

COMMITTEE of 100 on the FEDERAL CITY  
June 13, 2006

TESTIMONY BEFORE THE MAYOR'S OFFICE OF PLANNING STAFF  
on the  
COMPREHENSIVE PLAN REVISION DRAFT 1  
By Ann Hughes Hargrove

**Staff effort:** First we want to indicate our appreciation for the Long Term Planning Staff, who have worked tirelessly and well to create this first complete draft version of a revised Comprehensive Plan. Secondly, we are pleased to see attention paid to areas that were not covered adequately in the past, including Urban Design and Implementation (both of which need additional work).

**Plan Revision Schedule:** At a minimum, we would urge a simple revision: afford the full summer for citizen response and OP work on a more finished product. Why not send the final draft over to the Council in September?

We only now have a complete Plan draft, and everyone concerned should be afforded time to fully study it and make comments on it for the use of the Office of Planning. Furthermore, we believe the OP needs a goodly amount of time to develop the second draft to be sent to the Council. A schedule which would send the draft to the Council in July doesn't make sense—the time to improve the draft will be limited, and the Council will not start its process on it until Fall. The goal should be to get the best Plan possible before the Council before it starts its own deliberations.

***A Few Specific comments:***

1. The Land Use Element should continue to be recognized as the referee and summary planner for all the other elements.

The current Plan's Section 112 (c), "Interpretation of the District Elements," states: *"An element may be tempered or defined by one (1) or more of the other elements. This may occur both within one (1) element and between elements. Since the Land Use element integrates the policies and objectives of all other District elements, it should be given greater weight than the other elements"*. (p.1630, DCMR 46 No. 8) We recommend inclusion of this language.

2. There are policies in the general elements that are in substantial conflict with each other.

An example serves: bonus density and development directives substantially without geographic qualification on the one hand and language asserting the

value of conservation areas and historic preservation areas on the other. It is very unclear what a conservation area or historic preservation designation means as to future development and density, and there is inadequate direction in terms of amount of desired density and uses for those areas where increased density is anticipated. This should be straightened out in both text and maps.

To enable bonus density through PUDs, inclusionary zoning bonuses, and the targeting of all Metrorail stations for increased density for a range of \_ mile without criteria or indication of differences among areas simply nullifies the conservation and historic preservation supportive provisions stated elsewhere in the Plan and in maps. Hence, the absolute necessity, if the Comprehensive Plan is to be a rational planning instrument, of specifying the geographic full extent of, as well as limitations on, heightened density and bonus devices for all types of locations. Otherwise the purported Plan dissolves into *ad hoc*ery and arbitrariness. We urge that the areas where density should be increased be identified and described in terms of their matter of right ramifications for changed matter of right zoning if appropriate, without resort to bonus density as a subterfuge for achieving additional density willy-nilly, while at the same time developing policies that will serve to prevent the demolition of good stock in conservation areas and the destabilization of their matter of right zoning. Historic districts should not be subject to bonus density at all and certainly no “contributing” buildings in historic districts should be eligible for unnecessary bonuses that would deface or demolish facades.

There is no mechanism or governing standards to assure that the costs of individual bonus projects, in terms of loss of other values, such as conservation of built-up neighborhoods with sound housing stock and historic districts with their “contributing” buildings, will not significantly outweigh their presumed, benefits. Developing such standards, guidelines, appropriate mechanisms and requirements is of the first priority as is restrictive language in the Plan.

### 3. Inflated housing forecasts are employed as a basis for future actions

Housing forecasts, traditionally based on census data and past net housing trends, are essential in any overall land use plan. They affect development policies not only for the private sector, but also the public sector because of the obvious requirements to provide city services and facilities to accommodate the growth or lack thereof. The Plan’s housing projections are summarized in the draft Housing element (p. H-6), where they are projected to increase from 280,000 units in 2005 to 335,000 units in 2025, with 10,000 new units expected between 2005 and 2010 on the basis of units coming on line or in planning. But then the discussion takes a big leap: *“The remaining new units—45,000 in total—will be needed by 2025 to improve the long-term balance between demand*

