

**DISTRICT OF COLUMBIA SUPERIOR COURT
CIVIL ACTION DIVISION**

David P. BELT)
3940 Benning Rd., NE)
Washington, D.C. 20019)

Victor M. BOOTH)
708 Parkside Place NE)
Washington, D.C. 20019)

Civil Action No. 2021 01651

Rita CAMPBELL)
1515 Michigan Ave NE)
Washington, D.C. 20017)

LaTrice HERNDON)
604 21st St. NE)
Washington, D.C. 20002)

Mary Alice LEVINE)
3804 Alton Pl. NW)
Washington, D.C. 20016)

Chris OTTEN)
2203 Champlain St. NW)
Washington, D.C. 20009)

Graylin W. PRESBURY)
1331 Ridge Pl. SE)
Washington, D.C. 20020)

Mary E. ROWSE)
3706 Morrison St NW)
Washington, D.C. 20015)

Shirley SHANNON)
1336 Shepherd St., NE)
Washington, D.C. 20017)

Chris WILLIAMS)
201 I St. SW, Apt. 526)
Washington, D.C. 20024)

Minnie ELLIOTT)

1320 Saratoga Ave., NE, Apt. 1
Washington, D.C. 20018

Linda BROWN
1200 Delaware Ave. SW, Apt 14
Washington, D.C. 20024

Laura RICHARDS
3524 Carpenter St. SE
Washington, D.C. 20020

Marc POE
782 Columbia Rd. NW
Washington, D.C. 20001

Phyllis WELLS BLAIR
1614-A Beekman Pl. NW
Washington, D.C. 20009

Richard NASH
3456 Newark St., NW
Washington, D.C. 20016

William JORDAN
1337 Newton St., NW
Washington, D.C. 20010

Jerome PELOQUIN
4001 9 St., NE
Washington, D.C. 20017

PLAINTIFFS,

v.

The District of Columbia
Mayor Muriel E. BOWSER, Mayor,
In her official capacity
1350 Pennsylvania Ave., NW
Washington, D.C. 20004

John Falcicchio
Deputy Mayor for Planning and Economic Development,
In his official capacity,
1350 Pennsylvania Ave., NW
Washington, D.C. 20004

Andrew Trueblood)
Director, D.C. Office of Planning/Mayor’s Agent for)
Historic preservation, in his official capacity,)
1100 4th St., SW)
Washington, D.C. 20024)
)
)
DEFENDANTS.)
_____)

FIRST AMENDED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiffs bring this action for declaratory and injunctive relief, pursuant to Superior Court Civil Rules 12-I and 65, to determine whether Defendants have violated D.C. Code § 1-306.04(b), (d), and § 1-309.10 (c)(1), (d) in enacting new legislation to amend the D.C. Comprehensive Plan (“Comprehensive Plan,” “D.C. Comp Plan,” “Comp Plan,” or “Plan”) and the Plain’s incorporated maps, such as the Future Land Use Map (“FLUM”) without conducting the requisite environmental assessments or responding to Area Neighborhood Commission (“ANC”) concerns as required by law.

INTRODUCTION

1. The District of Columbia will imminently undergo major changes as a result of the enactment of the Comprehensive Plan Amendment Act of 2021, D.C. Act 24-110 (the “Amendments” or the “Act”).
2. District-led development projects have resulted in displacement of Black and low-income communities across the District, including the Navy Yard community, where the population of Black residents fell approximately 70% between 2000 and 2018, and Southwest. *See* American Neighborhood Change in the 21st Century, Institute on Metropolitan Opportunity, University of Minnesota Law School, April 2019, *available at*

<http://law.umn.edu>. The District has earned notoriety as one of the most gentrified cities in the United States. *See id.* Recent census data shows that the District’s Black population has shrunk significantly as this gentrification progressed over approximately 20 years. *See* The DCist, “Census Reveals Growing Diversity in Washington Region, Increasing White Population In D.C.,” August 17, 2021, *available at* <http://dcist.com>.

3. According to the Council on Racial Equity, the Comprehensive Plan Amendment Act of 2021 “will exacerbate racial inequities in the District of Columbia.... The Comprehensive Plan, as introduced, fails to address racism, an ongoing public health crisis in the District. As introduced, it appears that racial equity was neither a guiding principle in the preparation of the Comprehensive Plan, nor was it an explicit goal for the Plan’s policies, actions, implementation guidance or evaluation. **These process failures laid the groundwork for deficiencies in policy:** proposals are ahistorical, solutions are not proportionate to racial inequities, and directives are concerningly weak or vague.”

JURISDICTION AND VENUE

4. Pursuant to D.C. Code § 11-921, venue is proper and this Court has jurisdiction over this action.

FACTUAL AND LEGAL BACKGROUND

The Purpose of the Comprehensive Plan

5. The Comprehensive Plan is the District of Columbia’s central planning document. District agencies, residents, employers, developers, and other stakeholders are guided by the Comp Plan on topics of land use, economic development, housing, environmental protection, historic preservation, transportation, and more, to ensure that Washington,

D.C. evolves in line with the collective vision for “Planning an Inclusive City.” 10A DCMR § 100, 100.4 (“We strive to be a more “inclusive” city - ensure that economic opportunities reach all of our residents, and to protect and conserve the things we value most about our communities.”).

6. According to the Home Rule Charter, the Comprehensive Plan guides zoning in that zoning must not contradict the Plan. *See* D.C. Code § 6-641.02 (Zoning Regulations – Purpose).
7. Through the Plan, residents of the District are supposed to have a say in its future. The elected Council is able to set parameters that the independent Zoning Commission and the Mayor’s Office of Planning must not violate when they evaluate planning changes, provide zoning relief, and consider development projects. Real estate developers use the Plan to guide their project proposals. District residents rely on the Plan as a commitment to their neighborhoods.
8. The Comprehensive Plan statute passed in 2006 provided a 20-year framework intended to guide the future land use planning decisions for the District, and included key planning maps, such as the Future Land Use Map. *See* 10A DCMR § 225.1 (“The Future Land Use Map is part of the adopted Comprehensive Plan and carries the same legal weight as the Plan document itself.”).
9. Planning is central to the purpose of the Plan. The Plan was prepared “through an exhaustive process of research, analysis, and review, including citizen involvement and consultation with affected federal, state and local governments, and planning agencies in the National Capital region...” D.C. Code § 1-306.01(a)(1).
10. The Code defines six distinct purposes of the Comprehensive Plan as:

- i. Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development;
 - ii. Guide executive and legislative decisions on matters affecting the District and its citizens;
 - iii. Promote economic growth and jobs for District residents;
 - iv. Guide private and public development in order to achieve District and community goals;
 - v. Maintain and enhance the natural and architectural assets of the District; and assist in the conservation, stabilization, and improvement of each neighborhood and community in the District. D.C. Code § 1-306.01(b).
11. The regulations provide even more specificity on the importance of planning in implementing the Comprehensive plan: “Our city bears the imprints of many past plans, each a reflection of the goals and visions of its era. The influence of these plans can be seen all around us – they affect the way we live and work, the way we travel, and the design of our communities. ***Planning is part of our heritage. It has shaped the District’s identity for more than two centuries and has made us the place we are today ... The need for planning has never been greater than it is today.***” 10A DCMR § 100.2-3.
12. The Comp Plan provides the District’s response to important questions, and a “framework to achieve our goals” on issues including, “How will people get around the city ...? Where will our children go to school? Will police and fire services be adequate? Will our rivers be clean? Will our air be healthy? How will we resolve the affordable housing crisis and ensure that housing choices are available for all residents? How can we ensure that District residents have access to the thousands of new jobs we are expecting?

How will the character of our neighborhoods be conserved and improved? How will federal and local interests be balanced?” 10A DCMR § 100.5-6.

13. The Plan includes detailed maps and policies for the physical development of the District. 10A DCMR § 100.14. It provides “guidance on the choices necessary to make the District a better city.” 10A DCMR § 100.15. It also “addresses social and economic issues that affect and are linked to the development of the city and our citizens.” 10A DCMR § 100.14. “It allows the community to predict and understand the course of future public actions and shape private sector investment and actions too. It allows the District to ensure that its resources are used wisely and efficiently and that public investment is focused in the areas where it is needed most.” *Id.*

The Comp Plan Amendment Process

14. The Comprehensive Plan is not static and requires periodic proposed amendments, progress reports and an impact assessment of the proposed amendments. The Code requires that the “Mayor ... submit periodically to the Council for its consideration propose amendments to the Comprehensive Plan. Such amendments shall be submitted not less frequently than once every [four] years ... and shall be accompanied by an environmental assessment of the proposed amendments.” D.C. Code § 1-306.04(d).
15. The Code requires that the Mayor establish “[a] mechanism for public review of the Mayor’s proposed amendments.” D.C. Code § 306.04(e).
16. The regulations provide further guidance on the amendment process, to ensure that the purposes of the Comprehensive Plan are achieved. 10A DCMR § 2515-17. Any person requesting changes to the Plan must show that the changes are required, and must submit specific information along with the proposed amendments. 10A DCMR § 2515.2, 3. “The

greater the degree of change proposed, *the greater the burden of showing that the change is justified.*” 10A DCMR § 2515.2.

17. The following information must accompany amendments, under 10A DCMR § 2515.3:
 - i. If applicable, the location/general area that would be affected by the proposed change.
 - ii. A detailed description and explanation of the proposed text map/amendment, including the text and the specific language to be amended.
 - iii. A description of how the issue is currently addressed in the Comprehensive Plan. If it is not addressed, the public need for it must be described.
 - iv. *An explanation of why the proposed change is the best means for meeting the identified public need, and what other options exist for meeting this need.*
 - v. *The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change.*
 - vi. *Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment.*
 - vii. Demonstration of public support for the proposed amendment (as illustrated, for example, by discussion of the proposal at a public meeting, such as an ANC meeting).
18. Following the proposal of amendments, the Council must review and consider them. The regulations require that the Council consider and vote on the amendment package in at

least two legislative meetings. “Any new or significantly modified amendment that is generated during any of these readings would be *required to be accompanied by planning analysis and recommendation* prior to the Council taking final action on the amendment.” 10A DCMR § 2517.1(c).

Comprehensive Plan Amendment Act of 2021

19. On October 15, 2019, the D.C. Office of Planning published nearly 1,500 pages of redline edit amendments to nearly all existing policies of the Comprehensive Plan. These Amendments affect approximately 200 million square feet of land and air rights throughout the District. *See* Ex. A, Declaration of Chris Otten, Email correspondence from Andrew Trueblood.
20. The original deadline for public comment fell in December 2019, during the holiday season. The Office of Planning and the Mayor received letters from local Advisory Neighborhood Commissioners (ANCs) demanding more time for public review and comment. As a result of this outcry, the District extended the deadline to accept public comment to January 10, 2020, and ANC comments through February 14, 2020.
21. During the public review period, residents submitted comments and ANCs across the District submitted formal resolutions regarding the Plan Amendments.
22. ANCs across the District formally expressed concern with the changes to the Comp Plan in writing, including ANC 1C, 4D, 2A (demanding progress reports), 2E (expressing concern with the lack of data supporting the Amendments), and others. *See* D.C. Office of Planning, “ANC Resolutions and Responses,” *available at* <http://plandc.gov>.
23. On Jan. 15, 2020, ANC 4D submitted a Resolution on the Comprehensive Plan Processes and Amendments. This Resolution states:

What Processes Comprehensive Plan Law Requires

ANC 4D is concerned that the established legal process for developing amendments to the Comprehensive Plan has not been followed. The Comprehensive Plan at D.C. Code § 1-306.04(a), titled “Preserving and Ensuring Community Input,” states that continuous community input in every phase of developing the Comprehensive Plan is essential to assure that it is the valid expression of all District stakeholders. The law contains a nonexhaustive variety of methods that should be used to secure community input which to date have not been used. The process for proposing and developing amendments to the Framework Element of the Comprehensive Plan took place over a nearly three-year period. Yet OP which released proposed amendments to the Citywide and Area Elements and the FLUM and GPM to the public on October 15, 2019 is seeking to conclude public’s and ANC involvement in the process in less than four months by February 14.

In addition, the Comprehensive Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions. The Comprehensive Plan at D.C. Code § 1-306.04(b) requires the Mayor to submit a report on the progress made in implementing the District elements of the Comprehensive Plan. It is especially important to know what impact the current provisions have had before so many major changes are proposed. As ANC 4D urged in its unanimously passed March 20, 2018 ANC 4D Resolution Regarding District of Columbia Comprehensive Plan Amendment Process and Framework

Element, OP must provide understandable data and clear impact analysis to show the need for the wholesale changes to the Comprehensive Plan Elements. ANC 4D urges OP to explain whether or not existing Plan policies and actions are working before continuing its attempt to drastically change the law.

Jan. 15, 2020, ANC 4D Resolution on the Comprehensive Plan Processes and Amendments at 1-2, signed by Renee Bowser, Chair of ANC 4D.

24. On April 23, 2020, the Office of Planning sent a letter to ANC 4D purportedly responding to the concerns raised. After stating that the ANC is “[c]oncerned that the established legal process for developing amendments to the Comprehensive Plan has not been followed,” OP states, “Acknowledged. Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies. The Office of Planning (OP) has gone above and beyond the requirements for amendment to the Comprehensive Plan as outlined in D.C. Code § 1-306.04 as well as expectations set from previous amendment processes...” The OP never addressed the demands for progress reports and impact studies.
25. On February 14, 2020, Amir Irani, Chair ANC 1C, submitted 308 pages of Comments on the Comprehensive Plan to the Office of Planning. These comments included ANC 1C Recommendations on the Amendments to the D.C. Comprehensive Plan. The Comments state:

ANC 1C Concerns with OP’s Process

ANC 1C feels that the timeframe allotted for ANC comments on OP’s Amendments to the Comp Plan (even including the extension granted) is not

enough time to digest the 1,500 total pages of redlines to the 2006 Comp Plan, conduct meaningful community engagement, and write thorough recommendations, pursuant to the Implementation Element or Chapter 25 of the Plan itself, especially 10A DCMR §§ 2505, 2507, 2515, 2516, and more generally D.C. Code § 1-306, et. seq.

Moreover, 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.

ANC 1C is concerned that the Comp Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions. OP should provide a full explanation of their proposed changes to each Element, and must be able to provide understandable data and clear impact analysis to support amendments and assertions that certain actions have been completed pursuant to 10A DCMR §§ 2511, 2512 and especially D.C. Code § 1-306.04. Preserving and ensuring community input regarding the D.C. Comprehensive Plan.

While ANC 1C appreciates OP’s efforts to include ANCs in the process, the trainings OP provided were only helpful in relaying information on the structure of the Comp Plan, amendment process, and timeline. OP provided little support to those of us who understand our communities and are interested in collecting

input, but do not have planning/housing backgrounds. We would have benefited from meaningful efforts on the part of OP to engage with us and our communities at a grassroots level, using our conversations to shape the Comp Plan rather than the other way around. ANC 1C also believes that OP's Comprehensive Plan "Amendment" process has left out residents who do not speak English as a first language, contrary to the Language Access Act, an especially important issue for the diversity of Ward 1 families and residents who will be affected.

Feb. 14, 2020, ANC1C Irani Letter to Trueblood at 6-7.

26. The Office of Planning responded to the ANC1C Letter on April 23, 2020. On the concern that "the Comp Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions," and the demand for "understandable data" and "clear impact analysis to support amendments and assertions," the Office of Planning failed to respond at all. It states, "Acknowledged. This update did not involve the visioning and document restructuring of a rewrite, but it did involve *more substantial updating and outreach than the 2011 update*. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite..." April 23, 2020, Trueblood Letter to ANC1C at 10 (emphasis added).
27. Under the D.C. Advisory Neighborhood Commissions Law, "[t]he issues and concerns raised in the recommendations of the Commission shall be given great weight during the deliberations by the government entity. Great weight requires acknowledgement of the Commission as the source of the recommendations and **explicit reference to each** of the Commission's issues and concerns. ... The written rationale of the decision shall

articulate with particularity and precision the reasons why the Commission does or does not offer persuasive advice under the circumstances. In so doing, the government entity must articulate specific findings and conclusions with respect to each issue and concern raised by the Commission. Further, the government entity is required to support its position on the record.” D.C. Code § 1-309.10 (c)(1) (2020); (c)(1)(A) (2021); (d)(3).

28. Two months after the public comment period closed, the Mayor sent the Proposed Amendments to the Council of the District of Columbia.
29. Along with the Proposed Amendments, the Mayor sent a document called “Comprehensive Plan Environmental Assessment,” prepared by the Office of Planning. This “assessment” makes minimal mention of actual Comp Plan policies, or of the effects of changing these policies. The “assessment” fails to assess or even mention the substantial upzoning included in the changes to the Future Land Use Map (upFLUMing), including unlocking approximately 200 million square feet of land and air rights. The “assessment,” is also undated and unsigned.
30. In November 2020, during the COVID pandemic, the D.C. Council held a two-day public hearing concerning the Amendments to the Plan. The hearings lasted more than 15 hours, including live testimony from approximately 150 witnesses, many of whom opposed the substantial changes and significant up-zoning that the Comp Plan Amendments and the Future Land Use Map contained.
31. Council Chairman Mendleson shared an amended version, the Committee Print, with the Council on April 14, 2021. A second version was released days later, along with the Committee Report. The Committee Report lacked reference to any public testimony regarding the lack of progress reports and impact assessment that the law requires.

32. On April 19, 2021, the Council Office of Racial Equity (CORE), part of the Office of the Secretary of the D.C. Council, published a report titled, “Bill 24-0001, Racial Equity Impact Assessment, Comprehensive Plan Amendment Act of 2020.” A new initiative, CORE’s mission is “to eliminate racial disparities and achieve racial equity in the District of Columbia” ... and ... “to explore how policies, practices, and procedures under consideration in the District impact communities of color and if so, partner to identify solutions to mitigate those negative impacts in order to advance more equitable outcomes.” *See Our Mission and Purpose, The Council Office of Racial Equity, available at dcraciaequity.org.*
33. CORE criticized the Plan Amendments and the Plan Amendment process, concluding, “The Comprehensive Plan, as introduced, fails to address racism, an ongoing public health crisis in the District. As introduced, it appears that racial equity was neither a guiding principle in the preparation of the Comprehensive Plan, nor was it an explicit goal for the Plan’s policies, actions, implementation guidance, or evaluation. These process failures laid the groundwork for deficiencies in policy: proposals are ahistorical, solutions are not proportionate to racial inequities, and directives are concerningly weak or vague.” CORE Racial Equity Impact Assessment (“REIA”) at 2.
34. CORE determined, “As written, how rezoning requests may adversely or positively impact communities of color would be unknown and subject to chance.” CORE Report at 22. It further explained, “Despite the Plan’s commitment to eliminating racial inequities, the document before us still perpetuates the status quo. Although the Plan primarily sets guidance, *land use decisions impact every aspect of residents’ social and economic wellbeing.* These decisions influence housing prices, housing choice, rent burden,

education, a resident's access to transit, proximity to necessities, amenities, commute time, and healthcare options." CORE REIA at 24 (emphasis added).

35. CORE identified that the District failed to submit progress reports, as is required by law, D.C. Code § 1-306.04 (b):

D.C. Law requires a variety of means to secure community input. One way community input is weaved into the Implementation Element is through a required periodic review of progress reports. ***Although these progress reports are required at least once every four years, CORE has only found two since 2000: one published in 2010 and the other in 2012.***

Further, the Mayor is required to "submit to the Council a report, accompanied by a proposed resolution, on the progress made by the government of the District of Columbia in implementing the District elements of the Comprehensive Plan." OP maintains a website showing the progress of provisions, but this still does not meet the requirements spelled out by law. The Council has also not held or scheduled public hearings on those progress reports. Additionally, Council has not submitted its findings nor a copy of public testimony to the Mayor, both of which are required by law following each review period.

These provisions of the law were created to give the community a chance to weigh in on how actions in the existing Plan impact them. These reports and hearings would have also provided an opportunity for the public to see and give feedback on key projected implementation activities that will occur following the completion of the review period.

CORE REIA at 19 (emphasis added).

36. In addition to the District's failure to conduct progress reports (two since 2006, despite the requirement for reports every four years), CORE found that "zero statutorily required public hearings have been held on the District's progress on Plan implementation," and "One environmental assessment has been submitted to Council since 2002 despite D.C. law requiring Plan amendments to include an environmental assessment." CORE REIA at 24.
37. With regard to the "environmental assessment" for the present Comp Plan Amendments, CORE concluded that "The environmental assessment is incomplete and non-exhaustive: Based on the law, the Mayor is required to submit an environmental assessment of the proposed Comp Plan amendments. ***However, the five page assessment does not provide any thorough assessment, evaluation, analysis of data, project-based assessment, or critical analysis.***" CORE REIA at 26 (emphasis added).
38. In analyzing the Environmental Protection Element, CORE found it significant that, "The adult asthma rate in Wards 7 and 8 is 17 percent. Ward 5's rate is 14 percent. In contrast, Ward 2's rates are about 6 percent and Ward 4's under 10 percent. ... Fifty-one percent of the District's food deserts are in Ward 8, followed by 31 percent in Ward 7."
39. On May 4, 2021, the Council voted unanimously for the amended version of the Plan Amendments.
40. The Mayor signed the legislation on July 7, 2021, and it went into effect after the Congressional review period ended.
41. The Zoning Commission is considering applications for projects under the new FLUM and the Comp Plan Amendments that will significantly impact and harm the lives of the

Plaintiffs in this action. Plaintiff Phyllis Wells-Blair, a resident of Beekman Place in Northwest, and her neighbors are involved in litigation against Meridian International Center, challenging its application for a special exception to pursue development of an extremely large condominium building across the street from her community. *See* DCCA Case No. 19-AA-0294, *Youngblood v. D.C. Board of Zoning Adjustment*. Under the Comp Plan Amendments of 2021, her legal challenges to the development will be weakened.

42. The concrete, particular and individualized harm that Plaintiffs will experience, as detailed in the attached Declarations incorporated herein, directly flows from the District's actions in violating the D.C. Code during the Comp Plan Amendment process, and resulting in the Mayor signing the legislation without performing the necessary progress reports nor environmental assessments and impact studies that would anticipate predictable problems with the vast upFLUMing that the new legislation contains.

PARTIES

43. Plaintiffs are 18 residents of the District of Columbia, and represent a broad geographic area affected by the Comp Plan amendments, and specifically residents of, or rely on services in, the up-FLUMed areas. Plaintiffs would each be individually, concretely and specifically harmed if the Comp Plan amendments go into effect. Their attached Declarations describe that harm and are hereby incorporated herein. *See* Ex. A.
44. Defendant District of Columbia, through its executive agents and agencies, has violated D.C. law by failing to engage in the planning process for Amendments to the Comp Plan that the law requires, and by failing to give great weight to the ANC resolutions expressing such concerns. As such, the Mayor submitted legally deficient legislation to

the Council, which did not insist on compliance with the law. As a result, the Plaintiffs will suffer the harms described to their day-to-day lives and livelihoods in the District.

CAUSES OF ACTION

Claim One (Violations of the D.C. Code Planning Requirements for Amendments to the Comprehensive Plan)

45. Plaintiffs repeat and reallege, incorporating by reference, the preceding paragraphs as if fully set forth herein.
46. Plaintiffs are being irreparably harmed by reason of Defendant's violations of D.C. Code § 1-306.04. These assessments and reports are required to ensure that changes to the Comprehensive Plan, including increasing future planned density, do not overall harm D.C. residents and communities, particularly low income, working families, Black and Brown residents, the elderly, children, and those vulnerable to displacement, negative health impacts due to increased density and traffic, and financial upheaval. *See* D.C. Code § 1-306.04(b), (d); DCMR 10A-2515.1, 3, 2517.1.
47. Plaintiffs are entitled to injunctive relief enjoining the implementation of the Comprehensive Plan Amendment Act of 2021, and declaratory relief declaring the Act illegal and unenforceable.

Claim Two (Violation of the D.C. Advisory Neighborhood Commission Law)

48. Plaintiff incorporates by reference the preceding paragraphs as if fully set forth herein.
49. Plaintiffs are being irreparably harmed by reason of Defendant's violations of D.C. Code § 1-309.10 in that Defendant failed to address their ANC's concerns with great weight, as the law requires. The statutory intent is to ensure effective presentation of resident views

through their ANC resolutions. Therefore, by not considering these fundamental concerns, as expressed by the ANCs, the District and the Office of Planning harmed Plaintiffs' interest in participating in the democratic process.

50. Plaintiffs are entitled to injunctive relief enjoining the implementation of the Comprehensive Plan Amendment Act of 2021, and declaratory relief declaring the Act illegal and unenforceable.

PRAYER FOR RELIEF

Wherefore, plaintiff prays that this Court:

- A. Declare that Defendant is in violation of the D.C. Code;
- B. Order that Plan Amendments be enjoined and that implementation cease; and
- C. Grant such other relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs request a jury trial in the present case.

10/08/2021

Respectfully submitted,

Heather Benno [1010821]
Attorney for Plaintiffs
IMMIGRANT JUSTICE SOLUTIONS
1629 K St. NW, #300
Washington, DC 20006
(240) 435-7191

CERTIFICATE OF SERVICE

I, Heather Benno, attest that copies of the included First Amended Complaint were placed in the mail to be sent to the parties on the 8th day of October, 2021.

Mayor Muriel Bowser
The District of Columbia
c/o Attorney General Karl Racine
400 6th St. NW
Washington, DC 20001

Attorney General Karl Racine
400 6th St. NW
Washington, D.C. 20001

John Falcicchio
Deputy Mayor for Planning and Economic
Development
1350 Pennsylvania Ave., NW
Washington, D.C. 20004

Andrew Trueblood
Director, D.C. Office of Planning/Mayor's
Agent for Historic preservation
1100 4th St., SW
Washington, D.C. 20024

Signed,

/s Heather M. Benno

Heather Benno
Immigrant Justice Solutions
1629 K Street NW, Suite 300
Washington, DC 20006
Heather.Benno@gmail.com
(240) 435-7191

EXHIBIT A
PLAINTIFF
DECLARATIONS

PERSONAL ATTESTATION

1. My name is Linda Brown. I am over the age of 18 and attest under penalty of perjury that the following statements are true and correct to the best of my recollection and knowledge.
2. My 28-year-old daughter and I live at Greenleaf Senior Housing located at 1200 Delaware Avenue, SW, Apt. 14, Washington, DC, 20024 and have lived here for many years as public housing recipients. My daughter is disabled and totally dependent upon me and her nurses. She requires 24-hour care, daily visits from her nurse aids and uses a wheelchair.
3. The recent changes to the planning maps by the Mayor and Council will continue the significant and unexamined adverse impacts on me, my family and my Southwest Ward 6 neighborhood. Changes to the FLUM map will push up even bigger and denser buildings. These changes speed up the redevelopment planning for the property where I live and all around the area where I live.
4. I am not aware of any studies showing how these planning map changes will directly affect public housing residents like me and our future here in my community. The maps specifically change for where I live now! Clearly, like with other lower income Black residents like myself, we are facing displacement with each new development and rise in housing costs. Over the past 20 years, 60,000 Black folks have been pushed out of DC.
5. The changes in the Comprehensive Plan maps only seek more development without any account for human needs, like open greenspace, parks, and trees. All we will see is concrete and buildings. Increasing pollution emanating from the congested streets affects the air quality my health and the health of my family. I've already had to contend with cancer and poorer air quality will exacerbate my daughter's healthcare needs and costs.
6. I rely on the existing accessible parking to help my daughter, but it is becoming a premium and will become harder and harder to find as more and more people move into the bigger denser buildings. The nurse aids who assist me in caring for my daughter already are having trouble finding consistent nearby parking.
7. It is already difficult to navigate the busy streets with my daughter should we decide to go for a walk together which we regularly enjoy, but this will likely become impossible with the proposed population increases with new developments. The streets are becoming congested to a hazard. Where are the pedestrian impact studies for this geographic area with these proposed amendments to the Comp Plan.
8. I want to continue to live in a neighborhood that is a safe place for me and my daughter, one that we can afford, and which allows us to enjoy the outdoors. Instead, these planning changes and more development will bring more and more people, cars, and pollution, and without the required planning analysis, these impacts will harm us in surprising ways.

9. As a longtime resident of Southwest, I reject unchecked unstudied density increases in my neighborhood. For the health and safety of myself, my daughter, and the community in and around Greenleaf Senior Housing. Our future is imminently affected by the changes to the Comp Plan, especially because the changes never take into account the impacts to those specifically living around these map changes, like me.

As signed,

A handwritten signature in cursive script, reading "Linda Brown", is written over a horizontal line.

Name: Linda Brown

Address: 1200 Delaware Avenue, SW, Apt. 14, Washington, DC, 20024

Phone: (202) 705-5669

Date: August 13, 2021.

Personal Attestation

My name is Chris Otten and I am over the age of 18 and the following statements are to the best of my knowledge true and correct under penalty of perjury.

I live at 2203 Champlain Street NW. Me and my home will be sandwiched between the last minute unstudied proposed land use changes to the south, to the east and to the north as proposed by the Office of Planning and Ward 1 Councilmember Brianne Nadeau without any impact planning analysis or study whatsoever.

The five page ad-hoc non-relevant report that has no attribution to any agency or person without any date that I saw on the Council record doesn't mention any specific upFLUMing changes or the impacts of those land use changes on any given geographic area around the upFLUMing. That report is not a study of anything, especially not of the approved upFLUMing in my community nearby that is substantial and will impact me directly and acutely.

I live at a low-income Section 8 housing cooperative. My home and coop are vulnerable to shifting land values in the geographic area where the proposed upFLUMing is. In Adams Morgan, the right to develop bigger denser buildings means the imminent construction of higher-profit high-rise luxury condos and significantly more pressure on surrounding housing taxes and costs, especially on existing affordable housing units like mine. Thus the upFLUMing increases displacement pressures on the cooperative where I live and on existing affordable units where my neighbors and friends live.

And, despite the fact that thousands of low income working people like me have been displaced from Ward One over the past decade by the recent denser luxury development, the unstudied upFLUMing will only further exacerbate this displacement yet no DC planning official or Councilmember could take the time to look at the law that requires impact studies to accompany these types of substantial land use and map changes. Clearly, as the census shows, these types of changes have adverse impact on working-poor people like me who are far more vulnerable to increasing housing cost impacts. I am directly and concretely affected and imminently threatened by the proposed Comp Plan map changes, especially because the laws regarding impact studies were ignored.

As a member of the DC Grassroots Planning Coalition steering committee, I testified before the Council on numerous occasions. In November of 2020, I testified to my concerns at a hearing about the proposed changes to the Comp Plan before Council Chair Phil Mendelson. I point blank asked the Chair of the Council as to why the laws governing the Comp Plan amendment process requiring impact assessments could be ignored by the Executive. He demurred. Ultimately, when printed, the Committee report about this hearing never makes a mention about these laws that require impact studies. I asked the Committee staff and Chair to correct the report (see true and correct copies of emails attached). These emails were also ignored. Then in March 2021, at a public gathering, I gave notice to the Chair that his lack of accountability around the Comp Plan laws requiring impact studies could be pursued in court. Chairman Mendelson said, "Go for it."

My emails with the DC Office of Planning Director as to whether impact studies existed also were not answered despite Mr. Andrew Trueblood admitting that the Mayor's proposed FLUM changes to the Comp Plan land use maps equated about 200 million square feet of allowable upzoning. Then emails to my Councilmember, Brianne Nadeau, also went unanswered as to her last minute substantial changes to the planning maps in Adams Morgan just a few blocks from my home (see true and correct copies of emails attached).

I also attempted to clarify with the DC Council Office on Racial Equity as to whether any environmental assessments were completed between the time Mayor Bowser and the Office of Planning submitted their proposed Comp Plan changes to the Council in May 2020, and when the City Council's took their final vote on the Comp Plan changes in May 2021. Upon asking if any impact studies were further elaborated in any way for the public record, Mr. McClure, the Director of CORE affirmed he was not aware of any. Mind you, regarding the un-dated, un-captioned, un-signed so-called environmental assessment tacked onto the end of the Comp Plan changes sent by the Mayor over to the Council in May 2020, the DC Council Office on Racial Equity called that document "incomplete" and "not exhaustive." In fact, that five-page generic report makes no specific mention of any of the proposed 200-million square feet of UpFLUMing at all let alone any account of any last minute land map changes proposed by Councilmember Brianne Nadeau in and around my home and community in Adams Morgan.

As a former ANC Commissioner in Adams Morgan, I saw ANC-1C specifically raise issues and concerns about the Comp Plan amendment process in their official publicly recorded ANC resolution delivered to the Office of Planning in February 2020. The Adams Morgan ANC resolution on the proposed Comp Plan amendments acutely asks the OP to explain why the law as to impact assessments need not be followed:

ANC 1C Concerns with OP's Process

ANC 1C feels that the timeframe allotted for ANC comments on OP's Amendments to the CompPlan (even including the extension granted) is not enough time to digest the 1,500 total pages of redlines to the 2006 Comp Plan, conduct meaningful community engagement, and write thorough recommendations, pursuant to the Implementation Element or Chapter 25 of the Plan itself, especially 10A DCMR §§ 2505, 2507, 2515, 2516, and more generally DC Code § 1-306,et. seq.

Moreover, 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. ANC 1C is concerned that the Comp Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions. OP should provide a full explanation of their proposed changes to each Element, and must be able to provide understandable data and clear impact analysis to support amendments and assertions that certain actions have been completed pursuant to 10A DCMR §§ 2511, 2512, and especially DCCode § 1-306.04.

ANC 1C letter and resolution and transmitted to the DC Office of Planning Director, Andrew Trueblood on February 14, 2020 as shown at this website:

https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/page_content/attachments/ANC%201C%20-%20Comp%20Plan%20Resolution.pdf

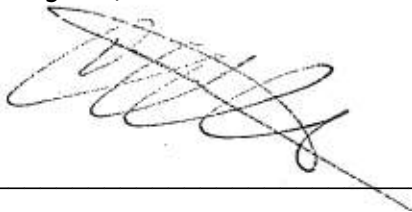
While the Office of Planning did respond to many of the Adams Morgan issues regarding changes to the Plan, the key concerns about “reporting the progress” of existing Plan policies and the requirement for “clear impact analysis” were both issues completely sidestepped by the Office of Planning in their official response to ANC-1C. See, the DC Office of Planning letter dated April 23, 2020, signed by Andrew Trueblood in response to the Adams Morgan ANC resolution on the DC Comp Plan changes as found at this website ::
https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/page_content/attachments/ANC%201C%20Response.pdf

To this day, the Office of Planning has not explained to my ANC Commission why the laws requiring impact studies do not have to be considered when amending the Comp Plan and land use maps, especially the last minute changes proposed from the Council dais in May 2021 by Ward One Councilmember, Brianne Nadeau.

The substantial inducement of population into Adams Morgan by the proposed unstudied upFLUMing will bring significant impacts to our air quality, noise pollution, trash, traffic, and other environmental impacts. I am especially sensitive to these sort of impacts as I already have lung complications. My health will only be worsened by the impacts of the substantial population and associated pollution, especially because there will be no mitigation plans that could and should have evolved from the completion of the required impact studies.

