIS: TRANSPORTATION ELEMENT

The [Transportation Element](#)'s goal is to “create a safe, sustainable, equitable, efficient, and multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.”

To examine the Comprehensive Plan’s policy proposals, it is critical to examine the District’s current transportation landscape and how the landscape is deeply connected to racial disparities in commuter experiences, environmental and health impacts, along with access to grocery stores, schools, health care, and access to commercial retail. Racial inequity in the District’s transportation landscape has historical roots in the segregation, displacement of, and disenfranchisement of Black, Indigenous, and residents of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) is seventeen percent in Wards 7 and 8. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

48%

Forty eight percent of DC’s [bus riders](#) are low-income, compared with eighteen percent of rail ridership.

51%

Fifty one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7.

The Transportation Element takes important steps towards advancing racial equity, like acknowledging that transportation should not be a barrier to economic opportunity in the District (Section 403.13). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to racial transit inequities and accessibility divides are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
408.2	Washington Metropolitan Area Transit Authority (WMATA) was created in 1967 by an interstate compact to plan, develop, build, finance, and operate a balanced regional transportation system in the national capital area. Construction of the planned 103 mile Metrorail system began in 1969 and was largely funded by the federal government. The first phase of Metrorail began operation in 1976 and was completed in early 2001.	<p>THE CONTENT IS AHISTORICAL.</p> <p>WMATA’s history is mentioned, but the driving force behind the metro is not. By omitting the full history of its creation, the narrative about residents’ proximity to the Metro may enable exclusionary policies that do not consider racial equity. When the element does recognize the history of the District’s transportation systems, the history shared is vague and excludes defining moments in which Black residents and other residents of color have been excluded from transit systems.</p>

<p>408.2</p>	<p>While much of the District is within a half mile of a station, some areas— such as Georgetown, the New York Avenue corridor, and Bolling Air Force Base—are not.</p>	<p>PLACES, NEIGHBORHOODS, AND COMMUNITIES ARE INCONSISTENTLY MENTIONED.</p> <p>This section omits several areas that are not within a half mile of a station (such as Hillcrest and Fairfax Village). These omitted areas are in Ward 8, which is the ward of residence for many Black and Brown residents. Despite being focused on transportation throughout the District, this element inconsistently mentions specific places that are impacted by or will be impacted (see Map 4.1 within this element).</p>
<p>400.2</p>	<p>The critical transportation issues facing the District are addressed in this element. These include:</p> <ul style="list-style-type: none"> • Eliminating fatalities and serious injuries on the transportation network; • Expanding the District’s transportation system to provide alternatives to the use of single-occupant autos; • Enhancing the District’s corridors for all modes of transportation; • Increasing bicycle and pedestrian connections, routes, and facilities; • Improving the efficiency of the existing transportation system; • Investing in bridge and roadway maintenance and repair; • Investing in transit network maintenance and repair; • Reducing pollution and negative health and environmental effects resulting from transportation; • Promoting transportation demand management (TDM). 	<p>STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM ARE NOT CONSISTENTLY ACCOUNTED FOR.</p> <p>Racial equity and accessibility are not listed as goals, despite these being critical transportation issues. Research notes that transportation policies have historically excluded a racial equity lens. This is especially true in DC, dating back to the early fight against freeways in the District. By not centering racial equity in the goals of the element, Black residents will continue to be negatively impacted.</p> <p>This section goes into detail about improving outcomes and promoting access yet does not discuss the glaring disparities in the District’s transit. It acknowledges the existing “pollution and negative health and effects resulting from transportation,” but fails to note these impacts disproportionately impact Black residents, particularly those living near major roadways such as 295 (see Map 4.4 in Section 412.3 and Map 4.5 in 412.8).</p> <p>Generally, the element does not take opportunities to consider how to eliminate barriers to transportation and environmental justice (Section T-5 on Technology and Innovation being an exception).</p>
<p>415.5</p>	<p>For instance, [the District] is helping to educate the public about various shared mobility options in the District, including point-to-point and traditional carsharing services. The District’s ultimate goal is to reduce reliance on single-occupancy vehicles and reduce vehicle miles traveled (VMT). To incentivize the use of shared cars and encourage the private sector to expand car-sharing programs, the District has designated strategic curbside parking spaces for these vehicles, accompanied by educational brochures to help explain this service to the public.</p>	<p>THE EXPERIENCES OF THE BLACK COMMUNITY AND OTHER COMMUNITIES OF COLOR ARE NOT CENTERED.</p> <p>This section mentions the District’s “ultimate goal...to reduce vehicle miles traveled” but only focuses on carsharing and technologies to achieve it. This does not center the experiences of communities in Wards 7 and 8, where ninety percent of residents are Black. These communities are hit hardest by lack of access to grocery stores and have to travel farther for employment opportunities, often by car.</p> <p>It also fails to center the experiences of residents that have been pushed out of the District but must rely on vehicle travel into the area for employment opportunities.</p>

		By not centering these experiences and racial equity, the section does not address one of the root causes of vehicle miles traveled in the District.
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ADDITIONAL ISSUES/CONCERNS

THE COVID-19 PUBLIC HEALTH EMERGENCY IS NOT MENTIONED: Transportation patterns and accessibility have shifted due to the public health emergency. It is alarming for the element to not mention or consider these shifts a year into the public health emergency, given the disparate impacts that the emergency has had on Black communities and other communities of color.

VAGUE LANGUAGE IS USED: This makes it difficult to directly pinpoint exact communities, wards, racial groups, and ethnic groups that could be impacted by the policy at hand. This is dangerous when coupled with an incomplete understanding of the history that these policies have had on communities of color. This practice also enables race neutral policies.

ANALYSIS: HOUSING ELEMENT

The Housing Element’s goal is to develop and maintain new residential units to achieve a total of 36,000 units by 2025 that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents throughout all of Washington, DC’s neighborhoods.

To analyze this element, we first examined racial inequities in housing today—the result of centuries of government-sanctioned structural and institutional racism. For example, disparities in homeownership in 2021 are driven by income disparities, wealth gaps, discrimination in lending, historic segregation practices, and subjectivity in appraisals—to name just a few factors.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

35%

Thirty five percent of District households of color [own their home](#). The rates for all racial groups are: white (forty nine percent), Asian/Pacific Islander (thirty eight percent), Black (thirty five percent), and Latino (thirty percent).

86.4%

Over eighty six percent of adults who are [experiencing homelessness](#) are Black, yet only over forty six percent of District residents are Black.

58.1%

Fifty eight percent of Hispanic households in DC are rent burdened, [higher than any other group](#). In contrast, thirty four and a half percent of white District households rent-burdened.

The Housing Element takes important steps towards advancing racial equity, like encouraging production of affordable housing in high-cost areas (Section 503.10) and supporting development of residential units that meet the needs of larger families (505.15). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to housing inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
512.2	An important part of ownership is access to financing and real estate opportunity. In the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.	HISTORY IS OVERSIMPLIFIED OR ERASED. Redlining is mentioned but the text fails to mention that the practice was race-based and ethnicity-based and that its lasting and prevalent effects targeted Black residents . Ignoring the past will not erase its audacities. At the very least, it will maintain them—and likely, it will exacerbate them.

513.1	<p>Homeownership...stood at forty-two percent in Washington, DC [in 2017]. Instability in the homeownership market and limited access to credit has caused many to select rental housing. These national factors are affecting all cities, but the District still has one of the lowest rates of homeownership in the country...</p>	<p>AGGREGATE STATISTICS ARE CITED.</p> <p>While the homeownership rate for all District residents is around 42%, the rate for white residents is forty-nine percent, higher than the rate for all communities of color. Aggregate statistics ignoring disparities and may encourage policies to improve outcomes for all residents—while ignoring (and perhaps exacerbating) gaps between white residents and residents of color.</p>
513.2	<p>Home prices create a significant obstacle to increasing the homeownership rate. In September 2015, only thirty-eight percent of the homes on the market with two or more bedrooms were affordable to the median income family. While the recent increase in the supply of condominiums has improved homeownership prospects somewhat, the options for multigenerational families continue to be limited.</p>	<p>THIS SECTION DOES NOT DISAGGREGATE DATA BY RACE OR ACCOUNT FOR RACIAL DIVIDES IN HOUSING BURDENS.</p> <p>Families of color are more likely to live in multigenerational households—meaning that they have a greater need for larger homes but even fewer options. Acknowledging the race is important to 1) understand if racial groups are facing multiple barriers to homeownership and 2) emphasize that <i>not</i> creating or following through with these policies will exacerbate racial inequity.</p>
516.4	<p>Permanent housing is generally more acceptable to communities than transient housing and more conducive to the stability of its occupants.</p>	<p>PRIVELEGED RESIDENTS ARE PRIORITIZED.</p> <p>This section raises two issues: 1) describing residents of permanent/transient housing as mutually exclusive to “communities” only reinforces and condones opposition to homes for <i>all</i> the District’s residents, and 2) the ordering of this sentence places the mere preferences of the neighborhood’s current residents first—over the quality of life benefits for vulnerable residents. Permanent housing is a proven, evidence-based response to chronic homelessness that should not be mentioned as an afterthought. These instances may seem subtle, but in aggregate convey a concerning and false hierarchy.</p>
511.7	<p>Tenants should be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.</p>	<p>IDEALS ARE THE NORM, RATHER THAN REQUIREMENTS.</p> <p>Previously, the section <i>required</i> that tenants were provided information about their rights rather than this being an ideal. Oftentimes, rollbacks from “must” and “ensure” to “should” leave already vulnerable communities more vulnerable.</p>

ADDITIONAL ISSUES/CONCERNS

COVID-19’S IMPACTS ARE DOWNPLAYED: The COVID-19 health emergency is only listed twice in the Plan, despite it having a [profound impact](#) on the District’s housing outcomes—especially on residents of color and other [vulnerable communities](#).

