

The Committee of 100
on the Federal City



January 10, 2020

Committee of 100 on the Federal City Comments on the Draft Comprehensive Plan

Dear Director Trueblood,

The following are comments on the draft Comprehensive Plan hereby submitted by the Committee of 100 for your consideration. We thank you for your time in considering these proposed comments.

Thank you.

Sincerely,

Kirby Vining
Chair, Committee of 100 on the Federal City

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Big Picture Issues

Revision not Amendment

These “amendments” to the Comprehensive Plan constitute a rewrite (a major revision and not an amendment as described in Implementation Element Section 2513.2) making major changes and rewrites to policies without the public engagement required. (see Implementation Element Section 2507.4, Policy IM-1.5.2 Promoting Community Involvement). This has been a top-down process and all amendments that exceed the scope of an amendment cycle should be removed, and a rewrite with extensive community involvement should be started soon with the new plan to be completed by 2026 as envisioned in the 2006 plan.

Planning and Development Priorities Wrongly Deleted

The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.

Unsupported Population and Housing Need Projections Diminish Protections

Many of the amendments are predicated on very aggressive and questionable projections of population increases and resulting housing needs, particularly market rate housing. Despite data showing a decline in yearly percentage growth increases in the past few years, the proposed amendments project growth based on forecasts for new construction that may or may not occur. This despite the fact that the Office of the Chief Financial Officer (using data from Moody’s Analytics and IHS Markit) anticipates “a gradual slowdown in annual population growth ... with some modest amount of net in-migration”. No evidence is presented of a growth emergency or a market rate housing emergency. Yet, the amendments propose to override existing protections for historic districts, historic resources, and neighborhood character and restrictions on height and density because there is an unprecedented need for more housing. Those protections and restrictions should be restored and more realistic estimates, including missing data about the need for low and very low affordable housing, should be provided.

Data Requirements and Inconsistencies

Data provided for the various Elements is not consistent and comparable, and important data have been deleted rather than updated (e.g., commuting patterns in Central Washington, employment of residents and non-residents in planning areas). These deficiencies should be corrected, and importantly, data should be more than a statement and should underpin planning priorities. The lack of planning-relevant data in the Housing Element is particularly egregious. (see Housing Element Comments)

One example of data inconsistencies:

The Economic Development Element states:

71% of DC jobs were held by non-residents in 2015. [p. 75, §717.9]

34% of DC residents worked in suburbs in 2015. [p. 81, §718.1]

The Transportation Element states:

In 2014, approximately 50 percent of persons working in the District commuted in from the suburbs (p. 12, §405.4)

24 percent of the District's residents commute to suburban destinations (p. 12-13, §405.6)

Neighborhood Character and Displacement

In large part, the success of Washington, DC as a desirable place to live derives from its interesting and varied neighborhoods. These variations are often described as "neighborhood character". Such character can include tangible features like the architectural design of a street of rowhouses and intangible aspects such as the broadcasting of GoGo music.

Some seek to diminish the importance and merit of neighborhood character by suggesting it is code for racial segregation. It has been well documented that DC neighborhoods have suffered the worst gentrification in the nation over the past decade and that it has led to the displacement of over 20,000 Black residents. But this transformation of so many neighborhoods and loss of homes has not been caused by historic district designations or interest in preserving neighborhood character. In fact, the loss of neighborhood character has often been a consequence of that same gentrification.

Land use policies that unfairly burden a segment of the DC population or violate the law should not be tolerated and should be directly addressed. The DC Comprehensive Plan amendments must include policies that will end land use policies and decisions that have led to displacement.

At the same time, much of the language struck or newly inserted undermines existing criteria for new development regarding compatibility with the existing community or protection of historic districts. Land Use Element Section 300.2 deletes the first bullet: "Promoting neighborhood conservation" and protections for neighborhood character and historic districts have been significantly diminished across the board. These proposed changes should be removed.

Respect versus Protect and Preserve

These amendments liberally replace the words “protect”, “preserve” and “protecting” with “respect” and “respecting” when discussing historic resources, neighborhood character, and neighborhoods. Protect and preserve are clearly understood and represent an action; respect is vague and is an attitude. These concepts are not synonymous and significantly diminish the city’s commitment to the protection of these important values and assets, including the legal requirement to protect historic resources. This is an example of the Office of Planning replacing stronger language with vague language, something many have objected to. The current language should be restored.

