

# Relevant Passages from the Comprehensive Plan

In an effort to distill the 1,500 pages of the Comprehensive Plan down to a more manageable set of passages and policies relevant to this Petition, I have created this 24-page document. While the Applicant (Office of Planning) has selectively quoted only policies which support their Petition, this list includes all the relevant policies in their entirety regardless of whether they support or oppose the Petition.

The Applicant has made the case that their Petition is not inconsistent with the Comprehensive Plan “On Balance”, while this testimony provides objective proof that it is inconsistent with the Comprehensive Plan. I’ve marked passages and policies with a “+” to indicate that the Petition **supports** them, while those I have marked with a “-” indicate that the Petition **contradicts** them. “+/-” indicates passages and policies that Petition both supports and contradicts.

I recognize that this may not appear to be objective, but I have put my best foot forward with a full and fair review of the Comprehensive Plan. Meanwhile, the Office of Planning never tried to take an objective stance as they would have for a private developer.

	+	-	+/-
Land Use Element (Greater weight per Policy IM-1.3.4)	1	3	0
Total Count	10	22	8

Various other passages are highlighted to point out flaws in the Applicant's method for determining Comprehensive Plan consistency, which the Zoning Commission should note.

## Chapter 2 Framework Element

First, it provides the context for the rest of the Plan by describing the forces driving change in the city. These forces include demographic shifts, economic change, technological change, fiscal challenges, tensions between federal and local interests, and more. Such "driving forces" define the major issues facing Washington and touch every aspect of life in the city. 200.2

Second, the Element includes a description of the District's growth forecasts and projections. The forecasts are expressed in narrative format and are also summarized in tables and charts. They show how and where the District expects to add households, people, and jobs between 2005 and 2025, and adds an extended forecast through 2045. 200.3

Third, the Framework Element ties the Comprehensive Plan to "Vision for Growing an Inclusive City." It lays out 40 principles to be followed as the District moves from "Vision to Reality." These principles, largely drawn from the Vision and from the previous Comprehensive Plan, express cross-cutting goals for the District's future that guide the Plan's policies and actions. 200.4

Finally, the Framework Element describes the Comprehensive Plan, Generalized Policy Map, and the Future Land Use Map, describes how the Comprehensive Plan guides development decisions, and describes the role of capital investments in addressing current and future challenges regarding infrastructure and facilities. The Generalized Policy Map "tells the story" of how the District is expected to change during the first quarter of the century. It highlights the places where much of the city's future growth and change is expected to occur and sets the stage for the Elements that follow. The Future Land Use Map shows the general character and distribution of recommended and planned uses across the city. Both maps carry the same legal weight as the text of the Comprehensive Plan. 200.5

The District should also ensure its plan for preserving and improving its neighborhoods is evidence-based and data-driven. The District should take advantage of any technologies it possesses that inform public policy. Risk terrain modeling, for example, is a predictive tool that explores the relationship between public safety and certain environmental features, including parks, transportation infrastructure, vacant or blighted properties, and businesses. The model allows the District to identify environmental features that impact public safety, coordinate a targeted response to address those features, and evaluate the success of that response. 209.3

+As an example, the stress of poverty, combined with substantial population growth, has created a housing affordability crisis that must be addressed. The need for more housing, and more affordable housing, has become an important policy goal that, if addressed and achieved, will help the city be more resilient. 213.5

#### Guiding Principles

The principles are grouped into five sections:

- Managing Growth and Change
- Creating Successful Neighborhoods
- Increasing Access to Education and Employment
- Connecting the City
- Building Green and Healthy Communities. 218.2

+1. The District seeks to create and support an equitable and inclusive city. Growth must be managed equitably to support all District residents, including vulnerable communities and District protected classes. We must recognize that managing growth and change includes addressing the historic, structural, and systemic racial inequities and disenfranchisement of many District residents. And, we must recognize the importance of longtime businesses, as well as educational and cultural institutions. An equitable and inclusive city includes access to housing that is healthy, safe, and affordable for a range of household types, sizes, and incomes in all neighborhoods. A citywide problem requires citywide solutions – ones that overcome the legacy of segregation, avoid concentrating poverty, and afford the opportunity to stay in one's home and not be displaced. 219.1

+/-2. Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city, such as local cultural heritage, and reduce negatives such as poverty, crime, food deserts, displacement, and homelessness. 219.2

6. A large component of current and forecasted growth in the next decade is expected to occur on large sites that are currently isolated from the rest of the city. Rather than letting these sites develop as gated or self-contained communities, they should be integrated into the city's urban fabric through the continuation of street patterns, open-space corridors and compatible development patterns where they meet existing neighborhoods. Since the District is landlocked, its large sites must be viewed as extraordinarily valuable assets. Not all should be used right away – some should be “banked” for the future. 219.6

-7. Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must be designed to respect the integrity of stable neighborhoods and the broader community context, and encourage housing and amenities for low-income households, who rely more on transit. Adequate infrastructure capacity should be ensured as growth occurs. 219.7

-9. The District prioritizes equitable participation that enfranchises everyone and builds people's long-term capacity to organize to improve their lives and neighborhoods. Residents and communities should have meaningful opportunities to participate in all stages of planning, policy, public investment, and development decision-making. The District has a special responsibility to identify, engage, and build capacity for greater participation among traditionally underrepresented communities, and will make additional, targeted efforts to improve services for these communities and promote their ability to participate on an equal basis with other communities. 220.1