I want to be protected as the city develops, not harmed yet I am imminently facing economic hardship, displacement, and environmental impacts to my health. The laws requiring impact studies exist to protect us. So I must ask that no changes to the Plan and planning maps go forward until the required studies are done and people like me are considered along with developer profit margins.

As signed,



Name: Chris Otten
Address: 2203 Champlain Street NW #303, WDC 20009
Phone / Email: crotten2@gmail.com, 202-810-2768
Date: August 13, 2021

AUG 16 2021

TRUE AND CORRECT COPY OF
AN EMAIL BETWEEN CHRIS
OTTEN AND BRIAN MCCLURE,
DC COUNCIL OFFICE ON
RACIAL EQUITY REGARDING
COMP PLAN STUDIES



d.c. forrd <dc4reality@gmail.com>

Re: Mr. McClure on the Comp Plan

1 message

d.c. forrd <dc4reality@gmail.com>

Mon, Aug 16, 2021 at 3:06 PM

To: "McClure, Brian (Council)" <bmcclure@dccouncil.us>

Cc: "Clayton, Melvin (Council)" <mclayton@dccouncil.us>, "Mody, Namita (Council)" <nmody@dccouncil.us>, "Robbins, Milika (Council)" <mrobbins@dccouncil.us>, Parisa Norouzi <parisa@empowerdc.org>

Thank you Mr. McClure.
Appreciate that feedback.
Chris O!

On Mon, Aug 16, 2021 at 3:02 PM McClure, Brian (Council) <bmcclure@dccouncil.us> wrote:

Hi Chris, apologies for the delay and thanks for your patience. Our Office has not seen an updated environmental assessment or additional progress reports since our REIA was released. You may want to check with OP or the Chairman's office to verify.

If I recall correctly, I think the Comp Plan may have made some changes to how progress reports are conducted and submitted based on the concerns outlined in the REIA. But those changes were only forward looking and did not necessarily address prior reports/assessments. But the Chairman's Office is better positioned to respond to all the changes that were made after first reading.

Let me know if this helps or if I can clarify anything.

--

Brian McClure, PhD
Director
Council Office of Racial Equity
Council of the District of Columbia
1350 Pennsylvania Ave., NW,
Washington, DC 20004
Direct: 202 549-5825
bmcclure@dccouncil.us

Visit us on the web at dcraciaequity.org

From: "d.c. forrd" <dc4reality@gmail.com>

Date: Monday, August 16, 2021 at 2:38 PM

To: "McClure, Brian (Council)" <bmcclure@DCCOUNCIL.US>

Cc: "Clayton, Melvin (Council)" <mclayton@DCCOUNCIL.US>, "Mody, Namita (Council)" <nmody@DCCOUNCIL.US>, "Robbins, Milika (Council)" <mrobbins@DCCOUNCIL.US>, Parisa Norouzi <parisa@empowerdc.org>

Subject: Re: Mr. McClure on the Comp Plan

Hi Mr. McClure,

I'm not sure if the office is open now or not, but we've been trying to get an answer to this important question for a couple months.

Just for clarity sake. As it seems, there is a gap in understanding how the CORE reports are received by the Council and how the Council may act to address the CORE concerns and issues.

Here with the Comp Plan the CORE report made very clear statements about the Environmental Assessment and Progress Reports regarding the Comp Plan -- they were missing incomplete and non exhaustive.

And we just wanted to verify that between the time the Council received the Comp Plan amendments from the Mayor to the time of the second Council approval vote on May 18, no additional environmental assessments or progress reporting were produced for CORE or for that matter for anyone in the public including the Council.

We are just hoping to confirm that as we can't find anything. Moreover, the recent census numbers release show how dramatically development is shifting this city now, for sure 60k Black folks have been displaced from DC between 2000-2020. A shocking number for us to see. 20k more folks over the past 10 years!

We look forward for someone, anyone from the CORE office to please respond to our inquiry as to the Comp Plan env assessment and progress reports. Again, that there has been no update on those that were submitted by the Mayor before the second vote was taken. Right?

Thanks,

Chris Otten

On Wed, Aug 11, 2021 at 5:47 PM d.c. forrd <dc4reality@gmail.com> wrote:

Hi Mr. McClure,

I hope your summer has been ok.

I don't recall seeing an answer to these series of emails.

The key question:

Is it the case that despite the changes made by the Council to the Mayor's COMP Plan proposal, that happened between April and May, the Council never addressed the missing progress reports and never addressed the lacking environmental impact assessments that the CORE report highlights as deeply deficient. Right? Perhaps I missed it given the volume of the documents at play. CORE Report Appendix at page 26.

Please advise.

Thanks,

Chris Otten

On Fri, Jul 2, 2021 at 5:13 PM d.c. forrd <dc4reality@gmail.com> wrote:

Hi Mr. McClure,

You've probably left for the weekend.

When you get the chance, I'm seeking just this last bit of info on analysis of Comp Plan.

Please respond when you get a moment,

see below.

Have a nice weekend.

Thanks,

Chris O.

On Fri, Jun 25, 2021 at 3:48 PM d.c. forrd <dc4reality@gmail.com> wrote:

Thanks for this note Mr. McClure. I've been delayed as I've been a bit under the weather.

But we really do appreciate your insights and understanding.

I do wonder however, is it the case that despite the changes made by the Council to the Mayor's proposal, that happened between April and May, the Council never addressed the missing progress reports and never addressed the lacking environmental impact assessments that the CORE report highlights as deeply deficient. Right? Perhaps I missed it given the volume of the documents at play. CORE Report Appendix at page 26.

Any insights you can share into this particular issue is very welcomed.

Thanks,
Chris O.

On Mon, Jun 21, 2021 at 6:30 PM McClure, Brian (Council) <bmccclure@dccouncil.us> wrote:

Hi Chris. Hope all is well.

Yes, the April 19th report first reviewed what the Mayor sent down. It then looked at changes made to OP's version made by the Chairman in what was called the "staff draft."

That is a good question. Currently, our office does not conduct a post vote report or a additional review once a measure has received its final vote. As I'm sure you know, the staff draft was subsequently significantly revised based on issues flagged in the report as well as by issues raised by the public and other members. There were many amendments that were incorporated that aimed to improve outcomes for Black residents and other residents of color.

--

Brian McClure, PhD
Director
Council Office of Racial Equity
Council of the District of Columbia
1350 Pennsylvania Ave., NW,
Washington, DC 20004
Direct: 202 549-5825
bmccclure@dccouncil.us

Visit us on the web at dcraciaequity.org

From: "d.c. forrd" <dc4reality@gmail.com>
Date: Monday, June 21, 2021 at 2:59 PM
To: "McClure, Brian (Council)" <bmccclure@DCCOUNCIL.US>
Subject: Re: Mr. McClure on the Comp Plan

hi brian,

just checking in to see if you saw this email.

thanks.

chris o.

On Thu, Jun 17, 2021 at 8:10 PM d.c. forrd <dc4reality@gmail.com> wrote:

Hi Mr. McClure:

Hope all is well. And things are going strong over at the office.

I wanted to check in with you about the Comp Plan because as you may know there are issues with what ultimately got passed by the Council.

I watched the event tonight, and I want to understand the CORE reporting process as best I can.

The CORE report that was published on April 19 was the report that coincides with Councilmember Mendelson's staff report and the Committee of the Whole's proposed changes to the Mayor's changes to the Comp Plan. Yes?

And that the conclusions in that April 19 final CORE Report, those were based on Mr. Mendelson's changes before it went to the full Council for a vote, yes?

Tonight you mentioned a preliminary report that preceded the staff changes and your office's final report. Is there a post vote report as well?

Thanks for any insights.

Chris Otten

--

DC for Reasonable Development

(202) 656-5874

www.dc4reason.org

fb.me/dc4reality

twitter.com/dc4reality

MAY 17 2021

TRUE AND CORRECT COPIES
OF EMAIL FROM CHRIS OTTEN
TO WARD ONE
COUNCILMEMBER BRIANNE
NADEAU AND STAFF
REGARDING LAST MINUTE
CHANGES TO THE COMP PLAN
LAND USE MAPS IN ADAMS
MORGAN; THIS EMAIL
REMAINS UNANSWERED



Re: COMP PLAN: ADAMS MORGAN: Does the Law Matter? Does Planning Matter?

CRO. 9000.series <crotten2@gmail.com>

Mon, May 17, 2021 at 3:24 PM

To: Brianne Nadeau <bnadeau@dccouncil.us>, "Meni, David (Council)" <dmeni@dccouncil.us>

PS: I've downloaded and screencapped your entire website to check on Comp Plan stuff.

On Mon, May 17, 2021 at 3:03 PM CRO. 9000.series <crotten2@gmail.com> wrote:

Dear Councilmember Nadeau and all Councilmembers,

My name is Chris Otten. I am a former ANC in Adams Morgan and a 20 year resident.

I am writing because I saw this video >>

<https://www.youtube.com/watch?v=PTJdDBUxpLE>

I hear in this video:

1. That the community supports the upFLUMing in Adams Morgan (NOT PROVEN)
2. That Chairman Mendelson suggests a planning assessment happen before going forward with the upFLUMing (PLANNING REQUIRED BY LAW)

As to point 1: I want to reiterate many people have objected to the last minute amendments that will permanently alter Adams Morgan forever and will have impacts on residents especially those vulnerable to displacement from the remaining affordable housing here, will impact population growth and capacities of our schools, clinics, transportation, utilities, parks, etc.

- [PR: Nadeau's Changes to the DC Comp Plan Resurrects Redlining of the Past](#)
- [COMP PLAN NEWS: Ward Eight and Ward One Ask Council to Reject Comp Plan](#)
- [Press Release:: Comp Plan Leaves Behind Ward One Residents](#)

In the video above, [the May 4th discussion](#) about the Comp Plan and CM Nadeau's changes, I think I hear there is no objection by the community to these changes. CM Nadeau says as such but yet didn't announce these changes in any newsletters, on any listservs, in any public way herself besides the May 4th Council session. Her staff did bring these proposals to the community at a lightly attended March 17 ANC Committee meeting whereby the ANC took no position and there were many voices against/concerned/or seeking more info on the UpFLUMing amendments proposal as put on the record. <https://www.youtube.com/watch?v=9HfRKJi2Po0>

To point 2. Chairman Mendelson suggests that planning be done before upFLUMing on U Street. The suggestion is good but brushed aside by my Councilmember. Problem here is that the suggestion for planning is not just common-sense, but is required by law.

See DC Code § 1-306.04 (b), DC Code § 1-306.04 (d), and DCMR 10A- 2515.1, and DCMR 2515.3, and,

DCMR 10A-2517.1 The following text outlines the steps in the Council review and adoption process for Comprehensive Plan amendments.

c. Following approval by the Committee of the Whole, Council considers and votes on an amendment package in at least two legislative meetings (first and second readings) no less than two weeks apart. **Any new or significantly modified amendment that**

is generated during any of these readings would be required to be accompanied by planning analysis and recommendation prior to the Council taking final action on the amendment.

Any action tomorrow as to the U Street upFLUMing, at the last minute representing substantial changes to Adams Morgan, and frankly **the complete giveaway of 200M sq ft of "unlocked" upzoning on the Future Land Use Map as desired by the Mayor** -- all being proposed and possibly legislated without the required planning impacts and progress reports -- would be considered unlawful and frankly harmful in light of the CORE report of status quo unplanned "growth" this city has come to know all too well over the past 15 years,

We are seeking truly transparent decision making based on a real impact study that considers how this type of growth will impact our existing residents vulnerable to destabilizing health and financial upheavals that is a form of violence against people like low income residents, working people and families and small businesses in the city and in Adams Morgan. If we can't get the help from the Council, what are we to do, go to Court again?

Please respond.

Thank you,
Chris Otten

cc: Adams Morgan for Reasonable Development
DC Grassroots Planning Coalition
Karl Racine, AG

APRIL 22 2021

TRUE AND CORRECT COPIES
OF EMAIL FROM CHRIS OTTEN
TO THE COMMITTEE OF THE
WHOLE STAFF AND COUNCIL
CHAIR PHIL MENDELSON
REGARDING CORRECTIONS TO
THE COMMITTEE REPORT ON
THE DC COMP PLAN; THIS
EMAIL REMAINS
UNANSWERED



d.c. forrd <dc4reality@gmail.com>

Re: Comp Plan City Council Committee Report: Missing Info

d.c. forrd <dc4reality@gmail.com>

Thu, Apr 22, 2021 at 10:52 AM

To: "Koster, Julia (Council)" <jkoster@dccouncil.us>, pmendelson <pmendelson@dccouncil.us>

Bcc: Dcgpsteering <dcgpsteering@googlegroups.com>, Akela Crawford <Akela.Crawford@legalclinic.org>, tvassefi@gmail.com, Vikram Surya Chiruvolu <vikram.chiruvolu@gmail.com>, Carolmiller100@gmail.com, Amandafox8@gmail.com, Amanda Fox Perry <amandacfox8@gmail.com>, Bill Rice <ricebill@aol.com>, Sandra Reischel <sandrareischel@yahoo.com>, cesar maxit <cesarmaxit@gmail.com>

Im sorry to bother you but time is of the essence.

Will you be responding to my email by chance?

Will you acknowledge that I and others raised as a key concern that laws governing the Comp Plan are not being followed to the imminent harm of working DC families and residents and particular communities of color in DC.

We raised these issues about the Comp Plan laws during the Nov hearings but the Committee report published on Monday makes no indication that we raised them.

In fact, several ANC's raised these laws as not being followed in resolutions that are also being ignored.

Knowing these laws exist as we have squarely put them before you, will the Committe please explain why they can be ignored by the Mayor and now by you and the Council especially my Councilmember Nadeau.

CM Nadeau has offered substantial changes to Adams Morgan affecting our community permanently. It was just mid March when her staff unveiled substantial upzoning in Adams Morgan at a ANC mtg with 20 people in attendance. The land value speculation that will be driven by the upzoning without planning will specifically and concretely affect those working poor residents and families living in the last affordable housing options here in this community. Moreover almost doubling the population along Columbia Road will push the 42 bus over capacity as CM Nadeau's changes would put significant additional capacity pressure on this line, making it much harder to get to to my health and professional appointments downtown. Moreover, the volume of construction noise dust and health impacts will negatively affect those like myself more vulnerable to the health effects of the likely substantial increase in luxe housing construction just blocks from my home. This goes on as for families, it will be harder to get kids into local schools becoming overcrowded and same for use of local parks clinics and other social needs and emergency response time that will be pushed to over capacity levels that they will likely no longer serve existing residents adequately.

Please advise.

Thank you,
Chris Otten
21 year Adams Morgan resident

On Monday, April 19, 2021, d.c. forrd <dc4reality@gmail.com> wrote:

Dear Mr. Mendelson and Mrs. Koster, and Committee staff, and Councilmembers,

Despite several people, including myself very specifically highlighting the **laws and regulations that govern amending the DC Comprehensive Plan**, there is only a brief mention in the entire **Committee of the Whole Committee Report**. Plus the report link is missing the attachments or at least not visible in the document link I received.

Only one statute associated with the Comp Plan is mentioned **within Mr. McClure's report on racial equity** concluding the Comp Plan represents "status quo" displacement of Black DC will continue under these current Comp Plan changes. Mr. McClure's report talks about the progress reporting that is supposed to be associated with the Plan to determine appropriate changes and those reports are sporadic and missing.

Most curiously, there is nothing in the COW Committee report on the Comp Plan contending directly with the laws that

require impact assessments associated with any proposed Comp Plan changes, let along the upFLUMing that equates to about 200 million square feet or approx \$85B of land value that the Mayor wants to "unlock" onto our communities.

DC Code § 1-306.04 (d) "[Amendments to the DC Comprehensive Plan] shall be accompanied by an environmental assessment of the proposed amendments... "

10A 2515.2, .3 "The greater the degree of change [to the DC Comprehensive Plan] proposed, the greater the burden of showing that the change is justified. ... The following supporting information will be required when an amendment is proposed: ... e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change. f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment."

I know ANC Commissioner Renee Bowser at the Comp Plan hearings specifically focused and testified as to the laws that require impact assessment of such substantial changes to our Comp Plan. Her testimony isn't even mentioned in your Committee report.

Under the COW Committee Report and summary of my specific testimony, there is no mention of my central theme that the laws are being ignored. And these laws and regulations, requiring impact assessments to allow for actual planning in the city, is certainly no small matter and centrally contends with racial equity as who the impacts of all the development in the past decade have befallen are largely working-class and low income Black communities in DC.

We know for sure your office as other Councilmembers have received quite a numerous amount of letters from the public that highlight the laws that govern the Comp Plan changes and how they've been ignored by the Mayor.

At the last DC Grassroots Planning Commission public meeting I spoke up and asked you if you will contend with these laws vis-a-vis your work in making the Mayor's amendments align with the law, aka have the Mayor do the impact assessments as required and as expected by basic planning common sense.

Respectfully, Mr. Mendelson, either you are trying to blow off these basic planning requirements completely, or they don't seem to matter, that laws are just some things that some people have to follow and others don't? Is that really it? The Mayor and Council don't have to consider the impacts of major planning changes?? Would DC be the only modern-day jurisdiction that has this type of "not-planning" planning posture.

Respectfully, I look forward to a response from you and the Committee. I'm hoping you can answer why don't the laws that govern changes to the DC Comprehensive Plan not apply or not matter, especially when the impacts that could be studied will now most fall on those most vulnerable communities in the District.

Thank you,
Chris Otten

PS: Here's the video testimonials by which you will find specific reference by many people to these Comp Plan laws, including official ANC resolutions that have been completely disregarded by the Office of Planning >>

<http://www.dgrassrootsplanning.org/testimony>

--

DC for Reasonable Development
(202) 656-5874
www.dc4reason.org
fb.me/dc4reality
twitter.com/dc4reality

--

APRIL 19 2021

TRUE AND CORRECT COPY OF
EMAIL FROM CHRIS OTTEN TO
DC COUNCIL COMP PLAN
STAFF, COMMITTEE STAFF,
CHAIR PHIL MENDELSON, AND
ALL COUNCILMEMBERS
ABOUT THE INCOMPLETE AND
INCORRECT COMMITTEE
REPORT ABOUT THE LAW
REQUIRING IMPACT STUDIES
TO ACCOMPANY THE
CHANGES; THIS EMAIL
REMAINS UNANSWERED



d.c. forrd <dc4reality@gmail.com>

Comp Plan City Council Committee Report: Missing Info

d.c. forrd <dc4reality@gmail.com>

Mon, Apr 19, 2021 at 5:47 PM

To: "Koster, Julia (Council)" <jkoster@dccouncil.us>, pmendelson <pmendelson@dccouncil.us>

Cc: Evan Cash <ecash@dccouncil.us>, "Committee of the Whole (Council)" <cow@dccouncil.us>, pmendelson <pmendelson@dccouncil.us>, Anita Bonds <abonds@dccouncil.us>, "Silverman, Elissa (Council)" <esilverman@dccouncil.us>, rwhite@dccouncil.us, chenderson@dccouncil.us, "Nadeau, Brianne K. (Council)" <bnadeau@dccouncil.us>, bpinto@dccouncil.us, mcheh@dccouncil.us, jlewisgeorge@dccouncil.us, kmcduffie@dccouncil.us, Charles Allen <callen@dccouncil.us>, vgray@dccouncil.us, twhite@dccouncil.us, Dcgpsteering <dcgpsteering@googlegroups.com>

Bcc: "McClure, Brian (Council)" <bmcclure@dccouncil.us>, "Clayton, Melvin (Council)" <mclayton@dccouncil.us>, "Mody, Namita (Council)" <nmody@dccouncil.us>, "Robbins, Milika (Council)" <mrobbins@dccouncil.us>, amclean@dccouncil.us, kwhtittier@dccouncil.us, "Benjamin, Aukima (COUNCIL)" <abenjamin@dccouncil.us>, nmendelsohn@dccouncil.us, jlewisgeorge@dccouncil.us, ledwards@dccouncil.us, tbenitez@dccouncil.us, ataliadoros@dccouncil.us, mlandrieu@dccouncil.us, keyster@dccouncil.us, wperkins@dccouncil.us, kmcduffie@dccouncil.us, mflowers@dccouncil.us, kcislo@dccouncil.us, jmcnair@dccouncil.us, mcrawfordriddick@dccouncil.us, shgrant@dccouncil.us, nfakolujo@dccouncil.us, Charles Allen <callen@dccouncil.us>, lmarks@dccouncil.us, nopkins@dccouncil.us, nmitchell@dccouncil.us, claskowski@dccouncil.us, esalmi@dccouncil.us, jmattison@dccouncil.us, kkennedy@dccouncil.us, jdemayo@dccouncil.us, vgray@dccouncil.us, sbunn@dccouncil.us, tnorfli@dccouncil.us, ttate@dccouncil.us, dhumphrey@dccouncil.us, jbetters@dccouncil.us, tfinnell@dccouncil.us, twhite@dccouncil.us, wlockridge@dccouncil.us, wglenn@dccouncil.us, lthorne@dccouncil.us, ecleckley@dccouncil.us, tjackson@dccouncil.us, shoskins@dccouncil.us, pmendelson <pmendelson@dccouncil.us>, mbexley@dccouncil.us, lwalton@dccouncil.us, mbattle@dccouncil.us, bmcduffie@dccouncil.us, Anita Bonds <abonds@dccouncil.us>, "Kang, Irene (Council)" <ikang@dccouncil.us>, dmeadows@dccouncil.us, nbell@dccouncil.us, "Silverman, Elissa (Council)" <esilverman@dccouncil.us>, "Rosen-Amy, Samuel (Council)" <srosenamy@dccouncil.us>, "Royster, Charnisa (Council)" <croyster@dccouncil.us>, "Hunt, Kelly (Council)" <khunt@dccouncil.us>, pjoseph@dccouncil.us, rwhite@dccouncil.us, mngwenya@dccouncil.us, afowlkes@dccouncil.us, kwhitehouse@dccouncil.us, aminor@dccouncil.us, chenderson@dccouncil.us, mshaffer@dccouncil.us, hedelman@dccouncil.us, mrichburg@dccouncil.us, "Nadeau, Brianne K. (Council)" <bnadeau@dccouncil.us>, tjackson@dccouncil.us, mnava@dccouncil.us, bdavis@dccouncil.us, amansoor@dccouncil.us, "Montiel, Oscar (Council)" <omontiel@dccouncil.us>, abobak@dccouncil.us, bpinto@dccouncil.us, ghulick@dccouncil.us, ehanson@dccouncil.us, bweise@dccouncil.us, lpryor@dccouncil.us, ebrantley@dccouncil.us, bromanowski@dccouncil.us, mcheh@dccouncil.us, jwillingham@dccouncil.us, dsmith@dccouncil.us, Ari Theresa <Actheresa@gmail.com>, Akela Crawford <Akela.Crawford@legalclinic.org>, Caitlin Cocilova <caitlin.cocilova@legalclinic.org>, tvassefi@gmail.com, Amandafox8@gmail.com, Amanda Fox Perry <amandacfox8@gmail.com>, Renee Bowser <reneelb@outlook.com>, Comp Plan <compplan@empowerdc.org>, Barbara Kahlow <Barbara.Kahlow@verizon.net>, Guy Durant <rightguydc@gmail.com>, Peter Stebbins <pjstebbins@gmail.com>, Meg Maguire <megmaguireconsultant@msn.com>, Nancy MacWood <nmacwood@gmail.com>, "g.idelson@verizon.net" <g.idelson@verizon.net>, George Clark <GRClark@georgerclark.com>, Sherice Muhammad <impeccabletaste@aol.com>, Malissa Freese <malissfree@aol.com>, Malissa Freese <miele1066@gmail.com>, Ambrose Lane Jr <ambrose2m@gmail.com>, Tyrell Holcomb <tyrellholcomb@gmail.com>, Salim Adofo <salimadofo@gmail.com>, Chris Williams <chriswilliams06@gmail.com>, Tonya Williams <tonyawilliams73@gmail.com>, Suriya Jayanti <suriyajayanti@gmail.com>, Vikram Surya Chiruvolu <vikram.chiruvolu@gmail.com>, John Lawrence Hargrove <ahhjlh@verizon.net>, Denis James <denisjames@verizon.net>, cynthia Carson <cyncarson@gmail.com>, Sandra Reischel <sandrareischel@yahoo.com>, cesar maxit <cesarmaxit@gmail.com>, Mary Alice Levine <maryalicelevine@gmail.com>, marc poe <mntnik00@gmail.com>, Ryan Cummins <ryan.cummins@gmail.com>, heather rellihan <heather333@msn.com>, Bill Rice <ricebill@aol.com>, KAREN BOSSHART <bosshartk@yahoo.com>, Katy Lang <katylang@gmail.com>, Beth Wagner <beth@serveyourcitydc.org>, David Belt <tazz20019@gmail.com>, J Chandler <bettercity2020@gmail.com>

Dear Mr. Mendelson and Mrs. Koster, and Committee staff, and Councilmembers,

Despite several people, including myself very specifically highlighting the **laws and regulations that govern amending the DC Comprehensive Plan**, there is only a brief mention in the entire **Committee of the Whole Committee Report**. Plus the report link is missing the attachments or at least not visible in the document link I received.

Only one statute associated with the Comp Plan is mentioned **within Mr. McClure's report on racial equity** concluding the Comp Plan represents "status quo" displacement of Black DC will continue under these current Comp Plan changes. Mr. McClure's report talks about the progress reporting that is supposed to be associated with the Plan to determine

appropriate changes and those reports are sporadic and missing.

Most curiously, there is nothing in the COW Committee report on the Comp Plan contending directly with the laws that require impact assessments associated with any proposed Comp Plan changes, let alone the upFLUMing that equates to about 200 million square feet or approx \$85B of land value that the Mayor wants to "unlock" onto our communities.

DC Code § 1-306.04 (d) "[Amendments to the DC Comprehensive Plan] shall be accompanied by an environmental assessment of the proposed amendments... "

10A 2515.2, .3 "The greater the degree of change [to the DC Comprehensive Plan] proposed, the greater the burden of showing that the change is justified. ... The following supporting information will be required when an amendment is proposed: ... e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change. f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment."

I know ANC Commissioner Renee Bowser at the Comp Plan hearings specifically focused and testified as to the laws that require impact assessment of such substantial changes to our Comp Plan. Her testimony isn't even mentioned in your Committee report.

Under the COW Committee Report and summary of my specific testimony, there is no mention of my central theme that the laws are being ignored. And these laws and regulations, requiring impact assessments to allow for actual planning in the city, is certainly no small matter and centrally contends with racial equity as who the impacts of all the development in the past decade have befallen are largely working-class and low income Black communities in DC.

We know for sure your office as other Councilmembers have received quite a numerous amount of letters from the public that highlight the laws that govern the Comp Plan changes and how they've been ignored by the Mayor.

At the last DC Grassroots Planning Commission public meeting I spoke up and asked you if you will contend with these laws vis-a-vis your work in making the Mayor's amendments align with the law, aka have the Mayor do the impact assessments as required and as expected by basic planning common sense.

Respectfully, Mr. Mendelson, either you are trying to blow off these basic planning requirements completely, or they don't seem to matter, that laws are just some things that some people have to follow and others don't? Is that really it? The Mayor and Council don't have to consider the impacts of major planning changes?? Would DC be the only modern-day jurisdiction that has this type of "not-planning" planning posture.

Respectfully, I look forward to a response from you and the Committee. I'm hoping you can answer why don't the laws that govern changes to the DC Comprehensive Plan not apply or not matter, especially when the impacts that could be studied will now most fall on those most vulnerable communities in the District.

Thank you,
Chris Otten

PS: Here's the video testimonials by which you will find specific reference by many people to these Comp Plan laws, including official ANC resolutions that have been completely disregarded by the Office of Planning >> <http://www.dccgrassrootsplanning.org/testimony>

--

DC for Reasonable Development
(202) 656-5874
www.dc4reason.org
fb.me/dc4reality
twitter.com/dc4reality

JAN 25 2021; JAN 27, 2021;
FEB 2 2021; APRIL 15 2021

TRUE AND CORRECT COPIES
OF EMAILS BETWEEN CHRIS
OTTEN AND JULIA KOSTER,
COMP PLAN STAFF FOR
COUNCIL CHAIR PHIL
MENDELSON REGARDING THE
REQUIRED IMPACT STUDIES
AND COMMITTEE REPORT ON
THE COMP PLAN



d.c. forrd <dc4reality@gmail.com>

Hi Julia: Comp Plan 2021

1 message

d.c. forrd <dc4reality@gmail.com>

Mon, Jan 25, 2021 at 3:19 PM

To: "Koster, Julia (Council)" <jkoster@dccouncil.us>

Hi Julia,

Hope you are alright, despite and fam is well. Happy New Year and the like. Wow. 2021. Here we go. Comp Plan city!

I wanted to let you know that Andrew Trueblood has informed me that the FLUM changes the Mayor proposed to the Council and is trying to impose on all of us is substantial.

Trueblood admits (and frankly I believe its a conservative number) that approximately 200 Million Square feet of land will be UpFlumed if the Comp Plan maps are approved as is, making 200M sq feet + air rights developable without much community input, that is, the usual status quo development without much community input, meeting much social need or planning, and thus more displacement.

There several testimonials in November besides mine that raised this issue, you know how the Mayor's OP process comports with DC laws and regulations. Seemingly it doesn't.

I'm wondering if the Chair is going to press OP to actually follow the law and determine:

1. The efficacy/progress reporting required of the existing policies to lay basis for need of the dramatic changes;
2. The impact assessment specific to amendments and specific to the areas/neighborhoods that may be affected say around the 200M sq ft of map amendment and subsequent upzoning;
3. And also for OP to follow DCMR regulations as to the Comp Plan amendments, such as:

10A DCMR 515.3 The following supporting information *will be required* when an amendment is proposed:

c. A description of how the issue is currently addressed in the Comprehensive Plan. If it is not addressed, the public need for it must be described.

e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change.

f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment.

. . . among others, as we [cited here](#) and throughout our testimony.

I know many people are very curious to the legality concerns here.

Also, when will the Committee report form the November hearings be ready for review.

Thanks for any insights and feedback whatsoever.

Chris O.

--

DC for Reasonable Development
(202) 656-5874
www.dc4reason.org
fb.me/dc4reality



d.c. forrd <dc4reality@gmail.com>

Re: Hi Julia: Comp Plan 2021

d.c. forrd <dc4reality@gmail.com>

Tue, Feb 2, 2021 at 4:45 PM

To: "Koster, Julia (Council)" <jkoster@dccouncil.us>

Julia,

Hi. Since the law stuff seems to be unimportant, when do you think a Committee report will be available from the November hearings?

Just curious.

Thanks,

Chris O.

On Wed, Jan 27, 2021 at 3:16 PM d.c. forrd <dc4reality@gmail.com> wrote:

Thanks for that Julia.

Can't understand why there isn't clear line draw here. Isn't it how this works: [Law says this](#), Mayor is supposed to do that before submitting amendments?

I guess when I testified in November, I figured by now the Chair and committee would have acted on this fundamental issue if there was a sense of agreement. It's been several months now, and I'm not getting that sense.

I appreciate your efforts on this massive document, but I am also dumbfounded that laws seem to not mean much in this city these days. My ANC asked about this almost a year ago. OP just blew them off (that's on the record). Amazing!

Instead we'll be surprised I guess . . . when the Committee report comes out . . . **which will be when ?**

I appreciate any further insights.

Thanks,

Chris O.

On Wed, Jan 27, 2021 at 9:16 AM Koster, Julia (Council) <jkoster@dccouncil.us> wrote:

Hi, Chris -

Good to hear from you - it has been a while and I hope you, too, are well. You raised these issues in your testimony and as I'm working with the chairman to go through the proposed amendments and public comments, we'll discuss these points.

All the best,

Julia

From: d.c. forrd <dc4reality@gmail.com>

Sent: Monday, January 25, 2021 3:19:51 PM

To: Koster, Julia (Council)

Subject: Hi Julia: Comp Plan 2021

Hi Julia,

Hope you are alright, despite and fam is well. Happy New Year and the like. Wow. 2021. Here we go. Comp Plan city!

I wanted to let you know that Andrew Trueblood has informed me that the FLUM changes the Mayor proposed to the Council and is trying to impose on all of us is substantial.

Trueblood admits (and frankly I believe its a conservative number) that approximately 200 Million Square feet of land will be UpFlumed if the Comp Plan maps are approved as is, making 200M sq feet + air rights developable without much community input, that is, the usual status quo development without much community input, meeting much social need or planning, and thus more displacement.

There several testimonials in November besides mine that raised this issue, you know how the Mayor's OP process comports with DC laws and regulations. Seemingly it doesn't.

I'm wondering if the Chair is going to press OP to actually follow the law and determine:

1. The efficacy/progress reporting required of the existing policies to lay basis for need of the dramatic changes;
2. The impact assessment specific to amendments and specific to the areas/neighborhoods that may be affected say around the 200M sq ft of map amendment and subsequent upzoning;
3. And also for OP to follow DCMR regulations as to the Comp Plan amendments, such as:

10A DCMR 515.3 The following supporting information *will be required* when an amendment is proposed:

c. A description of how the issue is currently addressed in the Comprehensive Plan. If it is not addressed, the public need for it must be described.

e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change.

f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment.

. . . among others, as we *cited here* and throughout our testimony.

I know many people are very curious to the legality concerns here.

Also, when will the Committee report form the November hearings be ready for review.

Thanks for any insights and feedback whatsoever.

Chris O.

--

DC for Reasonable Development

(202) 656-5874

www.dc4reason.org

fb.me/dc4reality

twitter.com/dc4reality

--

DC for Reasonable Development

(202) 656-5874

www.dc4reason.org

fb.me/dc4reality

twitter.com/dc4reality



d.c. forrd <dc4reality@gmail.com>

Re: Hi Julia, Comp Plan out

d.c. forrd <dc4reality@gmail.com>

Thu, Apr 15, 2021 at 10:32 AM

To: "Koster, Julia (Council)" <jkoster@dccouncil.us>

Ok. What a strange process.

Do you think the report will explain why the laws -- regarding impact studies and progress reporting -- can be overlooked??

On Thursday, April 15, 2021, Koster, Julia (Council) <jkoster@dccouncil.us> wrote:

Hi, Chris,

We will circulate the draft on Monday with the Committee Print.

thanks,

Julia

From: d.c. forrd <dc4reality@gmail.com>

Sent: Wednesday, April 14, 2021 7:27:32 PM

To: Koster, Julia (Council)

Subject: Hi Julia, Comp Plan out

Hi Julia,

Hope you are well. Its been a minute.
Just saw Phil put out the staff comp plan changes.

I was wondering was this accompanied by a Committee report to see how the testimony from November made any impact on the document? And in what ways.

Please point me to the link.

Thanks,
Chris O.