Resilience

The greatest threat along the miles of Anacostia and Potomac River waterfront is flooding. The current U S Federal Emergency Management Agency 500-year flood delineation of both rivers shows that flood waters will reach many hundreds of feet inland. No public action has been taken to date that sufficiently addresses this threat that endangers both property and lives.

The draft revisions to the Comprehensive Plan recognize that flooding is a significant problem. However, none of the recommendations call for the needed flood walls/berms infrastructure, raising ground levels to be out of harm’s way, or restricting new development in flood areas so that appropriate open space land uses can mitigate flood impacts. The failure to require the use of these three major public flood prevention actions should be corrected. All current draft recommendations address floodproofing buildings and providing funds and assistance to those flooded thus encouraging buildings and citizens to remain in harms way. While using flood resistant building materials and construction standards will reduce some of the physical damage, those actions alone are will do nothing to prevent flooding.

There are three ways to prevent the Anacostia and Potomac rivers flooding DC. They are:

- Build public flood walls/berms,
- Raise the ground level to be above flood water levels,
- Develop flood areas with land uses that will be least harmed by flood waters. (Using floodable areas for open space should always be considered.)
-

Comprehensive Plan policies need to be developed along with their required implementing actions.

One approach might be, building upon organizations like the Silver Jackets, fund and empower a new formal organization with District of Columbia, National Park Service, Army Corps of Engineers, National Capital Planning Commission and Federal Emergency Management Agency representatives to work together and begin the planning of measures to prevent flooding along the District of Columbia Anacostia and Potomac River waterfronts’ Resilience Focus Areas. Their work should address the land use and capital improvements needed to prevent flooding and the legislation, organization and finance actions required to implement the plans.

Until the plans identified have been prepared, adopted and enacted, all new development and projects on government owned or controlled land in floodable areas should be prevented, except for the most critically

needed major public works projects and other development that in no way could limit or restrict the above-mentioned organization's future recommendations.

Transportation

The Transportation Element inadequately addresses an important transportation mode—commuter rail.

The Committee of 100 on the Federal City (C100) endorses the basic concept of the Transportation Element (400.2):

The critical transportation issues facing the District of Columbia ... include:

Expanding the city's [transit] transportation system to provide alternatives to the use of single-occupant autos.

However, accepting the policies and recommendations and proposed implementation and the performance measures of moveDC will not accomplish that goal. Assessing land use impacts, reliability and equity are important aspects of a Transportation Plan, but the primary focus of moveDC is about what happens within the District and about individual modes of transportation – electric scooters, bicycle paths and pedestrian paths may improve mobility within the District for some residents, but the major problem facing our city is vehicle congestion and parking caused by commuters. In 2014, approximately 50 percent of persons working in the District commuted in from the suburbs. Further, moveDC is *youth-friendly but lifelong-lite* in its near silence on how to meet the needs of the many DC residents who work outside the city and growing families and seniors for whom bikes, ride-sharing and lengthy transit trips may supplement but will not replace their need for a private vehicle.

When we look at what's happening across our borders in terms of commuters coming into and going out of the District: of the daily trips into the District, 66 percent are driven, 24 percent are taken on transit. Twenty-four to 34 percent (see Data Inconsistencies above) of District's residents commute to suburban destinations. Clearly, there is a great deal of movement going both ways that deserves planning attention.

Commuter and Passenger Rail

Commuter and passenger rail are essential in providing pragmatic alternatives to automobile commuting. The DC State Rail Plan documents that importance and examines how it can serve an even greater function. But, the draft Transportation Element only mentions the State Rail Plan twice (408.13 and page 416.6). The DC State Rail Plan projects that if the growth in relative usage of stations by VRE/Amtrak Virginia services remains constant, daily ridership at L'Enfant Station will grow from around 7,500 per day now to 14,000 to 18,000 per day in 2040. VRE's planned expansion of L'Enfant Station is intended to enable service by larger, more frequent trains, as well as enable the station to safely accommodate more people. Daily ridership at Union Station is expected to increase from around 50,000 today to almost 135,000 in 2040, including growth in MARC, Amtrak, and VRE services (DC Rail Plan, p. 6-11).