-10. To participate effectively and represent community interests in public processes, the District should support and build the capacity of civic organizations, Advisory Neighborhood Commissions, residents, businesses and other stakeholders. We should encourage collaborative, community-led processes that bring together diverse perspectives. These processes should be clear, open and transparent. Notification procedures should be timely, provide appropriate information, and allow adequate, but not unnecessarily prolonged, time to respond. 220.2

+/-11. The residential character of neighborhoods must be protected, maintained and improved. Many District neighborhoods possess social,

economic, historic, and physical qualities that make them unique and desirable places in which to live. As the District continues to grow, more residents, and those of varied socio-economic backgrounds, should be accommodated, including the production and preservation of affordable housing, while using zoning, design, and other means to retain the qualities that physically characterize these neighborhoods and make them attractive. Zoning and other means should be used to attract neighborhood serving retail that, in turn, enhances the surrounding residential neighborhood. 220.3

+13. The recent population boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing, especially for low-income and workforce households, are essential to avoid a deepening of racial and economic divides in the city, and must occur city-wide to achieve fair housing objectives. Affordable renter-and owner-occupied housing production and preservation is central to the idea of growing more inclusively, as is the utilization of tools such as public housing, community land trusts, and limited equity cooperatives that help keep the costs of land affordable, particularly in areas with low homeownership rates and those at risk of cost increases due to housing speculation. 220.5

-17. Confidence in government begins at the neighborhood level. It is built block-by-block, based on day-to-day relationships and experiences. Meaningful participation and responsive neighborhood services are essential to sustain successful neighborhoods. 220.9

-18. Public input in decisions about land use and development is an essential part of creating successful neighborhoods, from development of the Comprehensive Plan to every facet of its implementation. 220.10

+/-The Comprehensive Plan, which includes a Generalized Policy Map and a Future Land Use Map, provides generalized guidance. The Generalized Policy Map provides guidance on whether areas are designated for conservation, enhancement, or change, as explained in Section 225. The Future Land Use Map shows anticipated future land uses, which may be the same, or different than, the current land uses. Both maps are part of the adopted Comprehensive Plan and the categories used for each map are described later in this Framework. 224.4

In its decision-making, the Zoning Commission must make a finding of

“not inconsistent with the Comprehensive Plan.” To do so, the Zoning Commission must consider the many competing, and sometimes conflicting, policies of the Comprehensive Plan, along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the Zoning Commission to consider and balance those policies relevant and material to the individual case before it in its decision-making, and clearly explain its decision-making rationale. 224.8

Specific public benefits are determined through each PUD application and should respond to critical issues facing the District as identified in the Comprehensive Plan and through the PUD process itself. In light of the acute need to preserve and build affordable housing, described in Section 206, and to prevent displacement of on-site residents, the following should be considered as high-priority public benefits in the evaluation of residential PUDs:

- The production of new affordable housing units above and beyond existing legal requirements or a net increase in the number of affordable units that exist on-site;
- The preservation of housing units made affordable through subsidy, covenant, or rent control, or replacement of such units at the same affordability level and similar household size;
- The minimizing of unnecessary off-site relocation through the construction of new units before the demolition of existing occupied units; and
- The right of existing residents of a redevelopment site to return to new on-site units at affordability levels similar to or greater than existing units. 224.9

#### Purpose of the Policy Map

The purpose of the Generalized Policy Map is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow-up plans, to manage this change. 225.1

The map should be used to guide land-use decision-making in conjunction with the Comprehensive Plan text, the Future Land Use Map, and other Comprehensive Plan maps. Boundaries on the map are to be interpreted in concert with these other sources, as well as the context of each location. 225.2

-Neighborhood Conservation areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change

occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. 225.4

-The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5

+Main Street Mixed Use Corridors: These are traditional commercial business corridors with a concentration of older storefronts along the street. The area served can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment. 225.14

The Future Land Use Map is part of the adopted Comprehensive Plan and carries the same legal weight as the Plan document itself. The Map uses color-coded categories to express public policy for future land uses across the city. **The Future Land Use Map is intended to be used in conjunction with the Comprehensive Plan’s policies and actions.** Preparation of this map

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is explicitly required by D.C. Law; its purpose is to “represent the land use policies set forth in the proposed Land Use Element,” using “standardized colors for planning maps.” (D.C. Official Code § 1-306.02). 227.1

Each land use category identifies representative zoning districts and states that other zoning districts may apply. The Zoning Commission, in selecting a zone district such as through a Planned Unit Development or Zoning Map Amendment, determines if it is not inconsistent with the Comprehensive Plan. **In making this determination for a selected zone district, the Zoning Commission considers and balances the competing and sometimes conflicting aspects of the Comprehensive Plan, including the policies and text; the intent of the Future Land Use Map land use category; and the Future Land Use Map and Generalized Policy Map.** Under the Zoning Regulations, a proposed Planned Unit Development should not result in unacceptable project impacts on the surrounding area. 227.2

**High Density Residential:** This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. 227.8

**Moderate Density Commercial:** This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Low-Density Commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in Low Density Commercial areas. Density typically ranges between a FAR of 2.5 and 4.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The MU-5 and MU-7 Zone Districts are representative of zone districts consistent with the Moderate Density Commercial category, and other zones may also apply. 227.11