THERE ARE CONTRADICTIONS: The Comprehensive Plan’s Framework Element acknowledges and accepts that the lengthy document contradicts itself at times. However, this is problematic from an equity lens: one section may portray one set of ideals and another may lay out a contradictory recommendation or policy.

LANGUAGE IS VAGUE OR BROAD: Vague language like “greatest extent feasible,” “substantial share,” “based on feasibility” creates room for interpretation which may further disadvantages residents of color.

ANALYSIS: ENVIRONMENTAL PROTECTION ELEMENT

The Environmental Protection Element’s goal is to ensure that the District’s “natural and man-made environment” is protected, restored, and enhanced.

To examine the Comprehensive Plan’s policy proposals, it’s critical to examine the District’s current environmental protection landscape and its historical contribution to environmental racism. The District’s current disparities in health outcomes, air quality, the concentration of industrial uses, heat vulnerability, and chemical exposure are linked to the segregation and displacement of Black, Indigenous, and residents of color. Historical practices such as racial covenants have consistently forced Black and brown residents to [live near toxic facilities](#) and highly polluted areas.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) in Wards 7 and 8 is seventeen percent. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

3

Ward 3 has the most mature [tree canopy](#). Vegetation can reduce the potential for urban heat islands. Wards 7 and 8 have the youngest canopy (due to District efforts to increase it).

51%

Fifty-one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7. This means that it is harder for the residents of these wards to access essential resources during an extreme weather event.

The Environmental Protection Element takes important steps towards advancing racial equity, like recognizing that some residents have been and continue to be disproportionately impacted by environmental practices (Section 600.11a and 628.2). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to environmental inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
603.12	Evaluate expanding restrictions and/or require adaptive design for development in areas that will be at increased risk of flooding due to climate change . Analyses should weigh the requirement to account for climate risks with the needs of a growing District.	THE CONTENT IS RACE NEUTRAL. The proposed analyses do not explicitly consider racial equity in the development of flood-prone areas, despite communities of color facing increased vulnerabilities due to climate change. By not citing disaggregated data, it is difficult to pinpoint exact communities, racial groups, and ethnic groups that could be impacted by the policy at hand.

606.1

Washington, DC is situated at the confluence of two great rivers: the Anacostia and the Potomac...For years, the Anacostia suffered the fate of being Washington DC's lesser known and less maintained river. **As its natural beauty yielded to industry, its waters became polluted** and the river became a divide that separated some neighborhoods from the rest of the District.

THE CONTENT IS AHISTORICAL.

This section mentions the impact of historical events that allowed the Anacostia River to become heavily polluted and "some neighborhoods" to be divided from the rest of the District. However, it fails to mention how the practices came to be and does not list which locations experience and which residents live with the burden of these impacts most heavily.

When the element does recognize the history of the District's environment policies and decisions, the history shared is vague and excludes defining moments in which Black, Indigenous, and residents of color have been displaced, discriminated against, and excluded in a way that negatively impacts their health, economic standing, and quality of life.

THE LANGUAGE IS VAGUE.

Neighborhoods, communities, or wards are not mentioned by name. This makes it harder for readers to understand the impact on exact locations and harder to hold policymakers accountable to achieving racial equity in those areas. Vague language such as "throughout the District," "some areas," and "places like" creates room for interpretation which may lead to further disadvantaging of residents of color.

ADDITIONAL ISSUES/CONCERNS

FUTURE RESIDENTS AND NEW DEVELOPMENTS ARE THE FOCUS: The Environmental Protection Element heavily focuses on protections regarding new developments. While this is important to hold developers accountable, it is not balanced with protections regarding existing communities, especially those disproportionately impacted by environmental racism.

ENVIRONMENTAL JUSTICE PRINCIPLES ARE INCLUDED INCONSISTENTLY: The element starts off strong by mentioning the importance of environmental justice, but eventually falls short of including these principles throughout the entirety of the element. Additionally, the element rarely mentions how corporations or developers will be held accountable beyond general suggestions of how new development should take place. Also, while municipal and federal benefits of industrial sites (such as trash transfer sites) can accrue to all residents, the [negative impacts](#) are often only felt by some. This violates [the Principles of Environmental Justice](#).

ANALYSIS: ECONOMIC DEVELOPMENT ELEMENT

The stated goal of the [Economic Development Element](#) is to “drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status.”

To analyze this element, we first examined how specific actions and policies proposed tackled issues of wealth and income inequality. We also explored whether the proposed actions and policies are designed to combat structural inequality, whether and how they employ new approaches to close the racial wealth gap, or whether they center the needs of communities of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

81x

The net worth of typical white households is **eighty one times greater** than the net worth of typical Black households in the District.

14%

Fourteen percent of District businesses are Black owned, although Black residents are 45 percent of the population. By contrast, **seventy one percent of businesses in DC are white owned**, while white residents account for forty two percent of the population.

67%

Sixty seven percent of Black and fifty nine percent of Latinx residents work full-time **and earn less than \$75,000**, compared to just thirty-four percent of their white counterparts and forty-three percent of their Asian or Pacific Islander counterparts.

The Economic Development Element takes important steps towards advancing racial equity, like leveraging sustainability policies to increase the number of entrepreneurs within new and emerging industries; calls for a focus on “economically disadvantaged individuals”; as well as attempting to apply an “equity focus” on business and workforce development programs (Sections 705.6, 717.11). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
703.15	<p>Support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance, promotion of District products and services, and market development.</p>	<p>POLICIES AIM TO IMPROVE OUTCOMES FOR EVERYONE, NOT SPECIFICALLY COMMUNITIES OF COLOR.</p> <p>The Framework Element’s goal is to target assistance to communities by need. In the District, the communities that are socially and economically vulnerable also tend to be Black and Brown. COVID-19 exploited and exacerbated these vulnerabilities: a recent report that forty one percent of Black owned businesses had to close, compared to seventeen percent of white owned businesses. Therefore, it is not enough to simply promote local entrepreneurship and rely on</p>

		existing technical assistance programs that may or may not be reaching businesses owned by people of color.
703.10a	This program [Opportunity Zones], although unproven, could be a useful tool in attracting investment in communities that have historically been overlooked by many investors.	<p>THE ELEMENT RELIES ON UNPROVEN PROGRAMS.</p> <p>The Economic Development element seems to only mention minority or equity in the context of <i>incorporating</i> businesses or communities into <i>existing</i> programs, or in studying these communities (see Sections 714.6, 714.3a, 714.20) in unproven or pilot programs. As acknowledged in the text, this specific section is not based on any data or proven outcomes.</p> <p>Recently, the Urban Institute found that the Opportunity Zones (OZ) incentive is not living up to its economic and community development goals. They also found that although OZs were designed to spur job creation, most OZ capital is flowing into real estate and not into operating businesses. As drafted, this section focuses on attracting investment to neglected areas but is silent on ensuring the community benefits from that investment or that the District can ensure an equitable and participatory community-driven approach. Without such assurances, this section has the potential to further advantage investors at the expense of historically neglected areas, which in the District, tend to be communities of color.</p>
700.5	Economic development is about more than simply increasing the number of jobs and improving the District’s finances. It is also about ensuring that all residents have opportunities to thrive economically.	<p>THERE IS NO ACCOUNTING FOR STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM.</p> <p>The element does not deal with structural racism or the resulting inequities in any substantial or comprehensive way. The element is correct in saying that “economic development is about more than increasing the number of jobs and improving the District’s finances.” It should also be about closing the racial wealth gap and eliminating income inequality. To do so, it must explain why <i>certain</i> residents have had trouble “accessing “opportunities to thrive economically.” By not addressing the historical root causes of existing structural inequalities, this narrative may repeat patterns of exclusion.</p> <p>Broadly, the element does not mention barriers preventing growth along racial lines (for example, student loan debt, retirement savings, or asset-generation) and does not offer a comprehensive or systemic approach to addressing those barriers.</p>

ADDITIONAL ISSUES/CONCERNS

PERFORMANCE-DRIVEN ACCOUNTABILITY IS NOT PRIOTITIZED: In some instances, the element proposes supporting programs that may be obsolete, or have not demonstrated measurable success (see DSLBD’s [CEED program, the Made in DC program, or Healthy Food programs](#), all of which went unfunded for Fiscal Year 2021 but are referenced in the Comp Plan). Policies and actions within the element must be up to date and sufficiently resourced to have real or meaningful impact.