--

DC for Reasonable Development

(202) 656-5874

www.dc4reason.org

fb.me/dc4reality

twitter.com/dc4reality

--

DC for Reasonable Development

(202) 656-5874

www.dc4reason.org

fb.me/dc4reality

twitter.com/dc4reality

Re: Hi Julia: Comp Plan 2021

1 message

Koster, Julia (Council) <jkoster@dccouncil.us>

Wed, Jan 27, 2021 at 9:16 AM

To: "d.c. forrd" <dc4reality@gmail.com>

Hi, Chris -

Good to hear from you - it has been a while and I hope you, too, are well. You raised these issues in your testimony and as I'm working with the chairman to go through the proposed amendments and public comments, we'll discuss these points.

All the best,

Julia

From: d.c. forrd <dc4reality@gmail.com>
Sent: Monday, January 25, 2021 3:19:51 PM
To: Koster, Julia (Council)
Subject: Hi Julia: Comp Plan 2021

Hi Julia,

Hope you are alright, despite and fam is well. Happy New Year and the like. Wow. 2021. Here we go. Comp Plan city!

I wanted to let you know that Andrew Trueblood has informed me that the FLUM changes the Mayor proposed to the Council and is trying to impose on all of us is substantial.

Trueblood admits (and frankly I believe its a conservative number) that approximately 200 Million Square feet of land will be UpFlumed if the Comp Plan maps are approved as is, making 200M sq feet + air rights developable without much community input, that is, the usual status quo development without much community input, meeting much social need or planning, and thus more displacement.

There several testimonials in November besides mine that raised this issue, you know how the Mayor's OP process comports with DC laws and regulations. Seemingly it doesn't.

I'm wondering if the Chair is going to press OP to actually follow the law and determine:

1. The efficacy/progress reporting required of the existing policies to lay basis for need of the dramatic changes;
2. The impact assessment specific to amendments and specific to the areas/neighborhoods that may be affected say around the 200M sq ft of map amendment and subsequent upzoning;
3. And also for OP to follow DCMR regulations as to the Comp Plan amendments, such as:

10A DCMR 515.3 The following supporting information *will be required* when an amendment is proposed:

c. A description of how the issue is currently addressed in the Comprehensive Plan. If it is not addressed, the public need for it must be described.

e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change.

f. Demonstration that the proposed change would be in conformance with the goals, policies and actions of the Comprehensive Plan. The applicant would be requested to include any data, research or reasoning that supports the proposed amendment.

. . . *among others, as we [cited here](#) and throughout our testimony.*

I know many people are very curious to the legality concerns here.

Also, when will the Committee report from the November hearings be ready for review.

Thanks for any insights and feedback whatsoever.

Chris O.

--

DC for Reasonable Development
(202) 656-5874
www.dc4reason.org
fb.me/dc4reality
twitter.com/dc4reality

MAR 31 2021

TRUE AND CORRECT COPY OF
EMAIL FROM CHRIS OTTEN TO
ALL COUNCILMEMBERS
ABOUT THE EXTENT OF THE
COMP PLAN LAND MAP
CHANGES AND NOTIFYING
THEM AGAIN OF THE LAW
REQUIRING IMPACT STUDIES;
THIS EMAIL REMAINS
UNANSWERED

DC Comp Plan: 200 MILLION SQUARE FEET of *upFLUMing*

d.c. forrd <dc4reality@gmail.com>

Wed, Mar 31, 2021 at 1:16 PM

To: "Committee of the Whole (Council)" <cow@dccouncil.us>, Evan Cash <ecash@dccouncil.us>, pmendelson <pmendelson@dccouncil.us>, "Koster, Julia (Council)" <jkoster@dccouncil.us>, "McClure, Brian (Council)" <bmcclure@dccouncil.us>

Cc: Dcgp steering <dcgpsteering@googlegroups.com>

Bcc: mbexley@dccouncil.us, lwalton@dccouncil.us, mbattle@dccouncil.us, bmcduffie@dccouncil.us, Anita Bonds <abonds@dccouncil.us>, "Mody, Namita (Council)" <nmody@dccouncil.us>, "Clayton, Melvin (Council)" <mclayton@dccouncil.us>, "Kang, Irene (Council)" <ikang@dccouncil.us>, dmeadows@dccouncil.us, nbell@dccouncil.us, "Silverman, Elissa (Council)" <esilverman@dccouncil.us>, "Rosen-Amy, Samuel (Council)" <srosenamy@dccouncil.us>, "Royster, Charnisa (Council)" <croyster@dccouncil.us>, "Hunt, Kelly (Council)" <khunt@dccouncil.us>, pjoseph@dccouncil.us, rwhite@dccouncil.us, mngwenya@dccouncil.us, afowlkes@dccouncil.us, kwhitehouse@dccouncil.us, aminor@dccouncil.us, chenderson@dccouncil.us, mshaffer@dccouncil.us, hedelman@dccouncil.us, mrichburg@dccouncil.us, "Nadeau, Brianna K. (Council)" <bnadeau@dccouncil.us>, tjackson@dccouncil.us, mnavas@dccouncil.us, bdavis@dccouncil.us, amansoor@dccouncil.us, "Montiel, Oscar (Council)" <omontiel@dccouncil.us>, abobak@dccouncil.us, bpinto@dccouncil.us, ghulick@dccouncil.us, ehanson@dccouncil.us, bweise@dccouncil.us, lpryor@dccouncil.us, ebrantley@dccouncil.us, bromanowski@dccouncil.us, mcch@dccouncil.us, jwillingham@dccouncil.us, dsmith@dccouncil.us, amclean@dccouncil.us, kwhittier@dccouncil.us, "Benjamin, Aukima (COUNCIL)" <abenjamin@dccouncil.us>, nmendelsohn@dccouncil.us, jlewisgeorge@dccouncil.us, ledwards@dccouncil.us, tbenitez@dccouncil.us, ataliadoros@dccouncil.us, mlandrieu@dccouncil.us, keyster@dccouncil.us, wperkins@dccouncil.us, kmcduffie@dccouncil.us, mflowers@dccouncil.us, kcislod@dccouncil.us, jmcnair@dccouncil.us, mcrawfordriddick@dccouncil.us, shgrant@dccouncil.us, nfakolujo@dccouncil.us, Charles Allen <callen@dccouncil.us>, lmarks@dccouncil.us, nopkins@dccouncil.us, nmitchell@dccouncil.us, claskowski@dccouncil.us, esalmi@dccouncil.us, jmattison@dccouncil.us, kennedy@dccouncil.us, jdemayo@dccouncil.us, vgray@dccouncil.us, sbunn@dccouncil.us, tnorfis@dccouncil.us, ttate@dccouncil.us, dhumphrey@dccouncil.us, jbetters@dccouncil.us, tfinnell@dccouncil.us, twhite@dccouncil.us, wlockridge@dccouncil.us, wglenn@dccouncil.us, lthorne@dccouncil.us, ecleckley@dccouncil.us, shoskins@dccouncil.us, Christof Rotten <crotten2@gmail.com>, AdMo Reasonable <admo4rd@gmail.com>, dc@grassrootsplanning.us, John Richard <jrichard@csrl.org>, John Richard <jrichard@essential.org>, Robin Diener <robinsdiener@gmail.com>, "Robbins, Milika (Council)" <mrobbins@dccouncil.us>, rsotten <rsotten@optonline.net>

Did you know -- The DC Comp Plan

Did you know the Mayor has proposed 200 million square feet of upFLUMing on the DC Future Land Use Map in the DC Comprehensive Plan?

- That is 200 million new square feet of habitable commercial, retail, and residential land uses not in existence right now. <https://www.youtube.com/watch?v=baokBRwB0ec&t=983s>
- That is 200 million square feet of new humans in the city, population growth that is supposed to be considered alongside other social needs, like more schools, clinics, libraries, parks, transpo, utilities, etc. <https://tinyurl.com/whole-neighborhood-approach>
- That is 200 million square feet of new people and use that drives up the value of the land and housing around it putting upward pressure on existing housing values and costs! <https://www.youtube.com/watch?v=oTFXDTg8KPg>

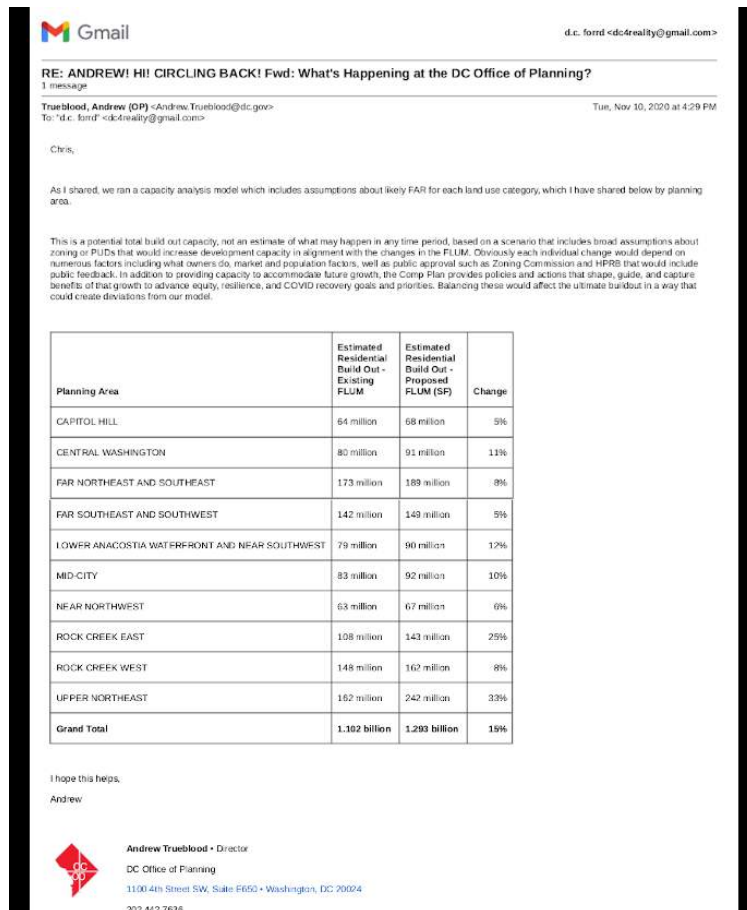
HOW WOULD YOU KNOW THIS 200 Million Square feet of UPFLUMING IS HAPPENING?

- You wouldn't know if English isn't your first language.
- You wouldn't know if you went to the Mayor's website about the Comp Plan >> <http://www.plandc.dc.gov>
- You wouldn't know if you went to the City Council Chair's webpage on the Comp Plan >> <http://chairmanmendelson.com/cow/complan/>

HOW DID WE FIND OUT THIS VOLUME OF UPFLUMING IS HAPPENING?

In anticipation for the [Council hearings on the DC Comp Plan held in November 2020](#), folks tried to understand what was happening to the maps based on what can be found [online](#).

We had to beg to get a volume in square feet of changes the UpFLUMing represented and finally just days before the hearing, we got an email from the Director of the Office of Planning.



RE: ANDREW! HI! CIRCLING BACK! Fwd: What's Happening at the DC Office of Planning?

1 message

Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov> Tue, Nov 10, 2020 at 4:29 PM
To: "d.c. fornd" <dcd4realty@gmail.com>

Chris,


As I shared, we ran a capacity analysis model which includes assumptions about likely FAR for each land use category, which I have shared below by planning area.

This is a potential total build out capacity, not an estimate of what may happen in any time period, based on a scenario that includes broad assumptions about zoning or PUDs that would increase development capacity in alignment with the changes in the FLUM. Obviously each individual change would depend on numerous factors including what owners do, market and population factors, well as public approval such as Zoning Commission and HPRB that would include public feedback; in addition to providing capacity to accommodate future growth, the Comp Plan provides policies and actions that shape, guide, and capture benefits of that growth to advance equity, resilience, and COVID recovery goals and priorities. Balancing these would affect the ultimate buildout in a way that could create deviations from our model.

Planning Area	Estimated Residential Build Out - Existing FLUM	Estimated Residential Build Out - Proposed FLUM (SF)	Change
CAPITOL HILL	64 million	68 million	8%
CENTRAL WASHINGTON	80 million	91 million	11%
FAR NORTHEAST AND SOUTHEAST	173 million	189 million	8%
FAR SOUTHEAST AND SOUTHWEST	142 million	149 million	5%
LOWER ANACOSTIA WATERFRONT AND NEAR SOUTHWEST	79 million	90 million	12%
MID-CITY	83 million	92 million	10%
NEAR NORTHWEST	63 million	67 million	6%
ROCK CREEK EAST	108 million	143 million	25%
ROCK CREEK WEST	148 million	162 million	8%
UPPER NORTHEAST	162 million	242 million	33%
Grand Total	1,102 billion	1,293 billion	15%

I hope this helps.

Andrew

 Andrew Trueblood • Director
DC Office of Planning
1100 4th Street SW, Suite E650 • Washington, DC 20004
202.442.7638

The UpFLUMing allows land owners where UpFLUMing happens to ask for a proforma zone map change that would work around community benefits agreements and meaningful community input such as with ANC's along the kind of engagement we see with other zone changes like Planned Unit Developments (PUDs).

Current Process: Big Projects (PUDs)



Your Input Eliminated: UpFLUM-ing



** Supermajority of proposed Comp Plan Map changes were submitted by developer interests*

This type of substantial change to the maps and to potential population growth is supposed to be accompanied with impact studies and a showing that the changes benefit and not harm DC neighbors.

- DC Code § 1-306.04 (d) "[Amendments to the DC Comprehensive Plan] shall be accompanied by an environmental assessment of the proposed amendments... ."
- 10A 2515.2, .3 "The greater the degree of change [to the DC Comprehensive Plan] proposed, the greater the burden of showing that the change is justified. ... The following supporting information will be required when an amendment is proposed: ... e. The anticipated impacts of the change, including the impacts on the geographic area affected and the issues presented. This should include an assessment of net benefits to the city resulting from the change."

CONCLUSION

The proposed Comp Plan map changes cannot be considered modern-day planning in our capital city. Rather, it represents hiding of key facts about changes to the plan that will result in the bypassing of community input and work around doing real planning that repairs the harms of the past and seeks to truly mitigate the impacts of future growth. We can develop our city without more displacement, but these types of changes to the maps are not the way.

See more info here from the DC Grassroots Planning Coalition >>

<https://tinyurl.com/dcgpc-comp-plan-packet>

Thank you,
Chris Otten, Co-Facilitator DC for Reasonable Development
DC Grassroots Steering Committee Member
ANC Commissioner 2008-2010; Candidate for Mayor 2006;
Homeless services advocate and Public property watchdog;
Adams Morgan Resident since 2000

--

DC for Reasonable Development
(202) 656-5874
www.dc4reason.org
fb.me/dc4reality

NOV 12 2020

TRUE AND CORRECT COPIES
OF EMAILS BETWEEN CHRIS
OTTEN AND OFFICE OF
PLANNING DIRECTOR,
ANDREW TRUEBLOOD
REGARDING 200 MILLION
SQUARE FEET OF CHANGES
TO THE COMP PLAN LAND USE
MAPS

Re: ANDREW! HI! CIRCLING BACK! Fwd: What's Happening at the DC Office of Planning?

d.c. forrd <dc4reality@gmail.com>

Thu, Nov 12, 2020 at 11:51

To: "Trueblood, Andrew (OP)" <Andrew.Trueblood@dc.gov>

Cc: DcGPCsteering <dcgpcsteering@googlegroups.com>, "Koster, Julia (Council)" <jkoster@dccouncil.us>

Bcc: Ari Theresa <Atheresa@gmail.com>

Perhaps Andrew, to help expedite a response so I can prepare for tomorrow's hearing, you may focus on replying to what should be easy to get as as I think you have probably analyzed already:

1. Considering the FLUM amendments, if the zoning and development is maxed out (not even including the extra density granted by PUDs) how many new units of housing would these FLUM changes likely bring online to get us to the Mayors goal 36000 x 2025?

2. Given the FLUM changes and possible max development densities and increased population, what env, traffic, utility, displacement, etc. impact studies were done along with these proposed changes to the Flum?

Thanks,
Chris O.

On Wed, Nov 11, 2020 at 11:59 AM d.c. forrd <dc4reality@gmail.com> wrote:

Thanks.

Does this matrix include all areas where The FLUM is proposed to be amended?

Following on in OPs research of these changes of tens of millions of sq ft of imminently expected new development that would now simply be asked for through Zone Map amendments*:

1. If maxed out and including ranges up to the new max development allowed, how many new units of housing would these changes likely bring online to get us to the Mayors goal of 36000 x 2025? This should be easy to find yea?

2. What impact studies were done along with these proposed changes to the Flum? Like further displacement, capital needs, social needs, transport needs, parks, libraries, schools, impacts on the environment?? A whole neighborhood approach to planning for these changes, yea?

3. Since a lot of the FLUM changes are for specific development sites, why not keep FLUM same and ask developers go through the PUD process for a more robust review of the new development? And don't the changes to the FLUM for specific projects simply equate to spot zoning?

Thanks for your insights.

O yea, I mentioned displacement. Have any of your policy changes considered displacement affects of the current policies and the changes to them. With 40k Black folks gone from DC between 2000-2010. We are almost about to get 2010-2020 and I'm sure it's going to be startling especially around the places where *FLUM/PUD developments have happened (think Navy Yard, Union Market, the Wharf, Shaw, etc).

While I'm disappointed I get some answers just two days before hearings, I appreciate the insights.

But ok. We plan on!

Chris O.

On Tuesday, November 10, 2020, Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov> wrote:

Chris,

As I shared, we ran a capacity analysis model which includes assumptions about likely FAR for each land use category, which I have shared below by planning area.

This is a potential total build out capacity, not an estimate of what may happen in any time period, based on a scenario that includes broad assumptions about zoning or PUDs that would increase development capacity in alignment with the change in the FLUM. Obviously each individual change would depend on numerous factors including what owners do, market and population factors, well as public approval such as Zoning Commission and HPRB that would include public feedback. In addition to providing capacity to accommodate future growth, the Comp Plan provides policies and actions that shape, guide, and capture benefits of that growth to advance equity, resilience, and COVID recovery goals and priorities. Balancing these would affect the ultimate buildout in a way that could create deviations from our model.

Planning Area	Estimated Residential Build Out - Existing FLUM	Estimated Residential Build Out - Proposed FLUM (SF)	Change
CAPITOL HILL	64 million	68 million	5%
CENTRAL WASHINGTON	80 million	91 million	11%
FAR NORTHEAST AND SOUTHEAST	173 million	189 million	8%
FAR SOUTHEAST AND SOUTHWEST	142 million	149 million	5%
LOWER ANACOSTIA WATERFRONT AND NEAR SOUTHWEST	79 million	90 million	12%
MID-CITY	83 million	92 million	10%
NEAR NORTHWEST	63 million	67 million	6%
ROCK CREEK EAST	108 million	143 million	25%
ROCK CREEK WEST	148 million	162 million	8%
UPPER NORTHEAST	162 million	242 million	33%
Grand Total	1.102 billion	1.293 billion	15%

I hope this helps,

Andrew



Andrew Trueblood • Director

DC Office of Planning

1100 4th Street SW, Suite E650 • Washington, DC 20024

202.442.7636

Andrew.Trueblood@dc.gov

planning.dc.gov

From: d.c. forrd <dc4reality@gmail.com>

Sent: Tuesday, November 10, 2020 10:15 AM

To: Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov>

Subject: Re: ANDREW! HI! CIRCLING BACK! Fwd: What's Happening at the DC Office of Planning?

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

thanks

On Mon, Nov 9, 2020 at 4:49 PM Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov> wrote:

Chris – thanks for the reminder and my apologies for the delayed response. We are finalizing some numbers and will be able to provide an answer tomorrow.

Best,
Andrew



Andrew Trueblood • Director

DC Office of Planning

1100 4th Street SW, Suite E650 • Washington, DC 20024

202.442.7636

Andrew.Trueblood@dc.gov

planning.dc.gov

From: d.c. forrd <dc4reality@gmail.com>
Sent: Monday, November 9, 2020 3:55 PM
To: Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov>; Dcgpsteering <dcgpcsteering@googlegroups.com>
Cc: Koster, Julia (Council) <jkoster@dccouncil.us>
Subject: Re: ANDREW! HI! CIRCLING BACK! Fwd: What's Happening at the DC Office of Planning?

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Andrew.

Hope you are well.

Its been more than a week.

Id really like to know the info im asking for.

Seems its should be at your fingertips given that this has been a very thoughtful and deliberative years long planning process, right?

Hearings are soon. Please respond.

Thanks

Chris

On Friday, October 30, 2020, d.c. forrd <dc4reality@gmail.com> wrote:

Ha! You are too humble Andrew.

I appreciate you looking to the gross square feet in potential development rights the "unlocking" of the FLUM may bring in terms of new development and expanded population growth in our communities and citywide.

I mean its difficult to understand the talking point without gross square feet numbers which may then be helpful to understand the amount of residential and commercial growth and thus population growth.

For example, whats really confusing is that you say the 6% in upFLUMing changes will bring 15% more developer rights. Can I ask, 15% of what? What is the baseline by which these percentages are based. I can't seem to figure it out.

Thanks for any clarifications on this.

Chris O.

On Fri, Oct 30, 2020 at 2:29 PM Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov> wrote:

Chris,

Thanks for the note. I would hope to leave the “influencer” title to the Kardashians.

So to clarify – we are proposing changes to 6% of the land area from the 2012 FLUM that we calculated could result in about 15% more opportunity for development. This is based on a model that we have made that makes a number of assumptions about buildable area based on FLUM and zoning restrictions, so that number is very much an estimate and not a forecast. The tweet that mentions 2% was in reference to the difference between the public review FLUM and the FLUM as submitted to the Council in April, which was driven primarily by ANC feedback for land use changes.

We can run the numbers on changes by planning area, but that will take a bit of time because of how we structure our original analysis. I will let you know once we have the numbers.

While most of the change of land that was non-federal or institutional was to create more opportunities for housing (“upflumming”), there are a few areas that had federal/institutional designation and have been designated with various categories (see Walter Reed, Armed Forces Retirement Home, and Howard University as examples). In these cases, it is hard to say whether we are up or downflumming, as it would depend on what you consider is possible with the current designation. For example, at both WRAMC and AFRH, we have designated some areas “parks, recreation, and open space”, which could be considered downflumming compared to the previous “federal designation. It is also worth noting that in some cases (see Federal Center SW or the NY Ave corridor), we striped residential on top of existing designation that does not necessarily create more density, but signals the importance of housing.

I hope this helps and I will be in touch as we get the updated breakdowns.

Best,
Andrew



Andrew Trueblood • Director

DC Office of Planning

1100 4th Street SW, Suite E650 • Washington, DC 20024

202.442.7636

Andrew.Trueblood@dc.gov

planning.dc.gov

From: d.c. forrd <dc4reality@gmail.com>

Sent: Thursday, October 29, 2020 3:49 PM

To: Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov>

Subject: ANDREW! HI! CIRCLING BACK! Fwd: What's Happening at the DC Office of Planning?

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Andrew,

Circling back. Hope all is well, "influencer!"

I wanted to write and continue our dialog on the DC Comp Plan in prep for the mid Nov hearings. And, thanks again for engaging with me so far as I'm really confused by the planning jargon and realities of these policy changes.

First, great show this week. I wanted to follow up >>

<https://youtu.be/3l85cdnpXfU?t=1063>

Here you discuss the FLUM and you say 6% of DC's land area has been proposed to be changed, and that will unlock 15% air rights development, yes?

1. Do you have any sense where the bulk of that is occurring? What wards? What communities?

2. Is there a fair calculation estimate or otherwise as to how much gross square feet of new development/air rights would this UpFluming as proposed represent?

3. Is it fair to say, there is no downFLUMing? If not, where is that happening?

4. I saw this tweet that says only 2% of the land use area is proposed to be changed, is it 2% or 6% or somewhere in the middle, I can't readily affirm these numbers. <https://twitter.com/OPinDC/status/1304051617793224704>

Thanks for any insights into these inquiries Andrew.

I've cc'd in the DCGPC steering committee as well!

Sincerely,

Chris Otten

----- Forwarded message -----

From: **Office of Planning** <Planning@subscriptions.dc.gov>

Date: Thu, Oct 29, 2020 at 3:33 PM

Subject: What's Happening at the DC Office of Planning?

To: <dc4reality@gmail.com>

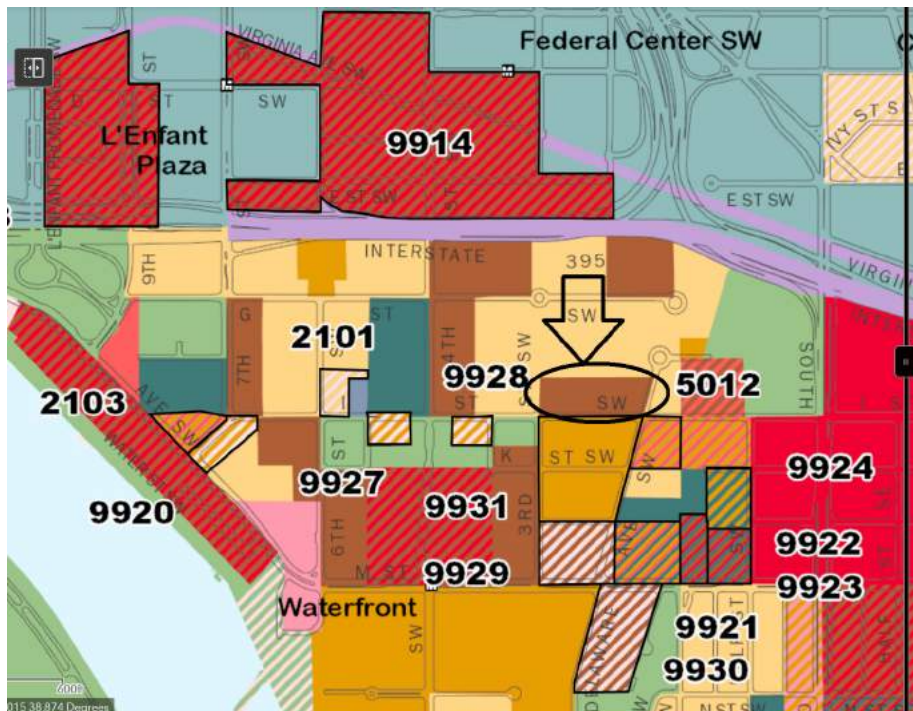


October 2020

PERSONAL ATTESTATION

My name is Christopher Williams and I attest that the statements below are true and correct to the best of my ability and recollection.

I live at 201 I St SW Apt 526, Washington, DC 20024, within .25 miles within 14 sites of Upfluming in Southwest DC. The density increases around my home are substantial and the impacts of which remain unevaluated per the law.



The upFLUMing affects the increasing lack of affordability in the area imminently threatening stable affordable housing like at my building and catalyzing redevelopment selling and higher housing cost pressures. My building has been put up for sale for example, triggered by the upFLUMing, as the land is now seen as more valuable impacting my life and my future in the neighborhood I enjoy.

I'm at the same income level as those in public housing making me more vulnerable to these types of land value changes. I have limited income on account of being a student and continue to experience financial challenges in being able to afford the area. I'm very worried about being displaced from my apartment. Rental assistance programs cannot be sustained or be enough with rising values.

My healthcare costs have gone up substantially with my medical needs that have come with the stress of being displaced. Being made more vulnerable, my mental health and well-being in seeking clinical service is a premium and becoming ever more costly.

Upfluming in Southwest DC is seeking to continue racially discriminatory policies. The UpFLUMed parcels of public land on the map labelled as 9924, 9922, 9923, 9921, 9930, 9929, and 9931 will allow the District to continue these policies after Black residents like me who are also disproportionately impacted by eroding affordability:

- Within the 20024 zip code between 2010 and 2014-2018, Blacks' population percentage declined from 55% to 43% while Whites' percentage increased from 34% to 48% (US Census/Policy Map). Since the total population increased from 11,510 to 13,354 during this period, Blacks decreased in total population - from 6,331 to 5,742. With exception of the southeast tract that contains public housing properties, all census tracts showed a decline in the overall Black population. Blacks continue to decline in population in Southwest while the White population increase. This has largely been catalyzed by racist city planning.
- Recent research shows that DC has experienced the most intense gentrification of any U.S. city since 2000. Southwest has stood out as an example of this: in the census tract containing the parts of Greenleaf Gardens north of M Street, the population doubled from 2000 to 2016, but the share of low-income households dropped from nearly 39% to 20% and over 160 rental units were lost. Black households were the only racial group in that area to see their population decline.
- SW is experiencing sharp rises in rent due to District-driven economic development. The average percentage change in median gross rent between 2009-2013 and 2014-2018 in SW was 33% (US Census/Policy Map). It varies by census tract: SW tract (27%), NW tract (27%), NE tract (18%), and SE tract (61%). The average percentage change across all census tracts in the District for this period was 24%. WUSA9 analyzed Zillow data on median rent in the District and found that Navy Yard and Southwest Waterfront grew by more than 12 percent in a single year - more than 3x faster than the rest of DC. Based on Zillow data by unit type, the SW-Waterfront neighborhood ranked high among roughly 50 neighborhoods for median rent: studio or one bedrooms (#9), two bedrooms (#16), and three bedrooms (#16). SW census tracts rank 33 (NW tract), 48 (SW tract), 52 (NE tract) for highest median rents for studios among 96 tracts in 2014-2018 (US Census/Policy Map). Two tracts rank 27 and 31 out of 163 tracts for highest median one bedroom. For two-bedrooms, two tracts placed 23 and 34 out of 161 ranked tracts. According to the Philadelphia Federal Reserve, renters are more vulnerable to displacement as their communities gentrify, and unlike owners, they reap none of the rewards that rising home prices and rents can bestow." Data comparing two four-year periods show that three of four census tracts in Southwest have a higher percentage of renters who are cost burdened (US Census/Policy Map). Affordable rentals remain out of reach mostly for household under 60% maximum annual income (MFI). Because Black households' median income falls under 60% MFI, the burden of constructing developments without substantial investment in affordable housing will fall disproportionately on Black residents.

The noise and air pollution is already major issue on I Street SW, that will become steadily worse with the intensification of density and subsequent construction trucks up and down the road that diminish the enjoyment of my community. I already have to keep my windows closed and it's going to get worse without mitigation.

The upFLUMing will mean increasing already overbearing traffic, thus will continue to diminish air quality in the neighborhood and pose dangers for pedestrians and cyclists. There is already bumper to bumper traffic in nearby corridors, on South Capitol, and on I Street where I live. During rush hour, major events at Wharf, the choking traffic is far too common. The District has not done a comprehensive traffic study in Southwest or the Southwest-Navy Yard area. Southwest has many fewer entry and exit points because it is surrounded by water on two sides. The increased density will negative impact livability for Southwest and erode our community feel. Without a comprehensive traffic study, emergency services will be challenged to navigate

the area. I am an avid walker and biker and am directly impacted by the FLUM changes that have gone unstudied.

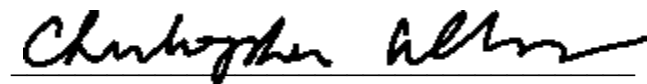
Public transit is also already at capacity now. The huge increases in density and population will cripple these public transit ways I rely on. I use the Metro to get to and from work. During regular times it is not uncommon at my Waterfront station Metro completely at capacity. Navy Yard is a stop just before Waterfront into center city and the offices there fill the cars there already now during rush hour. So the changes will increase the pressure and will affect my ability to access work and school by Metro.

This geographic area is vulnerable to flooding and this wasn't studied. SW is in a floodplain. Hardening the area with more concrete, buildings, and people cannot be changed after the fact. There was no analysis done, especially as it regards the public parcels in the area, as to how we likely need to use them to buffer the imminently flooding upon us with the major climate changes sadly underway. Without these studies, the Office of Planning has imminently risked my future here at my home and unacceptably have threatened this community I love.

I have very close friends at Greenleaf public housing that are imminently facing displacement, it is impacting their mental health, and more resources thus are demanded from me. I appreciate the low rise aesthetic of our community at Greenleaf, just across the street from my apartment, and the looming threat to go high density now will permanently harm my neighbors and community, especially because the displacement and environmental impacts of these changes were not studied. The proposed types of land use changes push out public spaces like at 4th and M where I sell my art. There is no substitute for public gathering spaces for social interactions and community well-being and togetherness. The increased upzoning and redevelopment crushes these spaces and our hopes threatening severe social impact, neighborhood cohesion, and health.

As a Board member of Grassroots Planning Coalition, a member of the Greenleaf Resident Advisory Group, Editor in Chief of SW Voice, social justice racial equity focused digital newspaper, Member of Buzzard Point Environmental Justice Group, and Co-Chair of the Capitol Park Plaza and Twins Tenant Association, I'm acutely and uniquely impacted and I want and deserve real planning studies to accompany the proposed land changes are made permanent. It's not only common sense, it's the law.

As signed,



Name: Christopher Williams

Address: 201 I St SW Apt 526, Washington, DC 20024

Phone / Email: (202) 630-0524/chrisville09@gmail.com

Date: 8/24/2021

PERSONAL ATTESTATION REGARDING

PROPOSED UP-FLUMING CHANGES TO COMPREHENSIVE PLAN

My name is David Belt. I am over the age of 18 and I attest under penalty of perjury that and the following statements are to the best of my knowledge true and correct to the best of my knowledge.

I have been a resident of Ward 7 for about 25 years and have owned my home at 3940 Benning Road NE for 21 years.

I am concretely and adversely impacted by the changes to the DC Comprehensive Plan where I live which is in close proximity to substantial changes to the planning maps near my home that will induce new bigger denser developments along the narrow transportation corridors in my neighborhood.

The lack of planning studies associated with the recent changes to the Future Land Use Map seems a purposeful pattern of malfeasance and dereliction. For example, the Office of Planning attempted, perhaps inadvertently, to upzone my property and others along Benning Road to the denser commercial zone C-3-A (now MU-7) on the other side of Benning Road, which includes the East River Shopping Center. I successfully petitioned the zoning commission (Zoning Case 13-07) to correct this obvious oversight by rezoning this square of private homes (now RA-3) to be not inconsistent with its present use and respectful of its location adjacent Fort Mahan National Park. But none of those corrective efforts will matter now given the FLUM changes proposed by the Mayor in the amendments to the Comp Plan and flagged on the FLUM Map as amendments 2035, 1542, 1984, 2021.

For example, I was a strong proponent of the new Dorothy Height Library with its low profile and visible green roof, staying in its original location since I believe that an institution of learning should remain forefront and accessible, especially in African-American community. The proposed FLUM changes will swallow the lower-density public institutions nearby, like the library that I advocated for and use regularly, to be surrounded by new bigger unaffordable development projects. The population increases proposed by the FLUM changes have not been studied but clearly threaten imposing adverse service-capacity issues for the existing library, buses, and low density commercial services nearby that I use and enjoy now.