**Local Public Facilities:** This designation includes land and facilities occupied and used by the District of Columbia government or other local government agencies (such as WMATA), excluding parks and open space. Uses include public schools including charter schools, public hospitals, government office complexes, and similar local government activities. Other non-governmental facilities may be co-located on site. While included in this category, local



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public facilities smaller than one acre – including some of the District’s libraries, police and fire stations, and similar uses – may not appear on the map due to scale. Zoning designations vary depending on surrounding uses. 227.17

The general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other (for example, ground-floor retail with three stories of housing above), the Future Land Use Map may note the dominant use by showing it at a slightly higher density than the other use in the mix (in this case, Moderate Density Residential/Low Density Commercial). **The Comprehensive Plan Area Elements may also provide detail on the specific mix of uses envisioned.** 227.21

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guidance for development and conservation decisions, and are **considered in concert with other Comprehensive Plan policies.** Several important parameters, defined below, apply to their use and Interpretation.

a. The Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements and development standards for setbacks, height, use, parking, and other attributes, **the Future Land Use Map is intended to be “soft-edged”** and does not follow parcel boundaries, and its categories do not specify allowable uses or development standards. By definition, the **Future Land Use Map is to be interpreted broadly and the land use categories identify desired objectives.**

b. The Future Land Use Map is a **generalized** depiction of intended uses in the horizon year of the Comprehensive Plan, roughly 20 years in the future. It is not an “existing land use map,” although in many cases future uses in an area may be the same as those that exist today.

c. While the densities within any given area on the Future Land Use Map reflect all contiguous properties on a block, there may be individual buildings that are larger or smaller than these ranges within each area. Similarly, the land-use category definitions describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. The granting of density bonuses (for example, through Planned Unit Developments or Inclusionary Zoning) may result in density that exceed the typical ranges cited here.

d. The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the Citywide Elements and the Area Elements.

e. The designation of an area with a particular Future Land Use Map category does not necessarily mean that the most intense zoning district described in that category is automatically permitted. And, even if a zone is not identified in a category, it can be permitted as described in Section 227.2. A range of densities and intensities applies within each category, and the use of different zone districts within each category should reinforce this range. There are many more zone districts than there are Comprehensive Plan land-use categories. Multiple zone districts should continue to be used to distinguish the different types of low- or moderate-density residential development which may occur within each area.

f. Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the MU-4 zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area and the adjacent uses.

\* Apparent Typo in Comp Plan, preserved in abundance of caution- [g. The intent of the Future Land Use Map is to show use rather than ownership. However, in a number of cases, ownership is displayed to note the]

g. The intent of the Future Land Use Map is to show use rather than ownership. However, in a number of cases, ownership is displayed to note the District's limited jurisdiction. Specifically, non-park federal facilities are shown as "Federal" even though the actual uses include housing and industry (e.g., Bolling Air Force Base), offices (e.g., the Federal Triangle), hospitals (e.g., Veteran's Administration), and other activities. Similarly, the "Local Public Facility" designation includes high-impact uses such as solid waste transfer stations and stadiums, as well as low-impact uses such as schools. Other maps in the Comprehensive Plan are used to show the specific types of public uses present in each area.

-h. The Map does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area

Elements of an approved Campus Plan.

i. Streets and public rights-of-way are not an explicit land-use category on the Future Land Use Map. Within any given area, the streets that pass through are assigned the same designation as the adjacent uses.

j. Urban renewal plans remain in effect for parts of the District of Columbia, including Shaw, Downtown, and Fort Lincoln. These plans remain in effect and their controlling provisions must be considered as land use and zoning decisions are made.

k. If a development or redevelopment requires discretionary approvals, the developer must address the permanent, offsite displacement of residents and businesses.

+/-l. Finally, the Future Land Use Map and the Generalized Policy Map can be amended. The Comprehensive Plan is intended to be a dynamic document that is periodically updated in response to the changing needs of the city. Requests to amend the maps can be made by residents, property owners, developers, and the District itself. In all cases, such changes require formal public hearings before the Council of the District of Columbia, and ample opportunities for formal public input. The process for Comprehensive Plan amendments is described in the Implementation Element. 228.1

## Chapter 3 Land Use Element

### +Policy LU-1.3.1: Reuse of Large Publicly Owned Sites

Recognize the potential for and encourage the reuse of large, government-owned properties to supply needed community services and facilities; provide significant deeply affordable housing and desired housing types such as family housing; create education and employment opportunities; remove barriers between neighborhoods; enhance equity, including racial equity, and inclusion; provide large and significant new parks, including wildlife habitats; enhance waterfront access; improve resilience; and enhance Washington, DC's neighborhoods. 306.6

### -Policy LU-2.1.5: Support Low-Density Neighborhoods

Support and maintain the District's established low-density neighborhoods

and related low-density zoning. Carefully manage the development of vacant land and alterations to existing structures to be compatible with the general design character and scale of the existing neighborhood and preserve civic and open space. 310.12

-Policy LU-2.1.7: Row House Neighborhood Character

Respect the character of row house neighborhoods by ensuring that infill development is compatible with existing design patterns and maintains or expands the number of family-sized units. Upward and outward extension of row houses that compromise their design should be discouraged. 310.14

