

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Planning**



Bill 23-736, the “Comprehensive Plan Amendment Act of 2020”

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

Virtual Platform

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Good afternoon, Chairman Mendelson, Councilmembers and staff of the Committee of the Whole. My name is Andrew Trueblood and I am the Director of the DC Office of Planning (OP). On behalf of Mayor Bowser, I am pleased to share with the Committee testimony on B23-0736, the “Comprehensive Plan Amendment Act of 2020.” OP urges the Council to adopt the proposed amendments to Chapters 1 and 3 through 25 of the District Elements of the Comprehensive Plan, what we have been referring to as the Comp Plan update.

Overview

The Comprehensive Plan is a high-level guide that sets a positive, long-term vision for the physical development of the District. It provides context, shared values, and goals to inform public decision-making and fine-grained planning efforts. It informs land use regulation and capital budgeting; guides executive and legislative decisions; and sets the groundwork for small area planning. Further it helps to guide actions of residents, businesses, and other organizations. However, it is not self-implementing, and its policy directives are not binding, unless and as provided by statute. We know that the city will change. The role of the Comprehensive Plan is to help guide that change toward a positive future both for today's residents and for our children and grandchildren.

The existing Comprehensive Plan, which was enacted in 2006 and underwent an amendment in 2011, is reflective of the challenges and environment of two decades ago. It needs to be updated to address the current and future challenges of COVID-19 recovery, housing, equity, and resilience. The Comp Plan



update seeks to address these challenges through the lens of the physical space of the District, from housing growth in the context of longstanding systemic racism to immediate public health and public space challenges. It proposes specific narratives, actions and policies that can help guide how the District tackles these challenges and more over the coming years.

OP appreciates everyone who has testified and submitted comments. These contributions illustrate both how important this update is and that this update is the product of unprecedented public engagement and careful consideration by District officials. We engaged community members, organizational stakeholders, professional experts, and staff at partner agencies. We have heard from over ten thousand residents and stakeholders. Some may have spent a minute sharing their values with us at a table at Marshall Heights Day. Hundreds of others have dedicated an hour or two at an ANC or community meeting to learn about the Comp Plan update and provide thoughtful feedback. Of course, there are also those dedicated stakeholders who have spent days reviewing the materials at plandc.dc.gov, preparing testimony for this hearing, talking to OP staff, and getting their neighbors involved. We appreciate the effort and insight of everyone who spent time learning and sharing with us to create the best community-informed update possible.

Through our project website, plandc.dc.gov, OP has provided information for those who want to spend 10 minutes or 10 hours reviewing the proposal, including various resources that support the document now under consideration by Council. In particular, we have interactive maps showing changes as well as theme-based crosswalks for equity, resilience, and COVID-19 recovery, which we know have been useful for various stakeholders.



OP has heard some concerns about moving forward with an update at this time, given COVID-19 and the resulting public health and economic impacts. The onset of COVID-19 occurred just prior to transmission of the Comp Plan update to the Council. Prior to submitting, our team reviewed the entire plan to ensure that it was still proper to move forward. Apart from some slight edits to language, for example to broaden the concept of an emergency to include public health emergencies, the team found that the proposal is still relevant. That is because the Comp Plan update is anchored in long-term values and goals that COVID-19 did not change. In fact, we found that the update is needed to anchor our long-term recovery to ensure we move toward our current shared vision and goals, especially around equity. The very uncertainty we are facing as a result of the COVID-19 pandemic is precisely the reason why we should act now to update the outdated existing Comp Plan document.

History of the Comprehensive Plan

The first Comprehensive Plan was produced in 1950 by the National Capital Park and Planning Commission, which was charged with planning for the District's parks and playgrounds, land use, transportation, and public facilities. The Commission produced another Comprehensive Plan in 1961, and another in 1967, which proposed radical changes to the city's landscape, including freeways and urban renewal.