DATA IS NOTE DISAGGREGATED BY RACE: Disaggregating data by race helps us to better understand existing barriers and gaps facing communities of color. That data allows us to design actions and policies that will achieve equal outcomes for people of color relative and in proportion to the inequities those communities face.

VAGUE LANGUAGE AND RACE NEUTRAL POLICIES ARE PREVALENT: “Racial equity” is not mentioned once in the [seventy-five page document](#). Only vague references to “equity,” “minority,” or “economically disadvantaged” are made.

ANALYSIS: PARKS, RECREATION, AND OPEN SPACE ELEMENT

The goal of the Parks, Recreation and Open Space Element is to “preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs through universal access, promote health and wellness, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of the national capital.”

To analyze this element, we examined the current landscape of the District’s parks, recreation and open space against the historical inequity caused by Jim Crow segregation. This disparities in parks and recreational access [caused by its legacy](#) remain to this day.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

.5

Some residents in Ward 7 have to walk [more than a half mile](#) to find District owned recreation space, despite parks accounting for more than a fifth of DC’s land.

38%

Thirty eight percent of Ward 7 residents had [no exercise or physical activity](#) in the last 30 days. In Ward 8, it is about twenty six and a half percent. It is six percent in Ward 3 and eight percent in Ward 2.

86%

Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black.

The Parks, Recreation, and Open Space Element takes important steps towards advancing racial equity, like recognizing how different parts of the District may have differing interests and the need to coordinate with sister agencies such as DC Public Schools (DCPS) to improve the appearance and usefulness of schoolyards and outdoor recreational facilities.² However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in parks and recreational spaces are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
812.7	Investments in infrastructure have helped deliver a connected waterfront, so that the Anacostia River no longer divides neighborhoods.	HISTORICAL CAUSES OF INEQUITIES OR EXISTING INEQUITIES ARE NOT DISCUSSED. Although physical improvements to projects such as the Suitland Parkway/I-295 interchange, the Anacostia Waterfront Initiative, and the Frederick Douglass Memorial Bridge are connecting communities, the Anacostia River remains an imaginary racial dividing line. Today, neighborhoods east of the Anacostia River continue to face disinvestment in infrastructure, lack of connectivity, and lack of active green space.

<p>810.19</p>	<p>Establish a system to maintain and regularly update data and maps on parks, recreational facilities, and programming offered by DPR and affiliated providers to measure improvements in levels of service and document achievements.</p>	<p>DECISION-MAKING PROCESSES DO NOT CALL FOR DISAGGREGATED DATA AND MEASURING AND EVALUATING RACIAL EQUITY.</p> <p>Despite disparities in the distribution of parks and recreational facilities across the District, this section does not require needs assessments and demographic analyses to disaggregate data by race, or to assess if and where racial inequalities may exist. Disaggregating data by race and analyzing racial equity impacts for any recreational facility assessment can be used to better inform how park improvements are prioritized. See Actions PROS-2.1.A, 2.1.B; 2.2.1.</p>
<p>810.15</p>	<p>Evaluate proposed park facilities to determine their ability to generate revenue and help recover operational and maintenance costs. When developing new facilities, assess the projected operation and maintenance costs prior to requesting capital funding approval.</p>	<p>POLICIES LEAVE ROOM FOR INEQUITABLE IMPLEMENTATION.</p> <p>This section calls for park proposals to be evaluated for their ability to generate revenue and recover maintenance costs. However, if an evaluation shows a facility will not generate sufficient revenue, no guidance is provided. This is concerning if evaluations determine areas in high need communities or Black communities will not generate revenue.</p> <hr/> <p>MORE INVESTMENT INTO MAINTAINING DISTRICT PARKS, RECREATION, AND OPEN SPACES IS NEEDED.</p> <p>It appears the District may need to consider how to improve the efficiency of a dedicated funding source to ensure parks are attractive, safe, and receive equitable funding. The District spends less on park operations and maintenance on a per capita basis than peer cities, such as Portland, Minneapolis, and Portland (See Section 810.2).</p>
<p>809.6</p>	<p>The District has one of the highest number of aquatics facilities per capita in the country. However, sometimes these facilities are not in the best location or best condition, and sometimes they are not large enough to meet demand.</p>	<p>WHEN LANGUAGE ABOUT PLACE OBSCURES SYSTEMIC CAUSES, IT IMPEDES SYSTEMIC SOLUTIONS.</p> <p>It is unclear what this section means by “not in the best location.” As Brookings has noted, achieving racial equity requires awareness of how we use language to describe both people and places. Describing a site as “not in the best location,” without explaining what that means can reduce “communities to only their challenges, while concealing the systemic forces that caused those challenges and the systemic solutions needed to combat them.”</p>

² This section does not mention how the community will be involved in planning decisions nor does it note existing inequities. For example, in Ward 7, there are [thirteen public schools](#) that are not open for public recreational use (versus four schools in the program).

ADDITIONAL ISSUES/CONCERNS

THE DEVELOPMENT OF GREEN SPACES AND PUBLIC LANDS VARIES GREATLY DEPENDING ON GEOGRAPHIC LOCATION: Section 805.3 acknowledges the need for parks may be more critical in “some areas” but fails to specify which areas of the District would benefit.

THERE IS A LACK OF CONSIDERATION FOR THE UNHOUSED POPULATION WHO UTILIZE DISTRICT PARKS AND OPEN SPACES: The element fails to mention the [unhoused population](#), many of whom encamp in DC parks. Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black. The element does not account for their experiences or needs.

ANALYSIS: EDUCATIONAL FACILITIES ELEMENT

The goal of the Educational Facilities Element is to “provide facilities that accommodate population growth and inspire excellence in learning; create an adequate, safe, and healthy environment for students; and help each individual achieve their fullest potential while helping to build and strengthen local communities.” Educational facilities refer to DCPS, DC Public Charter Schools (DCPCS), local colleges and universities, and child development facilities.

Institutional and structural racism have led to [inequitable outcomes](#) for Black DC residents and other residents of color. Today, the District’s educational facilities remain highly segregated and [academic achievement gaps](#) persist.

To analyze this element, we examined the current landscape of the District’s educational facilities and asked: How are educational facilities currently accommodating population growth and how does the element plan to accommodate for future growth? Is learning racially equitable across the District? Are schools adequate, safe, and fostering healthy environments in a racially equitable way? Are investments in local communities racially equitable?

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

90%

Ninety percent of District-owned school facilities graded [in poor condition](#) in SY2017-18 were in Wards 5, 7, and 8.

18

The average driving [commute time](#) of all sixth-grade students in DC is 12.7 minutes. For sixth-grade students in Ward 7, the average driving time is 18 minutes.

94%

Ninety-four percent of DC neighborhoods with a majority white population had less than ten percent of their families [living below](#) the poverty line, while that was true of just twenty-two percent of majority Black neighborhoods.

The Educational Facilities Element takes important steps towards advancing racial equity, like acknowledging the importance of leveraging institutions such as the University of the District of Columbia and maximizing the use of in-school facilities and spaces. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to educational facility inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1202.4	The trend of population growth in the District suggests that there will be many new students in need of education, necessitating additional school facility space and financial resources.	DISAGGREGATED DATA ON POPULATION TRENDS IS NOT PROVIDED. The Element frequently mentions that the District’s general and school age population is expected to grow over the next few years. However, there is no mention of how the anticipated racial demographic changes may impact growth.

1204.1	Washington, DC has made significant progress toward modernizing DCPS school buildings , investing more than \$2 billion since 2007 to modernize 73 school buildings. The District has budgeted an additional \$1.6 billion to modernize 20 DCPS school buildings from 2019-2024.	IMPROVEMENTS TO EDUCATIONAL FACILITIES IN A RACIALLY EQUITABLE WAY IS NOT EXPLICIT. A November 2019 DCPS report found that most of the facilities in Wards 7 and 8 were labeled as poor or very poor. Yet, the element does not discuss inequities faced by Black and Latinx students. These inequities range from the lack of school resources and empty libraries to minimal mental health supports and the urgent need for equity reforms in the school modernization process .
1210.4	Each SIT [School Improvement Team] includes parents, neighbors, and members of the larger community. This team provides feedback throughout design and construction and helps disseminate information about the school improvement to peers and constituencies.	THERE ARE MISSED OPPORTUNITIES FOR COMMUNITY INVOLVEMENT. The current plan mentions the creation of School Improvement Teams (SIT) at every school. These committees include school administrators, instructors, parents, and other community members—however, the plan does not mention including students.
1204.10	Strongly support the goal of making neighborhood schools an appealing “school of choice,” where students’ academic and personal achievements are nurtured, so that children do not have to travel long distances to schools across the District.	SCHOOL CHOICE IS PLAYING OUT INEQUITABLY ACROSS THE DISTRICT. In the 2017-18 school year , more than 37,000 students (or forty-one percent) crossed ward boundaries to attend school. For example, 488 students traveled from Ward 8 to Ward 4 for school, and 34 students traveled from Ward 4 to Ward 8. This shows how school choice is playing out differently among families in the District.
1216.3	As a result of funding for the PK Enhancement and Expansion Act of 2008, as well as other quality of life improvements, more families are choosing to raise their families in the District , resulting in an increased demand for child development facilities that serve children six weeks to three years of age.	HEAVY EMPHASIS IS PLACED ON NEW FAMILIES AND TRANSPLANTS. Long before massive displacement and other forces of gentrification led to rapid demographic transformation , the District, in the 1970s, peaked at over seventy percent Black. As drafted, this section ignores the fact that Black families are and always have been in the District.