-Policy LU-2.1.12: Reuse of Public Buildings

Rehabilitate vacant or outdated public and semi-public buildings for continued use including residential uses, particularly if located within residential areas. Reuse plans should be compatible with their surroundings and co-location of uses considered to meet broader District-wide goals. Reuse of public buildings should implement Small Area and Framework Plans where possible. 310.19

Policy LU-2.1.13: Planned Unit Developments in Neighborhood Commercial Corridors

Planned unit developments (PUDs) in neighborhood commercial areas shall provide high-quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits, such as housing, affordable housing, and affordable commercial space. 310.20

-Policy LU-2.3.4: Transitional and Buffer Zone Districts

Maintain mixed-use zone districts, which serve as transitional or buffer areas between residential and commercial districts and that also may contain institutional, nonprofit, embassy/chancery, and office-type uses. Through application of zoning regulations, consider appropriate height, design, density and operational standards to provide appropriate transitions between districts and enhance neighborhood character in each district. 312.6

## Chapter 5 Housing

+H-1.6 Sustainability and Resilience 508

Transit Oriented Development (TOD) fosters sustainability and resilience. Concentrated residential housing combined with a mix of other uses around Metro stations and high-capacity

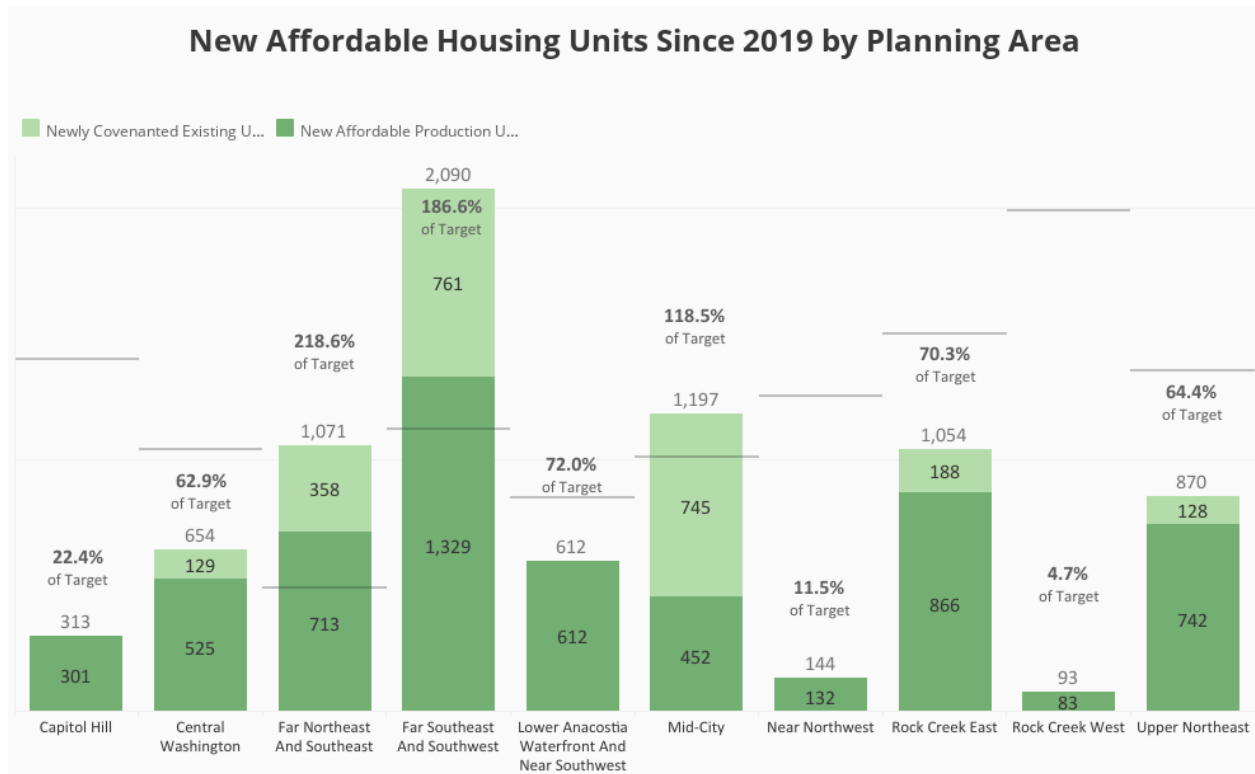
surface transit corridors reduces District residents' reliance on automobiles, thereby reducing GHG emissions. It is also proven to reduce a household's combined cost of housing and transportation. This can free up disposable income to increase the rate at which households save for future needs. Affordable housing near public transit can ensure that low-income households also receive these benefits. A 2011 study conducted for the District by the Center for Neighborhood Technology found that, on average, District households spent 26 percent less on transportation than the rest of the metropolitan area. It is important to consider this in the context of the differing transportation modes available to and used by lower income residents, as well as the potential benefits to them from TOD development. The reduction in transportation costs provides greater affordability for the typical household living in the District than one living farther out, where housing is less expensive but more dependent on automobiles. Finally, housing in pedestrian-friendly, transit rich environments proved to be more resilient to the price fluctuations caused by the foreclosure financial crisis. This protected homeowner equity from significant damage. 508.4