In 1973, the federal Home Rule Act designated the Mayor of the District of Columbia as the city's principal planner. The Comprehensive Plan was divided into "District" Elements to be prepared by the



District’s Office of Planning, and “Federal” Elements to be prepared by the National Capital Planning Commission (NCPC). The first Comprehensive Plan of the post-Home Rule era was completed in 1984. Between 1984 and 2005, the District Elements were amended four times. A 1985 amendment added the Land Use Element and maps. The 1989 and 1994 amendments added Ward Plans to the document, roughly tripling its size. The 1998 amendments included a variety of map and text changes to reflect then-current conditions.

In 2004, as the District was emerging from the federal control board and as its population decline came to an end, the District commenced a full rewrite of the Comprehensive Plan that the Council adopted in 2006. In 2011, the Comp Plan underwent a minor amendment that consisted primarily of technical corrections and a limited number of policy updates. In 2016, OP launched a second amendment to the 2006 Comprehensive Plan, resulting in the Comp Plan update before your consideration which contains substantial and much needed revisions reflecting our city’s current context and needs.

Update vs. Rewrite

The scope of this Comprehensive Plan update reflects that this amendment cycle is a “major update/revision” as defined in the current Implementation Element (2514.2). The full rewrite in 2006 was preceded by a two-year long assessment and visioning process that culminated in “A Vision for an Inclusive City,” which served as the foundation for the new Comprehensive Plan. By contrast, for this update we did not start with a blank page. The extensive public engagement for this update centered around revisions to the existing document. Moreover, this update maintains the existing structure of the 2006 Comp Plan text and maps, and the policies and actions are provided for a five-year timeline and



not a new 20-year horizon. This update did not involve the visioning and document re-structuring of a rewrite, but it did involve more substantial updating and outreach than the 2011 update. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite. A full rewrite should not begin for at least two years following the passage of the current Comp Plan to allow time to implement and evaluate the policies and actions it contains. The first step in the process to rewrite the Comp Plan should be for Council to allocate resources to OP to initiate a community visioning process to inform a framework for the rewrite.

Public Engagement Process

Public engagement has been a hallmark of the Comprehensive Plan update process and has been broader and deeper than for any previous update. Through various engagement events and venues, OP has heard from thousands of residents and stakeholders. This input has helped shape the update. In 2016, OP kicked off the amendment cycle by hosting seven town hall meetings across the District. Then, in 2017, during the official open call for amendments, OP held over 100 community-based office hours across all eight wards. The open call process yielded over 3,000 amendment proposals. OP also incorporated public input from other venues, including feedback provided through the DC Council's review of the Framework Element in 2018 and 2019; OP's 2019 DC Values Campaign, which reached nearly 3,100 residents and stakeholders across all eight wards; and numerous housing engagements in 2019. The update integrates more than 40 plans produced by District agencies, including small area plans, the preparation of which entailed hundreds of public engagements.



In October 2019, OP launched the final public review process, and took several steps to prioritize meaningful ANC participation, including holding trainings about the process and timeline; hosting ANC-specific trainings about key changes; and attending ANC meetings. As a result, OP received 34 official ANC resolutions.

The public review process for the draft update illustrates how OP has balanced our commitment to robust public engagement with our goal to deliver the proposal to allow Council to approve it before the end of 2020. Upon the draft update's release, OP heard from many residents, ANCs, and stakeholders who support moving the process to adopt the Comprehensive Plan update forward with all deliberate speed, because they desire to see their input reflected in an updated, adopted Comprehensive Plan. Others asked that the review period be extended, and in response OP granted an extension, ultimately to providing 88 days for the public and 123 days for ANCs. This time frame represents the longest feedback period ever provided for a draft Comprehensive Plan amendment.

Upon transmittal of the Mayor's Proposed Comp Plan to Council, each ANC that provided feedback on the public review draft received a written response from OP with information regarding the inclusion of their feedback in the Comprehensive Plan amendment. The DC Council also received all of the feedback submitted by the public and ANCs. ANCs were able to arrange for OP staff to discuss with them and review the feedback. Finally, OP reviewed, responded to, and posted on the Comp Plan webpage ANC resolutions received after the public review period. Throughout the Spring and Summer 2020 communicated with District residents through a variety of means to share the Comprehensive Plan Update. OP continued to engage with residents through the Council process and helped communicate the opportunities DC Council provided for public input.