Comments on the Land Use Element

Section 300.2 Restore the first bullet: “Promoting neighborhood conservation”. Neighborhoods are the underpinning of the city’s success and their importance should be recognized and their character should be protected and enhanced. The clumsy modifications to the third bullet do not adequately address that objective.

Section 300.3 Restore the phrase “it should be given greater weight than the other elements”. This is an important part of the balancing and the rest of the sentence doesn’t make any sense without it.

Section 301.6 Restore/update the information on the residential percentages in the first part of the paragraph. The rest of the first part of the paragraph doesn’t make much sense without it—making a comparison with nothing to compare it to.

Section 304.2 Restore the important wording of this section. Growth should be accommodated in a way that “protects” (current plan) not “respects” (new language) the area’s historic character. The Plan for the City of Washington refers just to the L’Enfant Plan and does not include the McMillan Plan; both should be cited, as the current plan does. They should not be replaced by the more generic sounding, but more limited term—The Plan for the City of Washington—as the new language does. (see also Section 304.12) The Height Act is an important aspect of the core city and the reference to it should not be deleted. The “street and open space framework” reference has also been deleted and should be restored as an important part of the central city character.

Section 304.8 Again here and elsewhere where it appears, the change to “respecting” historic resources from “protecting” is an inappropriate watering-down of historic preservation responsibilities.

Section 304.13a, LU-1.1.9 Add at the end “including the use of public open space in the 500-year floodplain.”

Section 304.13a, LU-1.1.10 Change “100-year flood event” to “500-year flood event”.

Section 305.12 “Protecting” and “respecting” are not synonymous. Restore “protect” and “protecting” historic buildings, vistas, etc. (see also Sections 309.8, 309.10, 309.12, 312.3, 316.7, and 316.9 re replacing protect with regard to neighborhoods, neighborhood character, etc.)

Section 305.13 Two principles should be applied to waterfront sites—maximum access for all citizens to waterfront amenities and conservation of natural resources. Residential, commercial, and office use often prevent such access for all citizens and should be prohibited.

Section 314.12 Eliminate “promote” and reinstate “ensure” compatibility. Surrounding areas should be able to expect that steps will be taken to ensure compatibility of industrial-type public works facilities. What would it even mean to “promote” such compatibility?

Comments on the Transportation Element

The Transportation Element needs policies and actions that address commuter rail, passenger rail, freight rail, and streetcars. (see Big Picture Issues) The amendments should incorporate the recommendations of the DC State Rail Plan.

The District has a unique relationship with many of the rail-related investments that occur within its borders. In many cases, the District will help plan or play a coordinating role and represent an important stakeholder, but funding and project management will primarily fall to other governmental or private entities. The two commuter rail systems that operate into the District are sponsored and funded by the neighboring states. Several state-supported intercity Amtrak routes originate and terminate in the District, but are supported by the Commonwealth of Virginia. Commuter and Passenger Rail are essential and prominent elements in the City's transportation portfolio that require no investment beyond coordination and planning on the part of the City and thus deserve prominent discussion and support in the Comprehensive Plan.

Commuter Rail

VRE and MARC currently carry commuters that add a combined \$1.64 billion to the District economy (DC State Rail Plan, p. 3-71). Commuter rail is highly effective in removing automobiles from roadways and thereby reducing vehicle miles traveled. The exceptionally high level of roadway congestion indicates that there will be large economic returns from reducing the number of commuters that drive into the District. This would reduce congestion, vehicular fatalities, injuries, and property damage, vehicle operations and maintenance costs, pollution, and pavement damage (*id.* p. 3-71).

A passenger survey conducted by VRE suggests that without the commuter rail service, passengers would do the following:

- 50 percent would drive alone;
- 20 percent would carpool; and
- 30 percent would take an alternate mode of transit.

Assuming alternate modal usage for MARC passengers would be similar to that of VRE, vehicle travel miles savings from those who would otherwise drive alone are 96.4 million miles. Of these miles, 14 percent, or 13.2 million miles take place within the District (*id.* p. 3-72)

Passenger Rail

Intercity rail in the Northeast Corridor is estimated to grow by 115 percent by 2040, outpacing aviation's expected 102 percent growth. Dramatic growth is also projected for commuter rail throughout the Northeast Corridor with an 87 percent demand increase compared to automobile's 22 percent. Growth in passenger train traffic between Virginia and the District over the Long Bridge is expected to increase by 140 percent between 2016 and 2040. (*id.* p. 4-3).