-Policy H-1.1.5: Housing Quality

Require the design of affordable and accessible housing to meet or exceed the high-quality architectural standards achieved by market-rate housing. Such housing should be built with high-quality materials and systems that minimize long-term operation, repair, and capital replacement costs. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance, should be generally compatible with the design character of the surrounding neighborhood, and should address the need for open space and recreational amenities. 503.7

+Policy H-1.2.3: Affordable and Mixed-Income Housing

Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. 504.10



**+Policy H-1.2.7: Density Bonuses for Affordable Housing**

Provide zoning incentives, such as through the PUD process, to developers proposing to build affordable housing substantially beyond any underlying requirement. Exceeding targets for affordable housing can refer to exceeding the quantity or depth of affordability otherwise required. The affordable housing proffered shall be considered a high priority public benefit for the purposes of granting density bonuses, especially when the proposal expands the inclusiveness of high-cost areas by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the design character of the neighborhood. 504.1

## Chapter 9 Urban Design

**-Policy UD-2.2.2: Areas of Strong Architectural Character**

Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development, additions, and renovations within such areas

do not need to replicate prevailing architectural styles exactly but should be complementary. 909.6

+/-Policy UD-2.2.3: Neighborhood Mixed-Use Centers

Undertake strategic and coordinated efforts to create neighborhood mixed-use centers that reinforce community identity and form compact, walkable environments with a broad mix of housing types, employment opportunities, neighborhood shops and services, and civic uses and public spaces. New buildings and projects should support the compact development of neighborhood centers and increase the diversity of uses and creation of public spaces where needed. 909.8

-Policy UD-2.2.4: Transitions in Building Intensity Design transitions between large- and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single-family or row houses) can be made more pleasing and gradual through a variety of context-specific design strategies, such as a slender massing of taller elements, stepping back the building at floors above its neighbors' predominant roof line, stepping a building's massing down to meet the roof line of its neighbors, or strategic placement of taller elements to mark corners, vista terminations, or large open-space frontages. 909.9

-Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. 909.10

-Policy UD-2.2.6: Large-Scale Development

New developments on parcels that are larger than the prevailing neighborhood lot size shall be carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. Incorporate existing assets, such as historic buildings and significant natural landscapes, into the design of redeveloped large sites. For sites that were originally planned as integrated complexes of multiple buildings, historic groupings of structures should be conserved where possible. (see Figure 9.17 for examples of breaking up the massing of development on lots larger than the prevailing neighborhood lot size). 909.11

## Chapter 20 Mid-City Area Element

The community delivered several key messages during these meetings, summarized below:

+/-• The unique character that defines Mid-City neighborhoods should be preserved as infill development takes place. The communities of the Mid-City welcome community reinvestment, but are worried that the rapid pace of redevelopment may be changing the fabric of the community too quickly. The loss of neighborhood diversity was the greatest concern expressed at almost every Comprehensive Plan meeting in the Mid-City area, and was raised in many different contexts: from the need for affordable housing to concerns about the influx of chain stores and loss of neighborhood businesses. Housing opportunities should be increased for people at all income levels so that Mid-City can remain a diverse neighborhood. The District-wide rise in housing prices has particularly impacted Mid-City, as costs have soared beyond what many local residents can afford. Moderate-income families and lower-income residents are being priced out of the area, and there are concerns that the community is becoming affordable only to persons with high incomes. Preserving the existing stock of affordable units is important, either through rehabilitation or replacement of existing units with new affordable units. The type of new housing being built in the area should be more varied. In particular, more three- and four-bedroom units are needed to attract and retain families.

+/-• New condominiums, apartments, and commercial development should be directed to the areas that are best able to handle increased density, namely areas immediately adjacent to Metrorail stations or along high-volume transit corridors. These areas are generally located around 14th and Park Streets NW, along the 14th Street NW corridor, along U Street NW — especially around the Metro station, along 7th Street NW and Georgia Avenue NW — especially west of Howard University, and in the southeastern corner of the Planning Area near the New York Avenue Metro station. Mixed-use development, with multi-story housing above retail shops and services, is desirable in these locations and would reinforce the Mid-City's character as a vital, pedestrian-oriented neighborhood.

-• The row house fabric that defines neighborhoods like Adams Morgan, Columbia Heights, Pleasant Plains, Eckington, and Bloomingdale should be conserved. Although Mid-City includes six historic districts (Greater U Street, LeDroit Park, Mount Pleasant, Strivers' Section, Washington Heights, and Kalorama Triangle), most of the row houses in Mid-City are not protected by historic district designations. Some are even zoned for high-density apartments.

- A variety of issues have arisen, including demolition and replacement with much larger buildings, the subdivision of row houses into multiunit flats, and top story additions that disrupt architectural balance. Intact blocks of well-kept row houses should be zoned for row houses, and not for tall apartment buildings, and additional historic districts and/or conservation districts should be considered to protect architectural character.

- The community is in need of additional parkland. Mid-City is the densest part of t Washington, DC, but the ratio of park acreage per resident is among the lowest in District. Rock Creek Park is a great resource, but is a long way from the eastern part of the Planning Area and is primarily a passive open space. The Planning Area has a shortage of active play fields and recreational



facilities, especially east of 16th Street NW. In many cases, schools are the only open spaces in the neighborhood, but access to school grounds may be restricted, and the school facilities themselves are in need of improvement. Sites such as the McMillan Reservoir Sand Filtration site offer the promise for additional neighborhood open space. New development there and elsewhere should set aside land for parks, while development along the area's commercial streets and around Metro stations should include pocket parks and plazas. Throughout the community, innovative approaches such as land trusts and easements should be considered to improve open space access.

