

April 18, 2002

Chairman Linda W. Cropp
Council of the District of Columbia
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Re: Bill 14-0602; PR14-604

Dear Chairman Cropp:

Washington's economic upturn has translated into many projects being planned or underway and with the Office of Planning necessarily involved on many fronts. That office is understandably stretched with all this ad hoc activity.

However, the Charter requirement for a Comprehensive Plan to guide decisions, especially as to land use, is urgently needed at a time when there is so much development activity popping up, both proposed and in the mill. Proposed projects fall all over each other for attention, compete for the same limited number of sites and in many cases precious city resources, and sometimes threaten—with all their potential for ostensible benefits—to assault local residential communities and the larger historic framework of the L'Enfant and McMillan Plans. This is, at least in part, a result of having a Comprehensive Plan with such a potpourri of alternatives possible for individual areas of the city, that there is, effectively, no guidance as to priorities. Meanwhile, the next hoped-for stages of Comprehensive Plan development to achieve better definition have languished.

Local communities, such as Takoma, which prides itself on its unique qualities, or areas north of Massachusetts Avenue or along the Anacostia River, need to be reassured that proposed policies or projects are not destabilizing and disrespectful of the qualities that make these neighborhoods special. There should be a sense of security and commitment embodied in the Plan. The process for amending it should offer a regular and ongoing opportunity for meaningful dialogue as well as a process, however lacking now in required definition, for informed and committed decision-making. Most importantly, the Plan offers the potential for the city to define a vision of itself at the beginning of this century that will carry us through incrementally and for the long haul, over the coming decades. Some have said that we are losing our way, and the city is changing around us without a guiding Plan and without reference to the past two major plans which broadly define the essential nature and features of the city.

Bill 14-0602

The four year cycle schedule is one of the Comprehensive Plan's most salient features, representing an effort to secure regularity in submissions and progress toward achieving policies and directives in the Plan. The Mayor's proposal is to amend this cycle, with the Plan not coming before us before 2005 (it was due March 32, 2002) and the progress report on implementing the Land Use Element for the current Plan postponed with the new cycle to 2003 (it was due in 2000). This means putting efforts to comply with the current enacted Plan and the preparation of a revised Plan on a schedule that leaves the city ship bobbing about without a course to follow. The progress report on the land use element for a 2005 amended Plan would not come before 2007. The proposed revised schedule would entail no updated Plan since 1998, a lapse of seven years.

What are the implications of this proposed cycle change?

1. Obviously, more time is needed to prepare amendments (whether for a radically reformatted plan, or for one merely updated). The question is: how much time is needed to do this?

We recommend March 31, 2004, instead of March 31, 2005 as the due date (a lapse of six years rather than seven since the last amendment cycle). This should provide sufficient time for a functioning planning office to prepare a proposed revised Comprehensive Plan, regardless of format, re-design, or content. Recommendations from the Comprehensive Planning Task force to be established are due by February of 2003. Since much of the basic work on the revised Plan can be initiated immediately, it should take no longer than one year beyond 2003 to complete the Plan in final form for submission. The schedule should reflect minimal delay and strong commitment up front. On the basis of the revised schedule, we recommend a progress report due date of March 31, 2006 on the 2004 Plan rather than March 31, 2007.

2. The present version of the Comprehensive Plan is law, and its implementation should be a major focus.

Undertaking the progress report exercise for the current cycle would be useful in preparing revisions for the next cycle. Such a review is an essential step in analyzing what is needed in an amended Plan. It also affords the opportunity to revise a work plan for undertaking compliance work with the present version of the Plan. It should be done as quickly as possible.

We recommend that the required progress report on the current Plan be submitted within 6 months, or by September 30, 2002. We recommend, further, the deployment of staff to prepare the progress report.

3. The Comprehensive Plan is a Charter responsibility, given to the Mayor.

Working on the Comprehensive Plan—changing its format, removing redundancies and addressing conflicting policies, establishing priorities, strengthening the land use element to incorporate many of the work elements of the ward plans, updating content, developing meaningful directives rather than platitudes for agencies to follow, reconciling policies with other planning entities, and designing format—all of this is basic work that should be done as part of regular and ongoing responsibilities. Going along with this work should be a structured role for citizens: a process that provides meaningful information to assure that informed participation of citizens and their local organizations will take place. All this work should be undertaken at the same time as work on individual small area plans or proposed development projects. We strongly urge that adequate staffing, through reorganization or re-deployment of staff as necessary, be provided in order to carry out the Comprehensive Plan responsibility adequately and to implement the current Plan.