Commuter Rail Infrastructure

To accommodate that growth, there are proposals to expand the crossing at Long Bridge from two to four tracks across the Potomac River and to expand Union Station (the EIS is nearing completion), and VRE plans to expand

the capacity of L'Enfant Station. Ensuring accessibility to and from the rail stations in the District will be increasingly important as ridership grows. One way to accomplish that access is to revive the Maryland Avenue Small Area Plan and the SE Ecodistrict Plan, both of which advocate a direct connection between the L'Enfant Rail Station and the L'Enfant Metro station that would provide rail commuters with direct access to the Yellow/Green, Blue/Orange and Silver lines.

Infill Rail Stations

As part of the efforts to describe passenger rail issues, needs, and potential improvements and investments, the DC State Rail Plan contains an analysis of potential new commuter rail stations (*id.* p. 4-10). Additional rail stations would add to the City's real estate tax revenues while providing more direct access for commuters to their final destinations. Based on property values surrounding Union Station and the L'Enfant Plaza station, commuter rail service contributes an incremental premium of over \$430 million in office property values (*id.* p. 3-71). Additional stations could provide added mobility for District residents and also relieve pressure on Metro's Red Line at Union Station by allowing passengers with destinations prior to or beyond Union Station to transfer to Metro earlier and not have to go through the station or pass directly to their destination.

The DC State Rail Plan suggests creating new rail stations in underserved areas that would enhance access to jobs and foster multi-modal connectivity. Ten potential sites for in-fill rail stations were identified (*id.* p. 4-11). Two of these potential locations (Benning Yard and Minnesota Avenue Metro Station) are located in Anacostia, on the Camden Line that connects Washington and Baltimore, but the Camden Line is used by far fewer trains than the NE Corridor (Penn line). The Transportation Element needs to advocate allowing VRE to thru-run through the Virginia Avenue tunnel to serve a new commuter rail station in Anacostia and then continue on to Baltimore, and allow MARC trains coming from Baltimore on the Camden line to serve both the new Anacostia commuter rail station and the expanded L'Enfant station and then continue to Virginia. The result would be a truly integrated commuter rail system allowing some MARC and VRE trains to bypass Union Station and providing commuters with access to the Metro Orange Line if the new station is co-located at the Minnesota Avenue Metro Station. The Minnesota Avenue Metro station is also proposed as the eastern terminus of the expanded Streetcar system that would provide direct access to Union Station.

Freight Rail

The draft Transportation Element acknowledges that while the District's freight rail network is small in terms of the amount of freight currently originating and

terminating in the District, it plays a key role in the regional freight network and local and regional rail passenger operations, with over 90 intercity or commuter passenger rail trains operating daily on the CSX network (Section 416.5). It also states a policy of encouraging "the use of rail for long-distance [rather than trucks] movement of goods cargo and continue to expand goods movement strategies to better manage truck traffic¹ within the District" (Section 416.10 Policy T-3.3.3).

¹ But the Draft also speaks approvingly of transportation of freight by truck, that few shippers would use other modes and that "truck based freight deliveries create jobs: a total of 129,500 jobs in the District can be traced to organizations that ship and/or receive freight via truck in the city" (draft Transportation Element, p.50). moveDC explained that "Truck congestion is a problem in DC. Congestion costs \$650,000 and adds 7% to the cost of commodities." (moveDC, p. F-8)

But the draft Transportation Element fails to offer specific information about the use of rail rather than trucks to receive and deliver long-distance freight² or guidance about how planning might address these issues. The DC State Rail Plan offers both.

In defining the issue, the DC State Rail plan explains at page 5-1:

The vast majority of rail freight that moves in the District is passing through, with origins and destinations outside the District. According to the 2014 U.S. Surface Transportation Board (STB) Waybill Sample, of the 46 million tons of rail freight handled in the District in 2014, only about 151,000 tons originated and 124,000 tons terminated in the District, accounting for 0.43 and 0.34 percent of all rail freight traffic, respectively.