ADDITIONAL ISSUES/CONCERNS

THERE IS NO PLAN FOR VIRTUAL LEARNING: The Covid-19 pandemic halted in-person learning for the last year. As schools have made the switch to virtual learning and hybrid models, issues around racial equity, learning loss, access to services, who is able to attend when schools reopen, and an equitable reopening present new challenges to racial equity in education. The element fails to consider these challenges.

COLLABORATION IS ENCOURAGED BUT NOT SPECIFIED: Section 1216.11 requires the executive branch to “explore collaborations with educational and business partners...to increase the availability of quality early childhood education, child development, after-school, and pre-school programs for all residents, especially low-and middle-income households, and families of children with disabilities.” This section should specify the types of

partners the District should seek. The District should explore collaborations with organizations that are led by Black people and other communities of color or have demonstrated proven success working with Black communities and other communities of color.

ANALYSIS: INFRASTRUCTURE ELEMENT

The Infrastructure Element’s goal is “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, as well as supporting future change and growth.”

An examination of the Comprehensive Plan’s policy proposals requires analyzing the current landscape of the District’s infrastructure landscape and asking, “is investment in local communities racially equitable?” Historically, the District’s infrastructure investments have not been racially equitable. From the digital divide to water facilities, historically Black communities of Wards 7 and 8 have been overlooked.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

70%

Less than seventy percent of households in Wards 7 and 8 have internet access.

5

Despite [thirty five percent](#) of Ward 7 residents relying on public transportation, only [five bus stops](#) in Ward 7 have [a shelter](#).

0

In 2009, there were zero green rooftops in Ward 7 compared to twenty-nine in Ward 2.

The Infrastructure Element takes important steps towards advancing racial equity, like enhancing coordination among relevant agencies and utilities when building new or modernizing infrastructure. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to infrastructure inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1312.5	<p>Minimizing the digital divide through solutions such as expanding public wireless internet access, digital literacy programs, and access to job opportunities and technical internships that focus on digitally underserved neighborhoods are core goals for Washington, DC.</p>	<p>THE DIGITAL DIVIDE IN PREDOMINATELY BLACK COMMUNITIES IS NOT ADDRESSED.</p> <p>This section does not define what a “digitally underserved neighborhood” is. Wards 7 and 8 have a ninety two percent and eighty nine percent Black population respectively. However, only forty five percent of households in Ward 7 and forty eight percent of households in Ward 8 have broadband subscriptions, compared with eighty two percent of households in Ward 2 and eighty six percent in Ward 3. The Covid-19 pandemic has multiplied the consequences of the digital divide.</p>

<p>1319.1</p>	<p>The goal for these efforts is to create vibrant new communities that are effectively integrated with surrounding neighborhoods, and that offer a high-quality 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.</p>	<p>THE ELEMENT DOES NOT EXPLICITLY MENTION RACIAL EQUITY.</p> <p>This section opens by listing several established communities and then proceeds to describe the goal of creating vibrant new communities. Other parts of the Comp Plan (specifically in Land Use) refer to communities that are largely Black or Latinx as “transitioning, “emerging, or “underserved” and refers to whiter, more affluent communities as “established” or “new.” As such, this language does not provide targeted assistance to those in the most need and is likely to exacerbate inequities.</p> <p>Broadly, this element does not explicitly mention the need for racially equitable infrastructure, describe how the District can ensure racially equitable infrastructure, or illustrate what racially equitable infrastructure should look like. It also does not acknowledge the history that has led to infrastructure inequities.</p>
<p>1302.7</p>	<p>This section contains a map that shows the Washington Aqueduct Service Area and Major Facilities as of 2018.</p>	<p>THE DISTRICT HAS NOT EQUITABLY INVESTED IN INFRASTRUCTURE.</p> <p>A review of the referenced map shows there are no major facilities to the east of the Anacostia River. However, as drafted, it is unclear exactly what the impacts of this are.</p>
<p>1304.2</p>	<p>Some areas in Wards 7 and 8 have historically experienced low water pressure. To improve the pressure, DC Water built a new pumping station in 2008, and in 2018, completed the construction of a new two-million-gallon water storage tower and new transmission mains at St. Elizabeth's.</p>	<p>THE LACK OF INFRASTRUCTURE IN WARDS 7 AND 8 PRESENT ONGOING PROBLEMS.</p> <p>The purpose of the pumping station is unclear given that the water pressure remains low after this project was completed. How is the District or DC Water monitoring progress to gauge effectiveness? The Comp Plan consistently references positive outputs, without examining the true outcomes of efforts.</p>

ADDITIONAL ISSUES/CONCERNS

FUTURE TELECOMMUNICATIONS IS PLANNED, BUT RACIAL EQUITY IS NOT AT THE FOREFRONT: Section 1312.1 mentions that the District “seeks to implement telecommunications policies that advance its initiatives to broaden technology infrastructure and wireless accessibility throughout the District, often in coordination with private industry and federal stakeholders.” It is unclear what the District’s role in this process will be, how this will be implemented, and how it will be targeted to address racial inequities of the digital divide (the extent of which is highlighted in the two sections that immediately follow).

ANALYSIS: IMPLEMENTATION ELEMENT

The Implementation Element “describe[s] how the policies and actions in the Comprehensive Plan should be carried out.” A priority of this element is to link relevant recommended actions to zoning regulations to “facilitate making zoning not inconsistent with the Comprehensive Plan.”

The Implementation Element “addresses the manner in which land use planning policies are interpreted and applied on a day-to-day basis.” This analysis examines whether the element’s proposed solutions will exacerbate racial inequity, maintain the status quo of racial inequity, or help to eliminate or reduce racial inequities. The litmus test for every approved policy and strategy should be its ability to narrow existing racial inequities.

Consider these metrics on the implementation of the Plan:

2

The Office of Planning conducted two [periodic progress reports](#) since 2006, despite the DC Law requiring reports every four years in the interest of transparency.³

0

Zero [statutorily required](#) public hearings have been held on the District’s progress on Plan implementation.

1

One [environmental assessment](#) has been submitted to Council since 2002 despite [DC Law requiring](#) Plan amendments include an environmental assessment.

The Implementation Element takes important steps towards advancing racial equity. For example, Section 2512.1 states that progress reports “will include monitoring data, activity and impact information that is disaggregated by...race.” As noted above, this will only be effective if the Office of Planning submits timely and accessible progress reports. In addition, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
2501.2	An equitable District is one in which all residents have the same opportunities to thrive and prosper, where health outcomes are improved for all racial and ethnic groups, and environmental benefits are shared by everyone.	<p>POLICIES ARE RACE NEUTRAL, NOT SPECIFICALLY FOCUSING ON IMPROVING OUTCOMES FOR COMMUNITIES OF COLOR.</p> <p>Policies and actions in the Comp Plan are not consistently designed to target Black communities and other communities of color. The majority of the citywide elements rely on overly vague language. In addition, many of the strategies throughout the Plan center inclusivity and <i>equality</i> more often than racial equity.</p>

³ As drafted, Section 2512.1 does not add enforcement provisions to ensure progress reports are timely submitted and hearings are timely held.