4. The city and the federal portions of the Comprehensive Plan for the nation's capital are required to be whole.

The National Capital Planning Commission is in the process of working on draft revisions on its part of the Plan, resulting in the two halves of the Plan being substantially out of sync. We recommend that a coordination process between the city and the National Capital Planning Commission be established immediately to review work on both halves of the Plan so that the

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plans will be compatible, complementary, and more closely in sync—in short, that they fit together as a whole.

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The resolution would establish a taskforce of 25-50 members to undertake a thorough and inclusive review of the current Comprehensive Plan process, the format and general content of the Comprehensive Plan, and recommended improvements to the process, format, and content. A public and structured exploration of these issues can be useful, and we commend the administration for recognizing this need.

First, we have made the simple recommendation that work on implementing the current version of the Plan and that of laying the groundwork for a revised Comprehensive Plan proceed immediately, including initiating a structured citizen participation program to provide an adequate information base for citizens to develop proposals for the revised future Plan. This work should be done at the same time the task force in undertaking its work.

Secondly, we recommend further, that the Office of Planning report directly to the Mayor, and not be a subordinate function. Some have argued that the current structure secures the planning director a “seat at the table”. However, that seat is a subsidiary one inasmuch as the Deputy Mayor is the Planning Director’s superior. Surely a seat at the table for an independent planning director, responsible directly to the Mayor, would assure the planning director a greater degree of influence in these deliberations. This change would represent an appropriate interpretation of the Charter responsibility in carrying out this important requirement and does not require a task force to recommend it. It should take place immediately.

Thirdly, we urge that goals be set at the outset for this process so that the study mission is clarified. This task force would not be a group established to actually do the plan or dictate its format or content. However, its advice in the preparation of the Plan and the future processes for undertaking it would be immeasurably more useful if its goals were clear from the outset. These should include, among others:

- _ an exploration of the price cities pay for lapses in planning policy and the advantages to having a Comprehensive Plan;
- _ promotion of the importance of planning policy embodied in a Comprehensive Plan within the decision-making machinery of the District government, including its agencies and commissions;
- _ determination of how long range capital budget bonding and other subsidization processes, which should be annually updated, should be reflected in Plan-related documents;
- _ a review of alternatives for improving planning processes, including the study of alternative planning mechanisms, to be done objectively and without pre-determined outcomes;
- _ a review of regional and national planning bodies and their planning focus and directives that are of potential relevance to the city's consideration of its planning policies;
- _ a recommendation for clarification of the relationship between the Comprehensive Plan and other District planning undertakings, such as those undertaken by the Department of Transportation and the National Capital Revitalization Corporation;
- _ a review of the city's capabilities with its GIS and related systems for facilitating planning and implementation;
- _ a broad-brush review of problems inherent in the current Plan which could be confronted in the revised Plan.

As to the last item, it should be obvious that there will be many approaches and many views regarding the merits or lack thereof of the Comprehensive Plan as it currently exists by individuals in a task force. In our judgment, the view of an informed citizenry must go hand-in-hand with views expressed by various interested parties involved with the task force. Since its recommendations will be given to the Mayor and the Council, they should be debated and reviewed at public hearings.

The Committee's Planning sub-committee is undertaking a review of possible options and changes in planning structure which range from simple suggestions rather easily undertaken to more ambitious suggestions, some of which may be feasible and some of which may be deemed unrealistic. This review appears timely and will undoubtedly take advantage of the city's taskforce work. We heartily endorse the objective of a proposed taskforce for reflecting on this issue further in an organized, and, hopefully, impartial way. We also plan to hold some forums, possibly with other groups undertaking work on the Plan which will be complementary to the work of the task force and the Office Planning outreach efforts.

[Full Name of Recipient]

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Thank you for your attention.

Sincerely,

Ann Hughes Hargrove, Chairman