DC is essentially a pass-through for rail freight: less than one percent of the freight that moves through DC is delivered or has its origin in DC. The 275,000 tons of rail freight delivered or having its origin in DC requires 13,750 trucks, or on average, only 37 trucks a day (using the freight tons-to-truck loads conversion quantified in the the MoveDC Plan of 20 tons per truck load). The total truck freight that moves through DC— is delivered to DC, has its origin in DC, or moves from place to place within DC— is expected to grow by 75% from 2011 to 2040 to over 47 million tons (District of Columbia Freight Plan Update (2014), Freight Subcommittee. Presented by Eulois Cleckley, District Department of Transportation, May 8th, 2014). US DOT estimates 40 tons of freight annually per capita, which means an awful lot of freight trucked in for 900,000 permanent residents and some additional amount for our hyper-large office component and visitors.

Needed Amendments

At page 3-68, the DC State Rail Plan advocates the use of rail rather than trucks to deliver and receive freight for our City because:

- Freight rail reduces emissions of greenhouse gases and other harmful pollutants since it is more fuel efficient and lower emitting than trucking;
- Freight rail reduces highway congestion;
- Freight rail reduces pavement damage caused by trucks; and
- Freight rail improves roadway safety by reducing truck traffic.

² Strangely, the draft Transportation Element states at page 52, section 416.6 its “continued support for the freight rail projects within the State Rail Plan” and describes the Virginia Avenue Tunnel as “now in the process of being expanded to include two tracks; this will increase the clearance allowing for double stack intermodal trains that can accommodate high-capacity containers. Construction began in 2015 and is expected to be completed in 2018.” The project is complete and in operation.

The draft Transportation Element needs to promote the advantage of a freight depot or commercial transload facility that would allow train loads to be broken down into smaller truck loads for local delivery. Already we are seeing movement towards smaller trucks, rather than interstate tractor trailers, with the recent zoning requirement of loading docks that accommodate trucks no larger than 30 feet in length. Page 5-7 of the DC State Rail Plan identifies ten potential sites for such a facility. This draft Transportation Element should recommend those sites be evaluated in future rail planning.

Enlarging DC's Rail Infrastructure

During the time this Comprehensive Plan remains in effect, the issue of expanding our rail network may arise. The DC State Rail Plan identifies 27.2-miles of active DC rail lines within the District of Columbia and an additional 18.7-miles of rail lines that are unused or inactive lines that may become active in the future. (DC Rail Plan pp. 3-32 – 3-39)

Unused Rail Network in the District

Two inactive rail lines are located in the District. The most significant is the Shepherd Branch. This originally provided access to the Shepherds Landing ferry in the nineteenth century. It is 6.7-mile single-track line connecting to the CSX mainline near the Anacostia Bridge and running parallel to Interstate 295, terminating at the Blue Plains sewage treatment plant. At one point, this line provided fuel to Bolling Air Force Base, coal to St. Elizabeths Hospital, and liquid chlorine to the Blue Plains sewage treatment plant. As of 2001, all traffic on the line stopped. According to CSX, at least a portion of the line has not been formally abandoned, so the right-of-way is still intact.

Rail-Trails in the District

Rails-to-trails is the common name used to describe abandoned rail lines that have been converted to paved or gravel paths for broader transportation use. Such an endeavor not only allows the reuse of abandoned rights-of-way, but can also preserve rights-of-way on inactive lines that may become active again in the future. The District is also home to rails-with-trails, which are rail rights-of-way that host adjacent trails with appropriate barriers for safety precautions. Currently, there are three rail-trails totaling close to 12 miles in the District of Columbia (Metropolitan Branch Trail, 8 miles—7 miles in DC; Capital Crescent Trail, 11 miles—4.3 miles in DC; West Campus Access Trail, 0.4 miles—all in DC).

Streetcars

The draft Transportation Element, section 407.15 states : “Phase 1 of the DC Streetcar began service in 2016, connecting Oklahoma Avenue/Benning Road to Union Station. Plans for extending the line east to Benning Road Metrorail Station and west to Georgetown are underway.” The draft Transportation Element fails to even mention the statutory requirement of DC Code §9-1173 and 1174³ that requires:

³ The 2010 streetcar legislation represents a pragmatic solution that accommodated the public policy considerations of the 1889 law (that barred overhead wires within the old city of Washington), but allowed the H Street/Benning Road segment of the streetcar system to proceed. The authority of the Council to repeal the 1889 law is questionable, so the legislation was crafted as a temporary waiver of the overhead wire prohibition,

1173 (a) Prior to the expansion or construction of aerial wire-powered streetcar transit beyond the H Street/Benning Road line [DDOT] shall develop a plan and submit the plan to the Council that evaluates the feasibility of using non-aerial power as a means of propulsion for the phase or extension.