Themes of the Comprehensive Plan update

The revisions included in the update fall into five broad themes:

1. COVID-19 recovery: The update guides COVID-19 response and recovery including through economic monitoring, planning for housing needs, resilience efforts, and a broadened frame for emergency response. OP created a crosswalk to highlight policies and actions that support COVID-19 recovery.
2. Housing: The updated Housing Element contains policies and actions that support the District's goal of producing 36,000 new units by 2025, of which 12,000 will be affordable to low- and moderate-income households, and to address pressing issues across the housing continuum, including housing affordability, physical, economic and cultural displacement, and housing for specific populations.
3. Equity and racial justice: The update includes new and revised polices and actions that when taken together will help ensure all residents have what they need to thrive, no matter their race, age, neighborhood or income. These policies and actions build off the equity definition as established in the Framework Element and are supported by important data and trends throughout the update that reflect current disparities.
4. Resilience: The update introduces approaches to respond to both human-made and natural shocks and stressors, including displacement and other risks posed by climate change and public health emergencies.
5. Public resources: The update introduces coordination between master facilities plans for our pars, school, library, and recreation systems. Recognizing that our streets and sidewalks are



more than just conduits for cars and commuters, the updated Urban Design Element includes a public life section that addresses the use of these important public spaces for cultural life and celebration.

The update also includes language changes to clarify and better reflect current policy. For example, to better reflect the Comprehensive Plan’s status as a guide, mandatory language such as “shall” and “must” has been replaced with terms like “should.” In addition, phrases like “protect neighborhood character,” which have been used to perpetuate racial exclusion and segregation, have been replaced with “respect neighborhood character” to reframe this important objective using an inclusive tone. However, we retained phrases like “protect historic resources” because that remains consistent with our current historic preservation policy.

The update incorporates key policies and actions from Small Area Plans and other plans and studies completed during the life of the 2006 Comprehensive Plan. OP reviewed more than 40 plans completed by District and federal agencies and worked with agency staff to identify relevant policies and actions for inclusion in the updated Comprehensive Plan. For example, the updated Environmental Protection Element integrates goals and actions from Sustainable DC 2.0. Similarly, the updated Parks, Recreation, and Open Space Element reflects principles and guidance from the 2014 Parks Master Plan. The updated Community Services and Facilities Element incorporates conclusions of the 2018 Health Equity Report, highlighting key social determinants of health and differential health outcomes, as well as related health plans for addressing these disparities. Based on the 2018 DC Public Education Master



Facilities Plan, the update more clearly links DCPS and public charter school facility planning with population growth forecasts.

The update reflects recent data, including data from the U.S. Census Bureau’s 2017 American Communities Survey. OP worked with several DC agencies to update their modeling based on this data. In some instances, the update retains 2015 data to provide greater context for the narratives presented. Some data points, such as commuter data in the Area Elements, were deleted due to the data no longer being collected. Finally, although the Comprehensive Plan has a horizon of 2025, additional forecasting and projections were included where available. For example, some forecasting and projections go to 2030 and 2045 in an effort to provide decision makers with well-rounded and robust information to aid in future implementation.

The General Policy Map (GPM) guides land use decision-making in conjunction with the Future Land Use Map and Comp Plan text to effectively balance the competing land use demands to support neighborhood, District, and regional goals, including the provision of opportunities for additional housing and employment. The GPM includes for the first time Future Planning Analysis Areas, which are areas of large tracts and / or corridors that are anticipated for a change in density and intensity of use. In these locations, planning efforts will be undertaken to analyze land use and policy impacts and ways to support growth. The updated GPM also includes Resilience Focus Areas, where future planning efforts are anticipated to improve resilience to flooding, especially in areas within the 100- and 500-year floodplains. Finally, the updated GPM incorporates the boundary for the Proposed State of



Washington, Douglass Commonwealth, which encompasses all of the District of Columbia, except an area around the Monumental Core that will remain a federal government enclave.