The increases in traffic and pollution under the existing development scheme is already causing harm, with almost unbearable congestion increasing after the Minnesota Avenue Reconstruction Project that introduced bottlenecks, poorly designed and timed traffic lights and poor coordination with Metro. The new Comp Plan amendments and associated upzoning will induce even bigger developments along these very narrow and busy corridors include the future DGS Headquarters on Minnesota Avenue expected to bring in from 500 – 700 out of town employees to add to the traffic, pollution, and parking problems.

The proposed FLUM changes are also prompting calls for funding the extension of an unwanted streetcar slated to run down Benning Road. Benning Road is a main commuter thoroughfare coming into and leaving the city and is a marked Evacuation Route in case of a disaster. There has been no impact studies showing how increasing density along these corridors will impact the existing emergency egress

or access designed and made available to help me and my neighbors in time of disaster or personal acute emergency needs.

It has come down to the forceful displacement of residential homeowners to possibly UPFLUM this increase in population associated with the map changes, city planners and DDOT will seek to take the entire front yards of many of these properties without consent or compensation to owners. To widen the street they will remove every mature tree along this entire stretch of Benning Road as well as pave over the dedicated greenspaces that are the front yards, some to the front door, to widen the sidewalks for pedestrian and bicycle traffic. The streetcar serving the upFLUM map density will drastically increase congestion, increase pollution with cars and trucks idling much longer and lower air quality making for an unhealthy environment, and will indeed inhibit emergency responder access to my home and my community. With the scope of the new construction proposed surpassing the presently zoned capacity of the Minnesota/Benning corridor the potential damage to my home is very real. I have suffered great property damage from Benning Road Reconstruction about 12 years ago and had to fight the city to repair the damage clearly caused by the construction.

To destroy the beauty of this city at the behest of big developers is unconscionable, especially for those charged with the power to preserve this city as one of the most beautiful and liveable cities in the world.

The recent quote by tennis superstar Rafael Nadal about Washington, DC says best what we all want: "What I saw, so beautiful. A very green city, lower buildings than most of the American big cities. I am enjoying the city, I am enjoying the people." - Rafael Nadal

This describes perfectly my neighborhood in Ward 7, however with the upFLUM right across the street from my residential neighborhood, the direction of the Comp Plan is 180 degrees opposite the beauty that Mr. Nadal describes.

As signed,



Name: David Belt

Address:

3940 Benning Road NE

Washington, DC 20019

Ward 7; ANC: 7F01

Phone / Email: tazz20019@gmail.com

Date: 8/19/2021

PERSONAL STATEMENT

My name is Graylin Presbury, and I attest that the statements below are true and correct to the best of my ability and recollection.

I have lived at 1331 Ridge Pl., SE, in Ward 8 with my wife for 35 years. It was Ward 6 when we first moved here. And, over time our community has gone from wholly Ward 6 to partly Ward 7 and Ward 8 to mostly Ward 8. We raised a daughter here. I am currently the President of Fairlawn Citizens Association, a group that has taken an acute interest in the planning changes afoot here in the area.

My community, Fairlawn, is sandwiched between two commercial corridors, namely Pennsylvania Avenue on one side and Good Hope Road on the other. On Pennsylvania Avenue proposed map changes and up zoning will impact four blocks from Fairlawn Avenue to 27th St., going from commercial low-density (CLD) to commercial moderate density (CMD – 1971). Similarly, on Good Hope Road five blocks are impacted from Martin Luther King Jr. Avenue to 18th St., going from commercial low-density (CLD) to commercial moderate density (CMD – 9975) for Minnesota Avenue to 18th St. and a combination of commercial moderate density and commercial high density from Martin Luther King Jr. Avenue to Minnesota Avenue (CMD/CHD – 287 & 2344.1). These numbers in parentheses are reflected on the DC Office of Planning's changes to the DC Future Land Use Map which is part of the DC Comprehensive Plan.

We are essentially moving from two-story buildings to three- and four- story moderate sized buildings to potentially ten+ story high density buildings. Clearly, the map changes will induce bigger denser buildings and more people and traffic. It represents a significant change with taller buildings, less open spaces, more noise, and closer sightlines. This will harm our community and my direct interests in seeking positive outcomes for our future here especially given my position in the civic association.

The Fairlawn corridors have narrow sidewalks and already have significant vehicular congestion especially during the rush hours on Good Hope Road. We already have a bottleneck turning onto Good Hope Road from Martin Luther King Jr. Avenue and 11th Street with the construction going on at MLK and Good Hope Road. Don't let there be a traffic accident or a vehicle breakdown, then are bets are off. The delays will likely be insurmountable. None of the up-zoned map changes were studied for additional adverse impact on our clogged arterial roads around Fairlawn and around my home.

There is already an inadequate amount of parking available as I've come to see with on my block and the area around my home, with visitors typically parking on the residential streets and walking back to the commercial corridor. These parking issues will be exacerbated by more growth, clearly, but it wasn't considered before making changes to the planning maps in my geographic area.

With the up zoning we can expect higher assessed real estate values and the associated real property taxes, as well as higher rents. As a property owner I should be happy about higher property evaluations that is as long as I can afford the property taxes. Facing displacement

pressure like this without a study and mitigation is unfair and unacceptable. Higher housing costs will lead to even more displacement pressures onto me and the community I enjoy now.

My health is also going to be challenged more. I personally suffer from sleep apnea and frequent bouts of bronchitis and other upper respiratory infections. I believe this is brought on by pollen and dust, especially when the seasons are changing. The construction impacts and traffic pollution that remain unevaluated means I will suffer more.

I've been retired for a few years now but when I was working I had to be particularly careful about over exerting myself in the outdoors, like running for a bus. I can recall how crowded the bus would be, especially during rush hour, and how I would try to take the less popular routes where I would have a seat to get to my destination.

The capacity of the public transportation that serves me and my community will be impaired by more population growth, mainly because of a lack of planning and study associated with the changes to the maps. And I can recall major concerns on the part of some even more senior residents when the Good Hope Road Circulator bus was eliminated. They particularly liked the service because it was more accommodating for wheelchairs and walkers with a very low step up to get on the bus and easy to get off as well. It was a great complement to the Metro Bus routes serving Good Hope Road.

I would like to see DC's planning officials do the planning required with any desire for more growth, otherwise families like mine, and our vulnerable communities will be further harmed and imminently so.

As signed,



Name: Graylin W. Presbury

Address: 1331 Ridge Pl., SE, WDC 20020

Phone / Email: 202-549-7730 / presbug@aol.com

Date: August 18, 2021

Personal Attestation

My name is Jerome Peloquin and I am over the age of 18 and the following statements are to the best of my knowledge true and correct under penalty of perjury.

I reside at 4001 9th Street NE, Washington, DC 20017. I am a United States Veteran, and retired Marine Corps. Sargent.

I chose to live in Brookland in Ward 5 nearby the Veteran's Hospital with intent, as I rely on and enjoy the federal medical services offered to those who have served our country in the armed forces. You can imagine my immense disappointment that DC's city planners took no account of impacts that are imminently from the substantial upzoning on the Comp Plan land use maps for Brookland, and at and around the Armed Forces Retirement Home, all in the geographic area in proximity to my home and to the Veteran's Hospital.

I am offended by the lack of planning and attempt to understand and mitigate what will be obvious impacts of the upzoning in the area, specifically how the substantial increase in population and traffic will impair my ability to access the critical federal services as readily as I do now, especially in medical emergencies as I've already had to contend with.

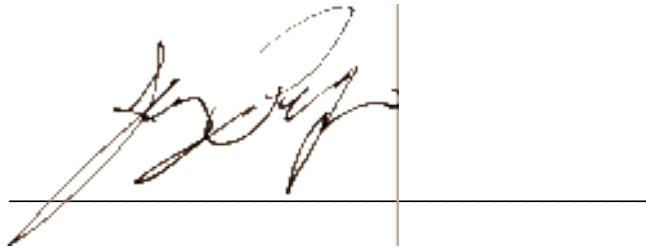
Over the past ten years, the Veteran's Hospital has helped me with eye health and new lenses, a new hip, ulcer surgeries, and now, sadly congestive heart issues. With the proposed upFLUMing and Comp Plan changes, we will see further burdens on the already gnarly traffic conditions, further impairing access to the hospital and the emergency medical services I rely on. Recall, most of the area intersections are failing now, what will be the result of the additional overcrowding and development pressure on the area. Moreover, increasing real estate pressures will likely displacement the Veteran's hospital from this location as well. An example of this, is the recent closure and redevelopment plans being proposed at Providence Hospital also nearby in my Ward.

Brookland and the federal medical services I rely on are provided in an area that has been demarcated by the city as a known internal flood area. Yet, the Mayor's upzoning as proposed and subsequent paving over of the existing green space I enjoy in the area is never evaluated for how it will likely increase flooding that will obviously impact my community, home and the provision of medical services I rely on. Mature trees are capable of absorbing thousands of gallons of rain water each major storm, these are put at risk with each new construction project and paving over of our land. Obviously, key climate concerns coupled with the growth of the city ought to be studied, and seriously so as required before making any changes to induce further growth. I find the disregard of planning by local and federal officials offensive, threatening imminent harm to me and my health.

Nobody at the National Capital Planning Commission (NCPC) took the time to consider how DC's desire to grow will affect federal services that I rely on now, like those at the Veteran's Hospital. Nobody at NCPC considered the flooding affects of DC's officials wanting to build more on less and less green spaces around federal buildings and federal interests. This is especially risky as climate change brings more intense storms, such as Ida.

I understand the upFLUMing is designed bring revenue into the city, but at who's expense. How far does DC need to grow without adequate planning evaluation before it implodes and harms people like me? Stacking people on top of people is foolhardy "planning" and challenges the livability of our city and my neighborhood by eliminating green space which is so important to my health and well being.

As signed,

A handwritten signature in black ink, appearing to read 'Jerome Peloquin', is written over a horizontal line. A vertical line is drawn to the right of the signature, extending from the top of the signature down to the bottom of the horizontal line.

Name: Jerome Peloquin
Address: 4001 9th Street NE, Washington, DC 20017
Phone / Email: aquaponikus@gmail.com
Date: August 1, 2021

Personal Statement of Laura M. Richards

My name is Laura M. Richards. I am over the age of 18. I attest under penalty of perjury the following statements are true and correct to the best of my knowledge.

I have lived in Penn-Branch in Southeast Washington DC for 34 years at 3524 Carpenter Street, SE, Washington, DC 20020.

I have been a member of the Penn-Branch-Cross Branch Citizens/Civic Association (now renamed the Penn-Branch Community Association) since shortly after moving to the neighborhood. I served one term as president and for many years co-chaired the Legislative Committee. I represented the Association in protesting an oversized antenna tower that was proposed to be located on the grounds of our low-rise neighborhood shopping center and which would have despoiled our views. I also participated in the 2008 Small Area Plan process, recruiting witnesses for the on-the-record neighborhood hearing and testifying before the D.C. City Council, conveying the community's preference for a 50-foot maximum height at the Penn-Branch Shopping Center. More recently I worked with the community in obtaining custom rezoning and design restrictions of proposed development at the shopping center.

I follow proposed development in the community and have monitored the Comprehensive Plan land use proposals throughout the DC Office of Planning's amendment process. I was surprised, and am adversely affected, by a land use change introduced for the first time two weeks before final passage of the Plan. The change introduces additional density to a key stretch of the Pennsylvania Avenue SE corridor that will irretrievably change the corridor's low-density residential nature that I have sought to preserve for my personal property interests and my longstanding interest in my community that I enjoy and take pride in.

I value the character of Penn-Branch and surrounding neighborhoods, which fuses urban and rural living in a harmonious whole. We are less than 4 miles from the U.S. Capitol and the intensity of our national political life; we also live on the edge of Fort Dupont Park and enjoy the natural environment and the abundant wildlife. In fact, regional habitat loss has led to an outsize deer population that has spilled over into our local streets. Besides the park, another prized asset is our viewshed. We are located at the top of the escarpment on the city's eastern edge, with an unobstructed view down the Pennsylvania Avenue to the Capitol. The view is preserved in part through generous building setbacks on both sides of the Avenue for most of its length.

Pennsylvania Avenue

Pennsylvania Avenue SE, from the Anacostia River to the Prince Georges County line, is the spine uniting Penn-Branch and other neighborhoods that fan out on either side. It is a designated Main Street, part of Main Street America, which originated at the National Trust for Historic Preservation, as a pro to revitalize older commercial corridors while preserving their historic character. That character is now at imminent risk from a density increase the goal of which is to create a town center development halfway along the corridor.

Corridor residents, including me, are engaged citizens who take a strong interest in development on the Avenue. The Avenue is primarily a residential street, with commercial activity confined to nodes at

major intersections – where Pennsylvania Avenue crosses Minnesota, Branch and Alabama avenues. The proposed amendment, so far unstudied and unplanned, to the DC Comprehensive Plan changes a key site from Low-Density to Moderate-Density Residential. That is not a modest change, because amendments to the Framework Element allow extra density for Inclusionary Zoning and for development pursued through a Planned Unit Development. The site of the land use change is a church which has made its intent clear: the rationale stated for the change is “to develop 30 or more senior affordable housing units, affordable and market rate townhomes and condos, a multiunit 100% affordable housing building, 43,000 square feet of retail that includes flexible space for the community, and about 26,000 square feet for a community-based organization.”

This change will create a mixed-used node along a significant stretch of street frontage that will alter irredeemably the corridor’s character. Instead of a low-density residential street punctuated by small commercial nodes, the corridor will become substantially denser and higher and primarily mixed-use. This will be done without the required public input for land use changes. There will be more vehicle traffic, adding to the corridor’s well-documented congestion, particularly during peak hours. More congestion makes it harder for me to get around and through this geographic area, to my personal and professional appointments. as A24-0110. The pollution increases will adversely impact my health as a senior in the community.

Penn-Branch is not insulated from the challenges facing the city. Ward 7’s median income is less than half that of the whole city; we live in proximity to great need. Penn-Branch incurs the “East of the River” stigma long attached to Southeast Washington generally, along with a lower level of public services and less private investment than much of the rest of the city enjoys.

I do not look at my neighborhood with rose-tinted glasses, but I do oppose this change that elevates pressures – environmental and economic -- on me and my community. I will concretely and adversely be affected by the loss of views, the loss of balance between residential and commercial uses, the environmental stresses that accompany increased density and increased traffic. Foremost, I am adversely affected by the loss of notice and an opportunity to comment on this last-minute change, although the D.C. Code and municipal regulations require notice and community input on land use changes.

As signed,



Laura M. Richards

Address: 3524 Carpenter St., SE, Washington, DC, 20020

Phone/Email: 202-583-3524 Lmmrichards@gmail.com

Date: August 30, 2021

My Personal Statement

I, Marc Poe am an adult over the age of 18 and of sound mind. I make the following statements to the best of my knowledge and ability under perjury of law.

I reside at 782 Columbia Rd NW, in Ward 1 of Washington, DC. I own the home at this address and have lived in it for the past 11 years. It sits on the block directly south of Bruce Monroe Park.

The UpFluming of the Bruce Monroe Park site would increase the population of my block by 320%. Existing reports show that the several key nearby intersections are already at a failing traffic levels. The instantaneous quadrupling of the number of residents and the additional vehicular traffic they bring will likely compromise the already challenged emergency response capability of our fire and police. This is of great concern because both Irving Street and Columbia Road, are one-way streets leading to and from Washington Hospital Center, Children's National Hospital, and the VA Hospital. Children's National hospital is the only level one pediatric trauma center in the area, building anything that would impede my child being rushed to the hospital would be the utmost travesty.

Last summer, a water main under Irving street in the block which borders this park, burst. The streets were flooded for hours. The whole Georgia Avenue corridor is being upFLUMed in an area where the infrastructure is over 100 years old without knowing of the impacts it may have on my property makes me want to move. I want to know the real affects upFlumming may have on the infrastructure and the public services essential to any neighborhood. Without it, the city is gambling with my safety and that of my neighbors.

A big amenity that helps keep me in this neighborhood IS Bruce Monroe park at Columbia at Georgia Avenue. I garden there. Play basketball there. Sometimes I even chill out near the fig tree with some yoga. When I had a dog, I needed the (makeshift) dog run to get his energy out. It was the only place within a mile that I could simply let him run. Eliminating this cornerstone of the neighborhood, especially without evaluating its potential long-term effects, infuriates me. There aren't many open green spaces like this left in the area and its being threatened unfairly.

I do not want this development crushing what makes my community so enjoyable or limiting essential public resources. It may or may not affect the value of my real estate, but without it, I lose the one thing that makes me want to continue living here. Bruce Monroe is the beating heart of this community.

As signed,



Name: Marc Poe

Address: 782 Columbia Rd NW, Washington, D.C 20001

Phone / Email: (202) 577-7104, mtnik00@gmail.com

Date: August 24, 2021

PERSONAL ATTESTATION

Introduction

My name is Mary Alice Levine. I am over the age of 18. I attest under penalty of perjury the following statements are true and correct to the best of my knowledge.

I have lived in Tenleytown for 36 years at 3804 Alton Place, NW, Washington, DC 20016.

I have been a member of the Friends of Tenley-Friendship Library since 1988 and was a Board member for 17 years. I am a longtime library card holder, borrow books and digital materials regularly, and often use library meeting rooms for public meetings.

I am on the Advisory Board of Tenleytown Historical Society, and formerly a director of the organization. I have been an active member for 25 years. The Tenleytown Historical Society seeks to preserve historic structures in Tenleytown and its environs and to make people aware of the history of this unique neighborhood.

I have been a delegate to the Ward 3 Democratic Committee for 14 years and serve on its Executive Board as Financial Secretary. I am also an active member of the Tenleytown Neighbors Association.

Tenleytown's Built Environment, Character and History

My deep involvement in the organizations above flows from my longlasting enjoyment of the character of Tenleytown and its rich history. Tenleytown was the site of a Civil War fort, Fort Reno City and the home of Piscataway Indians. It is still the site of the headwaters of the Piscataways' Soapstone Creek, though today much of that east-flowing creek has been diverted beneath Albemarle Street. I hope that today's neighborhood, with remnants of its past, can remain a welcoming, healthy, walkable community with schools, restaurants, merchants, and a library for many years to come. I enjoy Tenleytown's tree-lined streets, small single-family homes, friendly businesses, and neighborly families. I have consistently asked DC's planning officials to preserve Tenleytown's existing built environment. I have also asked that the capacity of our infrastructure be considered when planning any additional development. The Mayors and Deputy Mayors for Planning and Economic Development have ignored such requests and have planned haphazardly.

The Comp Plan's upFLUMing of Wisconsin Avenue, with the almost certain cooperation of the Zoning Commission, guarantees that developers will build much bigger, denser new buildings as a matter of right, without planning studies, not only on Wisconsin Avenue, but elsewhere in Tenleytown. The Council's upFLUMing of Wisconsin Avenue, now included in the Comprehensive Plan will affect me directly as it is only three blocks from my home.

I see that developers are driving the Comp Plan changes; neither the need for affordable housing, a respect for history, nor the infrastructure needs of the neighborhood are considered in Comp Plan changes. Because of this planning, as in the recent past, we will see the building of small, expensive housing units, designed for singles and students. With zoning in their favor, developers will build more such housing, both on and off upper Wisconsin Avenue. (An example is the soon-to-begin construction of a large apartment development, designed mostly for students, singles and young married couples without children at 4620 – 4624 Wisconsin Avenue, NW.) And nothing in the Comp Plan amendments encourages public housing or social housing in Tenleytown because that would curb developer profits and appetite.

Schools and Library

The Comp Plan and its amendments are silent on ensuring sufficient infrastructure to accommodate the sharp increase in population it encourages in our neighborhood. Perhaps the most obvious problem is the overcrowding in our schools, with little provision for increasing school facilities as population increases. The fact that the schools themselves can no longer encourage diversity by accepting more than a handful of students from other areas of the city exacerbates the lack of opportunities for a diverse education for DC's children.

The Comp Plan amendments include an upFLUM of most of an institutional block of Tenleytown that borders Janney Elementary School. This block is at the heart of Tenleytown. It contains St. Ann's Church and School and the Tenley-Friendship Library. The land of St. Ann's School and the Library have been upFLUMed from institutional zoning and local public facilities zoning to medium density residential zoning. This is an enormous change that was made two days before the Council's final vote on the Comp Plan amendments. To my knowledge, no neighbors were consulted. Certainly, no one I could find from St. Ann's, the Friends of the Library, or the Janney PTA was consulted. Not only would medium density development on the site eliminate aspects of Tenleytown's important institutions, but there is concern that future educational use of the property might have been scuppered.

With the upFLUM, the value of the St. Ann's School property and the air rights of the library will have increased dramatically; consequently, the City would be hesitant or unable to use either of the sites for a future Janney expansion.

My Tenley-Friendship Library is now again under threat of closure for construction of housing cantilevered on top because of this last minute upFLUM. I would be devastated if I had to part with that library again, or if the library was made smaller. I visited the library three to four times a week pre-Covid, both before the library was closed in 2003 and after it reopened in 2011.

The Tenley-Friendship Library was closed in 2003 in preparation for building a new library. Only then, did Office of Planning Director Andrew Altman realize that this would be a good

opportunity to add housing stock to the neighborhood by letting private developers build over the library and on the Janney soccer field. At that point the Library had already been designed. We waited eight years for the library to be rebuilt and reopened, while the City broke promises, and tried to give the land to developers.

The Tenley Library reopened in 2011, and shortly thereafter I became President of the Friends of Tenley Library. I swore I would never let the City shut down my library again.

Public Transportation: the Red Line

Another important area of infrastructure is the public transportation system that Tenleytown citizens rely on. During my entire 36 years in this community, I have always used Metro's Red Line to get to work, to entertainment, to friends' homes, and to the occasional doctor's appointment. It is clear that the increased population envisioned by revisions to the Comp Plan may further overwhelm the existing capacity of this critical public service. Metro's equipment has been aging and accidents occur more frequently, especially on the Red Line. When the Red Line was expanded to Tenleytown in the early 1980s, no one expected the ridership numbers to be as high as they are today, and the proposed upFLUMing of Wisconsin Avenue will only increase this ridership and the pressure on aging infrastructure, and the pressure on this aging resident. I drive a car very infrequently these days.

Underground Streams

Another significant infrastructure concern that remains unaddressed in the Comp Plan and its amendments is that of upper northwest's underground streams. Underground streams are important natural features of Tenleytown and the surrounding neighborhoods. In my experience, these numerous streams are among the most important environmental consideration that are almost always ignored by planners and developers, both before building starts and after water problems become apparent. Builders and homeowners have diverted these streams for their own convenience. My own home, for instance, has a sump pump and a French drain system to divert water from the basement.

We can divert our streams, but we can't eliminate them, and in a constant pattern of diversion, we never know where the water will show up unless we engage in environmental impact studies and provide for a suitable outlet for the diverted waters. Yet this sort of infrastructure planning is difficult and often not done in Tenleytown by developers and by planners.

Tenleytown history is full of examples of dry places suddenly flooding or developing pools of water for reasons no one has understood or anticipated. In my own case, we have been told the basement of our 100-year-old home was dry until the early 1980s. I believe the digging of Metro or the Wilson Pool might have diverted streams towards my basement. Other houses

also experienced flooded basements in this era, and St. Ann's Church had an unexpected basement flood.

My sump pump now pumps constantly during even moderately heavy rains. If any more stream water is diverted unexpectedly to my basement from the digging of nearby deep foundations, my home drainage system will be overwhelmed.

In the late 1990s, the Tenley-Friendship Library suddenly acquired about four feet of water in its basement, where no water had been before. The water was slowly pumped out into the street, but the basement water kept replenishing itself. As a result, the new replacement library was built without a basement and with no further explanation of the phenomenon.

And most recently, a new outdoor swimming pool at the Hearst Park has been dug. Before construction, neighbors begged for an environmental impact study, but they were ignored. Maps showed there was an intricate system of underground streams under the surface of the dig site, but city officials said streams were not close to the surface. The immediate result of the dig was a constant stream of water from the site that was diverted into a pipe and pumped into a storm drain (at the corner of Idaho Avenue and Quebec Street) at a rate of 7,000 gallons of water a day for over a year. Neighbors were told that the City suspected there was a new sink hole at the neighboring soccer field in Hearst Park. Work has been stopped several times, and construction deadlines have been advanced more than once. Land erosion near Springland Lane has been worsened as water from rain and snow, and perhaps now the pool site, flows to the nearby Melvin Hazen watershed. Further, there is now a collapsing storm drain at the corner of 36th and Ordway.

There is concern that when the underground streams dry up as a result of their diversion into the City's storm drains, sinkholes will open under houses that have been built on top of these streams.

With no understanding of the nature of stream diversion and few studies of the geology of building sites, builders run into difficulties and create enormous infrastructure problems as they haphazardly and sometimes unknowingly dig deep foundations for high buildings and other structures. This city has green-lighted more construction of bigger denser taller buildings requiring deeper foundations without any study of this matter whatsoever.

Conclusion

The Comp Plan's allowing for an increase in density and allowable construction without thought or study will clearly disrupt my life in Tenleytown.

As signed,

Mary Alice Levine

Name: Mary Alice Levine

Address: 3804 Alton Place NW, Washington, DC 20016

Phone / Email: 202-244-9637/ maryalicelevine@gmail.com

Date: June 11, 2021

Personal Statement of Plaintiff Mary E. Rowse

My name is Mary E. Rowse and I am over the age of 18. I attest under penalty of perjury the following statements are true and correct to the best of my knowledge.

I have lived in the Ward 3 Chevy Chase neighborhood for 41 years. My home on Morrison Street is a half-block from the Connecticut Avenue commercial strip that has been targeted by developers, their attorneys and the DC Office of Planning for increased density and up-zoning. More specifically, I live within Square 1868, one of the plotted squares included in the geographic area that will be directly impacted by the unstudied amendments to the Comprehensive Plan and Future Land Use Map (FLUM).

Given my experience here and enjoyment of my community, I am deeply concerned that the impacts of these changes remain unevaluated per the law. Over the last four decades, I have been involved with a number of different organizations and issues in my neighborhood. All of them center on the desire to inform, organize and protect this community.

Twenty years ago, I founded the Chevy Chase Community Listserv and have been its principal moderator. This respected neighborhood institution electronically connects nearly 5,400 people on a multitude of issues and promotes civil discussion and problem solving. It is a vital, "go-to" resource for many people.

In the late 1980s, I served two terms (four years) as an ANC Commissioner with Chevy Chase ANC 3G. I worked on a variety of neighborhood concerns, including transportation and land use. On one occasion, I worked on a precedent-setting case before the Board of Zoning Adjustment that ultimately ruled the square footage of a proposed building lot on Livingston Street NW could not be artificially inflated to create three buildable lots out of two.

In 1989-1990, I co-founded the non-profit organization Historic Chevy Chase, DC and served as its first President. I helped document the history of the neighborhood which included original research on the unique collection of catalogue houses in Chevy Chase, DC. I produced a variety of exhibits which were shared at various sites including the Chevy Chase Arcade and the Chevy Chase DC Public Library. I also organized a successful house tour of the neighborhood to educate the community about its importance as an early 20th century streetcar suburb.

For a number of years, I volunteered with the Chevy Chase Citizens Association, serving as chair of the group's Public Safety Committee. In that capacity, I raised awareness about auto theft, worked to persuade the DC Police Chief to increase police responsiveness by cutting in half the size of our Police Service Area, and founded a block-by-block Neighborhood Watch Program that became a model around the city. I remain active in neighborhood history, safety, transportation and traffic matters to this day.

For decades, Chevy Chase DC's low-scale commercial strip from Livingston Street NW to Chevy Chase Circle was designated "Low Density Commercial." In May 2021, the DC Council

voted to allow the DC Zoning Commission to increase the density of these blocks by changing the DC Comprehensive Plan's Future Land Use Map to "Mixed Use Low Density Commercial and Moderate Density Residential."

This increased density is very likely to destroy the community I enjoy now, one that I have supported in many volunteer roles over four decades.

The significant, developer-driven change that's been made in the heart of Chevy Chase DC opens the door for the Zoning Commission to up-zone the area and, in turn, to allow matter-of-right construction projects fifty-feet and higher and Planned Unit Developments sixty-feet and higher. The increased population driven by these land use changes will bring impacts that remain unevaluated contrary to common sense and the law. More traffic, more pollution, more noise, and more capacity will pressure existing community services and utilities and imminently threaten to tear down existing buildings for high-profit high-rises.

Such building density and height changes are out of character with the low-scale, historic nature of our commercial district, which has nurtured many independent, diverse, small businesses over the years because of its affordable, flexible space. For example, we have the 1925 Hatcher Building and a great number of other buildings from the 1920s that have housed businesses, including the landmarked 1925 Chevy Chase Arcade and 1922 Avalon Theatre.

Studies have shown that commercial blocks like those in Chevy Chase DC, with its mix of older, smaller buildings, perform better than areas dominated by larger, newer structures across a broad range of economic social and environmental factors. These irreplaceable historic buildings are powerful engines of economic growth, vitality and quality of life and contribute to the success of our neighborhood by providing more small business and creative jobs, more new businesses, fewer chain businesses, and more women-and minority-owned businesses than areas with newer, larger structures. People tend to patronize businesses in smaller scale areas more than in taller ones. Overall, there is empirical evidence that older buildings play an important role in a community's health and long-term success.

Small, independent businesses in Chevy Chase DC keep dollars in the local economy and provide more resilience against economic downturns but their future will be threatened if newer, larger buildings replace them along this important commercial strip from Livingston Street to Chevy Chase Circle.

Increased density and up-zoning along the Avenue will not make Chevy Chase DC better. It will very likely destroy the low-scale, livable community I enjoy now and one I have known and supported for over four decades. Land will be worth more and this higher value will destabilize real estate and longstanding businesses and cause displacement and speculation, as has happened in Cleveland Park, where property owners have reportedly kept storefronts vacant and bundled for sale while awaiting the DC Council FLUM vote. Such an upheaval will greatly impact my life and the low-scale, vibrant, historic commercial strip I have patronized and relied upon for over four decades. Many of these businesses may not survive and my neighbors and I will suffer the loss.

If taller, denser buildings are constructed along the Avenue adjacent to residentially zoned areas in the heart of my community, this will substantially alter the Chevy Chase DC I have known for 41 years and I will suffer great harm with increased congestion, noise and expense. The lack of planning associated with these fundamental changes to my community hurts my personal and property interests in my home, my neighborhood, and in my longtime enjoyment of public resources, businesses and people in the neighborhood.

The density being granted by the city's land use changes comes with no foundation for any meaningful affordable housing nor does it address racist housing disparities. In fact, these proposals will perpetuate and intensify these problems because market rate and luxury housing will be the primary result. The city's Inclusionary Zoning regulations are woefully inadequate to provide the kind of affordable housing necessary to help those in need.

The FLUM land use changes also target the Chevy Chase DC Library and Chevy Chase Community Center, likely leading to their demolition for bigger, mixed-use public/private redevelopment. This means essential neighborhood services I have regularly used and counted on for 41 years will be significantly disrupted, if rebuilt at all. For example, when the Tenley Library was demolished, it took *eight* years for the community to get a replacement. That same delay is very likely to happen in Chevy Chase DC.

The library and community center were built in 1967 and complement one another and are well-constructed examples of mid-century modern architecture – prized by many. They are located in the heart of our community surrounded by a memorial garden, basketball court and small, well-used parking lot. The community center has been slated for renovation for years, with money identified in the city's budget. The Chevy Chase ANC has discussed it at many meetings. The library was recently given a face lift and remains a busy place that I regularly visit.

The city's approved land use changes have occurred without any evaluation of the impact they will have on the future of these public resources I enjoy. Without the required impact planning studies, the FLUM changes imminently mean these two essential public buildings and land will be demolished and replaced with higher and denser structures, perhaps privatized, completely changing the character of this community and my experience of living and shopping here. I object to using public land for anything other than enhanced public services -- certainly not for the disruption and possible elimination of vital services I rely upon.

Moreover, any promises that any deeply affordable housing will be the result if these land use changes go into effect come with no studied evidence. In fact, allowing developers to build more dense market rate housing will only make Chevy Chase, DC more exclusive. To take on our fair share of affordable housing, we can preserve the numerous units that are already rent-controlled in the area and publicly acquire more units in apartment buildings up and down the Avenue for 30% AMI affordability. The city can also purchase smaller homes and subsidize their rent or sale to low-income residents. Adaptive re-use is the answer, not land use changes that tear down vital buildings for high-cost high-rises.

Public transportation is not strong in this area, with buses being the primary means for traveling for people who shop in the area like me. Also impacted are my neighbors with school children,

as schools and buses are quite overcrowded. Public transportation has diminished and deteriorated in this area, yet land use changes are slated to bring greater numbers of people who will use the already overcrowded public transportation system I rely upon. The Office of Planning has shown no concern for these issues, inexplicably choosing not to study the impact of denser development on our neighborhood's infrastructure of roads, utilities, transportation systems and schools.

The lack of planning by the city associated with the proposed land use changes clearly harms my interests in the community I have loved, my property interests, and my personal enjoyment of this area and the public resources I use. I ask for the court's help to bring planning back to the Office of Planning.

As signed,

A handwritten signature in blue ink that reads "Mary E. Rowse". The signature is written in a cursive style and is positioned above a horizontal line.

Name: Mary E. Rowse

Address: 3706 Morrison Street NW, Washington, DC 20015-1734

Phone: 202-362-9279

Email: merowse@aol.com

Date: August 23, 2021

Statement and Affidavit of Minnie Elliot

1. I, Minnie Elliott, and I am over the age of 18 and I make the following statements to the best of my knowledge and recollection pursuant to penalty of perjury by law.
2. I reside at 1320 Saratoga Avenue, NE, Apt. 1, Washington, D.C. I have lived at this address for 29 years, in Ward 5 and now live with my grand daughter and two great grandchildren who are ages 8 and 12.
3. I am the President of the Brookland Manor/Brentwood Village Residents Association. I am a Steering Committee member of the Brookland Manor Coalition. I am a retired DC Public School employee. I am a member of the Urban League and have been a longtime community organizer who's worked on welfare rights and economic rights for all people since I marched with Martin Luther King, Jr. during the Poor People's Campaign to resurrect the city.
4. I live in one of the UPFLUM-ed areas on the planning maps, where the existing community density will go from moderate (garden-style apartments with 535 units) to much higher density (nearly 1,800 units) in an effort by real-estate interests to build three times the allowable density in exchange for "public benefits." In actuality, the project and recent map changes by the Mayor and Council are a direct threat to the interests I have in staying in my home and community, and also risk eliminating some of the beneficial administrative rights granted to me by the existing Planned Unit Development order.
5. As a resident of Brookland Manor Garden Apartments, President of the neighborhood's residents' association and steering committee member of the Brookland Manor Coalition, I am directly threatened with being displaced and seeing my community that I enjoy, and fight for and with, also displaced, permanently. The map changes will negatively impact my own home, which I rent, because I am not sure where my family and great grandchildren, who I care for,

will live if I am forced to move into a smaller seniors-only unit or off the site and out of the community entirely. That is not a public benefit in a city with a housing crisis.