* * *

1174 (a) By January 1, 2014, and by that date every 3 years thereafter, the Mayor shall submit to the Council an assessment on the:

(1) Advances in propulsion technology;

(2) Feasibility, including cost, of converting to non-aerial motive power where aerial wiring has been installed;

(3) Feasibility, including cost, of using non-aerial motive power on such segments of the streetcar system where construction has yet to be initiated; and

(4) Any recommended amendments to this chapter, including a potential sunset date.

(b) The Council shall hold a public hearing on this report.

The Union Station to Georgetown Streetcar Extension

DDOT developed a Propulsion Technology analysis in 2014 and submitted it to Council in 2016 as Appendix C to the Union Station to Georgetown Streetcar study:

http://www.unionstationtogeorgetown.com/images/pdfs/AA%20Report/Appendix%20C_Propulsion%20Report.pdf

Based on the analysis in that Propulsion Report, the EA for the Union Station to Georgetown streetcar extension proposes the use of battery/super-capacitor

(non-aerial) propulsion. The EA contains a thoughtful discussion about advances in wireless technology and how overhead wires detract from aesthetics and visual quality of the City.

The Benning Road Streetcar Extension

DDOT has recently released the Section 106 report in support of the EA for the Benning Road extension of the Streetcar system and proposes to use overhead wire propulsion for that section of the Streetcar system. (*Benning Road and Bridges Transportation Improvement, Section 106 Technical Memorandum, September 2019*). But to recognize on the one hand that overhead wires detract from the viewsheds in some parts of the City, but then to allow overhead wires to be imposed in other parts of the City is prejudiced. We are one City. There are also significant operational and other questions about using two different technologies for different segments of the same Streetcar line. Even more importantly, a Propulsion Report that satisfies the requirements

limited to the H Street/Benning Road segment of the streetcar system, and limited in time until non-overhead wire technology became available.

of DC Code §9-1174(a) for this extension of the Streetcar system has not been submitted to Council.

How can planning go forward on the Streetcar system with these deficiencies?

Bus Transitways versus Streetcars

The draft Transportation Element states at 407.16 “Other ongoing transit improvement initiatives as of 2019 include: A. K Street Transitway: The transitway will provide two travel lanes for exclusive use by buses between 21th [sic] Street NW and 12st [sic] NW.”

But the Georgetown Streetcar extension also plans to use two transit lanes on K Street to be dedicated for streetcar use and perhaps local buses (November 17, 2016 DDOT Public Meeting). DDOT is considering two alternatives that differ as to whether the transitway is shared with buses and if shared with buses, how much of the transitway is shared.

https://dcstreetcar.com/wp-content/uploads/2016/11/USGTPublic-Mtg_111716_FINAL-Presentation.pdf

Alternative 2: Up to a half of the transitway would be dedicated to streetcars and would be shared with WMATA (local) buses, but not shared with commuter buses (that have a longer stop time to discharge and pickup passengers).

Alternative 4: Up to 90% of the transitway would be dedicated to streetcars and no buses would be in the transitway.

How can the future of K Street be planed with these competing transitway proposals?

Comments on the Housing Element

There is a great deal of good data in this element but significantly missing is information on the current distribution and need for various types of housing by planning area. For example, if the goal is that at least 15% of each planning area's housing will be affordable (Section 504.15), showing what that looks like now, would illustrate where the gaps are. Similarly, if we need more 3+ bedroom housing, showing by planning area where we have such housing now, where we need more and what the gap in need is by planning area (or ward) would help guide development.

Further needed data includes: where and what type of housing has been built by planning area; IZ units created by size and level of affordability by planning area; rents for various size housing by planning area (not just percentages of increases); low, very low, and extremely low income housing units of what size to meet current and future demand by planning area; PADD program (Property Acquisition and Disposition Division program) accomplishments—number of vacant properties purchased, number of new units, number bought by low income families, locations; bar chart showing how many public housing units by planning area, how many have been demolished, how many replaced; vouchers used by planning area and type of voucher; public financed and private financed affordable housing by planning area; and number of low income tax credits lost by ward/planning area and year.