<p>2502.5</p>	<p>To the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods, the transportation network, parking, and environmental quality are assessed and adequately mitigated.</p>	<p>EVALUATION OF RACIAL EQUITY IMPACTS ARE NOT CONSISTENTLY REQUIRED THROUGHOUT EACH STAGE OF THE PLANNING PROCESS.</p> <p>This section does not define what “positive impacts” are, how they can be maximized, and for whom these impacts are to be achieved for. It also does not define what “negative impacts” are. The development review process and decisions emanating from that process can and should establish a framework that applies a racial equity lens.</p>
<p>2505.4</p>	<p>Monitor social, economic, community, and real estate trends that might require land use actions or policy modifications. Incorporate current, reliable data in Washington, DC’s land use planning efforts, and use that data consistently across District agencies.</p>	<p>A ROBUST STRATEGY TO MONITOR, TRACK, AND EVALUATE OUTCOMES OR DISPARATE IMPACTS DOES NOT EXIST.</p> <p>This section does not acknowledge the need for disaggregating data by race. It follows a similar trend in the Comp Plan where explicit directions to close racial, social, and economic disparities via capital and program investments are not provided. In addition, the section does not expressly call for the creation of, monitoring of, or direct reporting about racial equity related measures.</p>
<p>2503.3</p>	<p>Small Area Plan work should consider competing demands, available staffing and time, and available funding. Such plans should address topics such as neighborhood revitalization and conservation needs, and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives.</p>	<p>THE DEVELOPMENT OF SMALL AREA PLANS DOES NOT REQUIRE THE APPLICATION OF A RACIAL EQUITY LENS.</p> <p>This section illustrates how the Implementation Element maintains expectations as opposed to disrupting or trying new approaches.</p> <p>Further, available funding and staffing should be aligned to reflect the commitments laid out by the Implementation Element. This is a principal flaw with the Comprehensive Plan. If staffing, funding, and resources are not allocated and provided, and done so in a way that will prioritize communities with the greatest level of need, inequities are likely to persist or be compounded.</p> <p>It also does not specify what “other implementation techniques” would be necessary to achieve the Plan’s objectives.</p>
<p>2507.1</p>	<p>The Zoning Commission, Board of Zoning Adjustment, and the DC Council itself provide formalized opportunities for public discourse on land use matters. The internet, e-mail, social media, and other technologies have made information instantly accessible to thousands of residents, enabling unprecedented levels of participation in community meetings, summits, and forums.</p>	<p>THE ELEMENT LACKS CONSIDERATION OF DIVERSE STRATEGIES TO ENSURE COMMUNITY ACCESS.</p> <p>This section takes important steps to ensure information is widely available to the public. However, it must also consider the digital divide in the District and find more effective ways to engage the entire community.</p>

<p>2507.3</p>	<p>Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation.</p>	<p>THE ONUS IS PUT ON THE COMMUNITY TO ENSURE THEIR OWN ENGAGEMENT.</p> <p>The onus must be on the District. First, the District should reflect on and research who engages, who is heard, who does not engage, and why that may be. This research should inform proactive identification and creation of new ways for residents to have their voices heard.</p> <p>In addition, the assumption that the community is not or has not engaged or attempted to engage the District should be interrogated.</p>
<p>2509.1, 2509.2, 2515.4</p>	<p>Capital Improvement Planning (CIP) provides one of the most important means to establish the Comprehensive Plan as the guiding document for future public investments.</p> <p>It is reviewed and updated on a regular basis to reflect changing priorities, unexpected events, and new opportunities.</p>	<p>CIP IS A MISSED OPPORTUNITY TO ENSURE RACIAL EQUITY IS AN INVESTMENT PRIORITY.</p> <p>This section presents a strong opportunity to center racial equity in budget considerations. The budget is where the rubber meets the road but unfortunately, there is no reference to prioritizing racial equity in this section. It is unclear how CIP will reinforce commitment and goals to racial equity.</p>

ADDITIONAL ISSUES/CONCERNS

THE ENVIRONMENTAL ASSESSMENT IS INCOMPLETE AND NON-EXHAUSTIVE: Based on [the law](#), the Mayor is required to submit an environmental assessment of the proposed Comp Plan amendments. However, the five page assessment does not provide any thorough assessment, evaluation, analysis of data, project-based assessment, or critical analysis.

TERMS DEFINED IN THE FRAMEWORK ELEMENT ARE NOT CONSISTENTLY USED: The Implementation Element offers an opportunity to reinforce and apply definitions established in the Framework Element and the Equity Crosswalk’s overview. However, terms such as “racial equity” or “equitable development” that were defined in the Framework (like in [Section 213.8](#)) rarely, if at all, appear in other Citywide elements.

GUIDANCE ON THE AMENDMENT SUBMITTAL PROCESS WAS STRUCK: Rather than striking this section, this process (laid out in Section 2515) requires clarity and specificity. This section also represents an opportunity to ensure that any zoning text amendment considers the potential for disparate impacts, ways to mitigate or eliminate potential disparate impacts, and ways to ensure public benefits for communities of color.

RACIAL EQUITY TRAINING FOR ZONING COMMISSION AND IMPLEMENTERS IS NOT MENTIONED: The Implementation Element represents an opportunity to be intentional in disrupting the status quo by building out new community led approaches. The District must ensure the Zoning Commission charged with making land use decisions is both committed and able to advance racial equity.

GLOSSARY

ACTION

A specific step to be taken by District Government to implement the policies in the Comprehensive Plan, such as the adoption of a new ordinance or completion of a capital improvement project; the accomplishment of a thing usually over a period of time, in stages, or with the possibility of repetition ([source](#))

ADMINISTRATION

1) The manner in which land use planning policies are interpreted and applied on a day-to-day basis; this includes the development review, small area planning, zoning, long-range planning, and community involvement activities that are used to carry out Comprehensive Plan policies 2) The officials in the executive branch of government under a particular chief executive ([source](#))

DEVELOPMENT REVIEW

The City process for reviewing and approving new buildings, alterations to existing buildings, and subdivisions ([source](#))

GUIDING PRINCIPLE

A statement of philosophy and basic values about the future of the city that sets the overall tone for the goals, policies, and actions in the Comprehensive Plan ([source](#))

LAND USE

Chapter of the Comprehensive Plan containing goals, policies, maps and actions to guide the future development and redevelopment of public and private property ([source](#))

PLANNING COMMISSION

A locally appointed commission that reviews plans and projects for consistency with the Comprehensive Plan, considers amendments to the Plan, and addresses long range planning issues; does not currently exist in the District of Columbia Government ([source](#))

POLICY

A specific statement of principle that implies clear commitment; a general direction that a governmental agency follows ([source](#))

RACIAL EQUITY

The elimination of racial disparities so that race no longer predicts opportunities, outcomes or the distribution of resources for residents of the District, particularly for Black residents and other residents of color ([source](#))

RACIAL INEQUITY

When race can be used to predict life outcomes, e.g., disproportionality in education (high school graduation rates), jobs (unemployment rate), criminal justice (arrest and incarceration rates), and other key economic and social indicators ([source](#))

REWRITE

According to law, the Comprehensive Plan is to be implemented over a 20 year cycle with the next rewrite scheduled to occur in 2026 ([source](#))

CODE OF THE DISTRICT OF COLUMBIA

TITLE 1. GOVERNMENT ORGANIZATION.
CHAPTER 3. SPECIFIED GOVERNMENTAL AUTHORITY.
SUBCHAPTER III-A. COMPREHENSIVE PLAN.
PART I. GENERAL.

§ 1–306.02. Mayor to submit proposed Land Use Element and map; submission of amendments to District elements of comprehensive plan; specifications; approval.

* * *

(f)(1) The Mayor shall transmit 2 generalized maps—a Future Land Use Map and a Generalized Policy Map—to the Council within 90 days of the effective date of the Comprehensive Plan Amendment Act of 2021, passed on 2nd reading on XXX, 2021 (Enrolled version of Bill 24-1) (“Act”).

(2) The maps transmitted under this section shall:

(A) Incorporate the map amendments enacted in sections 2(b) and (c) of the Act;

(B) Conform to the requirements of sections 223 through 226 of Chapter 200 (“the Framework Element”) of the Comprehensive Plan;

(C) Be printed at a scale of 1,500 feet to 1 inch;

(D) Use standardized colors for planning maps;

(E) Indicate generalized land use policies; and

(F) Include a street grid and any changes in format or design to improve the readability and understanding of the adopted policies.

(3)(A) The Council shall hold a public hearing to determine if the maps transmitted under this section conform to the requirements of paragraph 2 of this subsection. If the Council determines that a map transmitted under this section conforms as required, the Council shall approve the map by resolution.

(B) If the Council determines that a map transmitted under this section does not conform to the requirements of paragraph 2 of this section but requires corrections to conform, the Council shall approve the map by resolution, identifying the

required corrections, and the Mayor shall publish a new map with the required corrections.

* * *

§ 1–306.05. Publication of the Comprehensive Plan.

(c) Within 90 days of ~~April 8, 2011~~ the effective date of the Comprehensive Plan Amendment Act of 2021, passed on 2nd reading on XXXX XX, 2021 (Enrolled version of Bill 24-1), the Mayor shall publish the Comprehensive Plan, as amended, in its entirety. The Comprehensive Plan shall be consolidated by the District of Columbia Office of Documents into a single new or replacement title of the District of Columbia Municipal Regulations to be designated by the District of Columbia Office of Documents. The Comprehensive Plan shall be published in the format furnished by the Mayor and need not conform to the Office of Documents' publication standards.