6. At Brookland Manor, we won a “build-first” agreement with developer MidCity, and the Zoning Commission’s granting of MidCity’s ability to develop was contingent on “minimizing displacement.” The recent unstudied upFLUMing will make the proposed redevelopment at Brookland Manor, or any new developments elsewhere in the geographic area, get approved by-right for developers. That means, community members like myself will have even less of a say of how development happens around us and to us. This impacts my community directly because we currently have a lot of families, including mine, residing here that will no longer be able to due to the smaller size of the units and massive disruption to our lives by the construction. And, although the ability of the Zoning Commission to enforce minimizing displacement is dubious, the recent map changes at Brookland Manor imminently risks an administrative work around of contractual rights offered in the approved PUD zoning order such as the elimination of written promises to “build in place” during and throughout the redevelopment and to strike the Zoning Commission’s contractual responsibility to monitor the property to ensure displacement isn't happening. Not having these terms in place concretely harms my family and the community I love. Displacement will uproot us from our nearby doctors, schools, transportation, church, families, and friends.

7. The displacement concerns also relate to the obviously higher housing costs that are being foisted on all of us by the over-development now allowed to happen due to the map changes and destabilization of land values specifically where I live. We are working families and low income residents, many on vouchers like my family. There’s no commitment that vouchers values will increase as unit market rates increase. Fixed incomes don’t align well with

private developer profit interests. Displacement is a direct harm to my interests in my future and that of my community – additionally, displacement directly harms Black people. The Council’s Office of Racial Equity admits that we have a racial equity problem in the District, Black families are more likely to be impacted by displacement, and the current housing system of inclusionary zoning mostly helps families with 80% AMI— far above what the average Black family in DC makes.

8. The disruption of my community and the severe density increases will further impair my health and health care costs. More people and population growth will exacerbate pollution, traffic, noise, and trash. I already have persistent asthma, high blood pressure and high cholesterol problems and my grandchildren have major allergies that will be further adversely elevated by more and more construction and people. There were no health impact studies conducted in conjunction with the Mayor and Council approved upFLUMing that induces all of this activity and population growth.

9. The upheaval of the area, literally, will exacerbate the already severe rodent problem in our community. Large rat holes already have opened up with some of the new construction in the area. People have twisted their ankles, and the rats swarm the trash areas making it difficult for residents to take out their trash without fear of getting bit. Rodents also started come into our home! This will only get worse with all the approved construction in this entire neighborhood where the maps are changing, all done without actual planning.

10. Because I cannot walk long distances, I use an automobile for transportation in my neighborhood. One of my roles in the community is to provide transportation to other seniors. I have given rides to seniors to doctor’s appointments and to go grocery shopping. I provide these rides because I know how difficult it is to get around on foot for seniors. As it is, traffic is

terrible in my neighborhood. All traffic in the Brentwood neighborhood comes through the Rhode Island Montana Ave corridor. There is a lot of construction currently in the area and more construction directly on the land I live at now will only make the congestion worse. It is unsafe for children to cross streets due to lack of crossing guards and cross walk signals. None of our transportation capacities and pedestrian needs were studied overall in conjunction with the Mayor and Council approved upFLUMing. This is a real threat to our quality of life and well being of my family and grandkids.

11. We have had recurring electrical outages on our property. A few years back, I did not have electricity for a week due to one of these outages. Thunderstorms have brought down electrical poles and caused flooding in the area. Pouring more people into the area in denser bigger housing based on an already vulnerable utility grid is foolhardy. My family and my community will pay the price for the lack of planning, not the planners who have done no studies examining how the UpFLUMing will bring bigger burdens onto these existing community systems and utility needs.

As signed,

A handwritten signature in cursive script that reads "Minnie Elliott". The signature is written in black ink and is positioned above a horizontal line.

Name: Minnie Elliott

Address: 1320 Saratoga Avenue, NE, Apt. 1, Washington, D.C 20018

Phone / Email: (202) 299-6647, melliott1031@gmail.com

Date: August 1, 2021

1. My name is Phyllis Wells Blair and I attest that the statements below are true and correct to the best of my ability and recollection. I live at 1614-A Beekman Place, NW, Washington, DC 20009, in Ward

2. The back of the home that I own in Beekman Place faces 16th Street, NW. I am approximately 220 feet from the entrance gate on Belmont Street NW, which is directly across from where Meridian International Center (MIC) has proposed to build a hi-rise building across most of the open land and replace some of the existing structures there now. My Councilmember is helping the private owners at MIC by UPFLUMing the property specifically for the project.

3. I am concerned the additional zoning density will provide opportunities for investors, speculators, and absentee owners to want to build more housing, squeezing in any and every where there is space at my expense. The change is huge. A simple pleasant walk down the street will no longer be. It will be difficult to be here with more people and the crowds they intend to bring with their new events space. With more people and crowds come more noise, trash directly affecting my block, my home, and my community.

4. I love my property just as I bought it. The proposed UPFLUM-ed property would be built directly across the street from my community of Beekman Place. This spot zoning to benefit the private interests here has never had any public scrutiny or study. It was proposed by Councilmember Brienne Nadeau at the very last moment before the Comprehensive Plan was changed. Moreover, this last minute change to the FLUM would serve as a workaround of our zoning appeal and eliminate our administrative rights before the zoning board.

5. This area is already congested with traffic. Belmont Street is a very narrow two-way street from 16th Street to after where our entrance gate is. The remainder of the street going up then becomes a one way street. On occasions when MIC hosts events for large groups, Belmont Street becomes impassable, clogged by catering trucks and backed up by cars and buses with event guests. This will only get worse with more event space and a denser residential building. The intersection of 16th and Belmont Streets has no traffic light. With the majority of Belmont Street being one way, this intersection is the only access point for Beekman Place, MIC, and other residents living on Belmont, Crescent Place, and 17th Street. Sixteenth Street is a busy thoroughfare in the city and without a traffic light, makes a turn across traffic onto Belmont difficult at best and causes backups on 16th Street. The addition of residents living in a 110 unit building needing daily access to Belmont Street is an absolute nightmare. The street structure and traffic control in the neighborhood are not designed to handle a population density of the sort proposed by the UPFLUM-ing of the area. There simply is not the infrastructure to manage it. Likely this is the reason the area was not zoned for such population density in the first place. If city officials gave any thought to the changes and potential destructive force of this density, they would pull back from the current call to fill every neighborhood with more big development. For residents like me, an elder pedestrian and regular walker, I am directly impacted.

6. We, at Beekman Place, are constantly talking with our city police, ANC members, city government officials on ways to decrease crime and for provisions for more safety in our neighborhood. The increase in events, people and traffic will decrease safety and increase crime. Beekman Place residents have established a Safety Committee for more protection in and around our development, and are continuously reviewing and updating our plans. I was raised that I must be happy at home. I presently am, but it appears not for long. The construction, noise, debris, pollution, vermin and all things deep underground will be a great nuisance to my peaceful home living. Even walking to my neighborhood stores will be an inconvenience.

7. I suffer from allergies to environmental exposure already and take daily medication for it. It is beyond me how even a completely healthy person can manage day-to-day living with the upcoming months of continued heavy destruction and construction that will come from the MIC new building development of a 110 units 9 story luxury condominium and conference center. Rather than trees providing canopies over roofs and along city streets, increased density removes the trees and adds more rooftops and more concrete to absorb heat and radiate back into the neighborhood and atmosphere. It seems the District government is allowing this hazardous traffic pileup and new structure to happen without reference to its own urban plan. While we may need housing in the District, it need not be another expensive high-rise. Low- and middle-income families have been and are continuously being driven out of the District.

8. My community has suffered from continuing clogged traffic on 16th Street where it's joined by Belmont Street and with daily traffic backups especially at rush hour. I have experienced a couple of main water-line pipe breaks within 12 years, and a major electrical power brownout within 10 years, with loss of power for approximately a 24-hour period. All of these issues only become exacerbated with bigger denser projects and more people in the area. How can this be proposed and passed as permanent changes without any study whatsoever!

9. My home borders the proposed new development. The majority of my daily activities are in my neighborhood. The construction would impact my getting to and from the places where I carry out my business. The construction would adversely modify my route as I am able to walk to most places that I go.

10. Living in the city is one of the main reasons I bought my house some 35 years ago. I have the convenience of walking, taking buses and cabs and all other public transportation. Frequently I observe the 16th Street mass transit buses full of passengers and not just during rush hour periods. More density of my area would make the present periods of gridlock of cars, buses and people more chaotic and frustrating, especially for me and other senior citizens and those with physical impairments. Overall, the city's failed planning has and will be a disaster for DC residents. I strongly believe the Mayor and City Council are more interested in financial gains than in making and keeping their citizens happy and comfortable.

Money is the name of the game for politicians and developers, unfortunately the expense is actual planning with real impact studies to the area and along with that, so to is the imminent risk to my health, my home, and the community I enjoy.

As signed,



Name: Phyllis Wells Blair

Address: 1614-A Beekman Place, NW, Washington, DC 20009

Phone: 202-265-0060/ Email: pwblair@comcast.net

Date: August 23, 2021

PERSONAL ATTESTATION

My name is Richard B. Nash, Jr. and I attest that the statements below are true and correct to the best of my knowledge.

I reside at 3456 Newark Street, N.W, Washington, DC 20016, two blocks from one Future Land Use Map (FLUM) amendment site, No. 2803, and five blocks from another FLUM amendment site, No. 2123. Both FLUM-ups are in or contiguous to the Cleveland Park Historic District, a listed historic district on the National Register of Historic Places. The density increases reflected in both referenced FLUM amendments are substantial and the impacts of which remain unevaluated under the law. I also live one block from a new designated Future Planning Analysis Area on the Generalized Land Use Map, covering a low-density area of the Cleveland Park Historic District in which single family homes predominate, which is identified for “an increase in density and intensity of use.”

When my spouse and I purchased our home in 1999, the Cleveland Park Historic District was a material consideration in our decision. We valued – and appreciated the District’s commitment to preserve – the history, architecture and streetscape of the historic district. We relied on the fact that the District buttressed the creation of the Cleveland Park Historic District with zoning and historic preservation policies to support historic preservation. These included the Zoning Commission’s decision shortly after the Cleveland Park Historic District was created to adjust permitted height and density for infill construction to a height of not more than 40 feet, to be consistent with the predominant height and density of contributing buildings in the historic district. This policy that zoning be consistent with predominant height and density is reflected also in Comprehensive Plan Policy HP 2.4.1 and in consecutive releases of the District’s Historic Preservation Plan.

These historic blocks on Connecticut Avenue that have been FLUMmed up by amendment no. 2123 are characterized predominately by pedestrian-scale, one- and two- story commercial buildings, with mixed retail and apartment buildings up to five stories on the corners. The National Register nomination for the Cleveland Park Historic District states that this area includes an “aesthetically unified” and “unusually intact Art Deco commercial strip” which is “one of the best examples in the city,” and which “maintains its integrity especially with regard to scale” and is “remarkably unified in appearance.” The iconic Uptown Theater is the centerpiece of the Art Deco strip. The DC deputy preservation officer has stated that no other DC historic district has such a collection of low-scale commercial buildings like those that define Connecticut Avenue in Cleveland Park.

Recent FLUM Amendment No. 2123, however, contravenes and radically changes this long-settled policy that zoning be consistent with the predominant height and density of the historic district by designating the historic commercial area as “Medium Density Residential/ Moderate Density Commercial.” Under the Framework Element adopted by the D.C. Council, these FLUM categories enable MU-8 and MU-10 zones, which would permit, where one- and two-story contributing structures predominate, infill construction of up to 8 to 9 stories and 10-11 stories respectively. (MU-8 enables buildings of 90’ in height (70’+20’ penthouse) and MU-10 enables buildings of 110 feet in height (90’ plus 20’ penthouse.) A portion of the area upFLUMmed by Amendment No. 2123 is on Newark Street, N.W., a low-density area which is characterized by contributing single family houses of two- to three stories, not by commercial buildings. Rather than “minimizing design conflicts between preservation and zoning controls,” FLUM Amendment No. 2123 will create them. Amendment No. 2123 is not only inconsistent with HP 2.4.1 and other long-settled policy, it is an invitation and roadmap for the Zoning Commission to hollow-out and undermine the Cleveland Park Historic District through map amendments. The consequences of Amendment No. 2123 will materially affect the value and enjoyment of my property, as it will have a profound impact on the Cleveland Park Historic District.

No other neighborhood historic district in Washington has been selected for such FLUM density changes and text amendments as has Cleveland Park – not Capitol Hill, not Takoma Park, not Georgetown. At the same time, the result of FLUM Amendment No. 2123 will set an adverse precedent for historic preservation in these and other historic districts in Washington.

The FLUM Amendments will also exacerbate transportation, pollutant/particulate, infrastructure and water issues in Cleveland Park, and such impacts were not considered. For example, a number of the east-west cross streets in the historic district are narrow and classified as “local,” the lowest designation under the federal functional street classification which D.C. utilizes. Such streets currently carry substantial cut-through cross traffic which diverts from major arterials like Connecticut Avenue and Wisconsin Avenue. The FLUM amendments did not consider traffic impacts resulting from doubling, perhaps almost tripling the permitted height of new construction heights in portions of the historic district – at the same time that DDOT is proposing a redesign which will cut rush hour carrying capacity on Connecticut Avenue by 50 percent. During significant rainstorms, road and other transportation infrastructure in the area affected by FLUM amendment No. 2123 floods, including in the Cleveland Park Metro station. Yet the FLUM process failed to consider existing infrastructure issues, which surely will be exacerbated by significant increases in height and density in the area. As a resident, pedestrian, and public transit user in Cleveland Park, each of these impacts affect me.

The DC Council also created on the Generalized Land Use Map two new Future Planning Analysis Areas (FPAAs) that include and will affect substantial portions of the Park Historic District. DC Office of Planning Director Andrew Trueblood testified before the Council that the FPAAs designations are new, and “are areas of large tracts and/or corridors that are anticipated for a change in density and intensity of use.”

The Upper Wisconsin Corridor FPAAs would include the Cleveland Park Historic District and residential neighborhoods west of 36th St. between Lowell St. and Quebec St., N.W., just one block from my home. The Wisconsin FPAAs designation continues north on 37th St. to eventually include the Tenleytown and Friendship Heights Metro stations. A second FPAAs, covering the Upper Connecticut Avenue area south to Macomb Street, includes a substantial portion of the eastern portion of the Cleveland Park Historic District. As drawn, the proposed boundaries of each of the Upper Connecticut and Upper Wisconsin FPAAs extend well east and west of the arterial corridors to encompass single-family residential side streets in the historic district.

Including low density, single-family homes that are in designated Neighborhood Conservation Areas in new designated planning areas with the goal of changing both uses and the intensity of use is unprecedented. It is also alarming for all historic districts that OP includes a wide area of an historic district, particularly low-density blocks of single-family homes some distance from Metro stops, in an area that OP “anticipate(s) for a change in density and intensity of use.” The FPAAs’ geographic reach is also highly unusual (in the case of the Upper Wisconsin FPAAs, it extends more than one mile from the Tenleytown Metro).

The above statements on impact are informed as well by my knowledge and experience as a current vice president and immediate past board president of the Cleveland Park Historical Society and prior service on the board of the Cleveland Park Citizens Association. Given these community positions and my long held

personal and property interests in the existing historic community I have invested in and enjoy, I must object to the imminent threat by the unplanned and unstudied upFLUMing being proposed and thus I seek remedy under the law.



Name: Richard B. Nash, Jr.

Address: 3456 Newark Street, N.W., Washington, DC 20016

Phone: 202.237.5241

Date: August 31, 2021

PERSONAL ATTESTATION

My name is Shirley Shannon. I am over the age of 18 and attest under penalty of perjury that the following statements are true and correct to the best of my recollection and knowledge.

I have lived very close to the Howard Divinity School campus since 1950. I moved with my family to 1336 Shepherd St. NE as an infant and was raised in this community since and now own my childhood home. I went to Bunker Hill Elementary and the Taft Junior HS and then McKinley HS. I received my Masters degree at nearby at Trinity College, now Trinity University. I used to work in Langdon Park recreation center teaching arts and crafts. I raised my family here, taking care of my mom, husband, and daughter in this very special Ward 5 neighborhood known as Brookland.

I am a former member of the Brookland Civic Association and now a member of the recently formed Howard East Neighbors directly concerned about the future of the Howard Divinity School campus visible just up the block from my home.

The disregard of our concerns and interests in my enjoyment of this serene and green area of Brookland is absolutely unacceptable, especially without any evaluation of the impacts of the upzoning proposed on the geographic area, my neighbors, and on me and my home. I love this neighborhood, and love my home.

The un-examined proposed changes to the land maps at the Howard Divinity School campus concretely impacts my neighborhood, my home, and my health. The land use amendments proposed by the Mayor and approved by the Council will result in the replacement of this cherished open green space and the many trees that have been here since I've been a child with acres of pavement and numerous unaffordable condos. With this proposed redevelopment that will be made a by right project with the map changes which will absolutely affect me.

More than doubling the population in the area will more than double cars & traffic, pollution, and noise at the expense of the existing cooling green area that cleans our air and keeps our neighborhood serene. This project will also tear down a environmental buffer and bring the noise and traffic and pollution that is shielded away along South Dakota Avenue, allowing the impacts along that major corridor to infiltrate further into our community's environment and into my yards and home.

I want the peace and tranquility that I've enjoyed in my community and home for so long. I don't want that to be negatively affected this way, especially without any planning impact studies as required by law. I already suffer from terrible allergies and the pollution generated by more people and traffic in the heart of this area will exacerbate my sinuses and make me sick.

I am an avid walker. I walk to the school campus and enjoy the existing peace and aesthetic of the open green space. This is an historically religious area, and my neighbors and I walk up the hill to the seminary and reflect upon peace coming up and down the hill.

The changing street patterns and more traffic threatens my pedestrian safety and that of my neighbors and their children. I don't want these changes, the hacking and whacking up of the land and trees, cars going in and out, the anticipated drilling and construction. The impacts of which are all unstudied and will go unmitigated to the peril of my personal health and property interests and my enjoyment of this peaceful community. We desperately need those trees. We need all the trees we can get. Its protecting us from the pollution.

Where do the animals go? My goodness they got to survive. The flora and fauna, deer, birds, opossum, rabbits are needed and vital to me and my health and enjoyment. They have been here for all this time and now are threatened with being pushed off the land. Like them I too am worried about displacement. A redevelopment project of the size proposed on these areas of the maps that have been changed will destabilize land values, increasing tax burdens for me and my neighbors. I am on a fixed income and as the city has developed my taxes have steadily moved up. This upzoning here at the school campus will substantially push up the immediate area housing values and taxes. I cannot afford this type of displacement pressure.

The increase in population also puts pressure on the ease of parking for seniors like me. I need to park nearby my home for safety and access purposes, this will be impaired by more cars and more people, again unexamined with the proposed map changes. DC's planning officials have failed their duty to ensure existing residents are protected and are as important as bringing in new neighbors.

I am asking for any help in this matter and at the very least an examination of the impacts by the proposed changes to minimize the negative effects on me and my longstanding serene and green neighborhood.

As signed,

Shirley Shannon

Name: Shirley Shannon

Address: 1336 Shepherd St. NE, Washington, DC 20017

Phone: (202) 526 - 4909

Date: August 13, 2021

STATE THE FOLLOWING REQUEST AS A CLIENT:

1. To be kept informed about any important developments in my case
2. To be consulted before any significant decision is made on my behalf
3. To have all communications with my representative kept confidential

STATE THE FOLLOWING RESPONSES AS A CLIENT:

* I served as Counselor to Hayes Elementary School (ward 5) for close to twenty years:

Personal Attestation

I am over the age of 18 and the following statements are to the best of my knowledge true and correct under penalty of perjury.

My name is Victor M. Booth. My Primary residence is located at 708 Parkside Place, NE, Washington. D.C., 20019.

There has been denser development already brought to my community and in the area around Lily Ponds. The bigger denser buildings do not complement the existing community. The city has too many developers building too many big-box structures obstructing views, narrowing streets, removing fauna and trees, and making it much more difficult to find parking.

My property lost the street views that made it more appealing to potential buyers. We had more trees before away the large tracts of land around (Parkside Townhomes a Condominium) were handed to developers without community input. We lost all the green spaces that allowed the existing neighbors to have picnics and community gatherings but the city partnership with a developer created a small park that has less than five park benches and tables for a 1000 plus residence to “share.”

Now with the DC Comp Plan changes being proposed and approved without planning impact studies, all of this will get worse. The proposed upFLUMing specifically nearby my home in Ward 7 will only intensify the type of unplanned and unstudied development I describe above. It will bring even more people to an area that is choking in traffic and pollution. For example, there has been no study how the nearby proposed Upzoning may impact *the only* major egress way that my neighbors and I must get out of the city in a safe way, that is I-295. Have you been on this road on any given day at 5pm, its bumper to bumper now!

There's been no study about how piling in even more people in bigger denser buildings allowed by the recently approved upFLUMing will impair emergency responders in Ward 7 and impair safety response time that I rely on for my wellbeing. Pedestrian safety concerns are already off the hook as the pedestrian bridge that connects me and my neighborhood to Minnesota Ave was just hit and collapsed by the runaway buildup of vehicular traffic nearby. The upFLUMing will only make traffic and pollution worse and threatens my safety as I walk through my neighborhood.

I use mass transit but hate the already crowded trains that are taken out of service too often due to mechanical failures making it impossible to get to work on time. The additional Upzoning and population growth proposed near my home and my Metro stop will only make the transit system I need for personal and professional endeavors even more unreliable.

Parkside Townhomes and the area where I live has experienced electrical brownouts that Pepco has never resolved for the past 15 years. And now, the city's proposed UpFLUMing will bring this obviously vulnerable utility system to the absolute brink at my direct detriment. Why weren't utility studies completed along with the city's desires to blow out the zoning?

I have no choice but to seek remedy before the Court so that the city takes planning seriously otherwise risk imminent harm to DC neighbors, especially those neighbors like me who are in close proximity to the proposed density Upzoning and intensification of more people.

As signed,

DocuSigned by:

Victor M Booth

BC9EE5EEB59E4C9...

Name: Victor M. Booth

Address: 708 Parkside Place, NE, Washington, D.C. 20019

Phone / Email: boothmv@gmail.com

Date: August 5, 2021.

My Personal Statement on the DC Comp Plan Changes

I, William H. Jordan am an adult over the age of 18 and I make the following statements to the best of my knowledge and ability under perjury of law.

I own my home with my family 1337 Newton ST, NW, in Ward 1. My home is within one block of the city's recent unevaluated changes to the Future Land Use Map.

I am a member of the DC Grassroots Planning Steering Committee, a former ANC Commissioner in the area, and have testified before the Council about the Mayor's substantial changes as proposed to the DC Comprehensive Plan. Most of these changes are not accompanied with adequate planning studies or analysis of impacts on the environment that comes with more density, more people, more traffic, pollution, and capacity-issues as to services in my community. Moreover, there was no study of the displacement nor racial equity impacts that will exacerbated by imminent propelled development brought on by the land use changes. These unstudied changes will harm me, my family, and my community, already bombarded with development that has wiped out many of my working class neighbors and their families, renters and homeowners.

Acutely, the land use map changes move the development needle up from low density residential and commercial districts to medium density districts. That is going from two and three stories development envelopes to allow eight-plus story denser bigger buildings and for that many more people and commercial activity.

The UPFLUMing will further escalate speculative real estate property value assessments lending to higher property taxes, payments and thus displacement pressures on me and my family and families like mine. This tax pressure is beginning to price my family out my home and neighborhood while public spaces, parks, schools and other amenities are being lost or unable to keep up with growth.

The primary concern is displacement pressures, especially for Black families here in Columbia Heights like mine. The speculative pressures from UPFLUMING and related policies over the last 20 years led to the displacement of Black Families in the neighborhood, 50%. Family-sized housing 3-bedrooms and more is being replaced with studio and 1-Bedroom units that are priced out of the range of most moderate-income Black families. This is all leading to the rapid loss of my family's critically important social-economic and neighborhood networks. I've relied on this very valuable existing social network and its displacement by rising costs brought on by denser "luxury" directly harms the ability of my family to reside in this neighborhood, especially as related public and private amenities are lost as well.

The existing fragile utility and transit infrastructure is also failing under all this unstudied growth threatening the well-being of me and my family and my community. Growth pressures have already led to brown-outs, constant infrastructure breaks and patches to water, gas and electricity. Because growth is not being well planned, streets are sidewalks are constantly dug up basically my neighborhood has been a permanent construction zone since 2002. Constant traffic backup on 14th St. as led to traffic diverting to residential streets, and the planning changes will only make this worse unless proper analysis is completed and mitigating investments made and delivered upon.

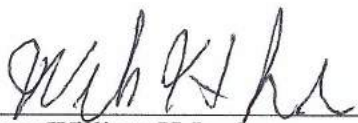
The little public space we have is also UPFLUMMED such as the nearby pocket-park. There was no showing of studies the increased density will have on the area's already tough heat-island effect and air pollution. This lack of study is especially unacceptable as we face major climate change issues

imminently facing us now. And the lack of planning studies extends to public services, like our transportation systems.

I utilize Metro and Buses in neighborhood to access work, shopping, and recreation on a daily basis. The UPFLUMMING in the already very busy 14th Street NW corridor is being done with little to no public notification and no comprehensive study to coincide with the proposed density increases will have on public transit capacity-use impacts, which are close to maximized now.

As a former ANC Commissioner and someone acutely tuned into the law, I simply ask that if the city wants to induce population growth and population density, the city planners are made to do it responsibly. That is, the Comp Plan map changes must be accompanied with study of impacts that the UPFLUMING will have on the geographic area around my home and in my community. Planning studies and mitigating investments are only common-sense to ensure a safe and healthy inclusive future for any modern-day city. They must be done!

As signed,



8/24/21

Name: William H Jordan

Address: 1337 Newton ST, NW

Phone / Email: (202) 500-0699, whj@melanet.com

Date: August 24, 2021

EXHIBIT B

CORE RACIAL

EQUITY IMPACT

ASSESSMENT

**EVEN IF SPECIAL LEGISLATION AND ORGANIZED
RELIEF INTERVENE, FREEDMEN ALWAYS START LIFE
UNDER AN ECONOMIC DISADVANTAGE WHICH
GENERATIONS, PERHAPS CENTURIES,
CANNOT OVERCOME.**

- W.E.B. Du Bois

**Achieving a racially equitable society requires policies and actions
that intentionally disrupt structural and institutional racism.**



BILL 24-0001
RACIAL EQUITY IMPACT ASSESSMENT
COMPREHENSIVE PLAN AMENDMENT
ACT OF 2020

TO: The Honorable Phil Mendelson, Chairman, Council of the District of Columbia
FROM: Dr. Brian McClure, Director, Council Office of Racial Equity
DATE: April 19, 2021

COMMITTEE
Committee of the Whole

BILL SUMMARY

Bill 24-0001, the “Comprehensive Plan Amendment Act of 2020,” establishes and updates a broad range of guidance, policies, and actions concerning the District’s short and long-term growth.

CONCLUSION

As introduced, Bill 24-0001 will exacerbate racial inequities in the District of Columbia.

The Committee Print, the draft amended by Chairman Mendelson’s office and under consideration by Council, makes impactful and significant changes to the Comprehensive Plan. These changes elevate racial equity as a policy priority and state that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan’s sheer size reduces the impact of the Committee Print’s positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Comprehensive Plan, as introduced, fails to address racism, an ongoing public health crisis¹ in the District. As introduced, it appears that racial equity² was neither a guiding principle in the preparation of the Comprehensive Plan, nor was it an explicit goal for the Plan’s policies, actions, implementation guidance, or evaluation. These process failures laid the groundwork for deficiencies in policy: proposals are ahistorical, solutions are not proportionate to racial inequities, and directives are concerningly weak or vague.

The Committee Print makes positive changes, perhaps the most impactful of which are to process—significantly multiplying their impact. In the Print, Small Area Plans should be conducted using a racial equity lens and the Zoning Commission must develop a process to consider all cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. However, in sum, the Plan’s size reduces the impact of the Print’s positive changes. Despite the Plan’s commitment to eliminating racial inequities, the document before us perpetuates the status quo.

This assessment intends to inform the public, Councilmembers, and Council staff about how land use decisions impact Black communities and other communities of color. While CORE’s final assessment does not represent our opinion of whether the bill should proceed, we hope it 1) fosters dialogue on the Print and 2) is used to move towards a more racially equitable *administration* of the Plan by residents, the Zoning Commission, executive agencies, and the Council. This would lay the foundation for a more racially equitable 2026 rewrite of the Plan which—both in process and in substance—must lead with racial equity.

¹ Resolution R23-0602, the [Sense of the Council to Declare Racism A Public Health Crisis in the District of Columbia Resolution of 2020](#), Effective from December 1, 2020. Published in the [DC Register](#) Volume 67, page 1406.

² For reference, see glossary of terms following the Appendix.

BACKGROUND

Structural and institutional racism led to stark racial inequities between the District’s Black and white residents. These racial inequities are among the worst in the country. In 2017, thirteen percent³ of Black residents were [unemployed](#), over four times the rate of white residents. In that same year, the median [hourly wage](#) for Black residents was \$23, while it was \$39 for white residents. Forty nine percent of white households in DC [own a home](#), while only thirty five percent of Black households and thirty percent of Latinx households are homeowners. Further, since the Comprehensive Plan last passed in 2006, at least 20,000 Black residents [have been displaced](#) from the District.

Since 2006, the [poverty](#) rate increased for Black residents. [Jobs](#) and [schools](#) remain highly segregated. Black residents [experience homelessness](#) at a rate disproportionate to the racial makeup of DC, [educational gaps](#) persist across racial and ethnic groups, and [the net worth](#) of white households in DC is eighty one times higher than that of Black households.

In 2020, COVID-19 added a public health emergency on top of the existing public health crisis of racism. These two crises exacerbated existing racial inequities and have created new ones: both COVID-19 and its impact have disproportionately devastated [Black communities](#) and [other communities of color](#).⁴ In the District, Black residents [are dying](#) of COVID-19 at a rate [disproportionate](#) to the racial makeup of DC. Nationally, Black [life expectancy](#) dropped by three years. Black owned businesses are [closing at higher rates](#) and have received less federal and [local government assistance](#). The [learning loss](#) that followed the transition to online learning in March of 2020 also disproportionately affected Black students.

It is also critical to consider [changes to the District’s population](#) over time. At its peak, Washington, DC was over seventy percent Black, leading George Clinton of The Parliament and others to refer to the nation’s capital as “Chocolate City.” In 2015, for the first time in decades, the Black majority [dropped below](#) fifty percent. The DC Policy Center and Council Office of Racial Equity (CORE)’s [DC Racial Equity Profile](#) highlights how since 2010, the District gained over 104,000 residents. Through 2017, most of this growth was in-migration of mainly young white people with advanced degrees, alongside a decline in the share of DC’s population that is Black (Figure 1).⁵ Moreover, the District remains highly racially and economically segregated, with most of the District’s Black, Latinx, and Asian and Pacific Islander residents living in Wards 1, 4, 5, 7, and 8.

It is against this backdrop that CORE reviewed the guidance, policies, and actions proposed in the Plan.

³ CORE aims to center accessibility in our writing. While this REIA’s approach towards accessibility is not exhaustive, you may find that we intentionally examine patterns such as spelling out statistics and interrogating the use of hyphenation in our writing habits.

⁴ When CORE talks about “communities of color,” we are referring to Black, Indigenous, Latinx, Asian American, Pacific Islander, and Native Hawaiian populations. We do so while acknowledging that each community of color has a unique history and experience of racism in the United States, and particularly, in the District of Columbia. While it is sometimes more efficient to reference “communities of color” in narrative text, policies and actions must respond to the [historical trauma](#) each community has faced by naming individual communities.

⁵ Between 2010 and 2017, the District’s Black population [increased by](#) 14,000 people. Native Americans’ population growth in the District declined over this period. Compared to all other racial groups, however, Black in-migration occurred at a much slower pace.

FIGURE 1

The proportion of Black residents has decreased since 2000, while most other racial groups have experienced population proportion increases.

RACE/ETHNICITY	POPULATION			PERCENTAGE POINT CHANGE FROM 2000 TO 2019
	2000	2010	2019	
WHITE	30.78%	38.48%	42.52%	↑ 12
BLACK	60.01%	50.71%	45.44%	↓ 15
HISPANIC	7.86%	9.10%	11.26%	↑ 3
ASIAN	2.13%	3.65%	4.07%	↑ 1
AMERICAN INDIAN OR ALASKAN NATIVE	0.30%	0.35%	0.27%	↓ 0
NATIVE HAWAIIAN OR PACIFIC ISLANDER	0.06%	0.05%	0.03%	↓ 0
TWO OR MORE RACES	2.35%	2.88%	3.30%	↑ 1
OTHER	3.84%	4.05%	4.37%	– 0

↑ Increase ↓ Decrease – No Change

NOTE Race categories identify percentages of the population that selected a single race, or a single race and Hispanic.

SOURCE The US Census Bureau

CREATED BY D.C. Policy Center | dcpolicycenter.org

WHAT IS THE COMPREHENSIVE PLAN?

- **The Comprehensive Plan guides the District’s long-term growth by setting policies on topics such as land use, housing, economic development, infrastructure, and the environment.**
- **The document is used by the District’s Zoning Commission—their decisions must be found to be *not inconsistent* with the Comprehensive Plan.**
- **The Plan is also used by stakeholders such as the Office of Planning, other District agencies, developers, and residents to ensure the District moves forward collectively.**
- **The latest Plan was written in 2006 and amended in 2011. The Office of Planning began its most recent public amendment process in 2016. After gathering public input, the Office of Planning transmitted its proposal to the Council in April 2020 as Bill 23-0376.**
- **In 2021, the bill was reintroduced as Bill 24-0001.**

The Comprehensive Plan guides the District’s long-term growth, shaping many aspects of residents’ lives. For example, the Plan describes how the District should balance competing demands for land, encourage retail expansion, use schools to meet nonacademic needs in their neighborhoods, and support efficient and environmentally friendly transportation choices.

This sweeping document is written every twenty years and is amended during the years between. The latest Comprehensive Plan was written in 2006 and amended in 2011. In 2016, the Office of Planning (OP) began another amendment process. The agency’s amendments—also referred to as the introduced version or

Mayor’s Proposal—were submitted to the Council of the District of Columbia in April 2020. After public hearings on the proposal in November 2020, the proposal was further amended by Chairman Mendelson. This version—the Committee Print—is the version currently before the Council in spring of 2021.