If Inclusionary Zoning is intended to create more inclusive planning areas, the areas classified as “downtown zones” under current zoning will never become inclusive because IZ does not apply to those zones. (see Section 503.7 Policy H.1.1.6: Housing in the Central City)

Section 504.14 Policy H-1.2.7: Density Bonuses for Affordable Housing laudably supports the effort to increase affordable housing. However, the character of neighborhoods is an important aspect of the livability of Washington, DC. Respecting the character of neighborhoods should always be required in allowing density bonuses and is particularly important in historic districts. Therefore, the following sentence that has been marked for deletion should be restored: “Density bonuses should be granted in historic districts only where the effect of such increased density does not significantly undermine the character of the neighborhood.”

Section 504.24 Action H-1.2.G: Land Trusts has been deleted as completed but should be reinstated. The use of Community Land Trusts is an important and viable option for creating affordable housing. Just because it has been done (and done successfully), doesn't mean it shouldn't be done again on large tracts of city-owned land.

Comments on the Environmental Protection Element

Section 623.7, Action E-1.1.B Development in Floodplains—Restore the opening phrase: “Restrict development within FEMA-designated floodplain areas and”.

Section 624.7, Policy E-4.7.4 on Floodplains is proposed for deletion entirely. The policy to “Restrict development within FEMA-designated flood plain areas.” should be restored.

Section 624.7 deletes the restriction on development in FEMA-designated flood plains (both 100-year and 500-year) as both a Policy and an Action. However, the restriction is an important step toward protecting the city from flooding. The current draft mentions other important measures to mitigate expected increases in flooding, e.g., study, monitor, update, but the amendments should retain the firm restriction on development in floodplains and thus the original language should be restored.

Comments on the Historic Preservation Element

Section 1007.6, Action Item HP-2.2.B—Change wording back to “protect” rather than “respect” important vistas. “Protect” clearly defines the intended outcome. “Respect” is vague and ambiguous.

Section 1010(?), Action Item HP-2.4.A The proposed amendment completely reverses the intent of the current action item that addresses overzoning. The changes would encourage upzoning in historic districts to the scale and height of contributing buildings. This would promote upzoning based on higher buildings that were constructed before zoning regulations and may be anomalies in many historic districts. It is also inconsistent with Policy HP-2.4.1 which states that “Zoning for each historic district shall be consistent with the **predominant** height and density of contributing buildings in the district.” [emphasis added]

Taller buildings in historic districts, e.g. early 20th-century apartment buildings and churches, are still generally the tallest buildings in historic districts and are exceptions to the general height and scale of the surrounding buildings. This contrast in heights in contributing buildings is often a historic characteristic of these districts. Taken literally, as an extreme example, this change would suggest that the 1600 block of Q Street NW could be upzoned to be compatible with the height of the Cairo building.

Section 1014.4, Action Item HP-3.1.C—The proposed new wording “especially in areas near Metro stations” should be deleted. While there may be some urgency due to development pressures around Metro stations, the Action Item is about listing properties that may be eligible for listing and making that information more widely available. Why is the plan singling out and creating a priority for areas near Metro stations in this section? Perhaps giving some more general priority to areas where development is likely imminent would be more appropriate.

Comments on the Infrastructure Element

Section 1308.3—Replace this paragraph which is entirely marked for deletion with new green infrastructure policies to pave all DC government-owned parking lots with pervious surfaces and develop a tax incentive program for residential and institutional properties to reduce water run off.

Section 1311.1—At the end of the last new paragraph add: “In planning and implementing the new technologies, the District should minimize any adverse impacts on human health, streetscapes, and the environment.”

Section 1312.1—Per pending litigation and decisions, after (FCC) in the first paragraph add: “They must also comply with all legal standards, such as environmental and historic preservation requirements.”

Section 1312.1—After the end of the last new paragraph add: “However, there are areas in the city where residents and businesses may believe that they are already adequately served with digital and information technologies. In order to be as responsive as possible to communities, individual ANCs should be afforded the opportunity to opt out of 5G implementation by resolution.”

Comments on the Central Washington Area Element

The element gives inadequate attention to the infrastructure needed to support the growth projected in Section 1614.5.