Finally, OP updated the Future Land Use Map (FLUM), which generally depicts the policies of the Land Use Element's intended uses for roughly 20 years into the future. In conjunction with other parts of the Comprehensive Plan, the FLUM serves as an important guide for growth and zoning decisions. The land use designations on the map reflect the recommendations of small area plans completed since 2006. In addition, the updated FLUM reflects policies supporting continued focus for growth at metro stations and along corridors and anticipates the transfer of federal land.

Feedback from Public Review

Public and ANC feedback received during the public review period was very diverse. However, a handful of trends emerged:

- Most of the comments on the text were for the Housing, Transportation, Upper Northeast Area, Lower Anacostia/Near Southwest Waterfront Area, and Land Use Elements. Each of these elements received over 100 comments.
- Many comments were supportive of the draft Comprehensive Plan generally, in addition to specific issues such as equity, affordable housing, and accommodating needs of older adults and persons experiencing homelessness.
- Finally, most of the comments on the maps were requests for increased density on the FLUM along major corridors and additional Future Planning Analysis Areas on the GPM.



In responding to the comments received during public review, OP was guided by the following questions:

- Does the feedback align with the principles of the Comprehensive Plan? There are 40 guiding principles for the Comprehensive Plan and all revisions proposed must be in alignment with those principles.
- Is the feedback addressed sufficiently in one of the Comprehensive Plan Elements? We recognize that policies in one element of the Comprehensive Plan may support goals for other elements. For the sake of consistency, we place the context and description of a policy or action in one element, and where relevant to another element, we provide a cross reference.
- Is the feedback appropriate to incorporate into a Comprehensive Plan? The Comprehensive Plan is intended to provide high-level guidance for decision-making around the physical layout and environment of the District. It does not dictate zoning, create laws or programs, make budgeting decisions, or plan for operations of government.
- Has there been sufficient analysis and community engagement of the feedback to incorporate it? The open call process in 2016 was designed to solicit from the public a range of ideas about potential policies and actions, including new ideas that had not been analyzed by OP or vetted by community residents. However, this public review process was not designed to incorporate newly proposed and unvetted policies or actions. Moving forward, such ideas can be considered in other place-based planning work or in the Comprehensive Plan rewrite.



After analyzing over 1,000 comments we received from the public and approximately 1,500 comments we received from 34 ANCs across all eight wards, we updated the 10/15/19 draft to include over 78% of the feedback was integrated, supported, or acknowledged in the Mayor’s proposal. Also, the updates to the Future Land Use Map created an additional 15% of land use capacity on less than 6% of land area.

As part of the legislation to adopt the Framework Element of the Comprehensive Plan, the DC Council included an amendment (Act A23-0127) which directed OP to develop a report to the Council to provide guidance related to the options for increasing the variety of housing types in single-family zones and the potential equity and affordability impacts. The report that OP has prepared in response recommends that the District pursue gentle density housing options in single-family neighborhoods in a targeted manner that prioritizes high-opportunity, high-cost neighborhoods near high-capacity transit. The report also finds that there are many potential affordability, equity, and environmental benefits to allowing additional housing options in single-family neighborhoods.

Suggestions for Comprehensive Plan rewrite

As mentioned previously, this update was not a rewrite, yet the process offers some lessons and ideas for the next Comprehensive Plan rewrite. We offer the following suggestions, some of which may require legislation to implement:

1. Scope the plan with accessibility and inclusivity. Consider reducing the detail and length to make the document more accessible to a broader audience. The current redlined version of the document is more than 1,600 pages in length. It is a very technical and data-heavy document



with language that some residents may find difficult to understand. National best practices in comprehensive planning indicate high-level, short, straightforward, goal-oriented plans are more user-friendly. In addition, they are easier to update and can be more responsive to changes in the city. Ultimately, the document should be useful and accessible to a variety of users, including planning staff, Councilmembers, ANCs, residents, landowners, and other stakeholders.