The Plan has 25 chapters (called elements) and two maps—the Future Land Use Map (FLUM) and the Generalized Policy Map (GPM). The elements are as follows:

ELEMENT	ELEMENT TYPE	DESCRIPTION
1	INTRODUCTION	This element covers the plan’s legal basis, outlines its history and role in planning, and provides an overview of its content.
2	FRAMEWORK ELEMENT	This element was introduced in 2018. Its second and final reading was in October 2019, and it passed independently of the rest of the Comprehensive Plan in February 2020. It is the plan’s foundation. It describes the forces driving change in the city, describes the District’s growth forecasts and projections, ties the Plan to the “Vision for Growing an Inclusive City,” and provides an overview of the plan, the plan’s role, and the attached maps.
3-14	CITYWIDE ELEMENTS	These elements address District-wide topics such as land use, transportation, housing, educational facilities, historic preservation, environmental protection, and economic development, among others.
15-24	AREA ELEMENTS	These elements describe the history, land use composition, demographics, housing characteristics, planning and development priorities, and policies specific to the District’s ten planning areas. For example, these include Upper Northeast, Far Northeast and Southeast, Near Northwest, and Rock Creek East, among others.
25	IMPLEMENTATION ELEMENT	This element “describes how the Comprehensive Plan’s recommended actions are to be carried out, and by which government agencies.” ⁶ This element also includes time frames indicating whether an action is ongoing or should be completed immediately, in the short-, medium-, or long-term, or is complete or obsolete.
MAP #1	FUTURE LAND USE MAP	The Future Land Use Map, often referred to as the FLUM, shows “anticipated future land uses.” These could align with current land uses or they could be different. For example, this could show an area change from a “residential-moderate density” zone to a “residential-moderate density” <i>and</i> “commercial-moderate density” zone.
MAP #2	GENERALIZED POLICY MAP	This map highlights future areas of resilience and planning analysis.

HOW DID CORE REVIEW THE COMPREHENSIVE PLAN?

This Racial Equity Impact Assessment (REIA) primarily evaluates how the Comprehensive Plan’s proposed policies and actions will improve outcomes for Black residents and other communities of color, exacerbate racial inequities, or maintain the racially inequitable status quo.

CORE customized our approach given the Comprehensive Plan’s unique qualities. The customized approach builds on [our typical practices](#), but tailors to the document’s length, number of topics covered, role in the District’s zoning decisions, and the timing of our assessment.

⁶ [Introduction Element](#), Mayor’s Comprehensive Plan Update Proposal.

CORE assessed the Committee Print in comparison to the introduced version of the bill.

Since 2006, there have been three versions of the Comprehensive Plan. The first version was passed in 2006 and slightly amended in 2011. The creation of the second version was led by the OP. The Office of Planning submitted this draft to the Council in April 2020 on behalf of Mayor Muriel Bowser’s Administration. This version was “introduced” as Bill 23-0736. Chairman Mendelson and his staff further edited this draft to create the third Comprehensive Plan update proposal, known as the Committee Print. The Committee Print was shared internally with Councilmembers and Council staff on April 14, 2021 and is the draft under consideration by the Council.

Our REIA process began with assessing the introduced version of the bill (the proposal led by the OP). We considered how the introduced version does, does not, or could advance racial equity. We provided the Chairman with a preliminary racial equity impact analysis of the

introduced version, which is summarized in detail in the Appendix of this document. We then reviewed the Committee Print in comparison to the introduced version. Both our preliminary analysis of the introduced version and our assessment of the Committee Print are included below. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Our analysis is based in historical context.

To understand the present, we must contextualize it in our past. We consult history to understand why racial inequities exist. What policies, decisions, actions, and sentiments explain how different racial groups experience life today?

Our analysis evaluates policies using the “Groundwater Approach.”

The [Groundwater Approach](#) aims to treat systems,⁷ not just problems at the individual level. The approach is grounded in three ideas: 1) that white supremacy ideology operates the same across systems; 2) socioeconomic difference does not explain racial inequity; and 3) inequities are caused by systems, regardless of people’s culture or behavior. Using the Groundwater Approach, a city in a housing crisis would not only

DATE	EVENT	VERSION
2006	The most recent full rewrite of the Comprehensive Plan is published.	1
2011	Minor amendments are made to the Comprehensive Plan.	
2016	The Office of Planning begins the Comprehensive Plan amendment process.	2
FEBRUARY 2020	The Framework Element (Chapter 2 of the Plan) is signed into law.	
APRIL 2020	The Office of Planning submits their proposed amendments to the 2006 Comprehensive Plan on behalf of Mayor Muriel Bowser’s administration. This submission is referred to as the introduced version of the bill and is numbered Bill 23-0736: Comprehensive Plan Amendment Act of 2020 .	
NOVEMBER 2020	The public testifies before Council on November 12th and 13th about the introduced version of the Plan.	
JANUARY 2021	The Plan is re-introduced in Council Period 24 as Bill 24-0001: Comprehensive Plan Amendment Act of 2020 .	
APRIL 2021	Chairman Mendelson releases the Committee Print for review by the Committee of the Whole.	3

⁷ These systems include structural and institutional racism. [Structural racism](#) is a system in which public policies, institutional practices, cultural representations, and other norms work in various, often reinforcing ways to perpetuate racial group inequity. It identifies dimensions of our history and culture that have allowed privileges associated with “whiteness” and disadvantages associated with “color” to endure and adapt over time. [Institutional racism](#) refers to policies, practices, and procedures that work better for white people than for people of color, often unintentionally.

provide temporary shelter to individuals experiencing homelessness. Rather, the city would *also* seek to understand and address the underlying—or groundwater—issues that sustain and cause homelessness.

Our analysis evaluates policies through a racial equity lens.

In addition to considering how history led to present conditions, we analyze proposed policies through a racial equity lens, which can be thought of as a prism. Looking through different sides of this prism could mean asking one, several, or all the following questions:

RACIAL EQUITY ANGLE	POSSIBLE QUESTIONS
EXPERIENCES OF EACH RACIAL AND ETHNIC POPULATION	How does each racial and ethnic group currently fare given the outcome this policy aims to improve? Which racial and ethnic groups would be most affected by this policy? Does the policy address these differences? If so, does the policy consider each community differently or are groups incorrectly lumped together? How proportionate is the policy to the inequities faced by each racial and ethnic group?
HISTORICAL LEGACIES OF RACISM AND RACIAL TRAUMA	Why do different racial and ethnic groups fare differently when we examine the outcome of interest? Which of these historical legacies continue to be implicated today, either via the policy at hand or in how the policy might be perceived?
RACIALLY EQUITABLE REPRESENTATION AND ENGAGEMENT	Who does the current feedback system favor? Who was “at the table” when decisions were made and who was at the table but did not have institutionally or socially recognized power to influence decisions? Who wasn’t but should have been? Who could have feasibly been there? Who was proactively invited? Whose lived experience was centered? Whose lived experiences are ignored? What advantages and disadvantages do different parties have when they are “at the table” and how do those parties look from a racial and ethnic perspective?
ASSESS DIFFERENT FORMS OF DISCRIMINATION	What do the eligibility and application processes for services and programs look like? In what ways are they inclusionary, in what ways are they exclusionary, and to whom? How are these processes being monitored for bias?
DIFFERENCES IN OUTPUTS⁸ FOR RACIAL AND ETHNIC GROUPS	What are the outputs of interest (or progress indicators) for this policy? What could the outputs be for each affected racial and ethnic population? Might the outputs be different across groups? Why? Does the policy indicate that outputs will be monitored and addressed?
DISPARATE RACIAL AND ETHNIC OUTCOMES	What could be the impact of this program or policy on each affected racial and ethnic population? Might the impacts be different across groups? Why? Is there an indication that outcomes will be monitored and addressed?

Framework adapted from [The State of Equity Measurement](#) (The Urban Institute) and [Using a Racial Equity Scorecard for Policy and Programs](#) (Bread for the World Institute).

If we determined that a policy exacerbates racial inequity (or has the potential to), we explain why. We then provided direction on how to revisit or analyze the policy with a racial equity lens.

⁸ An “output” is an easily measurable indicator related to a program or policy’s activities. An “outcome” is the true goal of the program or policy. For example, a student attendance program would measure the number of days a student is in school as an *output* to better understand how the program is affecting the *outcome* of better school performance. Policymakers and implementers must keep an eye on both.

Our analysis focused on the Plan’s most critical elements.

Every element in the Comprehensive Plan has the potential to impact Black residents and other residents of color. However, we focused on elements that 1) could have the most *profound* impact on Black residents and other residents of color and 2) were the most influential given the Comprehensive Plan’s role in zoning. These guidelines led the CORE team to conduct an in-depth, line-by-line analysis of the following elements (chapter numbers in parentheses):

- Land Use (3)
- Transportation (4)
- Housing (5)
- Environmental Protection (6)
- Economic Development (7)
- Parks, Recreation, and Open Space (8)
- Educational Facilities (12)
- Infrastructure (13)
- Implementation (25)

SUMMARY OF RACIAL EQUITY IMPACT THEMES

Several recurring themes prevent the Comprehensive Plan (as introduced) from advancing racial equity. We hope that these themes can be used as a resource by Councilmembers, the public, and the executive in applying a racial equity lens to review the Committee Print. The eight themes are listed below and are elaborated on over the following pages.⁹

P O L I C Y	1	As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.
	2	As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.
	3	As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.
	4	Vague and ambiguous language leaves room for interpretation that may widen racial inequities, harming the District’s Black residents and other residents of color.
P R O C E S S	5	As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.
	6	As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.
	7	As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.
	8	As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.

⁹ Please keep in mind the examples below are based on the introduced version and illustrate how we arrived at the stated themes. In many instances, these examples have been modified in the Committee Print.

HISTORICAL AND COMPREHENSIVE CONTEXT

ISSUE

As introduced, Bill 24-0001 lacks an honest historical narrative and provides a selective view of the present. This approach normalizes structural racism, laying a faulty foundation for policymaking.



The Plan oversimplifies, glosses over, omits, and disguises defining moments in history. The continued displacement of and discrimination against Black residents and [other communities of color](#) is largely ignored. Policies stemming from this inaccurate context will not—and cannot—address racial inequity.

BEST PRACTICE

Achieving racial equity requires acknowledging and accounting for historical trauma. In addition, to address racial inequities, we must acknowledge the full context of our present.



The past explains why Black communities and other communities of color experience widened racial divides to this very day. Recount history fully—especially when the truth is tough—and take a comprehensive look at our present when beginning the policymaking process.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 512.2

As introduced, this section reads, “in the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.” The section mentions redlining—which is critical when discussing housing policy—but then [omits that home loan funds](#) were withheld from Black residents and people of other ethnicities. Ignoring the past will not erase [its audacities](#); this policy [impacts Black residents to this day](#).

ADDITIONAL EXAMPLE | PARKS, RECREATION, AND OPEN SPACE ELEMENT

There is a lack of consideration for the unhoused population who utilize parks and open spaces in the District. The Parks, Recreation, and Open Space Element fails to mention the [unhoused population](#), many of whom encamp in District parks. In fact, eighty six percent of the [unhoused population in the District](#) are Black, although only forty seven percent of the District’s population is Black. Still, the element does not account for their experiences or needs.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

Section 312.1 of the Land Use Element ignores how [discriminatory government sanctioned practices](#) led to DC being one of the most segregated cities in the nation. The section only notes that, “many of Washington, DC’s neighborhoods were developed before 1920 when its first zoning regulations were applied.” This overlooks how prior to the 1920s, wealthy property owners and developers used [racially restrictive covenants](#) and the courts to wield tremendous influence in designing the District. This often unchecked

power was reinforced by court rulings such as [Costin v. Washington](#) and paved the way for [restrictive covenants post-1920](#) to become commonplace.¹⁰

HOW THE COMMITTEE PRINT ADDRESSES HISTORICAL AND COMPREHENSIVE CONTEXT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s efforts to include a more historically informed and comprehensive narrative in the Comprehensive Plan.

Initially, the introduced version was ahistorical, neglecting to mention or fully discuss critical moments and patterns that shaped the District. The Committee Print now discusses the role of highways in displacing Black communities (Section 400.11), the discrimination inherent in the creation of Metrorail (400.11), and the District’s role in reducing affordable housing options (510.3). In addition, the investment in the area around the Columbia Heights Metro station was portrayed as a pure “success story” without mentioning the displacement of Black and Latinx residents, but the Committee Print now adds this missing context (506.3).

The Committee Print also added a new action to the Land Use Element (Action LU-2.1.C) requiring additional study, public engagement, consideration of the District’s history of systemic racism and distinct land use and housing patterns. The purpose of this study is to help provide policymakers with a better understanding of how policies have created inequities, best practices to address land use inequities, and encourage more equitable development objectives.

The introduced version was also selective in the context it provided about the present. Now, the Committee Print’s Economic Development Element addresses income and wealth gaps (700.6*¹¹, 703.2).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹⁰ *Costin v. Washington* (Case No. 3,266) – Oct. Term, 1821 – [The Federal Cases: Comprising Cases Argued and Determined in the Circuit and District Courts of the United States](#), accessed April 2021.

¹¹ If a section number is marked with an asterisk, it denotes a new section that was added in the Committee Print. Please note that as the Print was drafted, section numbers may have shifted.

RACE NEUTRAL POLICIES

ISSUE

As introduced, the Comp Plan’s policies are race neutral, aiming to improve outcomes by providing the same tools and resources to everyone—despite deep and persistent racial inequities.



Passing race neutral policies today perpetuates the past. Simply, if racist policies have led to white communities having “more” and communities of color having “less,” treating everyone the same today will not change that inequity. Unfortunately, the introduced Plan does just that: its proposed solutions are not in proportion to racial inequities and focus on equality and inclusivity.

BEST PRACTICE

Tailor policies to address racial inequities by [acknowledging](#) how Black communities and other communities of color have their own distinct history, experiences, and relationship to white supremacy.



When designing policies, consider how different racial groups may be affected based on their history and current experiences. Write policies with [community- and circumstance-specific](#) solutions that treat communities equitably rather than equally (by providing everyone the same solution). Ensure that relevant outputs and outcomes are monitored for disparate impacts.

ILLUSTRATIVE EXAMPLE | ECONOMIC DEVELOPMENT ELEMENT | SECTION 703.15

This policy cites the District’s goal to “support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance” and a range of other tools. This policy would provide the same level of support to *all* local entrepreneurs—despite the fact that Black owned businesses [make up less](#) than fourteen percent of total businesses in the District, while Black residents make up forty five percent of the population. (In contrast, seventy one percent of businesses are white owned, and about fifteen percent of businesses are owned by Asian or Pacific Islanders.) This policy also ignores that between 2016-2018, less than twenty six percent of [contracts awarded](#) in the District went to minority owned businesses. It also ignores that since COVID-19, forty one percent of [Black owned businesses have closed](#) compared to seventeen percent of white owned businesses (due to the pandemic).

ADDITIONAL EXAMPLE | TRANSPORTATION ELEMENT | SECTION 415.7

Section 415.7 considers the use of roadway pricing, where drivers would be “charged via electronically read debit cards for entering the central portion of the District.” Congestion pricing is likely to have a disparate income on Black residents without explicit recognition and reflection of the [income differences](#) between racial groups in the District. This policy consideration is even more troubling given how many Black residents commute [via car](#) because they have been pushed to the outer edges—and outside of—the District due to rising housing costs.

In addition, this section assumes that all drivers have debit cards. As noted in [the Council’s Committee Report for Bill 23-122](#), “one percent of white households are unbanked, in contrast to twenty one percent of

Black households. Another thirty six percent of Black households are underbanked,” illustrating the consequences and shortcomings of a race neutral lens.

HOW THE COMMITTEE PRINT ADDRESSES RACE NEUTRAL POLICIES

Based on a sampling of sections—although the Committee Print takes steps in the right direction—CORE remains discouraged by the Committee Print’s race neutral approach. We are strongly encouraged by the Committee Print’s Economic Development Element. However, in other elements such as Housing, Land Use, and Transportation, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan.

Initially, the Economic Development Element largely ignored structural inequity, the racial wealth gap, and any centering of businesses owned by Black residents and other residents of color. Now, the Committee Print addresses what a racially equitable economy looks like (Section 700.6*) and contemplates policies and actions that center the experiences of the Black community and other communities of color.

The Print includes policies that actively advance racial equity. New language calls on the District to advance racially equitable economic development by “disrupting systems that perpetuate income and wealth inequality.” Section 703.20 (Action ED-1.1.A) now requires the Economic Development Strategic Plan to “identify approaches that provide recruitment and opportunities to participate by small and minority-owned businesses, and approaches to close the racial income and wealth gaps in the District.”

In addition, Section 703.15 (Policy ED-1.1.4) initially talked about providing support for *all* District residents seeking entrepreneurship opportunities. This section omitted the fact that Black owned businesses in the District are [struggling](#), [closing](#), and receiving [technical assistance](#) at inequitable rates. The Committee Print addresses this concern by adding language to provide support to [equity impact enterprises](#) (small, local businesses that are likely to be owned by Black residents or other residents of color).

However, in other elements, the Committee Print does not fully overcome the race neutral policies of the introduced Comprehensive Plan. For example, Land Use Section 307.15 (Policy LU-1.4.6) deals with parking near Metro stations. Below, we analyze an instance where the Committee Print takes strides, but more steps could be taken to truly address racial inequity.

	INTRODUCED VERSION	COMMITTEE PRINT (change in bold)
PLAN TEXT	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.	Parking [around transit stations] should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters, while considering the commuting characteristics of District residents, such as access to transit stations and mode use, to provide equitable outcomes. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station.
ANALYSIS	This section unilaterally discourages parking and deprioritizes the needs of all-day commuters without considering why some commuters may be driving. “There is a deep racial divide in commuting modes ,” according to the DC Policy Center. 47 percent of Black or African American residents drove to work in 2015, compared to about 28 percent of white residents. This is because of proximity to transit and employment of opportunities, which are deeply intertwined with race.	The Committee Print takes a step toward acknowledging commuting differences, but the core policy remains unchanged in the Print. The referenced study specifically speaks to racial disparities in driving to work, but it is important to be mindful of racial inequities in commuting modes and we must consider the specific needs of all-day commuters. If this policy took a groundwater approach, it would ask, “what is the racial makeup of all-day commuters parking at Metro stations? What does the data tell us about who they are? What would the outcome be if the needs of all-day commuters were deprioritized?”

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE STRENGTH

ISSUE

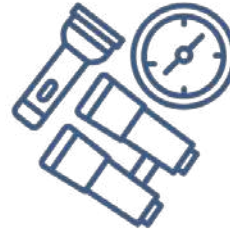
As introduced, the Comp Plan often replaces strict and enforceable language with softer, aspirational, and nonbinding language.



Bill 24-0001 significantly weakens the language of the 2006/2011 Plan. The introduced version often expresses the District’s aspirations rather than its commitment and obligation to policies or actions.

BEST PRACTICE

Policies that are straightforward, enforceable, and account for racial inequities advance racial equity.



Binding language is clear to follow. It leaves little room for interpretation, improving the likelihood that policies are executed as intended. Strong directives also hold the government accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 511.7

Previously this policy read, “ensure compliance with the Community Investment Act of 1977, which prohibits the practice of redlining local neighborhoods.” As part of the 2020 amendments, the section was updated to say that “redlining...*should be prohibited*.” Given the racist history and [enduring legacy](#) of redlining practices, full compliance with fair housing laws must be fully enforced and complied with.

ADDITIONAL EXAMPLE | HOUSING ELEMENT | SECTION 510.16

In the introduced version of the Comprehensive Plan, Section 511.7 read, “tenants *should* be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.” Previously, the section *required* that tenants were provided information about their rights. The introduced version weakened this push for tenant rights, reverting from a requirement to an ideal.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE STRENGTH

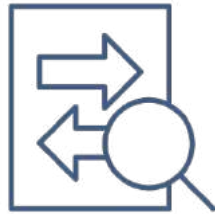
Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s return to the strong, strict, and clear language of the 2006/2011 Comprehensive Plan. In the Housing Element, for example, Sections 510.1, 506.11, 511.7, and 514.8 state the District’s intent clearly and strongly.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

LANGUAGE CLARITY

ISSUE

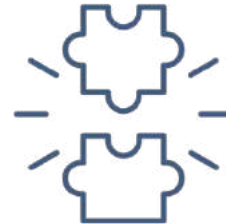
Vague and ambiguous language leaves room for interpretation that may widen inequities, harming the District’s Black residents and other residents of color.



Vague language like “greatest extent feasible” and “substantial share” lacks accountability. Similarly, ambiguous language like “neighborhood character,” “high need,” and “equitable” are used without contextual definitions.

BEST PRACTICE

Use clear and specific language to ensure all parties understand expectations and can be held accountable. Name specific racial and ethnic groups where possible and relevant.



Straightforward writing improves the likelihood that the policy will drive change instead of only offering platitudes. With clear policies, implementing agencies can also be held accountable.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 510.12

This policy notes that “as affordable housing reaches the end of its functional life, [the District must] support the redevelopment of the site to the greatest extent feasible in line with the District’s goals and strategies regarding equity and inclusion.” Affordable housing is a limited but critical resource in the District, and this section is concerningly vague about what would happen when such housing becomes less viable. First, it is unclear what type of “affordable housing” is being referenced, which is important given how different funding sources (and potentially other factors) define “functional life.” (While the Committee Print does define how it uses the phrase “affordable housing,” the definition is limited to the tenants’ income threshold, not the funding source.) Second, it is unclear which “goals and strategies regarding equity and inclusion” apply and racial equity is not specifically mentioned. Third, it is unclear how the Zoning Commission will measure feasibility—financial, or something else? This phrasing leaves the future of affordable housing—and more important, the future of residents who reside there—at the discretion of the Zoning Commission’s interpretation.

ADDITIONAL EXAMPLE | LAND USE ELEMENT

CORE strongly encourages the interrogation of the words we use, why we use those words, and what historical meanings are attached to words, even if they are terms of art. For example, the Land Use Element uses [amorphous](#) terms such as “preserve neighborhood character” and “established neighborhoods.” These terms are inherently biased and racially coded, and therefore should be defined to ensure clarity in how and why they are used. [Historically](#), such terms have been used to exclude Black residents in order to [maintain “exclusively” white](#) communities. Further, as drafted, the Comp Plan refers to more affluent, gentrifying communities as “established” and refers to predominantly Black or low-income communities as “emerging” or “underserved.” Such language stems from [racist language](#) that sent veiled signals to white residents about which communities were safe to rent or buy in.

Even if these terms technically do not have the same intent today, it is important to be mindful of the terms we use to characterize different communities.

HOW THE COMMITTEE PRINT ADDRESSES LANGUAGE CLARITY

Based on a sampling of sections, CORE is unconvinced that the Committee Print’s changes respond to a call for language clarity.

For example, Section 506.9 (Policy H-1.4.4) called for public housing renovations to “minimize displacement and resident moves” in the introduced version. The Committee Print changes this to read, “*to the greatest extent possible, minimize temporary displacement and resident moves.*” It is unclear who is tasked with implementing this aspirational language. In addition, if the District’s goal is to end racial inequities, CORE believes the District should set guidance to prevent and eliminate displacement, rather than minimize it.

More broadly, the language used to define communities and racial equity is inconsistent throughout the Committee Print. This largely stems from the introduced version’s language choice—but nevertheless, the Committee Print falls short of correcting this problem throughout the Plan. “Communities of color” is often used instead of explicitly naming racial groups (Sections 403.13, 628.5), and “communities of color” is often used alongside “low-income communities,” blurring the hardships caused by racism and those caused purely by income (304.7, 400.11*, 500.31). In addition, we encourage readers to be mindful that we do not use “low-income” or other phrases as substitutes to mean Black.

Further, a commitment to “equity” is sometimes the focus of the Committee Print versus “racial equity” (400.3, 504.16). Where possible, the Plan should be clear when it is speaking about equity, when it is speaking about racial equity, and why. The Comprehensive Plan’s fundamental concern is land use—it should be the Comprehensive Plan’s fundamental goal to address the lasting impacts of racial discrimination in the District’s land use.

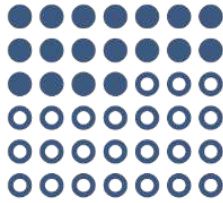
Finally, the Committee Print continues using “neighborhood character” and “historic character” despite their racist roots. The Committee Report discusses the Committee of the Whole’s evaluation of the issue, though the language remains in the Committee Print.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

DISAGGREGATED DATA

ISSUE

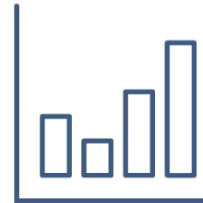
As introduced, Bill 24-0001 reinforces structural racism by reporting aggregate data and concealing racial inequities.



When aggregate statistics are used in policymaking, they tell an incomplete story and lay a mistaken foundation of the issue at hand. Put another way, aggregate statistics typically conceal the inequities experienced by Black communities and communities of color.

BEST PRACTICE

Disaggregating data by race exposes inequities, providing information necessary to deconstruct structural racism.



[Disaggregating data](#) by race highlights experiences faced by Black communities and other communities of color. Understanding these [differences](#) is critical to designing policies proportionate to racial inequities.

ILLUSTRATIVE EXAMPLE | HOUSING ELEMENT | SECTION 513.1

This section reports the District’s homeownership rate as forty two percent for all residents (an *aggregate* statistic). [Disaggregated statistics](#) show that the homeownership rate is forty nine percent for white residents, thirty five percent for Black residents, thirty percent for Latinx residents, and thirty five percent for all residents of color. Ignoring racial disparities may lead to policies that increase the District’s overall homeownership rate, while ignoring (and perhaps exacerbating) the homeownership gap between white residents and residents of color.

ADDITIONAL EXAMPLE | LAND USE ELEMENT | SECTION 304.1

This narrative section notes that “since...2006, the District’s population has grown almost twenty percent and is anticipated to reach 987,200 residents after 2045. The continued interest in living and working in the District requires a shift in planning efforts to support such growth and the challenges it brings.” The twenty percent increase in population is net growth—and doesn’t account for who has left the District and why. From 2000 to 2013, [20,000 Black residents](#) were displaced from the District of Columbia. DC was one of seven cities in the country that accounted for nearly half of the nation’s gentrification. Reporting aggregate data obscures these critical facts.

HOW THE COMMITTEE PRINT ADDRESSES DISAGGREGATED DATA

Based on a sampling of sections, CORE is encouraged by the Committee Print’s use of and call for the **disaggregation of data**. Section 513.1 and 513.2 now discuss the inequities in home ownership rates between racial groups. Section 415.8* notes the importance of “disaggregated data that identifies the mode use, ability, and access for communities of color” to inform “appropriate, equitable [Transit Demand Management] measures [and] minimize barriers to entry.”

However, there is room for improvement. In several elements, disaggregated data is mentioned in the beginning of a chapter, but not throughout the chapter. The Plan could pull in publicly available data disaggregated by race and ethnicity in additional instances. Ideally, the introduced version of the Plan should have made this effort throughout the amendment process given the length of the document.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMUNITY INPUT

ISSUE

As introduced, Bill 24-0001 does not encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making processes.



Increasing community participation can support racially equitable processes by distributing the power of decision making and elevating the voices of those not “in the room.” Community involvement is critical in planning decisions, where impacts are far reaching and long term.

BEST PRACTICE

Follow [the Framework Element](#), which calls for “those most impacted by structural racism” to be proactively and “meaningfully involved” in the planning process. Create accessible processes that are accountable to community-driven priorities.



Racially equitable planning begins with listening to, recognizing the power of, and building with the community. The District needs [new strategies](#) and [innovative methods](#) to *proactively* elevate and authentically listen to voices that have historically been excluded from planning, implementation, and evaluation processes.

ILLUSTRATIVE EXAMPLE | FUTURE LAND USE MAP + LAND USE ELEMENT

As introduced, the Comprehensive Plan does not build on the goals laid out in the [Framework Element](#) (213.6) to build capacity of the most marginalized communities to “fully and substantively participate in decision-making processes.” As introduced, the Comprehensive Plan fails to: 1) clarify how existing land use and zoning processes work and intersect with the Future Land Use Map (FLUM); 2) envision new strategies to accomplish the Framework’s goal to encourage a more inclusive community input process; and 3) maintains an existing community input process that is both exclusionary and inaccessible.

Existing [law requires](#) continuous community input in every phase of the Comprehensive Plan’s development, from conception to adoption to implementation.¹² However, the current community input process for development decisions is often technical and unclear. This advantages privileged stakeholders who have the time and resources to understand and participate in [development reviews](#), [design reviews](#), and the [map amendment process](#).

There are [many tools](#) that can be employed to [disrupt the status quo](#) and encourage new ways for community input. CORE strongly encourages employing these methods [to map how a resident](#) would learn the various community input processes and use a structured approach to [reduce complexity](#) in understanding the processes—and within the processes themselves.

¹² Existing law calls for a variety of means to secure community input throughout each stage of development, which may include developing of Small Area Plans or testifying on text amendments, for example. This may include advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication.

ADDITIONAL EXAMPLE | PRESERVING + ENSURING COMMUNITY INPUT | DC CODE 1-306.04

DC Law requires a variety of means to secure community input.¹³ One way community input is weaved into the Implementation Element is through a required periodic review of progress reports. Although these progress reports are required at least once every four years, CORE has only found two since 2000: one published in [2010](#) and the other in [2012](#).

Further, the Mayor is required to “submit to the Council a report, accompanied by a proposed resolution, on the progress made by the government of the District of Columbia in implementing the District elements of the Comprehensive Plan.” OP maintains a [website](#) showing the progress of provisions, but this still does not meet the requirements spelled out by law. The Council has also not held or scheduled public hearings on those progress reports. Additionally, Council has not submitted its findings nor a copy of public testimony to the Mayor, both of which are required by law following each review period.

These provisions of the law were created to give the community a chance to weigh in on how actions in the existing Plan impact them. These reports and hearings would have also provided an opportunity for the public to see and give feedback on key projected implementation activities that will occur following the completion of the review period.

HOW THE COMMITTEE PRINT ADDRESSES COMMUNITY INPUT

Based on a sampling of sections, CORE is encouraged by the Committee Print’s steps to clarify and strengthen community involvement. The Implementation Element now requires Small Area Plans and other planning studies be conducted using a racial equity lens (Section 2503.2). The element also requires that these and all other planning documents be evaluated using a racial equity impact analysis.

The Committee Print also adds a new policy that promotes full, transparent, and equitable participation that enables low income households, communities of color, older adults, and individuals with disabilities to participate fully and equitably. Second, it acknowledges the need to remove existing barriers which prevent equitable community participation. Some barriers include inequitable access to information and technology, availability of time, and resource constraints such as transportation.

The Committee Print takes important steps by requiring that District-led planning activities shall provide meaningful, accessible, and equitable opportunities for public participation early and throughout all planning activities. Additional language in the Print takes important steps to help residents gain clarity into navigating the various maps and review processes. New language in the Print calls for both the Future Land Use Map and the Generalized Policy Map to be evaluated for effectiveness in achieving District goals, appropriateness of categories, clarity, and ease of use. CORE is encouraged by these additions and strongly encourages racially equitable participation to help lead and shape how these goals are set and evaluated.

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

¹³ This may include advisory and technical committees, community workshops, public forums, or other means of discussion to name a few.

INTERNAL PLANNING

ISSUE

As introduced, the Comp Plan fails to equip District Government employees with the tools to take up the work of advancing racial equity.



While the Comp Plan is designed to set policies and provide guidance on land use decisions, it does not equip District Government staff and the Zoning Commission with the training, resources, and support needed to implement the Plan in a racially equitable way.

BEST PRACTICE

Proactively train staff on how to develop and use a racial equity lens in city planning. Ensure the diversity of the District is represented and reflected in all decision-making processes.



Use a variety of strategies, like [a racial equity toolkit](#), to ensure planning processes, land use decisions, and investment decisions are designed to close racial inequities. [Ensure](#) that communities and experts of color with lived and/or scholarly expertise participate *and* lead (or co-lead) decision making processes.

ILLUSTRATIVE EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2501.3

According to OP, the purpose of the [Equity Crosswalk](#) is to help the District to prioritize and target public investments, policies, and programs, particularly for those who have been most marginalized by systemic racism and structural inequity. However, it is unclear how the Equity Crosswalk will be used (and by whom) once the Comp Plan is passed into law. Nothing in the Crosswalk prepares agencies and agency staff to apply a racial equity lens to ensure programs, regulations, and operating procedures are implemented in a racially equitable way. In addition, of the ninety seven actions in the Crosswalk, the words “race” or “racial equity” are only mentioned three times. While the concept of the Equity Crosswalk is laudable, the policies and actions it contains do not focus on eliminating racial inequities.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.1

This section requires agency review of development proposals for impacts on public services and the natural environment. However, this section does not call for the Historic Preservation Review Board or other District staff to develop or be trained in racial equity assessment tools. Such tools are designed to measure and assess projects for their impacts on Black communities and other communities of color.

HOW THE COMMITTEE PRINT ADDRESSES INTERNAL PLANNING

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s updates. This includes updated language requiring District agencies to evaluate and implement the Plan’s policies through a racial equity lens (Section 2501.2). The Print also includes a separate new action item (Action IM-1.1.C) focused on providing ongoing racial equity training for development review decision-makers and

related staff. This includes staff and Zoning Commissioners, the Board of Zoning Adjustment, and the Historic Preservation Review Board.

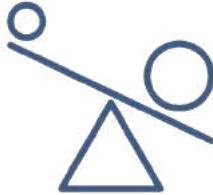
The Print also improves the Capital Improvement Planning (CIP) process by requiring the CIP to evaluate how major capital projects contribute to the goal of racially equitable development across the District (2509.3, 2509.5).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

EVALUATION THROUGH A RACIAL EQUITY LENS

ISSUE

As introduced, the Comp Plan does not require planning decisions or implementation strategies to evaluate how racial equity is or is not being achieved.



The Comp Plan requires studies, evaluations, development reviews, environmental assessments, and progress reports—but a racial equity lens is not explicitly required. A racial equity lens would center the needs, leadership, and expertise of Black residents and other residents of color, paving the way for the elimination of racial inequities.

BEST PRACTICE

Disparate impact analyses and racial equity-focused evaluations must inform planning decisions.



Frequent racial equity-focused [evaluations](#) establish critical baseline data, support the development of goals based on that data, and normalize continuous monitoring of racial equity goals. Ideally, frequent evaluations would also inform course correcting actions between evaluations.

ILLUSTRATIVE EXAMPLE | LAND USE ELEMENT | SECTION 316.1

This section requires the District “to develop criteria for evaluating rezoning requests.” However, an evaluation methodology from a racial equity perspective is not offered in this section or in any other part of the Plan. As written, how rezoning requests may adversely or positively impact communities of color would be unknown and subject to chance.

ADDITIONAL EXAMPLE | IMPLEMENTATION ELEMENT | SECTION 2502.5

This section states, “to the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods...are assessed and adequately mitigated.” However, this section does not define what positive impacts are, how they can be maximized, and for whom these impacts are to be achieved for. Moreover, it also does not define or articulate what negative impacts are.

This is an opportunity to reinforce the District’s commitment to improving outcomes and eliminating racial inequities, specifically for communities of color. Further, the development review process and decisions coming from that process can and should establish a framework that applies a racial equity lens.