**TITLE 38. EDUCATIONAL INSTITUTIONS
CHAPTER 28. SCHOOL-BASED BUDGETING AND ACCOUNTABILITY
SUBCHAPTER I. GENERAL PROVISIONS**

§ 38–2803. Multiyear Facilities Master Plan.

(a)(1) Beginning on December 15, 2017, and every 10 years thereafter, the Mayor shall prepare and submit to the Council for its review and approval a comprehensive 10-year Master Facilities Plan for public education facilities ~~along with a proposed resolution, in accordance with which shall comply with the requirements of~~ this section. The Mayor's submission shall be accompanied by a proposed resolution to approve the Plan. If approved by the Council, the 10-year Master Facilities Plan shall take effect on the first day of the succeeding fiscal year.

(2) The Council shall conduct at least one public hearing on the proposed 10-year Master Facilities Plan before ~~approval~~ voting to approve or disapprove the Plan.

(3) If the Council disapproves the proposed Plan, it shall state its reasons for disapproval or make recommendations in the disapproval resolution or in an accompanying legislative report. Thereupon, the Mayor shall submit a revised Master Facilities Plan within 180 days after the Council's disapproval.

(4) If the Council approves the Master Facilities Plan, the Plan shall take effect no later than the first day of the succeeding fiscal year.

~~(5)~~ (3) If, subsequent to Council approval of the 10-year Master Facilities Plan, material changes to the plan become necessary, the Mayor may modify the Plan; provided, that any the modification shall be submitted to the Council, with an accompanying proposed resolution, for consideration in the same manner as specified in paragraphs (2), (3), and (4)

~~of this subsection. for review and approval along with the Mayor's annual submission of a capital budget recommendation for public schools.~~

(6) Notwithstanding paragraph (1) of this subsection, the Mayor shall prepare and submit to the Council by December 15, 2022 an approvable comprehensive 5-year Master Facilities Plan for public education facilities. The process for its review and approval shall be the same as provided in paragraphs (1) through (4) of this subsection.

5 A BILL
6

7
8 24-1
9

10
11 IN THE COUNCIL OF THE DISTRICT OF COLUMBIA
12

13
14
15 To amend the Comprehensive Plan for the National Capital: District Elements of 2006 to reflect
16 revised policies, actions, and determinations and to update the maps accordingly; to
17 amend the District of Columbia Comprehensive Plan Act of 1984 to require the Mayor to
18 transmit two maps and the publication-ready Comprehensive Plan to the Council for
19 approval, and to publish the Comprehensive Plan; to amend the District of Columbia
20 Comprehensive Plan Act of 1984 Land Use Element Amendment Act of 1984 to require
21 the Mayor to propose amendments to the zoning regulations or maps to eliminate any
22 inconsistency of the zoning regulations with the Land Use Element of the Comprehensive
23 Plan within 16 months of the effective date of this act ; to provide that the text, maps, and
24 graphics of the District Elements of the Comprehensive Plan for the National Capital
25 need not be published in the District of Columbia Register to become effective; and to
26 provide that no element of the Comprehensive Plan for the National Capital shall take
27 effect until it has been reviewed by the National Capital Planning Commission.
28

29 BE IT ENACTED BY THE COUNCIL OF THE DISTRICT OF COLUMBIA, That this
30 act may be cited as the “Comprehensive Plan Amendment Act of 2021”.

31 Sec. 2. The District of Columbia Comprehensive Plan Act of 1984, effective April 10,
32 1984 (D.C. Law 5-76; D.C. Official Code § 1-306.01 *et seq.*), is amended as follows:

33 (a) Chapters 1 and 3 through 25 and the Implementation Table of Section 3 (10-A DCMR
34 §§ 100.1 *et seq.* and 300.1 through 2500.1 *et seq.*) are repealed and replaced by the attached
35 District Elements of the Comprehensive Plan for the National Capital submitted by the Mayor to
36 the Council on January 4, 2021 and passed on 2nd reading on XXX, 2021 (Enrolled version of
37 Bill 24-1). The text and graphics of the submittal are incorporated into and deemed a part of this
38 act as if contained herein.

39 (b) The District of Columbia Comprehensive Plan Future Land Use Map, enacted as part
40 of the Comprehensive Plan, is amended as shown on the map submitted by the Mayor of the
41 District of Columbia to the Council on January 4, 2021, and as further amended by the Council
42 of the District of Columbia as follows:

43 (1) The public right of way between 19th Street NW and the 1900 block of Lamont
44 Street NW is changed from Moderate Density Residential to Parks Recreation and Open
45 Space.

46 (2) The area 150 feet on either side of Mount Pleasant Street NW between Newton
47 Street NW and Park Road NW is changed from Moderate Density Residential to Medium
48 Density Residential.

49 (3) The following area, roughly bounded by 16th Street NW, Oak Street NW,
50 Meridian Place NW, and Hertford Place NW, is changed from Moderate Density
51 Residential to Medium Density Residential (Trinity AME Church):

52 (A) Square 2683;

53 (B) Square 2684, lots 491, 490, 489, 821, 820, 558, 555, 826, 827 and 825; and

54 (C) Square 2686, lots 619, 620, 803, 816, 805, 016, and 818.

55 (4) Two areas, one at the southeast corner of Irving Street NW and 15th Street NW,
56 and the second just east of the northeast corner of Columbia Road NW and 14th Street
57 NW, both Moderate Density Residential, are changed to Medium Density Residential.

58 (5) The area shown as the Mayor's proposed amendment #9933.1 is changed from
59 Moderate Density Residential to Moderate Density Residential/Parks Recreation and
60 Open Space.

61 (6) The area bounded by Columbia Road NW to the north, Warder Street NW to the
62 west, and Michigan Avenue to the south and east is changed from Parks Recreation and
63 Open Space to Moderate Density Residential / Parks Recreation and Open Space.

64 (7) The area on the north side of Columbia Road NW between Quarry Road NW and
65 Biltmore Street NW currently designated as Moderate Density Residential / Low Density
66 Commercial is changed to Medium Density Residential / Low Density Commercial.

67 (8) On both sides of Georgia Avenue NW between Columbia Road NW and Euclid
68 Street NW, the area currently designated as Moderate Density Residential / Low Density
69 Commercial is changed to Medium Density Residential / Low Density Commercial.

70 (9) The area 300 feet to the west of 16th Street NW between Crescent Place NW and
71 Belmont Street NW is changed from Moderate Density Residential to Medium Density
72 Residential.

73 (10) The area shown as the Mayor's proposed amendment #5014 north of
74 Florida Avenue NW between 11th Street NW and Sherman Street NW is changed from
75 Medium Density Residential /Medium Density Commercial to Medium Density
76 Residential /Medium Density Commercial / Parks Recreation and Open Space.

77 (11) Square 2557, generally bounded by Florida Avenue NW, California
78 Avenue NW and 18th Street NW is changed from Low Density Commercial to Moderate
79 Density Residential / Low Density Commercial.

80 (12) The area shown as the Mayor's proposed amendment #9813 generally
81 bounded by U Street NW, V Street NW, between 14th and 15th Street NW is changed
82 from Medium Density Residential / Medium Density Commercial / Local Public Facility
83 to High Density Residential / Medium Density Commercial / Local Public Facility.

84 (13) The area of Squares 3082, 3083, 3084, and 3085, and generally located
85 between V Street NW, Elm Street NW, 2nd Street NW, and 4th Street NW, that is
86 currently designated Local Public Facility is changed to Parks Recreation and Open
87 Space.

88 (14) The area of Square 3095 generally located between 3rd and 4th Streets NW
89 and north of Rhode Island Avenue NW that is currently designated Moderate Density
90 Residential / Moderate Density Commercial is changed to Medium Density Residential /
91 Moderate Density Commercial.

92 (15) The area shown as the Mayor's proposed amendment #9981, bounded by
93 9th, 10th and E Streets NW and Pennsylvania Avenue NW, is changed from High Density
94 Commercial to Federal/ High Density Commercial.

95 (16) The area shown as the Mayor's proposed amendment #2123 as High
96 Density Residential / Medium Density Commercial, and generally a corridor on either
97 side of Connecticut Avenue NW and bounded by Macomb Street, NW on the north and
98 Porter Street, NW on the south is changed to Medium Density Residential / Moderate
99 Density Commercial.

100 (17) The areas shown as the Mayor's proposed amendments 2154.1, 2154.3,
101 2154.23 and 2154.21 are changed and extended as follows: the area bounded by Western
102 Avenue, 100 feet east of 45th Street NW, the north edge of the alley that is approximately
103 100 feet north of Harrison Street, NW, and Wisconsin Avenue NW, is designated as High
104 Density Residential/High Density Commercial. Apply a Local Public Facility
105 designation to the area bounded by Western Avenue, 45th Street NW, Harrison Street,
106 NW, Jenifer Street NW and Wisconsin Avenue NW.

107 (18) The area generally bounded by Western Avenue NW, Wisconsin Avenue
108 NW, and Jenifer Street NW and designated on the existing FLUM as Medium Density
109 Commercial / Medium Density Residential is changed to High Density Commercial /
110 High Density Residential.