- Language barriers should be broken so that more foreign-born residents can get an education, find suitable housing, find a job, and participate in community life and civic affairs. With a growing population of English language learners, the Planning Area needs alternative education options and better access to literacy and language programs. If residents are to fill the quality jobs to be created in the new economy, better vocational training and bilingual services are needed. Local public schools, charter schools, universities, and nonprofits should be integral partners in these efforts.

- The arts should be recognized as an essential part of community life. While this is true in all parts of Washington, DC, it is especially true in Mid-City's multicultural neighborhoods. The Planning Area has been the home of many ethnic and racial groups for more than 100 years, and has long been a center of creative expression and cultural diversity. The area should celebrate its past through heritage trails and historic exhibits, and celebrate its present through indoor and outdoor performance, art, and music. New cultural facilities should also be part of the area's future.

- Better economic balance should be achieved in the neighborhood. The neighborhood centers on the west side of the Mid-City Planning Area are generally vibrant, with strong demand for commercial space. Neighborhood business districts on the east side, particularly along Georgia Avenue NW and North Capitol Street NW, are still facing challenges. There are numerous vacant and boarded up properties, along with concerns about fire safety, underused and abandoned properties, and crime. Commercial change is also an issue. Small corner stores and other businesses that are unique to the neighborhood are having a harder time getting by. The area's restaurants, ethnic establishments, and iconic neighborhood businesses are an important part of what defines this community. They should be strongly supported in the future.

- Pedestrian safety, improved traffic operations, and parking management are all high priorities. Increased density within this already dense Planning Area creates busier streets—both for cars and for people. Despite its proximity to a Metro station, Columbia Heights will become more congested as 700 new housing units and 500,000 square feet of new retail space are opened. Parking demand will continue to exceed supply in Adams Morgan and Mount Pleasant. Commuter traffic along North Capitol Street NW and Florida Avenue NW will continue to burden side streets in Eckington and Bloomingdale. New solutions and strategies to traffic management

are needed. Increasing transit service and improving pedestrian safety are important parts of the equation, but they should not be the only parts.

-• Public facilities in Mid-City need improvement. Many of the area's schools, libraries, and recreation centers are outdated and do not meet the needs of the community. At the same time, residents are concerned about proposals to use private development to leverage public facility replacement. A key concern is that public facilities are not rebuilt at the expense of neighborhood open space, which is already in very short supply. While Mid-City has several new facilities, including the Girard Street Playground, the Columbia Heights Community Center, and Bell- Lincoln Multicultural Middle/ High School, there are still unmet needs.

• Mid-City needs greening. This Planning Area has a very high percentage of impervious surface coverage and lost much of its tree cover during the 1970s, 80s, and 90s. Tree planting is needed to reduce urban runoff, create shade, remove air pollutants, and create beauty in the neighborhoods. Future development should incorporate green roofs and other methods to reduce resource consumption, conserve energy and water, and be more environmentally-friendly. 2007.3

-Policy MC-1.1.1: Neighborhood Conservation

Retain and reinforce the historic character of Mid-City neighborhoods, particularly its mix of row houses, apartment houses, as well as historic African-American Civil War Memorial districts, and walkable neighborhood shopping districts. The Planning Area's squares, alleyways, and historic alley lots offer opportunities for preservation and creative development. The area's rich architectural heritage and cultural history should be preserved and enhanced. 2008.2

+/-Policy MC-2.3.7 Use of Public Sites

Utilize public land at the Reeves Center, Housing Finance Agency, Garnet-Paterson, Engine 9, and MPD 3rd District Headquarters to create mixed-use neighborhood landmarks that acknowledge and continue the history of U Street as a Black business corridor. Added density at these public sites should be used to create a significant amount of new affordable housing, establish space for cultural uses, and provide for additional public facilities, such as a new public library. New construction should concentrate density towards U Street and use design strategies to visually reduce building height and bulk to provide appropriate transitions to adjacent lower density areas. 2013.11

## Chapter 25 Implementation

Action: IM-1.B Equity Tools for District Agencies, including the Zoning Commission Prepare and implement tools, including training, to assist District agencies in evaluating and implementing the Comprehensive Plan's policies and actions through an equity, particularly a racial equity lens. This includes tools to use as part of the development review process, preparation of plans, zoning code updates, and preparation of the capital improvement program, that considers how to apply an equity analysis in these processes, including any information needed. **This shall specifically include a process for the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.** 2501.8

Not all projects are subject to review prior to filing an application for a building permit. Much of Washington, DC's development is permitted as a matter-of-right under existing zoning, affording few opportunities for OP to review it for Comprehensive Plan consistency. **In the future, increased scrutiny of matter-of-right projects will be needed, particularly with respect to urban design, environmental impacts, racial equity, and affordability.** This could be included through adjustments to the thresholds for projects requiring Large Tract Review, implementation of a Site Plan Review process, changes to the District's Environmental Impact Screening Forms, and additional standards to ensure that new development addresses broader civic issues, including the District's commitments to housing and affordable housing, equity, and resilience, as well as open space, the transportation network, arts and culture, parking, infrastructure, the natural environment, public service needs, and affordability. 2502.2

