



Office of the Director

**VIA ELECTRONIC MAIL**

August 17, 2020

Chairman Phil Mendelson  
1350 Pennsylvania Avenue NW  
Suite 504  
Washington DC 20004

Dear Chairman Mendelson:

In April 2020, Mayor Bowser transmitted an updated Comprehensive Plan (Comp Plan) to the Council for consideration and approval. As shared at the time, it is critical that the Council approve the plan in 2020 to ensure the District can achieve critical goals around economic recovery, housing, equity, and resilience, among others. As shown below, delays in approval will cause unneeded and irreparable harm to goals we all seek to achieve at this critical time.

Mayor Bowser's proposal is the product of unprecedented public engagement, including over 10,000 public responses received since 2016 when an Open Call for public amendments initiated the amendment process and includes policy guidance from over 40 planning activities conducted by District government agencies over the last four years. Given the level of public and agency feedback represented in this update, this proposal embodies the best and most relevant planning and thinking, so will not require major changes from Council.<sup>1</sup>

Moreover, at the Council's request, the Office of Planning (OP) took extra steps to ensure community feedback could be provided prior to Council submission and that the update was submitted to Council with sufficient time for review and approval in 2020.

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<sup>1</sup> Prior to transmitting the updated Comp Plan to Council, the severity of COVID-19 as a global health pandemic became apparent. OP rigorously reviewed its final proposal through the lens of emergency response and recovery and found that, as a long-term document, it already addressed many of the issues the District was facing. The values and long-term goals for the District remain the same, even if events significantly change the current situation and present-day policies. OP did make minor changes to broaden disaster-related language and included new policies and actions related to ongoing monitoring, response, and recovery. OP has released a COVID-19 crosswalk on [plandc.dc.gov](http://plandc.dc.gov) that illustrates how thoroughly the current proposal addresses this (and future) challenges.



While adoption of the Comp Plan in a responsible and timely manner is critical generally for the District, including to help guide the FY22 capital budget, there are some acute needs that call for a sense of urgency and would be incalculably harmed with delay beyond 2020.

Most concerning is the current Comp Plan's inability to fully support the District's acute housing needs. The current document does not support equitable housing opportunities at the level required across the District. This is especially critical given the pressing issue of land use appeals. The 2006 Comp Plan, in its outdated and internally-conflicting form, has proven to offer enough uncertainty and lack of clarity for litigation of important projects. This updated Comp Plan provides clarity for all stakeholders through updated policies and maps that will significantly reduce the risk of courts overturning local decision-making.

The Mayor's proposal addresses our housing needs directly through new or updated policies that seek to achieve a minimum percentage of affordable units within each Planning Area, develop one-third of new housing as affordable, remove barriers to the development of affordable housing in high-cost areas of the District, preserve existing subsidized and naturally occurring affordable housing, and minimize displacement from redevelopment or conversions of affordable housing.

In addition to these policies are updates to the Future Land Use Map (FLUM), which allow for additional housing opportunities across the District. We estimate the proposed updates, which affect 6% of the mapped area, will result in 15% additional capacity, which will be critical as the District seeks to address its existing housing shortage. Every month of delay on the Comp Plan is a month of not serving our residents, across the District, with critical additional affordable housing, housing, and amenities.

This is not just a theoretical impact, as we are aware of several projects that are waiting for this updated FLUM to move forward. These projects represent thousands of housing opportunities, including deeply affordable housing and include developments at the Takoma, Rhode Island Avenue, Anacostia, and Southwest Waterfront Metro stations as well as at Barry Farm, Greenleaf, Benning Road, Georgia Avenue, and along the M Street SE waterfront. In addition, a lack of clear guidance via an approved updated Comp Plan will impair the District's efforts to ensure federal projects such as the Armed Forces Retirement Home and Union Station redevelopment align with our long-term priorities.

Beyond impairing the District's ability to provide needed housing, a delayed Comp Plan will also delay priority place-based planning initiatives. Without an approved Comp Plan, OP will not have the updated guidance across Elements and Maps that will be required to complete its anticipated Small Area Plan work. The most immediate plans put in jeopardy are current efforts in Congress Heights, Pennsylvania Avenue SE and Chevy Chase. In addition, delay in Comp Plan approval will cause cascading delays in OP's ability to begin future planning studies anticipated in areas that include Upper Wisconsin Avenue, New York Avenue NE, Foggy Bottom, and North Capitol Crossroads. In addition, delays in passing this Comp Plan update will result in future delays of a full rewrite of the Comp Plan.

Finally, delays in approving the Comp Plan update will impair OP's ability to move forward on its public and civic life work, which has become even more critical given both COVID-19 and the racial justice protests. The Urban Design Element provides needed policy direction and updates for commemorative works, the development of public life studies, and the activation of public spaces.

As shared above, the Executive has a sense of urgency in finalizing the Comp Plan. OP worked tirelessly through the Winter and the COVID-19 disruptions to ensure the Council and the public had the proposal in early Spring. It is also why OP has set up meetings with interested Councilmembers and staff to review elements and discuss the updates in the coming weeks. We urge the Council to hold a hearing in the Fall which would allow additional feedback from the public, while also ensuring adequate time for Council to markup and pass the Comp Plan before the end of this year.

To that end OP stands ready to address any questions or concerns you may have or any support you need to meet these critical timelines.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Trueblood', with a long horizontal flourish extending to the right.

Andrew Trueblood