1602.1 indicates that approximately 15% of the acreage within the Central Washington boundaries is water. How is water accounted for in the pie chart in Section 1602.2? Including it in any form of use (other than as water) significantly skews the land use percentages and it should be broken out separately.

Section 1602.7 identifies government owned land. Does that include parks, open space, and water? The plan should say what is included in the number and break it out so that it is possible to tell how much is actually developable.

Section 1603.4 With current trends indicating that people with children are moving out of DC, are the large projected increases in households and population in Central Washington realistic?

Sections 1605.1, 1605.2, and 1605.4 contain very relevant planning data on commuting but has been deleted. The data may need to be updated but shouldn't be deleted.

Section 1606.1 Are the listed areas enough to accommodate the projected growth?

Section 1607 The Planning and Development Priorities are still valid and relevant goals, priorities, and guidance and should not be deleted.

Section 1608.11 is to be deleted. Does this mean there should be no more hotels?

Section 1608.13 The stricken language should be restored. The "L'Enfant framework of diagonal streets" etc. are important elements of the Central Washington character.

Section 1609.10 is laudable in it's objective to update historic property designation but it is unrealistic to think that it will ever be complete. Time passes and things happen and existing properties become historic and should be designated.

Sections 1611.14 re the FBI Building, 1612.3 re the Newseum, and 1614.2 re the Apple store are all out-of-date.

Section 1618.5 regarding upgrading the public realm of NoMa is deleted, probably because it was not adequately done, but it is still needed (particularly parks and open space) and should be retained.

Comments on the Implementation Element

Equity is intended to be a theme of this element. However, the element only mentions health and the environment. Jobs, transportation, education, and affordable housing are not mentioned. While there is an Equity Crosswalk Element, attention to equity needs to be significantly broadened in the Implementation Element narrative.

Efforts in the Implemental Element to increase affordable housing seem to rely on Inclusionary Zoning (IZ) and Planned Unit Developments (PUDs). Both are very limited tools, and IZ doesn't apply at all in the downtown zones. Such reliance will continue the imbalance between affordable and market rate housing. The city is not going to be able to zone and develop its way out of the affordable housing crisis. Many more tools and partners are needed and should be referenced in the Implementation Element and utilized by the city.

Sections 2512.1 through 2514.1 would change the planning and reporting cycles. Plan revisions would be every 12 years instead of 20 with progress reports and plan amendments every 3 to 4 years. The current plan calls for progress reports every 2 years. The existing schedule of major revisions with public input every 20 years, amendments every 4 years, and progress reports to the DC Council every 2 years should be retained as more responsive and responsible.

Section 2510.1 states that the Zoning Commission has it's own staff support. This statement is extremely misleading. While it has administrative and some legal support, it relies on the Office of Planning for all substantive analysis and recommendations. While the Zoning Commission should have its own independent subject matter support, since it does not, this sentence should be rewritten and made accurate.

Comments on the Resilience Crosswalk Table for Implementation

Policy R-1.1.4 Improvements for Housing Resilience

Add at end: “Also provide financial incentives, including buyout of property owners to move to higher elevation, flood-free land.”

Action R-1.1.B1 Comprehensive and Integrated Flood Modeling

Add after “...change projections.” a new sentence: “Such models must be at least as far reaching as the Federal Emergency Management Agency’s 500-year flood plain descriptions and delineations.”

Action R-1.1.B2 Flood Resilience Standards

Add at end: “Also develop and implement no-build regulations in flood hazard areas.”

Policy R-1.1.E Post-Disaster Housing Recovery and Redevelopment

Add at the end: “and preventing construction in flood prone areas.”

Policy R-1.1.F1: Post-Disaster Housing Repair and Reconstruction

This should include incentives to move residents out of flood prone areas.

Comments on the Generalized Policy Map

LEGEND

Change “Resilience Focus Area” description to read:

Resilience Focus Areas

Areas where future planning efforts are anticipated to ensure resilience to flooding for existing and new development and infrastructure projects, including capital projects. The Resilience Area includes all FEMA-designated 500-year floodplains. At a minimum, future planning efforts must include land use, zoning, building standards and policies, and capital flood prevention projects such as flood walls and/or ground elevation to above future flood levels. Any redrawing of the Resilience Focus Areas delineation must cover the entire Federal Emergency Management Agency 500-year definition and delineation.