### From the ZC's Racial Equity Tool Publication:

#### Part One: Racial Equity Analysis Submissions (Guidance regarding the Comprehensive Plan)

The Citywide and Area Elements of the Comprehensive Plan that explicitly focus on advancing equity are listed below. **The Zoning Commission expects a discussion of these elements, as applicable, along with a discussion of Small Area and City Center Plans, as applicable, from the Applicant/Petitioner and the Office of Planning in racial equity analysis submissions that analyze a zoning action through a racial equity lens.** See hyperlinks to specific Citywide and Area Elements, and Small Area Plans and Center City Plans below<sup>1</sup>. (Note: **These Elements and Plans are not intended to be an exhaustive list of where and how the Comprehensive Plan addresses equity, race, and racial equity. Often policies will impact equity but not explicitly mention race or racial equity.**)

## Part Two: Applicant/Petitioner Community Outreach and Engagement

The Zoning Commission expects racial equity analysis submissions that analyze a zoning action through a racial equity lens to include a detailed discussion from the Applicant/Petitioner on community outreach and engagement efforts. Each heading below lists a step/component of a community outreach/engagement effort. Under each heading is a set of questions designed to help the Applicant/Petitioner define the community that will be affected by the zoning action, develop an outreach plan to specifically target that community, and incorporate community input into the proposed zoning action. As applicable to the zoning action, the Applicant/Petitioner should address/answer the questions below. Note: Not every question suggested below will be applicable to every zoning action. The Zoning Commission firmly believes that community outreach and engagement efforts must start at the inception of any redevelopment plan before a zoning action is filed with the Zoning Commission. If Applicants/Petitioners who are ANCs, citizen/civic/neighborhood associations and other non-profit organizations, individual homeowners, and small developers, have questions about their community outreach and engagement efforts, they should contact the Office of Planning and/or the Office of Zoning

- What community is impacted by the zoning action?
- What specific factors define the impacted community?
  - o What are some of the defining characteristics of the community (e.g., shared experience, language, etc.)?
- Who would potentially be burdened as a result of the zoning action?
- Within the community, who would potentially benefit as a result of the zoning action?

Based on your community outreach regarding the zoning action and past land use and zoning discrimination that the community has experienced, answer the following, as applicable:

- Are there negative conditions in the community that are the result of past or present discrimination?
  - o Note: These conditions may be implicit (e.g., lack of investment/infrastructure in neighborhoods of color) or explicit (e.g., redlining, restrictive covenants, racial segregation) effects of past or present discrimination.
- Are there current efforts or ongoing efforts in the community that are addressing past discrimination described above?
- What are the current challenges facing the community as a result of present discrimination? What unique factors about the affected community and/or communities influenced your outreach plan/efforts?
- How were your outreach efforts proactive in terms of meeting community needs and circumstances?
- What was the overall timeframe and frequency of your outreach? Note: Please include evidence of outreach efforts, as applicable (e.g., meeting minutes)
- Has the community identified negative outcomes that could result from the zoning action, i.e. specific things the community doesn't want to change/happen as a result of the zoning action?
- Has the community identified positive outcomes that could result from the zoning action, i.e. specific things the community wants to change as a result of the zoning action?

- Will members of the community be displaced (either directly or indirectly) as a result of the zoning action? o Please include a narrative and your own analysis in the response.
- Did community outreach inform/change your zoning action? If so, how does it incorporate or respond directly to the community input received?
- If the zoning action could potentially create negative outcomes, how will they be mitigated?
- What input from the community was shared but not incorporated into the zoning action? Why?

### Part Three: Disaggregated Data Regarding Race and Ethnicity

The Zoning Commission expects disaggregated race and ethnicity data from the Office of Planning in every racial equity analysis submission that analyzes a zoning action through a racial equity lens.

The disaggregated race and ethnicity data should be compiled from the following sources, only: OP Demographic Data Hub ([opdatahub.dc.gov/](https://opdatahub.dc.gov/)) US Census (<https://data.census.gov>) Open Data DC Platform ([opendata.dc.gov](https://opendata.dc.gov)) OP Upward Mobility Dashboard (<https://upwardmobility.dc.gov/page/dashboard>)

As applicable to the zoning action, the disaggregated data regarding race and ethnicity should address/answer the questions below.

Questions:

- Which planning area is the zoning action located in?
- Are there relevant area metrics other than planning area that OP can utilize to compile demographic data specific to the area around the zoning action?
- Based on planning area and/or other relevant area metrics for the location of the zoning action, please answer the following:
  - o What is the total population?
  - o What is the racial and ethnic composition of the population?
  - o What is the median income?
  - o What is the median income by race?
  - o What is the median age?
  - o What is the median age by race?
- Are there vulnerable or special populations such as seniors, children, and/or persons with disabilities that are identifiable based on the available data?
  - o What percentage of the population owns the real property where they live?
  - o What percentage of the population owns the real property where they live, by race?
  - o What percentage of the population rents the real property where they live?
  - o What percentage of the population rents the real property where they live, by race?
  - o Is the area on track to meet the Mayor's 2025 affordable housing goal4 ? Please explain.
- Is there other data about the existing demographics of the area that is relevant to the proposed zoning action?
- What do available data sources show about the intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?