HOW THE COMMITTEE PRINT ADDRESSES EVALUATION THROUGH A RACIAL EQUITY LENS

Based on a sampling of sections, CORE is strongly encouraged by the Committee Print’s incorporation of racial equity evaluations. In the Housing Element, racial equity evaluations are now embedded in a review of federal and local housing programs (Section 504.27) and the allocation of housing improvement funds

will consider historic barriers and existing racial gaps in housing access and opportunity (506.8). In the Economic Development Element, stricter monitoring of Opportunity Zones is now required (703.26).

The Implementation Element includes the most significant improvements, including perhaps the most consequential improvement to the Committee Print. A new action (2501.7*) requires that the Zoning Commission develop a process of evaluating all cases through a racial equity lens. In addition, racial equity tools are now required in the preparation of plans, zoning code updates, and the Capital Improvement Program (2509.3). Importantly, related racial equity training for staff is also required (2502.1).

These examples represent a sampling of changes made in the Committee Print. As you review the policies and actions most important to you, we hope our assessment can serve as a guide.

COMMITTEE PRINT CONCLUSION

The Committee Print makes impactful and significant changes to the Comprehensive Plan, elevating racial equity as a policy priority and stating that decisions must use a racial equity lens. These changes *do* advance racial equity. However, in the aggregate, the Plan's sheer size reduces the impact of the Committee Print's positive changes. CORE anticipates that the Committee Print is not enough to disrupt the status quo of deep racial inequities in the District of Columbia.

The Zoning Commission must now develop a process to consider *all* cases through a racial equity lens.

Perhaps the Committee Print's most important changes appear in the Implementation Element. Now, Small Area Plans should be conducted using a racial equity lens and consider the use of a racial equity impact analysis (or similar tool). In addition, the Zoning Commission must now develop a process to consider *all* cases through a racial equity lens. The Print also requires racial equity training tailored to planning for all implementing staff. These process changes will influence many plans and decisions into the future, significantly multiplying their impact.

The Committee Print also makes encouraging changes to the introduced version's policies. The Print now reports disaggregated data, requires studies through a racial equity lens, and sets new goals to encourage equitable public participation. The Print infuses a focus on eliminating racial inequities in many elements, not just in the Framework. Throughout the elements, softer language was reverted to stronger directives to protect residents and hold implementing agencies accountable. A more honest historical context and depiction of the present is recognized in several areas. And in the Economic Development Element, equity impact enterprises are now highlighted.

While the Committee Print takes key steps in some areas to improve the introduced version, these changes do not appear in all relevant instances and throughout all elements. Language remains in need of clarification, racial inequities are hidden where the Plan uses aggregate data, and historical context and racial trauma are inconsistently recognized. These issues lead to inconsistently informed and race neutral policies. These policies, therefore, are often racially inequitable.

After analyzing legislation, CORE weighs its conclusions to determine [the impact of a bill](#). This methodology, however, is difficult to apply to the Comprehensive Plan. We had to consider how much weight to give to policies, to actions, and to general guidance, all of which can vary in size and scope. This makes it hard to determine any given section's possible impact. An assessment is never a simple comparison of the number of "racially equitable" policies to the number of "racially inequitable" ones, but the Comprehensive Plan's length, breadth, and role made it even more of an undertaking. Given the scope of the Comprehensive Plan, CORE adapted our assessment to account for some of these complexities.

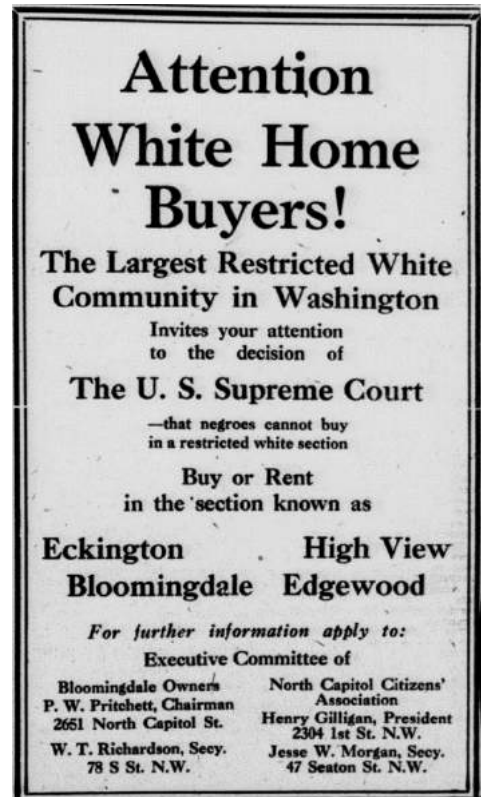
Despite the Plan's commitment to eliminating racial inequities, the document before us still perpetuates the status quo. Although the Plan primarily sets guidance, land use decisions impact every aspect of residents' social and economic wellbeing. These decisions influence housing prices, housing choice, rent burden, education, a resident's access to transit, proximity to necessities, amenities, commute time, and healthcare options.

While CORE's final assessment does not represent our opinion of whether the bill should proceed, we do hope that members, staff, and the public use it to inform debate, to improve upon the strides made by the Committee Print, and once passed, as a foundation to build upon during implementation. Specifically, this REIA aims to provide guidance on how land use decisions impact Black communities and other communities of color. It also intends to foster greater dialogue, particularly on issues related to race. We especially hope that it sparks conversation leading into the development of Small Area Plans, other long-term planning decisions, and into the 2026 rewrite.

RECOMMENDATIONS

The Comprehensive Plan document is only the guide to the District's growth. The actual growth will be determined by how residents, the Zoning Commission, Office of Planning, other executive agencies, and the Council choose to implement the Plan. Our hope is that this REIA is used as a framework to move towards a more racially equitable *administration* of the Comprehensive Plan. These implementation changes would also lay a foundation for a more racially equitable 2026 Plan (in both its drafting process and policies):

- On both the Executive and Council side, review the Comprehensive Plan law and **ensure future compliance**.
- **Restructure processes to empower communities of color with real planning and development decision-making authority.** New York, for example, uses [participatory planning and budgeting](#) to allow residents opportunities to not just participate in planning, but to have real authority to make decisions by sharing ideas, developing proposals, and voting on community projects. A similar concept can be applied locally to planning processes.
- **For the next Comp Plan rewrite, and to comply with existing law**, each Council committee should consider **holding both public hearings and community roundtables on the relevant element(s) under that Committee's purview.** This should include holding nontraditional hearings that accommodate the schedule and location needs of those with the least flexibility. This may also mean the facilitation of more informal community driven conversations such as Ramsey County's [Equity Action Circle](#), which was created to ensure the voice of the community is driving decision-making processes.
- **Review which administrative data** is collected on planning matters and how it can be used to understand how planning decisions are reducing or exacerbating racial inequities.
- Set up systems to collect and **track disaggregated data** by race and ethnicity on planning matters. Regularly evaluate disaggregated data to determine if and how decisions and policies affect outcomes for Black communities and other communities of color.
- **Establish definitive goals** to eliminate known racial inequities. These goals should be established through a racially equitable process.
- Require **specialized racial equity training** for all staff involved in planning decisions (including boards and commissions). Such training will equip staff to craft solutions proportionate to the racial historical trauma that Black communities and other communities of color in the District have faced. This training should be specific to planning in the District and include a review of the District's history (like the ad above). Lastly, this training should help staff understand how to apply a racial equity lens to the Plan's guidance, policies, programs to eliminate current racial inequities.



A 1926 ad published after racial covenants were deemed legal by the U.S. Supreme Court. ([source](#))

CAVEATS/CONSIDERATIONS

Alongside the analysis provided above, the Council Office of Racial Equity encourages readers to keep the following caveats and considerations in mind:

CORE acknowledges the Office of Planning's [efforts](#) to amend the Comprehensive Plan via community meetings, office hours, and online feedback.

Community engagement is critical to racially equitable policies and decision making. It is especially critical in planning decisions, where the impacts are far reaching and long lasting. To this end, OP held 100 community based office hours across all wards, reviewed 3,000 amendment proposals, and engaged ANCs.

In many ways, OP's planning efforts have deepened and refined the general guidance offered in the Plan. These efforts focused in on place-based planning and produced twenty-nine SAPs, strategic and long-term plans, and other planning documents such as *MoveDC*, *SustainableDC*, and *Climate Ready DC*. These growth strategies include a greater focus on affordable housing, the inclusion of resilience, and a focus on equity (although not racial equity). Collectively, these strategies are likely to accommodate growth and can generate positive outcomes for *many* residents.

However, these efforts, while commendable, do not replace the need for innovative, consistent participatory approaches that substantively and proactively includes Black communities and other communities of color early on in both planning and decision making processes.

Assessing legislation's potential racial equity impacts is a rigorous, challenging, analytical, and uncertain undertaking.

Assessing policy for racial equity is a rigorous and organized exercise but also one with constraints. It's impossible for anyone to predict the future, implementation does not always match the intent of the law, critical data may be unavailable, and today's circumstances may change tomorrow. In such a long document, there are also many policies, competing priorities, and diverse implementers. Our assessment is our most educated and critical hypothesis.

This assessment intends to inform the public, Councilmembers, and Council staff about the Comprehensive Plan through a racial equity lens.

As a reminder, a REIA is not binding. Regardless of CORE's final assessment, the legislation can still pass.

This assessment aims to be accurate and useful. It provides a representative look at the Plan but does not include a review of every element.

Given the complexity of racial equity issues, the length of the legislation, and CORE's decision to focus on the most critical elements, we have not raised *all* relevant racial equity issues present in the plan. Our hope is that by organizing this assessment into themes, we can better convey how to examine the document through a racial equity lens.

In addition, an omission from our assessment should not: 1) be interpreted as a section having no racial equity impact or 2) invalidate another party's concern.

This assessment is based on the introduced version of Bill 24-0001 and the Committee Print. It does not assess any versions that follow.

CORE reviewed the introduced version of the Comprehensive Plan and the Committee Print with a racial equity lens. Though the Committee Print will continue to be updated and amended through second and final reading, our analysis only covers the Committee Print circulated on April 14, 2021. We aim for our assessment to support the Council as they review the Committee Print and move toward passage.

Racially equitable implementation is critical.

The Council legislates and the executive branch implements. Given this, part of CORE’s review centered around whether Bill 24-0001 provided the comprehensive guidance, tools, and resources necessary to implement the policies and actions using a racial equity lens. The Recommendations Section identifies key focus points to ensure racial equity is embedded throughout the implementation phase.

APPENDIX

Please note that this preliminary analysis was conducted on the Office of Planning’s introduced version of the Comprehensive Plan.

To arrive at the eight policy and process themes in the REIA, CORE reviewed nine of the Plan’s elements in detail, line-by-line.

These reviews began with research on the racial inequities that exist today in areas like transportation, housing, and education facilities. Next, CORE highlighted sections of concern within the element. Recurring concerns were converted to feedback themes. Feedback themes for each element are listed below in **BOLD UPPERCASE** letters, along with illustrative examples from the Comprehensive Plan (as introduced).

ANALYSIS: LAND USE ELEMENT

The goal of the [Land Use Element](#) is to “establish the basic policies guiding the physical form of the District.” The Land Use Element serves as the foundation of the Comprehensive Plan and “provides direction on a range of development, preservation, and land use compatibility issues.”

An analysis of the Land Use Element’s policy proposals must begin by acknowledging how government-sanctioned practices first led to the [forceful removal of Indigenous people](#) at the expense of [colonial expansion](#), land growth, wealth accumulation, and development. With that understanding, we then begin to examine the District’s current landscape and racial disparities. Land use decisions impact key social, economic, and wellbeing indicators—determining housing prices, housing choice, rent burden, a resident’s access to transit, proximity to necessities, amenities, commute time, and healthcare options. There are deep and pervasive racial inequities in each of these stated indicators.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

20,000

20,000 Black residents were [displaced](#) from the District of Columbia between 2000 and 2013.

40%

Forty percent of the District’s Black children are living in high poverty areas. 25% of *all* children were [living in areas of racialized concentrated poverty](#).

\$3,100

The [average monthly rent](#) for a DC two-bedroom was \$3,100 in 2020. Tenants must make more than \$132,000/year to pay twenty-eight percent or less of their income on rent.

The Land Use Element takes some important steps towards advancing racial equity, like speaking to the need for *permanent, affordable rental and for-sale multi-family housing adjacent to transit*. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in land use are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
307.9	<p>The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area.</p>	<p>THIS SECTION NOTES THAT THE “FUTURE LAND USE MAP (FLUM) EXPRESSES THE DESIRED INTENSITY AND MIX OF USES...” BUT OMITTS WHO DESIRES THESE INTENSITIES AND USES.</p> <p>The Framework Element explicitly calls for communities of color and “those most impacted by structural racism” to be “meaningfully involved in the creation and implementation of institutional policies and practices.” However, the Land Use Element does not actively encourage community participation in innovative ways, explicitly mention Black communities and other communities of color, or offer general guidance on methods to encourage community participation (see</p>

		<p>Framework Element, page 33). Since 2006, twenty-nine Small Area Plans have been completed. However, the SAP process should be more transparent, predictable, and used as an opportunity to foster greater public participation in a racially equitable way.</p>
<p>308.4</p>	<p>Infill development may also include the restoration of vacant and abandoned structures. In 2003, there were an estimated 2,700 vacant and abandoned residential properties in the District. While the number has declined since then, some parts of Washington, DC continue to have a relatively higher amount of vacant buildings.</p>	<p>CRITICAL PARTS OF HISTORY ARE OVERSIMPLIFIED AND ERASED.</p> <p>This section leaves the impression that vacant or abandoned structures are naturally occurring phenomena rather than outcomes of discriminatory federal and local practices, such as predatory lending, the housing bust and foreclosure crisis that exacerbated wealth inequities, and the devaluation of assets in Black neighborhoods.¹ By not acknowledging <i>how</i> these conditions came to be may explain the section’s failure to articulate <i>why</i> “some parts of the District continue to have a relatively higher number of vacant buildings” than other parts of the city. (Also see Sections 311.2 and 311.4.) According to American Community Survey data, Ward 8 has the highest vacant housing units at just over thirteen percent compared to Ward 3, which has the lowest at about six and a half percent.</p>
<p>310.6</p>	<p>During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities. This does not mean that all neighborhoods should become the same or that a uniform formula should be applied to each community. Rather, it means that each neighborhood should have certain basic assets and amenities. These assets and amenities should be respected and enhanced where they exist today and created or restored where they do not.</p>	<p>THE ELEMENT DEVIATES FROM THE GOALS OF THE FRAMEWORK ELEMENT.</p> <p>This section illustrates how the Land Use Element deviates from the goals set forth in the Framework Element. The Framework articulated the need to 1) target support to communities of color through policies and programs; 2) center and “focus on the needs of communities of color”; and 3) remove barriers so that such communities can participate and make informed decisions in the planning process.</p> <p>First, to only “strive for greater equity” is inconsistent with the Framework’s goal to eliminate racial inequities. Further, the focus must be on racial equity, not just equity. Second, language such as “greater equity across all neighborhoods,” fails to center the needs and experiences of communities of color in the District. Third, instead of “focusing on the needs” of communities of color we should leverage and cultivate the leadership and expertise that exists within Black communities and other communities of color. Next, language such as “assets and amenities should be respected” places the focus on assets and amenities instead of explicitly focusing on the residents of those neighborhoods where these assets and amenities should be restored or created. Finally, using the phrase “basic assets” is unclear. Who gets to determine basic? And giving Black</p>

¹ In 1956, the Federal Aid Highway Act, signed by President Dwight Eisenhower provided local municipalities with funding for highway construction costs. This Act created massive and hasty freeway projects. These projects displaced thousands of Black and brown residents, destroyed Black and brown neighborhoods, confiscated the homes of Black residents, and led to [decades of litigation](#). During that time, many of those homes sat vacant.

		communities “basic” amenities while other communities already have more will likely maintain or widen racial inequities.
310.22	Conduct an ongoing review with periodic publication of social and economic neighborhood indicators for the purpose of targeting neighborhood investments, particularly for the purposes of achieving neighborhood diversity and fair housing .	PROVISIONS TO TRACK, EVALUATE, OR ASSESS ADVERSE IMPACTS ON BLACK COMMUNITIES ARE NOT INCLUDED. The policies and actions in the Comp Plan can only advance racial equity if the proposed policies and actions are “ specific, measurable, attainable, relevant, and timely .” This section is vague, does not mention racial equity considerations, or define what neighborhood diversity is. In addition, nowhere does the Land Use Element explicitly give directions to close racial inequities nor does it expressly call for the creation of, monitoring of, or direct reporting of measures that can gauge the impact of proposed policies and actions on achieving racial equity (for example, see Section 310.22).

ADDITIONAL ISSUES/CONCERNS

PRIVATE INVESTMENT IS HEAVILY RELIED ON: Although leveraging private investment is an important development strategy, at times the Land Use Element appears to heavily rely on that investment instead of encouraging innovative or proven public strategies and sustained public investment.

For example, section 315.4 notes how the goal is to “free up land” on the one hand but then proposes to make it available for *both* public and private investment. The section is also silent on how the plans to reorganize and consolidate would be executed, who helped develop the aforementioned plans, what the government’s role would be, and what the role of private developers would be.

AMBIGUOUS LANGUAGE, UNDEFINED TERMS, AND WEAKENED LANGUAGE ARE USED: The Land Use Element does not define terms such as “affordable housing” and “range of incomes” (among others) that may help the public, OP, and zoning commissioners implement and understand the policies. Much of the element’s language is weak—it more often expresses the District’s aspirations as opposed to their commitment and obligation to the stated policies or actions (For additional examples, see Section 310.8 (use of aspirational tones); 310.11 (which does not define what constitutes an “area characterized by vacant, abandoned, and underused older buildings), and Sections 313.14 and 306.13 (which strike stronger existing language for weaker language).

ANALYSIS: TRANSPORTATION ELEMENT

The [Transportation Element](#)'s goal is to “create a safe, sustainable, equitable, efficient, and multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.”

To examine the Comprehensive Plan’s policy proposals, it is critical to examine the District’s current transportation landscape and how the landscape is deeply connected to racial disparities in commuter experiences, environmental and health impacts, along with access to grocery stores, schools, health care, and access to commercial retail. Racial inequity in the District’s transportation landscape has historical roots in the segregation, displacement of, and disenfranchisement of Black, Indigenous, and residents of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) is seventeen percent in Wards 7 and 8. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

48%

Forty eight percent of DC’s [bus riders](#) are low-income, compared with eighteen percent of rail ridership.

51%

Fifty one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7.

The Transportation Element takes important steps towards advancing racial equity, like acknowledging that transportation should not be a barrier to economic opportunity in the District (Section 403.13). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to racial transit inequities and accessibility divides are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
408.2	Washington Metropolitan Area Transit Authority (WMATA) was created in 1967 by an interstate compact to plan, develop, build, finance, and operate a balanced regional transportation system in the national capital area. Construction of the planned 103 mile Metrorail system began in 1969 and was largely funded by the federal government. The first phase of Metrorail began operation in 1976 and was completed in early 2001.	<p>THE CONTENT IS AHISTORICAL.</p> <p>WMATA’s history is mentioned, but the driving force behind the metro is not. By omitting the full history of its creation, the narrative about residents’ proximity to the Metro may enable exclusionary policies that do not consider racial equity. When the element does recognize the history of the District’s transportation systems, the history shared is vague and excludes defining moments in which Black residents and other residents of color have been excluded from transit systems.</p>

<p>408.2</p>	<p>While much of the District is within a half mile of a station, some areas— such as Georgetown, the New York Avenue corridor, and Bolling Air Force Base—are not.</p>	<p>PLACES, NEIGHBORHOODS, AND COMMUNITIES ARE INCONSISTENTLY MENTIONED.</p> <p>This section omits several areas that are not within a half mile of a station (such as Hillcrest and Fairfax Village). These omitted areas are in Ward 8, which is the ward of residence for many Black and Brown residents. Despite being focused on transportation throughout the District, this element inconsistently mentions specific places that are impacted by or will be impacted (see Map 4.1 within this element).</p>
<p>400.2</p>	<p>The critical transportation issues facing the District are addressed in this element. These include:</p> <ul style="list-style-type: none"> • Eliminating fatalities and serious injuries on the transportation network; • Expanding the District’s transportation system to provide alternatives to the use of single-occupant autos; • Enhancing the District’s corridors for all modes of transportation; • Increasing bicycle and pedestrian connections, routes, and facilities; • Improving the efficiency of the existing transportation system; • Investing in bridge and roadway maintenance and repair; • Investing in transit network maintenance and repair; • Reducing pollution and negative health and environmental effects resulting from transportation; • Promoting transportation demand management (TDM). 	<p>STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM ARE NOT CONSISTENTLY ACCOUNTED FOR.</p> <p>Racial equity and accessibility are not listed as goals, despite these being critical transportation issues. Research notes that transportation policies have historically excluded a racial equity lens. This is especially true in DC, dating back to the early fight against freeways in the District. By not centering racial equity in the goals of the element, Black residents will continue to be negatively impacted.</p> <p>This section goes into detail about improving outcomes and promoting access yet does not discuss the glaring disparities in the District’s transit. It acknowledges the existing “pollution and negative health and effects resulting from transportation,” but fails to note these impacts disproportionately impact Black residents, particularly those living near major roadways such as 295 (see Map 4.4 in Section 412.3 and Map 4.5 in 412.8).</p> <p>Generally, the element does not take opportunities to consider how to eliminate barriers to transportation and environmental justice (Section T-5 on Technology and Innovation being an exception).</p>
<p>415.5</p>	<p>For instance, [the District] is helping to educate the public about various shared mobility options in the District, including point-to-point and traditional carsharing services. The District’s ultimate goal is to reduce reliance on single-occupancy vehicles and reduce vehicle miles traveled (VMT). To incentivize the use of shared cars and encourage the private sector to expand car-sharing programs, the District has designated strategic curbside parking spaces for these vehicles, accompanied by educational brochures to help explain this service to the public.</p>	<p>THE EXPERIENCES OF THE BLACK COMMUNITY AND OTHER COMMUNITIES OF COLOR ARE NOT CENTERED.</p> <p>This section mentions the District’s “ultimate goal...to reduce vehicle miles traveled” but only focuses on carsharing and technologies to achieve it. This does not center the experiences of communities in Wards 7 and 8, where ninety percent of residents are Black. These communities are hit hardest by lack of access to grocery stores and have to travel farther for employment opportunities, often by car.</p> <p>It also fails to center the experiences of residents that have been pushed out of the District but must rely on vehicle travel into the area for employment opportunities.</p>

		By not centering these experiences and racial equity, the section does not address one of the root causes of vehicle miles traveled in the District.
--	--	--

ADDITIONAL ISSUES/CONCERNS

THE COVID-19 PUBLIC HEALTH EMERGENCY IS NOT MENTIONED: Transportation patterns and accessibility have shifted due to the public health emergency. It is alarming for the element to not mention or consider these shifts a year into the public health emergency, given the disparate impacts that the emergency has had on Black communities and other communities of color.

VAGUE LANGUAGE IS USED: This makes it difficult to directly pinpoint exact communities, wards, racial groups, and ethnic groups that could be impacted by the policy at hand. This is dangerous when coupled with an incomplete understanding of the history that these policies have had on communities of color. This practice also enables race neutral policies.

ANALYSIS: HOUSING ELEMENT

The Housing Element’s goal is to develop and maintain new residential units to achieve a total of 36,000 units by 2025 that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents throughout all of Washington, DC’s neighborhoods.

To analyze this element, we first examined racial inequities in housing today—the result of centuries of government-sanctioned structural and institutional racism. For example, disparities in homeownership in 2021 are driven by income disparities, wealth gaps, discrimination in lending, historic segregation practices, and subjectivity in appraisals—to name just a few factors.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

35%

Thirty five percent of District households of color [own their home](#). The rates for all racial groups are: white (forty nine percent), Asian/Pacific Islander (thirty eight percent), Black (thirty five percent), and Latino (thirty percent).

86.4%

Over eighty six percent of adults who are [experiencing homelessness](#) are Black, yet only over forty six percent of District residents are Black.

58.1%

Fifty eight percent of Hispanic households in DC are rent burdened, [higher than any other group](#). In contrast, thirty four and a half percent of white District households rent-burdened.

The Housing Element takes important steps towards advancing racial equity, like encouraging production of affordable housing in high-cost areas (Section 503.10) and supporting development of residential units that meet the needs of larger families (505.15). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to housing inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
512.2	An important part of ownership is access to financing and real estate opportunity. In the past, the practice of redlining (i.e., withholding home loan funds in certain neighborhoods) by certain lenders made it more difficult to secure home loans in parts of Washington, DC.	HISTORY IS OVERSIMPLIFIED OR ERASED. Redlining is mentioned but the text fails to mention that the practice was race-based and ethnicity-based and that its lasting and prevalent effects targeted Black residents . Ignoring the past will not erase its audacities. At the very least, it will maintain them—and likely, it will exacerbate them.

513.1	<p>Homeownership...stood at forty-two percent in Washington, DC [in 2017]. Instability in the homeownership market and limited access to credit has caused many to select rental housing. These national factors are affecting all cities, but the District still has one of the lowest rates of homeownership in the country...</p>	<p>AGGREGATE STATISTICS ARE CITED.</p> <p>While the homeownership rate for all District residents is around 42%, the rate for white residents is forty-nine percent, higher than the rate for all communities of color. Aggregate statistics ignoring disparities and may encourage policies to improve outcomes for all residents—while ignoring (and perhaps exacerbating) gaps between white residents and residents of color.</p>
513.2	<p>Home prices create a significant obstacle to increasing the homeownership rate. In September 2015, only thirty-eight percent of the homes on the market with two or more bedrooms were affordable to the median income family. While the recent increase in the supply of condominiums has improved homeownership prospects somewhat, the options for multigenerational families continue to be limited.</p>	<p>THIS SECTION DOES NOT DISAGGREGATE DATA BY RACE OR ACCOUNT FOR RACIAL DIVIDES IN HOUSING BURDENS.</p> <p>Families of color are more likely to live in multigenerational households—meaning that they have a greater need for larger homes but even fewer options. Acknowledging the race is important to 1) understand if racial groups are facing multiple barriers to homeownership and 2) emphasize that <i>not</i> creating or following through with these policies will exacerbate racial inequity.</p>
516.4	<p>Permanent housing is generally more acceptable to communities than transient housing and more conducive to the stability of its occupants.</p>	<p>PRIVELEGED RESIDENTS ARE PRIORITIZED.</p> <p>This section raises two issues: 1) describing residents of permanent/transient housing as mutually exclusive to “communities” only reinforces and condones opposition to homes for <i>all</i> the District’s residents, and 2) the ordering of this sentence places the mere preferences of the neighborhood’s current residents first—over the quality of life benefits for vulnerable residents. Permanent housing is a proven, evidence-based response to chronic homelessness that should not be mentioned as an afterthought. These instances may seem subtle, but in aggregate convey a concerning and false hierarchy.</p>
511.7	<p>Tenants should be provided information on tenant rights, such as how to obtain inspections, contest petitions for substantial rehabilitation, purchase multi-family buildings, and vote in conversion elections.</p>	<p>IDEALS ARE THE NORM, RATHER THAN REQUIREMENTS.</p> <p>Previously, the section <i>required</i> that tenants were provided information about their rights rather than this being an ideal. Oftentimes, rollbacks from “must” and “ensure” to “should” leave already vulnerable communities more vulnerable.</p>

ADDITIONAL ISSUES/CONCERNS

COVID-19’S IMPACTS ARE DOWNPLAYED: The COVID-19 health emergency is only listed twice in the Plan, despite it having a [profound impact](#) on the District’s housing outcomes—especially on residents of color and other [vulnerable communities](#).

THERE ARE CONTRADICTIONS: The Comprehensive Plan’s Framework Element acknowledges and accepts that the lengthy document contradicts itself at times. However, this is problematic from an equity lens: one section may portray one set of ideals and another may lay out a contradictory recommendation or policy.

LANGUAGE IS VAGUE OR BROAD: Vague language like “greatest extent feasible,” “substantial share,” “based on feasibility” creates room for interpretation which may further disadvantages residents of color.

ANALYSIS: ENVIRONMENTAL PROTECTION ELEMENT

The Environmental Protection Element’s goal is to ensure that the District’s “natural and man-made environment” is protected, restored, and enhanced.

To examine the Comprehensive Plan’s policy proposals, it’s critical to examine the District’s current environmental protection landscape and its historical contribution to environmental racism. The District’s current disparities in health outcomes, air quality, the concentration of industrial uses, heat vulnerability, and chemical exposure are linked to the segregation and displacement of Black, Indigenous, and residents of color. Historical practices such as racial covenants have consistently forced Black and brown residents to [live near toxic facilities](#) and highly polluted areas.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

17%

The [adult asthma rate](#) in Wards 7 and 8 is seventeen percent. Ward 5’s rate is fourteen percent. In contrast, Ward 2’s rates are about six percent and Ward 3’s under ten percent.

3

Ward 3 has the most mature [tree canopy](#). Vegetation can reduce the potential for urban heat islands. Wards 7 and 8 have the youngest canopy (due to District efforts to increase it).

51%

Fifty-one percent of the District’s [food deserts](#) are in Ward 8, followed by thirty-one percent in Ward 7. This means that it is harder for the residents of these wards to access essential resources during an extreme weather event.

The Environmental Protection Element takes important steps towards advancing racial equity, like recognizing that some residents have been and continue to be disproportionately impacted by environmental practices (Section 600.11a and 628.2). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to environmental inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
603.12	Evaluate expanding restrictions and/or require adaptive design for development in areas that will be at increased risk of flooding due to climate change . Analyses should weigh the requirement to account for climate risks with the needs of a growing District.	THE CONTENT IS RACE NEUTRAL. The proposed analyses do not explicitly consider racial equity in the development of flood-prone areas, despite communities of color facing increased vulnerabilities due to climate change. By not citing disaggregated data, it is difficult to pinpoint exact communities, racial groups, and ethnic groups that could be impacted by the policy at hand.

606.1

Washington, DC is situated at the confluence of two great rivers: the Anacostia and the Potomac...For years, the Anacostia suffered the fate of being Washington DC's lesser known and less maintained river. **As its natural beauty yielded to industry, its waters became polluted** and the river became a divide that separated some neighborhoods from the rest of the District.

THE CONTENT IS AHISTORICAL.

This section mentions the impact of historical events that allowed the Anacostia River to become heavily polluted and "some neighborhoods" to be divided from the rest of the District. However, it fails to mention how the practices came to be and does not list which locations experience and which residents live with the burden of these impacts most heavily.

When the element does recognize the history of the District's environment policies and decisions, the history shared is vague and excludes defining moments in which Black, Indigenous, and residents of color have been displaced, discriminated against, and excluded in a way that negatively impacts their health, economic standing, and quality of life.

THE LANGUAGE IS VAGUE.

Neighborhoods, communities, or wards are not mentioned by name. This makes it harder for readers to understand the impact on exact locations and harder to hold policymakers accountable to achieving racial equity in those areas. Vague language such as "throughout the District," "some areas," and "places like" creates room for interpretation which may lead to further disadvantaging of residents of color.

ADDITIONAL ISSUES/CONCERNS

FUTURE RESIDENTS AND NEW DEVELOPMENTS ARE THE FOCUS: The Environmental Protection Element heavily focuses on protections regarding new developments. While this is important to hold developers accountable, it is not balanced with protections regarding existing communities, especially those disproportionately impacted by environmental racism.

ENVIRONMENTAL JUSTICE PRINCIPLES ARE INCLUDED INCONSISTENTLY: The element starts off strong by mentioning the importance of environmental justice, but eventually falls short of including these principles throughout the entirety of the element. Additionally, the element rarely mentions how corporations or developers will be held accountable beyond general suggestions of how new development should take place. Also, while municipal and federal benefits of industrial sites (such as trash transfer sites) can accrue to all residents, the [negative impacts](#) are often only felt by some. This violates [the Principles of Environmental Justice](#).

ANALYSIS: ECONOMIC DEVELOPMENT ELEMENT

The stated goal of the [Economic Development Element](#) is to “drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status.”

To analyze this element, we first examined how specific actions and policies proposed tackled issues of wealth and income inequality. We also explored whether the proposed actions and policies are designed to combat structural inequality, whether and how they employ new approaches to close the racial wealth gap, or whether they center the needs of communities of color.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

81x

The net worth of typical white households is **eighty one times greater** than the net worth of typical Black households in the District.

14%

Fourteen percent of District businesses are Black owned, although Black residents are 45 percent of the population. By contrast, **seventy one percent of businesses in DC are white owned**, while white residents account for forty two percent of the population.

67%

Sixty seven percent of Black and fifty nine percent of Latinx residents work full-time **and earn less than \$75,000**, compared to just thirty-four percent of their white counterparts and forty-three percent of their Asian or Pacific Islander counterparts.

The Economic Development Element takes important steps towards advancing racial equity, like leveraging sustainability policies to increase the number of entrepreneurs within new and emerging industries; calls for a focus on “economically disadvantaged individuals”; as well as attempting to apply an “equity focus” on business and workforce development programs (Sections 705.6, 717.11). However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
703.15	<p>Support District residents seeking entrepreneurship opportunities through layered programs, including technical assistance, promotion of District products and services, and market development.</p>	<p>POLICIES AIM TO IMPROVE OUTCOMES FOR EVERYONE, NOT SPECIFICALLY COMMUNITIES OF COLOR.</p> <p>The Framework Element’s goal is to target assistance to communities by need. In the District, the communities that are socially and economically vulnerable also tend to be Black and Brown. COVID-19 exploited and exacerbated these vulnerabilities: a recent report that forty one percent of Black owned businesses had to close, compared to seventeen percent of white owned businesses. Therefore, it is not enough to simply promote local entrepreneurship and rely on</p>

		existing technical assistance programs that may or may not be reaching businesses owned by people of color.
703.10a	This program [Opportunity Zones], although unproven, could be a useful tool in attracting investment in communities that have historically been overlooked by many investors.	<p>THE ELEMENT RELIES ON UNPROVEN PROGRAMS.</p> <p>The Economic Development element seems to only mention minority or equity in the context of <i>incorporating</i> businesses or communities into <i>existing</i> programs, or in studying these communities (see Sections 714.6, 714.3a, 714.20) in unproven or pilot programs. As acknowledged in the text, this specific section is not based on any data or proven outcomes.</p> <p>Recently, the Urban Institute found that the Opportunity Zones (OZ) incentive is not living up to its economic and community development goals. They also found that although OZs were designed to spur job creation, most OZ capital is flowing into real estate and not into operating businesses. As drafted, this section focuses on attracting investment to neglected areas but is silent on ensuring the community benefits from that investment or that the District can ensure an equitable and participatory community-driven approach. Without such assurances, this section has the potential to further advantage investors at the expense of historically neglected areas, which in the District, tend to be communities of color.</p>
700.5	Economic development is about more than simply increasing the number of jobs and improving the District’s finances. It is also about ensuring that all residents have opportunities to thrive economically.	<p>THERE IS NO ACCOUNTING FOR STRUCTURAL INEQUALITY AND INSTITUTIONAL RACISM.</p> <p>The element does not deal with structural racism or the resulting inequities in any substantial or comprehensive way. The element is correct in saying that “economic development is about more than increasing the number of jobs and improving the District’s finances.” It should also be about closing the racial wealth gap and eliminating income inequality. To do so, it must explain why <i>certain</i> residents have had trouble “accessing “opportunities to thrive economically.” By not addressing the historical root causes of existing structural inequalities, this narrative may repeat patterns of exclusion.</p> <p>Broadly, the element does not mention barriers preventing growth along racial lines (for example, student loan debt, retirement savings, or asset-generation) and does not offer a comprehensive or systemic approach to addressing those barriers.</p>

ADDITIONAL ISSUES/CONCERNS

PERFORMANCE-DRIVEN ACCOUNTABILITY IS NOT PRIOTITIZED: In some instances, the element proposes supporting programs that may be obsolete, or have not demonstrated measurable success (see DSLBD’s [CEED program, the Made in DC program, or Healthy Food programs](#), all of which went unfunded for Fiscal Year 2021 but are referenced in the Comp Plan). Policies and actions within the element must be up to date and sufficiently resourced to have real or meaningful impact.

