

WI ALLIANCE OF HOWARD NEIGHBORS

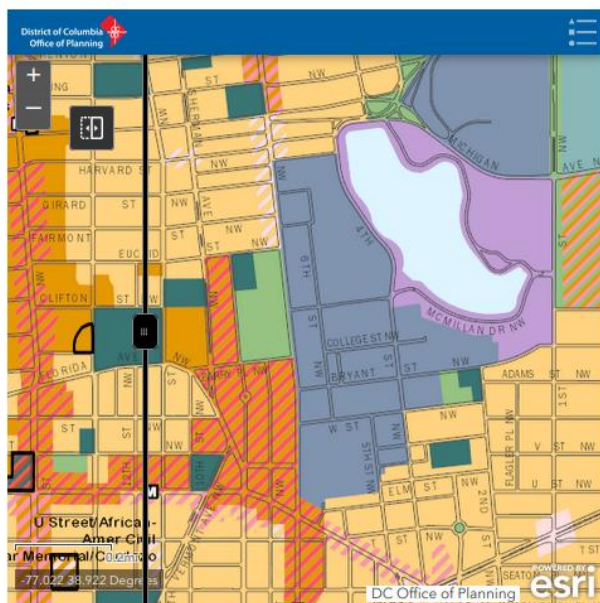
Opposition Testimony to 24-01

1. **Reset as Contested Case** -- Per the zoning regulations, this case should not be rulemaking since it will benefit a small set of property owners, two in fact. This must be reset down as a contested case to allow much wider notice, cross examination of the applicant, and examination of the Office of Planning's non-planning.
2. **No Adverse Impact Claims Are Specious:** The rezoning application mentions that there will be no adverse impacts on health, safety, and general welfare. However, the provided documents do not include comprehensive studies on traffic, environmental concerns, light, air quality, or sociological impacts such as displacement or gentrification. The lack of study is ghastly.
3. **Lack of Notification and Community Engagement:** There are claims of outreach and coordination with local Advisory Neighborhood Commissions (ANCs) and some organizations. However, no evidence or list detailing notification to residents, particularly those in public housing or directly adjacent communities, is presented in the documents. There is also no mention of engagement with potentially affected residents concerning their feedback.
4. **Missing Racial Equity Impact Analysis:** The documents claim to align with the racial equity goals outlined in the Comprehensive Plan. However, the emphasis seems to be on compliance with zoning regulations rather than direct engagement with the impacted community or studies on how the rezoning might affect existing vulnerable populations, such as public housing residents nearby including our members. While the application includes a "Racial Equity Tool" analysis, it largely focuses on compliance with overarching policies. It does not appear to address specific outreach to or feedback from residents in public housing or vulnerable communities potentially affected by the density increase. There is no clear list of individuals or groups who were notified.
5. **No Impact Studies:** The proposal references transportation and infrastructure improvements but lacks detailed impact assessments regarding traffic flow, air quality, environmental concerns, or the

sociological impacts of development. Additionally, while there are plans to align with Comprehensive Plan guidelines, such as sustainability and pedestrian access, specific impact data are missing. The application relies heavily on theoretical compliance with the Comprehensive Plan and policy frameworks rather than concrete assessments. Theoretical alignment with the Plan is insufficient without demonstrating how it benefits current residents without adverse impacts.

6. **Flawed Moderate vs. High Density Argument:** The applicant and OP claim that current zoning (moderate density) is inconsistent with the Comprehensive Plan's vision of high-density mixed use. However, this argument is made without supporting studies on how the change would impact the surrounding areas, especially in terms of traffic, environment, and displacement pressures. Moreover, it is a fact that the Comp Plan FLUM map changes were never reviewed as to impacts either, contravening DC Code Section 1-306.4, especially at subsection (d) as well as 10A DCMR 2515.2 and .3. Thus this application is unlawful as were the changes to the Comp Plan.

Pre-2021 Comp Plan



Post 2021 Comp Plan



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