



**We oppose the Office of Planning's changes to the leading chapter of the DC Comprehensive Plan, the Framework Element** [www.fb.me/DCGrassrootsPlan](http://www.fb.me/DCGrassrootsPlan). *Here's why:*

**OP Has Bypassed ANC & Community Input** -- Moving away from their own published Comp Plan amendment review process, OP has gone straight to the Council without coming to the community with their proposed changes to the Framework. The amendments are significant and will impact all neighborhoods, all constituents, including limited English speaking residents and families. **More transparency with the public is needed, and OP must be told to do this.**

**OP's has made the language of the Comp Plan weak and vague – we want it to be clear and specific.**

- **OP seeks to make the Future Land Use Map discretionary, allowing Zoning Commissioners unlimited development governance.** *This is heading in the wrong direction.* The unelected, unaccountable Zoning Commissioners should not have that much power and discretion. **The City Council can help by setting clear boundaries in the Comp Plan, with defined limits to the Commission's discretion in approving large projects across DC's communities.**
- **OP wants to replace clear language in the Comp Plan with squishy words like "generally" and "should be" and "perhaps" and "encourage."** *We want stronger directives with clear language that doesn't fuzzy development outcomes in the District.* If the Future Land Use Map (a 20-year development map as derived over many years by many residents and passed into law in 2006) expects buildings no taller than three stories, then that's what we expect real estate speculators to abide by.
- **OP serves the real estate speculators interests by trying to eliminate residents appeal rights.** *We want stronger rights as directly affected residents, not less.* If we don't have rights to challenge the poor planning that has been forced on us, the large development projects will continue to push longtime residents out of our neighborhoods without mitigation or remedy. **We are asking for clearer rights during development review, not less accountability.**

#### **A CLOSER LOOK AT OP'S COMP PLAN FRAMEWORK CHANGES**

- The Grassroots Planning Coalition is concerned about equity, affordability, and preventing displacement. OP's changes do nothing to address these critical community concerns.
- Instead the changes grant everything on the developer's wish list, opening the door to increased density as a matter of right throughout the city without regard to affordability, environmental impacts, infrastructure impacts, or community input.

- The changes effectively revoke residents' right to appeal by employing language so vague that courts would not be able to rule on its intent.
- Because OP acts as an agent of DMPED, and the Zoning Commission approves every project before them without regard to impacts or community values, court appeals have largely been the only avenue available to residents to challenge irregular or unlawful economic development decisions that adversely affect them.
- In fact, until the McMillan ruling, Zoning Commissioner Anthony Hood insisted that gentrification, displacement, and environmental impacts were not in the Zoning Commission's purview. The courts held that whenever the Comprehensive Plan has affirmative directives ("shall" "must" "require") -- which the Plan does for such impacts -- they constitute law that the ZC must follow.
- OP's changes are being offered under the guise of "affordability" and "clarification." In fact they do nothing to mandate that affordability be linked to density. Nor do they define affordability, or ensure family-sized units are constructed. At the same time, they make constraints on density endlessly elastic. The proposed new language adds qualifiers that allow the Zoning Commission broad discretion and interpretive powers, undermining predictability for residents.
- The changes grant permission to the Zoning Commission to ignore elements of the Comp Plan at will, thereby conferring on the ZC an authority above the law.

#### **WHAT WE WANT THE COUNCIL TO DO:**

- Refrain from passing the Framework and implementing it as law until we have seen the rest of the document and its impact on communities, as reflected in the FLUM. A Council vote encompass the whole document, not sections of it.
- Remove the changes that make language weak and unspecific, that allow increased density as a matter of right, and that make it impossible for residents to hold developers and ZC accountable by seeking interpretation from the courts.
- Work with us to strengthen and sharpen the language to address equity, affordability, and displacement.

#### **A STRONGER COMP PLAN WILL SET THE TONE FOR ADDRESSING OUR HOUSING CRISIS AND SHOULD INCLUDE (among other thing):**

- 30% of new housing in the city is affordable for families (3+bedrooms) at incomes below 30% AMI. On city-owned land, 50% of new housing must be permanently affordable at these levels.
- Rent control expanded to apply to more and newer residential buildings.
- Implementation of the commercial land trust, already included in the Comprehensive Plan, to create and preserve affordable commercial and retail space for long-time and new locally owned businesses.
- Complete impact analysis of projects by the respective agencies during PUD review: DDOE for environmental impacts, DPW for refuse and noise impacts, DSLBD for retail/commercial analysis, DCPS/DCPL/DPR to evaluate facilities capacity, DHCD for affordability analysis and demographic evaluations to determine displacement vulnerabilities in the surrounding community; FEMS/MPD for emergency response capacity, etc.