111 (19) The areas shown as the Mayor's proposed amendments 2353.2 and
112 2353.1, on the Howard Law School property generally in the area bounded by

113 Connecticut Avenue NW and Upton Street NW, are changed to push north the
114 Institutional / Low Density Residential designation for 2353.2 to Van Ness Street NW
115 and encompassing the library building.

116 (20) The area generally bounded by Woodley Road NW, Shoreham Drive NW,
117 Calvert Street NW and 29th Street NW, except for the area designated for LPUB at the
118 corner of 29th and Calvert Streets NW, is striped Low Density Commercial, creating a
119 High Density Residential / Low Density Commercial and Medium Density Residential /
120 Low Density Commercial areas.

121 (21) The area shown as the Mayor's proposed amendment #5001 and generally
122 bounded by Western Avenue NW, Military Road NW, Livingston Street NW and 42nd
123 Street NW is changed to Moderate Density Residential / Institutional.

124 (22) The area shown as the Mayor's proposed amendment #5013, at the
125 southeast corner of Nebraska Avenue NW and Connecticut Avenue NW, is changed to
126 Moderate Density Commercial / Medium Density Residential.

127 (23) The area shown as the Mayor's proposed amendment #2803, on the
128 western side of Wisconsin Avenue NW from Idaho Avenue NW to Lowell Street NW, is
129 changed so that the Moderate Density Commercial Designation extends only as far south
130 as the existing Low Density Commercial Designation, midblock between Macomb Street
131 NW and Lowell Street NW.

132 (24) The area occupied by Children's Hospital, Square 2950, Lot 808, and
133 generally located in the area bounded by 14th Street, NW extended, Fern Street NW,
134 Dahlia Street NW and east of 13th Street, NW extended is changed from Federal to
135 Institutional.

136 (25) The area shown as the Mayor's proposed amendment #2377 as Low
137 Density Commercial / Moderate Density Residential and generally bound by Aspen

138 Street NW, Willow Street NW, and Laurel Street NW is rejected. The area retains the
139 existing FLUM designation of Low Density Commercial / Low Density Residential /
140 Institutional.

141 (26) The area shown as the Mayor's proposed amendment #1590, generally the
142 northeast corner of South Dakota Avenue and Kennedy Street NE, is rejected. The area
143 retains the existing FLUM designation of Moderate Density Commercial / Low Density
144 Residential

145 (27) The area shown as the Mayor's proposed amendment #9946, generally the
146 southwest corner of 1st Place NE and Riggs Road NE is rejected. The area retains the
147 existing FLUM designation of Parks Recreation and Open Space.

148 (28) The area shown as the Mayor's proposed amendment #649, generally
149 between 14th and 17 Streets NE and Otis Street NE, is rejected. The area retains the
150 existing FLUM designation of Institutional.

151 (29) The area shown as the Mayor's proposed amendment #2503, generally at
152 the northeast corner of 13th Street NE and Rhode Island Avenue NE, is rejected. The area
153 retains the existing FLUM designation of Moderate Density Residential.

154 (30) The area shown as the Mayor's proposed amendments #1614, 1678, and
155 2072, as Medium Density Residential / Production Distribution Repair and generally
156 bounded by Okie, Fenwick, Gallaudet and Kendall Streets, NE is rejected. The area
157 retains the existing FLUM designation of Production, Distribution and Repair.

158 (31) For Square 3636, Lot 5, generally the area bounded by Franklin Street NE,
159 7th Street NE, and the Metrorail line to the east is changed from Production Distribution
160 and Repair to Production Distribution and Repair / Moderate Density Residential.

161 (32) The area shown as the Mayor's proposed amendments #1920, as High
162 Density Residential /Production Distribution Repair, is revised to reject the area generally

163 north of Evarts Street NE and bounded by Girard Street NE and 10th Street NE to the
164 existing FLUM designation of Production Distribution Repair.

165 (33) The areas shown as the Mayor's proposed amendments #2419.2 and
166 2419.3, generally west of the Metrorail line and extending between R Street to W Street
167 NE, are rejected. The area retains the existing FLUM designation of Production
168 Distribution and Repair.

169 (34) The area shown as the Mayor's proposed amendment #9997, as Medium
170 Density Commercial / Medium Density Residential, and generally bounded by Michigan
171 Avenue NE, Newton Street NE, and 10th Streets NE (Square 3826 Lot 0800, Square
172 3826 Lot 0014, Square 3826 Lot 0009, Square 3826 Lot 0010, Square 3826 NE corner of
173 Lot 0804) is changed to Parks, Recreation and Open Space

174 (35) The area shown as the Mayor's proposed amendment #2191, as Moderate
175 Density Commercial / Medium Density Residential, and generally bounded by Rhode
176 Island Avenue NE, Montana Avenue NE, Saratoga Avenue NE and Brentwood Road NE,
177 is changed to remove all of the proposed Moderate Density Commercial except for the
178 area currently designated as Moderate Density Commercial on the existing FLUM.

179 (36) The area shown as the Mayor's proposed amendment #1691, as High
180 Density Commercial / Medium Density Residential / Parks Recreation and Open Space,
181 and generally bounded by 1st Street NW, Michigan Avenue, North Capitol Street, and
182 Evarts Street NE is rejected. The area retains the existing FLUM designation of
183 Moderate Density Commercial / Medium Density Residential / Parks Recreation and
184 Open Space.

185 (37) The area shown as the Mayor's proposed amendments #1906 and #2061.5,
186 generally north of Michigan Avenue NE, east of the Metrorail line, and west of 10th

187 Street NE, is rejected. The area retains the existing FLUM designation of Production
188 Distribution and Repair / Moderate Density Commercial.

189 (38) The area generally bounded by Florida Avenue NE, 5th Street NE, 6th
190 Street NE and Morse Street NE is changed from Moderate Density Residential / Medium
191 Density Commercial to Medium Density Residential / High Density Commercial.

192 (39) The area shown as the Mayor's proposed amendment #9928, as Low
193 Density Commercial / Medium Density and generally south of I Street SW between 3rd
194 and 4th Streets SW is rejected. The area retains the existing FLUM designation of
195 Moderate Density Residential.

196 (40) Lots 2, 819-825 and 833-835 in Square 365, and Lot 30 in Square 397,
197 generally on the northern corners of 9th and P Streets NW, and currently Moderate
198 Density Residential, Medium Density Residential / Medium Density Commercial and
199 Local Public Facility is changed to Medium Density Commercial / Medium Density
200 Residential.

201 (41) The area shown as the Mayor's proposed amendment #9903, generally on
202 the southwest corner of D Street NE and 14th Street NE west of Kentucky Avenue is
203 rejected. The area retains the existing FLUM designation of Commercial Low Density.

204 (42) The area shown as the Mayor's proposed amendment #2373, at the
205 northeast corner of 12th Street NW and Maryland Avenue NW is changed to High
206 Density Residential / High Density Commercial.

207 (43) The areas shown as the Mayor's proposed amendments # 1587 and #9978
208 between Martin Luther King Jr Avenue NE and 2nd Street NE are rejected. The areas
209 retain the existing FLUM designation of Low Density Residential.

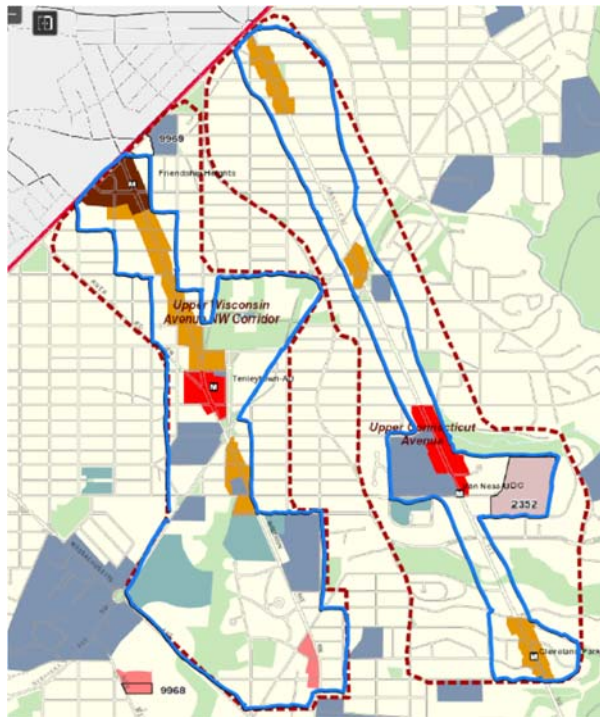
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211 (c) The District of Columbia Generalized Policy Map, which was enacted as part of the
212 Comprehensive Plan, is amended as shown on the map submitted by the Mayor of the
213 District of Columbia to the Council on (date) and as further amended by the Council of the
214 District of Columbia as follows:

215 (1) Adding to the legend under “Proposed State of Washington,
216 Douglass Commonwealth” the following language: The proposed state encompasses all
217 of the District of Columbia except an area around the Monumental Core that would
218 remain the Constitutional enclave of the federal government. The boundary would only
219 be applicable after approval of statehood by Congress and proclamation of the President
220 admitting the State of Washington, DC. The proposed boundary was adopted by the
221 Council of the District of Columbia (R. 16-621, effective November 18, 2016) and
222 affirmed by majority vote for the advisory referendum during the November 8, 2016
223 general election. The boundaries are included here for illustrative purposes only.