2. Consider the optimal process to both facilitate long-term planning while allowing for much-needed, more nimble updating. The process for the rewrite and future processes beyond the upcoming rewrite should consider utilization of concurrent planning efforts to inform the overall Comprehensive Plan. For example, a new District agency plan could be adopted as an amended Citywide Element or a new area plan could be adopted as an amended Area Element. This approach is similar to neighboring jurisdictions and best practices in the planning field.
3. Evaluate the maps needed, including the granularity of FLUM and GPM to distinguish them from parcel-level zoning maps. For example, previous iterations of the FLUM and GPM were generalized, most notably the FLUM from 1984, meeting the intention for their use as high-level guidance. However, as digital cartography technology improved, over time the maps have become a combination of generalized areas and fine-grained detailed areas. The rewrite should consider whether the maps should reflect a generalized or parcel-level approach and maintain that approach through future amendments.



Urgency of immediate adoption

The existing Comp Plan was prepared prior to our acute housing challenges and does not address unbalanced geographic distribution of housing opportunities, nor does it provide sufficient guidance to remedy that issue. Simply put the existing Comp Plan does not sufficiently support efforts to meet the housing needs of District residents today, let alone in the future.

The Comp Plan update contains new and updated policies that respond to the Framework’s focus on housing. They support the District’s goal of producing 36,000 new units and 12,000 affordable units by 2025, promote housing preservation and equity; address various types of displacement; and support specific housing needs, such as larger housing units, and housing for vulnerable populations such as older adults, residents with disabilities, as well as at-risk homeless populations, including LGBTQ youth.

Updates to the Future Land Use Map (FLUM) provide additional development capacity that allow us to plan for and realize new affordable housing. We estimate the proposed updates to the FLUM, which affect 6% of the mapped area, will result in 15% additional capacity. Through OP’s work with the Zoning Commission on inclusionary zoning, the District can leverage additional development capacity toward more affordable housing.

We also know of numerous projects featuring affordable housing that are waiting on this proposal to move forward. For over a thousand units now under consideration by the Zoning Commission, each month of delay on adopting the Comp Plan update is a month of not serving our residents with critical



affordable housing and amenities. In addition, guidance from the Comp Plan update will assist District officials as we encourage federal officials to align projects such as the Armed Forces Retirement Home redevelopment and Union Station expansion with DC’s priorities.

The Comp Plan update includes policies in the Urban Design and Historic Preservation Elements that inform District activities related commemorative works, the development of public life studies, and the activation of public spaces – work which has become even more critical given both COVID-19 and the racial justice protests. The Comp Plan update also includes important guidance across Elements and Maps that will be required for OP to complete its anticipated community planning work, an area of practice that advances equity, lifts up community-based vision, and promotes livability. Areas where community plans are in jeopardy include: Congress Heights, Pennsylvania Avenue SE, Chevy Chase, and our Resilience Focus Areas around the waterfronts. Delays in Comp Plan approval will cause cascading delays in initiating new work in areas that such as Upper Wisconsin Avenue, New York Avenue NE, and other places highlighted for future planning analysis, and ultimately will delay OP’s ability to start a full rewrite of the Comp Plan.

Moreover, the Comp Plan update includes revisions that address the pressing issue of land use appeals. The 2006 Comp Plan, which contains many internally conflicted policies, has proven to offer too much fodder for litigation of important projects. The update builds on the work of the Framework Element that the Council approved a year ago, providing updated policies and maps that will reduce uncertainties and ambiguity, ultimately reducing the risk of federal courts overturning local decision-making.



In conclusion, the update that Mayor Bowser submitted to the Council in April 2020 reflects robust community input, broad DC government feedback, and deep planning analysis. The resulting maps, narrative, policies and actions will provide the District government and residents with the support we need to seize the opportunities and tackle the challenges ahead.