## Part Four: Criteria to Evaluate a Zoning Action through a Racial Equity Lens

The Zoning Commission will use the data provided in racial equity analysis submissions from the Applicant/Petitioner and the Office of Planning, described above in Parts One-Three, as well as the themes/questions below in evaluating a zoning action's consistency with the Comprehensive Plan through a racial equity lens.

### -Policy IM-1.1.2: Review of Development in Surrounding Communities

Increase the District's participation in the review of development projects located in neighboring jurisdictions along the District's boundaries to promote land use compatibility, improve access to services and amenities, promote coordinated transportation systems, and more effectively address transportation and parking issues. 2502

+Policy IM-1.1.4: Incentives for Achieving Goals and Policies Use zoning incentives, such as increased height and density, in appropriate locations to achieve Comprehensive Plan goals and policies, including advancing equitable development and meaningful racial equity outcomes and increased housing and affordable housing supply. A variety of tools, which could include regulatory measures, incentives, or more efficient processes, should be explored and implemented as appropriate to encourage development consistent with Comprehensive Plan goals that offer benefits to address District-wide and neighborhood needs. These could include flexibility with zoning requirements, entitlement and regulatory relief, permissive design review, reduction of parking requirements, expedited entitlement review, waivers of various fees, and other financing tools. 2502.9

Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions The Board of Zoning Adjustment, the Zoning Commission, , and other District agencies or decision-making bodies regulating land use, shall, when required by law or regulation, look to the District Elements of the Comprehensive Plan and its accompanying maps. Decisions on requests for rezoning shall be guided by the Future Land Use and Policy Maps read in conjunction with the text of the Comprehensive Plan (Citywide and Area Elements), as well as Small Area Plans pertaining to the area proposed for rezoning. 2504.5

Policy IM-1.3.4: Interpretation of the District Elements Recognize the overlapping nature of the Comprehensive Plan Elements as they are interpreted and applied. An element may be tempered by one or more of the other elements. As noted in Section 300.3, because the Land Use Element integrates the policies of all other District Elements, it should be given greater weight than the other elements. 2504.6

A typical amendment process includes the following steps. OP provides broad public outreach and public comment opportunities, including to other District agencies, to solicit amendments. Each party submitting an amendment should provide information explaining the proposed

change and its purpose. OP screens amendments to ensure they are appropriate for the Comprehensive Plan (e.g. not a budget or legislative request.) OP also prepares its own proposed amendments. OP then prepares a report identifying amendments it recommends for inclusion. OP distributes this report for ANC and public review and comment for a minimum of 60 days, after which OP revises the report. 2511.3

The Mayor prepares a final draft of the amendments and submits this to the Council of the District of Columbia as a bill. The Council conducts hearings, marks up the bill, and takes action. These amendments are forwarded to NCPD for a 60-day federal interest review, which could result in additional revisions. The Mayor takes action to approve or veto the legislation. The District-approved amendments are forwarded to Congress for a 30-day review. 2511.4

The public participation process for a major revision, full rewrite or an amendment should use a broad array of tools and practices and provide meaningful engagement and opportunities for participation for ANCs and the public. 2511.6

#### -IM-3.4 Commercial Linkage 2514

The housing linkage objective requires applicants who obtain an increase of non-residential square footage - as a result of providing habitable non-residential penthouse space, of obtaining a discretionary street or alley closing, or of obtaining a discretionary zoning density increase - to produce housing or contribute funds to the HPTF. The amount based on a formula tied to the amount or value of the additional square footage obtained. 2514.1

#### -Policy IM-1.5.1 Equitable Public Participation

Throughout the Comprehensive Plan, policies and actions describe various planning activities. District-led planning activities shall provide meaningful, accessible, and equitable opportunities for public participation early and throughout these planning activities. Planning activities led by other federal, regional, non-profit, or private entities will be encouraged to follow this policy guidance. Public outreach and engagement tools and practices should be developed appropriate to the needs of the communities included in the study, reflecting the geographic area, scale, and type of planning study. Partner with and involve the community in developing plans and studies, including the comprehensive plan, small area plans, and other District-sponsored plans. To promote full, transparent, and equitable participation, public engagement must be undertaken that enables low-income households, communities of color, older adults, and individuals with disabilities to participate fully and equitably, recognizing potential disparities in access to information and technology, availability of time and resources, and other issues. 2506.2

+Policy IM-1.5.2: ANC Involvement Include ANCs and area residents in the review of development to assist the District in responding to resident concerns. Consistent with requirements of District Code, ANC issues and concerns, as embodied in resolutions, should be given great weight as land use decisions are made. 2506.3

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Relevant Passages from the Comprehensive Plan

Testimony of Randall Jones

-Policy IM-1.5.4: Faith-Based Institutions Recognize the importance of faith-based institutions to neighborhood life in Washington, DC, including their role as neighborhood centers, social service providers, and community anchors. Work collaboratively with local faith-based institutions in neighborhood planning and development initiatives to address community needs, and to reach residents who might not otherwise participate in local planning initiatives. Encourage partnerships with faith-based institutions to develop affordable housing and community services. 2506.5