**and supply. This is equivalent to 3,000 new units per year, which is double the rate of production experienced during the last five years.” Even if “demand” figures are off, and that’s bad enough, the production figures are definitely way off as to total units and units per year. They are just plain inflated unrealistically. The two dimensions in any given market analysis situation are joined somewhat arbitrarily, but the recommendations in the Plan are off the scale. Wishes or so-called “needs” cannot be translated into future housing production totals appropriately that belie past experience unless there is a miracle anticipated to afford major change, such as the sudden stretching of the District’s boundary into vacant land that isn’t part of someone else’s jurisdiction.**

**We recommend that a more realistic number be substituted as based on trend lines having to do with adjusted census data, but especially regarding net housing production. We would urge that a second look be given to that section and include more detail about precisely where, in this built-up city, we expect growth, by whatever measure, to occur, which, in turn, would be delineated in the Land Use element and maps and not result, because of these inflated numbers and bonus policies, in the destabilization of good housing stock or historic districts.**

- 4. There are Inadequate guidelines by specific areas for “buffers” or “edges” as a transition from higher density to lower density.**

**The problem will be substantial for those areas obviously slated for increased density where differing densities will be jammed up together without specifics for the “edges”. Examples: the changed CEA boundaries eastward to Capitol Hill , the Anacostia and South Capitol areas, the rowhouse areas north of the New York Avenue NOMA area, major corridors such as Wisconsin Avenue (although the latter without clarity on the two guideline maps), and proposed high density expansion and redevelopment of institutions, including universities (the latter of which, in land use terms, is unfortunately largely relegated to the Education element rather than in the Land Use element as to campus plans and restrictions on expansion as part of the discussion regarding land use policies for institutions).**

**For “edges”, definitive guidelines for each of these areas should be developed, including not only setbacks of buildings (the traditional simplistic idea) but also distinctions that would entail buffers of land and possible zoning changes to facilitate land area transition from higher to lower density for assemblage parcels in the various divergent areas, including those that are adjacent to historic districts.**

5. **Adequate guideline language having to do with text and map interpretation and guidance is missing, as is additional mapping that might be possible to better clarify growth areas more specifically.**

**Either the Future Policy map should be accompanied by additional maps that further define areas of growth, or this already very crowded future policy map should illustrate types of growth areas by symbols that in turn will be related to text in the Plan. The two major maps together are insufficiently informative as to growth policies as well as to types of growth desired by area, and there is no text matched to them to clarify these issues. (Past incarnations of the Comprehensive Plan at least had related maps having to do with special treatment areas, housing opportunity areas, and development opportunity areas, with text guidelines incorporated into the Plan for the specific areas. While these were roughly drawn areas and the guidelines very general, they were at least a better step in the right direction than the lack of specificity and direction reflected in the proposed Comprehensive Plan and its maps. And the practice of accompanying a generalized land use map with sub-maps oriented toward the types of policies is quite common in other cities, as is the accepted practice not to have conflicting text and lack of clear direction for geographic areas within the jurisdiction itself.)**

**Additionally, the Land Use Plan element ought to include goals regarding the total percentage of land that should be allocated for various uses, as for residential, commercial, mixed-use, industrial and certain major uses, including institutions, public facilities (including parks) and the like in relation to available land and future population projections. There is one inadequate map on major parcels eligible for development, but this does not serve as a substitute for a more detailed map or maps that would illustrate not only such parcels but also smaller areas or areas in need of change as well. These additional estimate tools would provide another piece of the landuse framework for determining land use policies.**

6. **Legal Significance of the Guideline Maps: they should be enacted as part of the Plan**

**Previously, the Generalized Land Use Map was adopted by the Council by resolution rather than by enactment as part of a Comprehensive Plan Act. The guideline map or two maps should not be merely adopted by resolution but should be enacted as part of the Plan. Furthermore, their interpretation should not be changed by mere fiat of the Office of Planning in the middle of a zoning case, as was done in one map and text case in the past, but rather the decision should be made by Council action after receiving the request from the Mayor.**

***Conclusion:*** Dorn McGrath will comment on the importance of reflecting a commitment in the Plan to establish a DC Planning Commission.

The Committee will endeavor to provide additional comments over the coming weeks, including a review of the area plans that are substitutes for the ward plans in the prior Plan.

Thank you for your attention.