



February 5, 2020

Mr. Andrew Trueblood, Director
Office of Planning
1100 4th Street SW
Suite 650 East
Washington, DC 20024

RE: Proposed Amendments to the Comprehensive Plan

Dear Director Trueblood:

This brief reply sets out three main comments:

- 1) The current Comprehensive Plan is riddled with internal policy and data inconsistencies. The coherence and integration of the document needs to be materially improved, especially now that the Comprehensive Plan has already assumed a larger role in zoning and development decisions than many envisioned at its writing. The Office of Planning's [OP] proposed changes are in this direction and, hereby, obtain our support. We would like to see OP go further than currently proposed in rectifying the competing policies and data inconsistencies within the document. (We understand that at the time the Comprehensive Plan was written, a guidance role was envisioned for the document; it was to work alongside zoning regulations but not be equal in legal weight to the zoning code. In our view, this guidance role has been inappropriately supplanted over time so that the Comprehensive Plan functions similarly to the zoning code. Policy inconsistencies that were unfortunate in the former scenario are entirely unacceptable in the latter.)

Further, we implore OP to make explicit its intention that the Comprehensive Plan is a guidance document and not a document on equal footing to the zoning code before government bodies. To the extent that OP believes the courts have misinterpreted this intention, we encourage OP to restate how it intends this version of the Plan to be viewed by government agencies and the courts.

- 2) Elements of the existing Comprehensive Plan have been weaponized to varying degrees in an effort to stall development across the District. OP needs to look closely at which parts of the Plan may be used for purposes different than their original intent and clean up the language to foreclose misuse. OP's currently proposed changes are in this direction, but we would like to see OP go further than currently proposed.
- 3) Since the Comprehensive Plan plays a large role in guiding (or determining at-present) development and zoning decisions, it is imperative that the Plan mandates District decisionmakers take a broad, holistic view of development. Here, we are disturbed by the lack of serious attention paid to the many potential ancillary effects of development decisions.

For example, the affordable housing goals and the distribution of the apparent planned responsibility for achieving these goals across the planning districts – for the purposes of reaching more equitable spatial distribution and a higher level of overall affordable housing provision – are cited by your office with little to no mention of the necessarily complementary needs for educational and transport infrastructure to accommodate both the new residents and the existing ones.

We accept the view that development is coming. Generally, this prospect is positive, but even if not in all aspects it is likely that development is still going to occur. Thus, it is critical in our view that the city address all complementary aspects of development in the Comprehensive Plan. We list several such examples here.

In our planning district, the public schools are uniformly over-capacity and the city has continually failed to produce any document or plan sufficient to alleviate this problem. Development brings more students to our schools, which we support. But it also exacerbates our existing capacity problem. The Comprehensive Plan should instruct decisionmakers to engage seriously with school capacity when evaluating development proposals. (A one-page letter from the Deputy Mayor for Education stating that he expects minimal impact on school crowding from a potential development project is inadequate and too late to do any good.) We do not ask that approval of development projects be made conditional on a credible, acceptable plan to address school capacity issues, but we fear that the city will continue to underperform on addressing this critical issue.

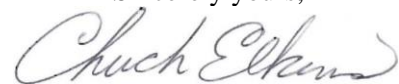
Development brings more people generally. These new neighbors need viable transportation infrastructure and options. We want to see the Comprehensive Plan speak to this need when evaluating development proposals. The importance of this point is heightened by WMATA's current proposal to significantly cut back several bus lines in our area. There is also a spatial aspect of the desirability of more intense development that we wish to see addressed more explicitly within the Comprehensive Plan. Namely, development projects should be more strongly encouraged at locations with established transportation infrastructure, such as at Metro stations and along major arterial roads. This transit-oriented development approach is one that has been successfully implemented by other major US cities.

Other infrastructure needs should be similarly addressed. A lack of adequate water pressure during a 2009 fire forced firefighters to go five blocks away from the home to find a hydrant with sufficient pressure, preventing the fire from being contained in time. Likewise, some areas of our community lack the requisite gas pipes for certain cooking and heating options. More neighbors necessarily increase the burden placed upon the already inadequate infrastructure. Without properly addressing these linked infrastructure needs during review of a proposed development, the existing problems will be worsened to the detriment of all.

The list goes on. We need to ensure adequate playgrounds, libraries and retail options (including grocery stores) are available to accommodate new residents. We wish to see OP devote more attention to these quality-of-life needs within the guidance provided by the Comprehensive Plan.

In short, development and housing more specifically are not just about putting a roof over one's head. We wish to see OP include requirements that decisionmakers and District agencies engage seriously with the issues mentioned here during consideration of any development initiatives or actual projects.

Sincerely yours,

A handwritten signature in cursive script that reads "Chuck Elkins".

Chuck Elkins, Chair