224 (2) Amending the description of the Future Planning Analysis Area as
225 follows: “Areas of large tracts or corridors where future analysis is anticipated to ensure
226 adequate planning for equitable growth. Planning analyses generally establish guiding
227 documents including, but not limited to, Small Area Plans, development frameworks,
228 technical studies, retail strategies, or design guidelines. Such analyses ~~should~~ shall
229 precede any ~~significant~~ zoning changes in this area. The planning process should evaluate
230 current infrastructure and utility capacity against full build out and projected population
231 growth. Planning should focus on issues most relevant to the community that can be
232 effectively addressed through a neighborhood planning process.”

233 (3) Changing the boundaries of the Future Planning Analysis Areas
234 designated around Wisconsin Avenue NW and Connecticut Avenue NW to generally
235 reduce the width of these areas, as shown in blue in the image below.



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(4) Extending the Future Planning Analysis Area designated for Connecticut Avenue NW to extend further south and to include an area bounded by Macomb Street NW on the north, 34th Street NW and Cleveland Avenue NW on the west, Calvert Street, NW on the south, and an area east of Connecticut Avenue, NW, and including the Woodley Park Metro Station, and the Omni Shoreham and Marriott Woodley Park hotels, as shown in blue in the image below.



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(5) The area occupied by Children’s Hospital, Square 2950, Lot 808, and generally located in the area bounded by 14th Street, NW extended, Fern Street, NW, Dahlia Street, NW and east of 13th Street, NW extended is changed from Federal/Land Use Change to Institutional.

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(d) Section 7 (D.C. Official Code § 1-306.02) is amended by adding a new subsection (f) to read as follows:

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“(f)(1) The Mayor shall transmit 2 generalized maps—a Future Land Use Map and a Generalized Policy Map—to the Council within 90 days of the effective date of the Comprehensive Plan Amendment Act of 2021, passed on 2nd reading on XXX, 2021 (Enrolled version of Bill 24-1) (“Act”).

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“(2) The maps transmitted under this section shall:

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“(A) Incorporate the map amendments enacted in sections 101(u) and (v) of the Act;

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“(B) Conform to the requirements of sections 223 through 226 of Chapter 200 (“the Framework Element”) of the Comprehensive Plan;

259 “(C) Be printed at a scale of 1,500 feet to 1 inch;
260 “(D) Use standardized colors for planning maps;
261 “(E) Indicate generalized land use policies; and
262 “(F) Include a street grid and any changes in format or design to improve
263 the readability and understanding of the adopted policies.

264 “(3)(A) The Council shall hold a public hearing to determine if the maps
265 transmitted under this section conform to the requirements of paragraph 2 of this subsection. If
266 the Council determines that a map transmitted under this section conforms as required, the
267 Council shall approve the map by resolution.

268 “(B) If the Council determines that a map transmitted under this section
269 does not conform to the requirements of paragraph 2 of this section but requires corrections to
270 conform, the Council shall approve the map by resolution, identifying the required corrections,
271 and the Mayor shall publish a new map with the required corrections.”.

272 (b) Section 9a(c) (D.C. Official Code § 1 -306.05(c)) is amended to read as follows:

273 “(c) Within 90 days of the effective date of the Comprehensive Plan Amendment Act of
274 2021, passed on 2nd reading on XXXX XX, 2021 (Enrolled version of Bill 24-1), the Mayor
275 shall publish the Comprehensive Plan, as amended, in its entirety. The Comprehensive Plan shall
276 be consolidated by the District of Columbia Office of Documents into a single new or
277 replacement title of the District of Columbia Municipal Regulations to be designated by the
278 District of Columbia Office of Documents. The Comprehensive Plan shall be published in the
279 format furnished by the Mayor and need not conform to the Office of Documents’ publication
280 standards.”.

281 Sec. 3. Master Facilities Plan.

282 Sec. 3. Section 1104 (a) of The School Based Budgeting and Accountability Act
283 of 1998 (D.C. Law 12-175, effective March 26, 1999; D.C. Official Code 38-2803 (a)) is
284 amended to read as follows:

285 “(a)(1) Beginning on December 15, 2017, and every 10 years thereafter, the Mayor shall
286 prepare and submit to the Council for its review and approval a comprehensive 10-year Master
287 Facilities Plan for public education facilities which shall comply with the requirements of this
288 section. The Mayor’s submission shall be accompanied by a proposed resolution to approve the
289 Plan.

290 “(2) The Council shall conduct at least one public hearing on the proposed 10-year
291 Master Facilities Plan before voting to approve or disapprove the Plan.

292 “(3) If the Council disapproves the proposed Plan, it shall state its reasons for
293 disapproval or make recommendations in the disapproval resolution or in an accompanying
294 legislative report. Thereupon, the Mayor shall submit a revised Master Facilities Plan within 180
295 days after the Council’s disapproval.

296 “(4) If the Council approves the Master Facilities Plan, the Plan shall take effect no later
297 than the first day of the succeeding fiscal year.

298 “(5) If, subsequent to Council approval of the Master Facilities Plan, material changes
299 become necessary, the Mayor may modify the Plan; provided, that the modification shall be
300 submitted to the Council, with an accompanying proposed resolution, for consideration in the
301 same manner as specified in paragraphs (2), (3), and (4) of this subsection.

302 “(6) Notwithstanding paragraph (1) of this subsection, the Mayor shall prepare and
303 submit to the Council by December 15, 2022 an approvable comprehensive 5-year Master
304 Facilities Plan for public education facilities. The process for its review and approval shall be
305 the same as provided in paragraphs (1) through (4) of this subsection.”.

306 Sec. 4 PDR Retention Land Report

307 By January 2025 or one year prior to initiating the full rewrite of the Comprehensive
308 Plan, if earlier, the Office of Planning shall provide to the Council a report giving additional
309 guidance on the following: (1) identification of the amount, location, and characteristics of land
310 sufficient to meet the District's current and future needs for Production Distribution and Repair
311 (PDR) land; (2) quantifiable targets for PDR land retention; and (3) strategies to retain existing
312 and accommodate future PDR uses, particularly for high-impact uses. Further, the study will
313 address the Council's concern that mixing other uses, particularly residential, with PDR uses will
314 create economic conditions and land use conflicts that will reduce land and areas available for
315 PDR uses, particularly high-impact uses. This study shall be completed prior to or concurrent
316 with any future planning analyses in the New York Avenue NW corridor.

317 Sec. 5. Publication requirement exemption.

318 Notwithstanding section 9 [effective date], subsection 308(b) of the District of Columbia
319 Administrative Procedure Act, effective March 6, 1979 (D.C. Law 2-153; D.C. Official Code §
320 2-558(b)), and section 204 of the District of Columbia Administrative Procedure Act of 1975,
321 October 8, 1975 (D.C. Law 1-19; D.C. Official Code § 2-602), the text, maps, and graphics of
322 the District elements of the Comprehensive Plan for the National Capital, as amended by this act,
323 need not be published in the District of Columbia Register to become effective.

324 Sec. 6. Applicability.

325 No District Element of the Comprehensive Plan for the National Capital shall apply until
326 it has been reviewed by the National Capital Planning Commission as provided in section 2(a) of
327 the National Capital Planning Act of 1952, approved June 6, 1924 (43 Stat. 463; D.C. Official
328 Code § 2-1002(a)), and section 423 of the District of Columbia Home Rule Act, approved 24,
329 1973 (87 Stat. 792; D.C. Official Code § 1-204.23).

330 Sec. 7. Fiscal impact statement.

331 The Council adopts the fiscal impact statement in the committee report as the fiscal
332 impact statement required by section 602(c)(3) of the District of Columbia Home Rule Act,
333 approved December 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(3)). Sec. 6.
334 Effective date. This act shall take effect following approval by the Mayor (or in the event of
335 veto by the Mayor, action by the Council to override the veto), a 30-day period of Congressional
336 review as provided in section 602(c)(1) of the District of Columbia Home Rule Act, approved
337 December 4, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(1)), and publication in the
338 District of Columbia Register.

339 Sec. 8. Effective date

340 This act shall take effect following approval by the Mayor (or in the event of veto by the
341 Mayor, action by the Council to override the veto), a 30-day period of Congressional review as
342 provided in section 602(c)(1) of the District of Columbia Home Rule Act, approved December
343 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(1)), and publication in the District of
344 Columbia Register.