DATA IS NOTE DISAGGREGATED BY RACE: Disaggregating data by race helps us to better understand existing barriers and gaps facing communities of color. That data allows us to design actions and policies that will achieve equal outcomes for people of color relative and in proportion to the inequities those communities face.

VAGUE LANGUAGE AND RACE NEUTRAL POLICIES ARE PREVALENT: “Racial equity” is not mentioned once in the [seventy-five page document](#). Only vague references to “equity,” “minority,” or “economically disadvantaged” are made.

ANALYSIS: PARKS, RECREATION, AND OPEN SPACE ELEMENT

The goal of the Parks, Recreation and Open Space Element is to “preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs through universal access, promote health and wellness, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of the national capital.”

To analyze this element, we examined the current landscape of the District’s parks, recreation and open space against the historical inequity caused by Jim Crow segregation. This disparities in parks and recreational access [caused by its legacy](#) remain to this day.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

.5

Some residents in Ward 7 have to walk [more than a half mile](#) to find District owned recreation space, despite parks accounting for more than a fifth of DC’s land.

38%

Thirty eight percent of Ward 7 residents had [no exercise or physical activity](#) in the last 30 days. In Ward 8, it is about twenty six and a half percent. It is six percent in Ward 3 and eight percent in Ward 2.

86%

Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black.

The Parks, Recreation, and Open Space Element takes important steps towards advancing racial equity, like recognizing how different parts of the District may have differing interests and the need to coordinate with sister agencies such as DC Public Schools (DCPS) to improve the appearance and usefulness of schoolyards and outdoor recreational facilities.² However, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities in parks and recreational spaces are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
812.7	Investments in infrastructure have helped deliver a connected waterfront, so that the Anacostia River no longer divides neighborhoods.	HISTORICAL CAUSES OF INEQUITIES OR EXISTING INEQUITIES ARE NOT DISCUSSED. Although physical improvements to projects such as the Suitland Parkway/I-295 interchange, the Anacostia Waterfront Initiative, and the Frederick Douglass Memorial Bridge are connecting communities, the Anacostia River remains an imaginary racial dividing line. Today, neighborhoods east of the Anacostia River continue to face disinvestment in infrastructure, lack of connectivity, and lack of active green space.

<p>810.19</p>	<p>Establish a system to maintain and regularly update data and maps on parks, recreational facilities, and programming offered by DPR and affiliated providers to measure improvements in levels of service and document achievements.</p>	<p>DECISION-MAKING PROCESSES DO NOT CALL FOR DISAGGREGATED DATA AND MEASURING AND EVALUATING RACIAL EQUITY.</p> <p>Despite disparities in the distribution of parks and recreational facilities across the District, this section does not require needs assessments and demographic analyses to disaggregate data by race, or to assess if and where racial inequalities may exist. Disaggregating data by race and analyzing racial equity impacts for any recreational facility assessment can be used to better inform how park improvements are prioritized. See Actions PROS-2.1.A, 2.1.B; 2.2.1.</p>
<p>810.15</p>	<p>Evaluate proposed park facilities to determine their ability to generate revenue and help recover operational and maintenance costs. When developing new facilities, assess the projected operation and maintenance costs prior to requesting capital funding approval.</p>	<p>POLICIES LEAVE ROOM FOR INEQUITABLE IMPLEMENTATION.</p> <p>This section calls for park proposals to be evaluated for their ability to generate revenue and recover maintenance costs. However, if an evaluation shows a facility will not generate sufficient revenue, no guidance is provided. This is concerning if evaluations determine areas in high need communities or Black communities will not generate revenue.</p> <hr/> <p>MORE INVESTMENT INTO MAINTAINING DISTRICT PARKS, RECREATION, AND OPEN SPACES IS NEEDED.</p> <p>It appears the District may need to consider how to improve the efficiency of a dedicated funding source to ensure parks are attractive, safe, and receive equitable funding. The District spends less on park operations and maintenance on a per capita basis than peer cities, such as Portland, Minneapolis, and Portland (See Section 810.2).</p>
<p>809.6</p>	<p>The District has one of the highest number of aquatics facilities per capita in the country. However, sometimes these facilities are not in the best location or best condition, and sometimes they are not large enough to meet demand.</p>	<p>WHEN LANGUAGE ABOUT PLACE OBSCURES SYSTEMIC CAUSES, IT IMPEDES SYSTEMIC SOLUTIONS.</p> <p>It is unclear what this section means by “not in the best location.” As Brookings has noted, achieving racial equity requires awareness of how we use language to describe both people and places. Describing a site as “not in the best location,” without explaining what that means can reduce “communities to only their challenges, while concealing the systemic forces that caused those challenges and the systemic solutions needed to combat them.”</p>

² This section does not mention how the community will be involved in planning decisions nor does it note existing inequities. For example, in Ward 7, there are [thirteen public schools](#) that are not open for public recreational use (versus four schools in the program).

ADDITIONAL ISSUES/CONCERNS

THE DEVELOPMENT OF GREEN SPACES AND PUBLIC LANDS VARIES GREATLY DEPENDING ON GEOGRAPHIC LOCATION: Section 805.3 acknowledges the need for parks may be more critical in “some areas” but fails to specify which areas of the District would benefit.

THERE IS A LACK OF CONSIDERATION FOR THE UNHOUSED POPULATION WHO UTILIZE DISTRICT PARKS AND OPEN SPACES: The element fails to mention the [unhoused population](#), many of whom encamp in DC parks. Eighty six percent of the [unhoused population in the District](#) is Black, while only forty six percent of the District’s population is Black. The element does not account for their experiences or needs.

ANALYSIS: EDUCATIONAL FACILITIES ELEMENT

The goal of the Educational Facilities Element is to “provide facilities that accommodate population growth and inspire excellence in learning; create an adequate, safe, and healthy environment for students; and help each individual achieve their fullest potential while helping to build and strengthen local communities.” Educational facilities refer to DCPS, DC Public Charter Schools (DCPCS), local colleges and universities, and child development facilities.

Institutional and structural racism have led to [inequitable outcomes](#) for Black DC residents and other residents of color. Today, the District’s educational facilities remain highly segregated and [academic achievement gaps](#) persist.

To analyze this element, we examined the current landscape of the District’s educational facilities and asked: How are educational facilities currently accommodating population growth and how does the element plan to accommodate for future growth? Is learning racially equitable across the District? Are schools adequate, safe, and fostering healthy environments in a racially equitable way? Are investments in local communities racially equitable?

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

90%

Ninety percent of District-owned school facilities graded [in poor condition](#) in SY2017-18 were in Wards 5, 7, and 8.

18

The average driving [commute time](#) of all sixth-grade students in DC is 12.7 minutes. For sixth-grade students in Ward 7, the average driving time is 18 minutes.

94%

Ninety-four percent of DC neighborhoods with a majority white population had less than ten percent of their families [living below](#) the poverty line, while that was true of just twenty-two percent of majority Black neighborhoods.

The Educational Facilities Element takes important steps towards advancing racial equity, like acknowledging the importance of leveraging institutions such as the University of the District of Columbia and maximizing the use of in-school facilities and spaces. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to educational facility inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1202.4	The trend of population growth in the District suggests that there will be many new students in need of education, necessitating additional school facility space and financial resources.	DISAGGREGATED DATA ON POPULATION TRENDS IS NOT PROVIDED. The Element frequently mentions that the District’s general and school age population is expected to grow over the next few years. However, there is no mention of how the anticipated racial demographic changes may impact growth.

1204.1	Washington, DC has made significant progress toward modernizing DCPS school buildings , investing more than \$2 billion since 2007 to modernize 73 school buildings. The District has budgeted an additional \$1.6 billion to modernize 20 DCPS school buildings from 2019-2024.	IMPROVEMENTS TO EDUCATIONAL FACILITIES IN A RACIALLY EQUITABLE WAY IS NOT EXPLICIT. A November 2019 DCPS report found that most of the facilities in Wards 7 and 8 were labeled as poor or very poor. Yet, the element does not discuss inequities faced by Black and Latinx students. These inequities range from the lack of school resources and empty libraries to minimal mental health supports and the urgent need for equity reforms in the school modernization process .
1210.4	Each SIT [School Improvement Team] includes parents, neighbors, and members of the larger community. This team provides feedback throughout design and construction and helps disseminate information about the school improvement to peers and constituencies.	THERE ARE MISSED OPPORTUNITIES FOR COMMUNITY INVOLVEMENT. The current plan mentions the creation of School Improvement Teams (SIT) at every school. These committees include school administrators, instructors, parents, and other community members—however, the plan does not mention including students.
1204.10	Strongly support the goal of making neighborhood schools an appealing “school of choice,” where students’ academic and personal achievements are nurtured, so that children do not have to travel long distances to schools across the District.	SCHOOL CHOICE IS PLAYING OUT INEQUITABLY ACROSS THE DISTRICT. In the 2017-18 school year , more than 37,000 students (or forty-one percent) crossed ward boundaries to attend school. For example, 488 students traveled from Ward 8 to Ward 4 for school, and 34 students traveled from Ward 4 to Ward 8. This shows how school choice is playing out differently among families in the District.
1216.3	As a result of funding for the PK Enhancement and Expansion Act of 2008, as well as other quality of life improvements, more families are choosing to raise their families in the District , resulting in an increased demand for child development facilities that serve children six weeks to three years of age.	HEAVY EMPHASIS IS PLACED ON NEW FAMILIES AND TRANSPLANTS. Long before massive displacement and other forces of gentrification led to rapid demographic transformation , the District, in the 1970s, peaked at over seventy percent Black. As drafted, this section ignores the fact that Black families are and always have been in the District.

ADDITIONAL ISSUES/CONCERNS

THERE IS NO PLAN FOR VIRTUAL LEARNING: The Covid-19 pandemic halted in-person learning for the last year. As schools have made the switch to virtual learning and hybrid models, issues around racial equity, learning loss, access to services, who is able to attend when schools reopen, and an equitable reopening present new challenges to racial equity in education. The element fails to consider these challenges.

COLLABORATION IS ENCOURAGED BUT NOT SPECIFIED: Section 1216.11 requires the executive branch to “explore collaborations with educational and business partners...to increase the availability of quality early childhood education, child development, after-school, and pre-school programs for all residents, especially low-and middle-income households, and families of children with disabilities.” This section should specify the types of

partners the District should seek. The District should explore collaborations with organizations that are led by Black people and other communities of color or have demonstrated proven success working with Black communities and other communities of color.

ANALYSIS: INFRASTRUCTURE ELEMENT

The Infrastructure Element’s goal is “to provide high-quality, robust, efficiently managed and maintained, and properly funded infrastructure to meet the needs of residents, workers, and visitors in an accessible and equitable way, as well as supporting future change and growth.”

An examination of the Comprehensive Plan’s policy proposals requires analyzing the current landscape of the District’s infrastructure landscape and asking, “is investment in local communities racially equitable?” Historically, the District’s infrastructure investments have not been racially equitable. From the digital divide to water facilities, historically Black communities of Wards 7 and 8 have been overlooked.

Consider these key statistics, describing the consequences of structural and institutional racism in the United States:

70%

Less than seventy percent of households in Wards 7 and 8 have internet access.

5

Despite [thirty five percent](#) of Ward 7 residents relying on public transportation, only [five bus stops](#) in Ward 7 have [a shelter](#).

0

In 2009, there were zero green rooftops in Ward 7 compared to twenty-nine in Ward 2.

The Infrastructure Element takes important steps towards advancing racial equity, like enhancing coordination among relevant agencies and utilities when building new or modernizing infrastructure. However, there are many areas that can be strengthened. Themes likely to maintain or contribute to infrastructure inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
1312.5	<p>Minimizing the digital divide through solutions such as expanding public wireless internet access, digital literacy programs, and access to job opportunities and technical internships that focus on digitally underserved neighborhoods are core goals for Washington, DC.</p>	<p>THE DIGITAL DIVIDE IN PREDOMINATELY BLACK COMMUNITIES IS NOT ADDRESSED.</p> <p>This section does not define what a “digitally underserved neighborhood” is. Wards 7 and 8 have a ninety two percent and eighty nine percent Black population respectively. However, only forty five percent of households in Ward 7 and forty eight percent of households in Ward 8 have broadband subscriptions, compared with eighty two percent of households in Ward 2 and eighty six percent in Ward 3. The Covid-19 pandemic has multiplied the consequences of the digital divide.</p>

<p>1319.1</p>	<p>The goal for these efforts is to create vibrant new communities that are effectively integrated with surrounding neighborhoods, and that offer a high-quality experience for residents, workers, and visitors. Having infrastructure keep pace with growth will be critical in coming years, given that existing infrastructure systems may require modernization or expansion to meet the needs of these new areas.</p>	<p>THE ELEMENT DOES NOT EXPLICITLY MENTION RACIAL EQUITY.</p> <p>This section opens by listing several established communities and then proceeds to describe the goal of creating vibrant new communities. Other parts of the Comp Plan (specifically in Land Use) refer to communities that are largely Black or Latinx as “transitioning, “emerging, or “underserved” and refers to whiter, more affluent communities as “established” or “new.” As such, this language does not provide targeted assistance to those in the most need and is likely to exacerbate inequities.</p> <p>Broadly, this element does not explicitly mention the need for racially equitable infrastructure, describe how the District can ensure racially equitable infrastructure, or illustrate what racially equitable infrastructure should look like. It also does not acknowledge the history that has led to infrastructure inequities.</p>
<p>1302.7</p>	<p>This section contains a map that shows the Washington Aqueduct Service Area and Major Facilities as of 2018.</p>	<p>THE DISTRICT HAS NOT EQUITABLY INVESTED IN INFRASTRUCTURE.</p> <p>A review of the referenced map shows there are no major facilities to the east of the Anacostia River. However, as drafted, it is unclear exactly what the impacts of this are.</p>
<p>1304.2</p>	<p>Some areas in Wards 7 and 8 have historically experienced low water pressure. To improve the pressure, DC Water built a new pumping station in 2008, and in 2018, completed the construction of a new two-million-gallon water storage tower and new transmission mains at St. Elizabeth's.</p>	<p>THE LACK OF INFRASTRUCTURE IN WARDS 7 AND 8 PRESENT ONGOING PROBLEMS.</p> <p>The purpose of the pumping station is unclear given that the water pressure remains low after this project was completed. How is the District or DC Water monitoring progress to gauge effectiveness? The Comp Plan consistently references positive outputs, without examining the true outcomes of efforts.</p>

ADDITIONAL ISSUES/CONCERNS

FUTURE TELECOMMUNICATIONS IS PLANNED, BUT RACIAL EQUITY IS NOT AT THE FOREFRONT: Section 1312.1 mentions that the District “seeks to implement telecommunications policies that advance its initiatives to broaden technology infrastructure and wireless accessibility throughout the District, often in coordination with private industry and federal stakeholders.” It is unclear what the District’s role in this process will be, how this will be implemented, and how it will be targeted to address racial inequities of the digital divide (the extent of which is highlighted in the two sections that immediately follow).

ANALYSIS: IMPLEMENTATION ELEMENT

The Implementation Element “describe[s] how the policies and actions in the Comprehensive Plan should be carried out.” A priority of this element is to link relevant recommended actions to zoning regulations to “facilitate making zoning not inconsistent with the Comprehensive Plan.”

The Implementation Element “addresses the manner in which land use planning policies are interpreted and applied on a day-to-day basis.” This analysis examines whether the element’s proposed solutions will exacerbate racial inequity, maintain the status quo of racial inequity, or help to eliminate or reduce racial inequities. The litmus test for every approved policy and strategy should be its ability to narrow existing racial inequities.

Consider these metrics on the implementation of the Plan:

2

The Office of Planning conducted two [periodic progress reports](#) since 2006, despite the DC Law requiring reports every four years in the interest of transparency.³

0

Zero [statutorily required](#) public hearings have been held on the District’s progress on Plan implementation.

1

One [environmental assessment](#) has been submitted to Council since 2002 despite [DC Law requiring](#) Plan amendments include an environmental assessment.

The Implementation Element takes important steps towards advancing racial equity. For example, Section 2512.1 states that progress reports “will include monitoring data, activity and impact information that is disaggregated by...race.” As noted above, this will only be effective if the Office of Planning submits timely and accessible progress reports. In addition, there are many areas that can be strengthened. Themes likely to maintain or contribute to inequities are illustrated with examples below:

SECTION(S)	BILL 24-0001 TEXT (AS INTRODUCED, WITH AMENDMENTS ACCEPTED)	ISSUE(S)/CONCERN(S)
2501.2	An equitable District is one in which all residents have the same opportunities to thrive and prosper, where health outcomes are improved for all racial and ethnic groups, and environmental benefits are shared by everyone.	<p>POLICIES ARE RACE NEUTRAL, NOT SPECIFICALLY FOCUSING ON IMPROVING OUTCOMES FOR COMMUNITIES OF COLOR.</p> <p>Policies and actions in the Comp Plan are not consistently designed to target Black communities and other communities of color. The majority of the citywide elements rely on overly vague language. In addition, many of the strategies throughout the Plan center inclusivity and <i>equality</i> more often than racial equity.</p>

³ As drafted, Section 2512.1 does not add enforcement provisions to ensure progress reports are timely submitted and hearings are timely held.

<p>2502.5</p>	<p>To the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative impacts on neighborhoods, the transportation network, parking, and environmental quality are assessed and adequately mitigated.</p>	<p>EVALUATION OF RACIAL EQUITY IMPACTS ARE NOT CONSISTENTLY REQUIRED THROUGHOUT EACH STAGE OF THE PLANNING PROCESS.</p> <p>This section does not define what “positive impacts” are, how they can be maximized, and for whom these impacts are to be achieved for. It also does not define what “negative impacts” are. The development review process and decisions emanating from that process can and should establish a framework that applies a racial equity lens.</p>
<p>2505.4</p>	<p>Monitor social, economic, community, and real estate trends that might require land use actions or policy modifications. Incorporate current, reliable data in Washington, DC’s land use planning efforts, and use that data consistently across District agencies.</p>	<p>A ROBUST STRATEGY TO MONITOR, TRACK, AND EVALUATE OUTCOMES OR DISPARATE IMPACTS DOES NOT EXIST.</p> <p>This section does not acknowledge the need for disaggregating data by race. It follows a similar trend in the Comp Plan where explicit directions to close racial, social, and economic disparities via capital and program investments are not provided. In addition, the section does not expressly call for the creation of, monitoring of, or direct reporting about racial equity related measures.</p>
<p>2503.3</p>	<p>Small Area Plan work should consider competing demands, available staffing and time, and available funding. Such plans should address topics such as neighborhood revitalization and conservation needs, and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives.</p>	<p>THE DEVELOPMENT OF SMALL AREA PLANS DOES NOT REQUIRE THE APPLICATION OF A RACIAL EQUITY LENS.</p> <p>This section illustrates how the Implementation Element maintains expectations as opposed to disrupting or trying new approaches.</p> <p>Further, available funding and staffing should be aligned to reflect the commitments laid out by the Implementation Element. This is a principal flaw with the Comprehensive Plan. If staffing, funding, and resources are not allocated and provided, and done so in a way that will prioritize communities with the greatest level of need, inequities are likely to persist or be compounded.</p> <p>It also does not specify what “other implementation techniques” would be necessary to achieve the Plan’s objectives.</p>
<p>2507.1</p>	<p>The Zoning Commission, Board of Zoning Adjustment, and the DC Council itself provide formalized opportunities for public discourse on land use matters. The internet, e-mail, social media, and other technologies have made information instantly accessible to thousands of residents, enabling unprecedented levels of participation in community meetings, summits, and forums.</p>	<p>THE ELEMENT LACKS CONSIDERATION OF DIVERSE STRATEGIES TO ENSURE COMMUNITY ACCESS.</p> <p>This section takes important steps to ensure information is widely available to the public. However, it must also consider the digital divide in the District and find more effective ways to engage the entire community.</p>

<p>2507.3</p>	<p>Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation.</p>	<p>THE ONUS IS PUT ON THE COMMUNITY TO ENSURE THEIR OWN ENGAGEMENT.</p> <p>The onus must be on the District. First, the District should reflect on and research who engages, who is heard, who does not engage, and why that may be. This research should inform proactive identification and creation of new ways for residents to have their voices heard.</p> <p>In addition, the assumption that the community is not or has not engaged or attempted to engage the District should be interrogated.</p>
<p>2509.1, 2509.2, 2515.4</p>	<p>Capital Improvement Planning (CIP) provides one of the most important means to establish the Comprehensive Plan as the guiding document for future public investments.</p> <p>It is reviewed and updated on a regular basis to reflect changing priorities, unexpected events, and new opportunities.</p>	<p>CIP IS A MISSED OPPORTUNITY TO ENSURE RACIAL EQUITY IS AN INVESTMENT PRIORITY.</p> <p>This section presents a strong opportunity to center racial equity in budget considerations. The budget is where the rubber meets the road but unfortunately, there is no reference to prioritizing racial equity in this section. It is unclear how CIP will reinforce commitment and goals to racial equity.</p>

ADDITIONAL ISSUES/CONCERNS

THE ENVIRONMENTAL ASSESSMENT IS INCOMPLETE AND NON-EXHAUSTIVE: Based on [the law](#), the Mayor is required to submit an environmental assessment of the proposed Comp Plan amendments. However, the five page assessment does not provide any thorough assessment, evaluation, analysis of data, project-based assessment, or critical analysis.

TERMS DEFINED IN THE FRAMEWORK ELEMENT ARE NOT CONSISTENTLY USED: The Implementation Element offers an opportunity to reinforce and apply definitions established in the Framework Element and the Equity Crosswalk’s overview. However, terms such as “racial equity” or “equitable development” that were defined in the Framework (like in [Section 213.8](#)) rarely, if at all, appear in other Citywide elements.

GUIDANCE ON THE AMENDMENT SUBMITTAL PROCESS WAS STRUCK: Rather than striking this section, this process (laid out in Section 2515) requires clarity and specificity. This section also represents an opportunity to ensure that any zoning text amendment considers the potential for disparate impacts, ways to mitigate or eliminate potential disparate impacts, and ways to ensure public benefits for communities of color.

RACIAL EQUITY TRAINING FOR ZONING COMMISSION AND IMPLEMENTERS IS NOT MENTIONED: The Implementation Element represents an opportunity to be intentional in disrupting the status quo by building out new community led approaches. The District must ensure the Zoning Commission charged with making land use decisions is both committed and able to advance racial equity.

GLOSSARY

ACTION

A specific step to be taken by District Government to implement the policies in the Comprehensive Plan, such as the adoption of a new ordinance or completion of a capital improvement project; the accomplishment of a thing usually over a period of time, in stages, or with the possibility of repetition ([source](#))

ADMINISTRATION

1) The manner in which land use planning policies are interpreted and applied on a day-to-day basis; this includes the development review, small area planning, zoning, long-range planning, and community involvement activities that are used to carry out Comprehensive Plan policies 2) The officials in the executive branch of government under a particular chief executive ([source](#))

DEVELOPMENT REVIEW

The City process for reviewing and approving new buildings, alterations to existing buildings, and subdivisions ([source](#))

GUIDING PRINCIPLE

A statement of philosophy and basic values about the future of the city that sets the overall tone for the goals, policies, and actions in the Comprehensive Plan ([source](#))

LAND USE

Chapter of the Comprehensive Plan containing goals, policies, maps and actions to guide the future development and redevelopment of public and private property ([source](#))

PLANNING COMMISSION

A locally appointed commission that reviews plans and projects for consistency with the Comprehensive Plan, considers amendments to the Plan, and addresses long range planning issues; does not currently exist in the District of Columbia Government ([source](#))

POLICY

A specific statement of principle that implies clear commitment; a general direction that a governmental agency follows ([source](#))

RACIAL EQUITY

The elimination of racial disparities so that race no longer predicts opportunities, outcomes or the distribution of resources for residents of the District, particularly for Black residents and other residents of color ([source](#))

RACIAL INEQUITY

When race can be used to predict life outcomes, e.g., disproportionality in education (high school graduation rates), jobs (unemployment rate), criminal justice (arrest and incarceration rates), and other key economic and social indicators ([source](#))

REWRITE

According to law, the Comprehensive Plan is to be implemented over a 20 year cycle with the next rewrite scheduled to occur in 2026 ([source](#))

CODE OF THE DISTRICT OF COLUMBIA

TITLE 1. GOVERNMENT ORGANIZATION.
CHAPTER 3. SPECIFIED GOVERNMENTAL AUTHORITY.
SUBCHAPTER III-A. COMPREHENSIVE PLAN.
PART I. GENERAL.

§ 1-306.02. Mayor to submit proposed Land Use Element and map; submission of amendments to District elements of comprehensive plan; specifications; approval.

* * *

(f)(1) The Mayor shall transmit 2 generalized maps—a Future Land Use Map and a Generalized Policy Map—to the Council within 90 days of the effective date of the Comprehensive Plan Amendment Act of 2021, passed on 2nd reading on XXX, 2021 (Enrolled version of Bill 24-1) (“Act”).

(2) The maps transmitted under this section shall:

(A) Incorporate the map amendments enacted in sections 2(b) and (c) of the Act;

(B) Conform to the requirements of sections 223 through 226 of Chapter 200 (“the Framework Element”) of the Comprehensive Plan;

(C) Be printed at a scale of 1,500 feet to 1 inch;

(D) Use standardized colors for planning maps;

(E) Indicate generalized land use policies; and

(F) Include a street grid and any changes in format or design to improve the readability and understanding of the adopted policies.

(3)(A) The Council shall hold a public hearing to determine if the maps transmitted under this section conform to the requirements of paragraph 2 of this subsection. If the Council determines that a map transmitted under this section conforms as required, the Council shall approve the map by resolution.

(B) If the Council determines that a map transmitted under this section does not conform to the requirements of paragraph 2 of this section but requires corrections to conform, the Council shall approve the map by resolution, identifying the

EXHIBIT C

2006

ENVIRONMENTAL

ASSESSMENT FOR

REVISION OF THE

COMP PLAN

READ ME FIRST

12/11/06

This folder contains the Environmental Assessment of the Mayor's Draft of the Comprehensive Plan. Because the Environmental Assessment is almost 300 pages long, we have posted it in sections.

**COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL
DISTRICT ELEMENTS**

**ENVIRONMENTAL
ASSESSMENT**

November 2006

**COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL
DISTRICT ELEMENTS**

**ENVIRONMENTAL
ASSESSMENT**

Prepared by: DC Office of Planning

Affiliated Consultants: Louis Berger Group
Phillips Preiss Shapiro

November 2006

This page left intentionally blank

TABLE OF CONTENTS

INTRODUCTION..... I-1

PROJECT DESCRIPTION II-1

SETTING, IMPACTS, AND MITIGATION III-1

- A. Land Use IIIA-1**
- B. Population, Housing, and Employment IIIB-1**
- C. Transportation IIIC-1**
- D. Infrastructure..... IIID-1**
- E. Biotic Resouces IIIE-1**
- F. Water Quality..... IIIF-1**
- G. Air Resources IIIG-1**
- H. Land Resources IIIH-1**
- I. Environmental Hazards IIII-1**
- J. Community Services IIIJ-1**
- K. Cultural Resources IIIK-1**
- L. Visual Resources IIIL-1**
- M. Economic Impacts..... IIIM-1**

CONSISTENCY WITH ADOPTED PLANS AND PRORAMS IV-1

ALTERNATIVES TO THE PROPOSED PROJECT..... V-1

CONCLUSIONS VI-1

This page left intentionally blank

I. INTRODUCTION

The purpose of this report is to describe the environmental consequences of adopting the revised District Elements of the Comprehensive Plan for the National Capital (hereinafter referred to as the “Comprehensive Plan” or “Comp Plan”). On July 14, 2006, the revised Comp Plan was presented by Mayor Anthony Williams to the Council of the District of Columbia as Bill 16-876, the Comprehensive Plan Amendment Act of 2006. The Bill would amend the Comprehensive Plan of 1984 and 1985, as amended by DC Law 8-129 (1989/90), DC Council resolution 9-275 (1992), DC Law 10-193 (1994), DC Council resolution 11-313 (1996), and DC Law 12-99 (1997/98).

The assessment has been prepared pursuant to the District of Columbia Environmental Protection Act of 1989 and the National Environmental Policy Act (NEPA) of 1969. DCEPA and NEPA require that appropriate measures for the protection of the natural environment be integrated in local and federal planning processes. Accordingly, the entire Comprehensive Plan revision has been designed to assess the environmental consequences of the policy and map changes under consideration. The findings of these assessments have been disclosed continuously throughout the process. In May 2006, the DC Office of Planning completed and published a series of technical reports on transportation, infrastructure, the economy, and the environment. The technical reports provided baseline data, technical analysis, and findings. Policies in the Comp Plan were developed to address the findings and ensure that environmental impacts were appropriately mitigated.

Although the analysis that underpins this Environmental Assessment (EA) has been available for public review for over six months, the purpose of the EA is to structure the analysis in a way that is compatible with the federal review that follows Council adoption. The Assessment has primarily been prepared to assist the National Capital Planning Commission (NCPC) in its review of the Plan’s effects on matters of federal interest. The assessment is intended to disclose those impacts that may be significant and adverse, describe possible measures which mitigate or eliminate these impacts, and describe a range of alternatives to the project.

This Assessment evaluates the Plan’s content as it existed on the date it was submitted by the Mayor to the Council (July 14, 2006). Excerpts from the Plan (e.g., lists of plan policies) are included in this report as appropriate. It should be noted a number of text and map changes were made during the five-month period of Council and public review between July and November, 2006. These changes are not reflected in the excerpted text. A summary of these changes is included in the final section of the EA. The Office of Planning has determined that the Council-recommended changes do not substantively change the conclusions of this EA or require that additional, supplemental mitigation measures be required.

BACKGROUND

Section 431 of the 1973 Home Rule Act designated the Mayor of the District of Columbia as the city's chief planner and further directed the Mayor to prepare the local ("District") elements of the District of Columbia Comprehensive Plan. The requirements for the District of Columbia Comprehensive Plan are defined by the DC Code. Section 1-301.62 establishes that the Plan's purpose is to "define the requirements and aspirations of District residents and accordingly influence social, economic, and physical development." Section 1.204.23 states that the plan "may include land use elements, urban renewal and redevelopment elements, a multi-year program of municipal public works for the District, and physical, social, economic, transportation, and population elements." The District Elements are published as Chapter 10 of the DC Municipal Regulations.

In addition, the DC Environmental Protection Act of 1989 requires District agencies to analyze and disclose the environmental effects of their major actions. The amendment of the Comprehensive Plan may be considered a major action under the Act, and is therefore subject to this requirement.

The Comprehensive Plan is amended on an approximately four year cycle. In the 1994 and 1998 Comp Plan amendments, the environmental assessment used a "checklist" format, simply noting whether proposed map and text changes would have positive or negative environmental, fiscal, and historic resource impacts.

Because the current (2006) action represents a major update of the 1984 Plan rather than a series of minor map and text amendments, a more rigorous assessment has been provided in this document. Rather than using the checklist format, this report uses narrative text organized around major subject areas.

Since the Comp Plan is a "policy" plan rather than a specific development proposal, the Environmental Assessment focuses on the secondary effects that can be expected to follow Plan adoption. These effects include land use changes, traffic increases, added demands on municipal services, and cumulative long-term changes in environmental quality. Additional environmental documentation will be necessary and will be required to assess the impacts of specific development projects (including publicly initiated projects) subsequent to the Comp Plan's adoption.

SCOPE AND FORMAT OF THIS REPORT

This report addresses the major environmental issues associated with the Comp Plan. For each topic addressed, the text describes the existing setting, probable impacts, and suggested mitigation measures. To a great extent, the Comp Plan is "self-mitigating" in that its policies and actions have been designed to anticipate and respond to expected impacts. Relevant mitigating policies and actions are listed throughout this report. In the Concluding chapter of the report, a summary of impacts is provided.

The report is organized into the following sections:

- I. **Introduction.** This section explains the purpose of the Environmental Assessment and its organization.
- II. **Project Description.** This section describes the major recommendations of the proposed Plan and presents qualitative and quantitative data on the project. The text discusses policy changes, map changes, and land use category definition changes.
- III. **Setting, Impacts, and Mitigation.** This section presents an impact analysis for all of the topics identified as being potentially affected by the proposed Plan. The following topic areas are addressed:
 - A. **Land Use,** including land use compatibility issues and the potential effects of the Plan and its associated map changes on long-term land use and development patterns in the District.
 - B. **Population, Employment, and Housing,** including anticipated impacts of the Plan on population, employment, and housing growth; the balance between jobs and housing; and housing displacement or unit loss.
 - C. **Transportation,** especially the effects of Plan-facilitated land use and transportation changes on local and regional traffic conditions.
 - D. **Infrastructure,** including the impacts of Plan-facilitated change on the District's water system, sewer system, storm drainage system, solid waste management system, and energy and telecommunication systems.
 - E. **Biotic Resources,** including the potential impacts of the Plan on vegetation and wildlife, particularly on sensitive habitats such as wetlands.
 - F. **Water Resources,** including the impacts of Plan-related development on urban runoff, drinking water, and local water quality conditions.
 - G. **Air Resources,** including the potential air quality impacts resulting from the proposed Plan.
 - H. **Land Resources,** including Plan-related impacts on soil, erosion hazards, slope stability, and geologic conditions.
 - I. **Hazardous Materials,** including the risk of increased exposure to hazardous substances or incidents resulting from project-facilitated development.

- J. **Community Services**, including Plan-related impacts on schools, libraries, police and fire services, health care facilities, child care facilities, and parks.
 - K. **Cultural Resources**, including the impact of the Plan on historic and archaeological resources in the District.
 - L. **Visual Resources**, including the effects of the Plan on urban design, views, and the District's visual character.
 - M. **Economic Development**, including the effects of the Plan on the local economy, job base, and business mix.
- IV. **Consistency with Adopted Plans and Programs.** This section describes the relationship between this Plan and other plans and programs guiding land use and transportation decisions in the District of Columbia, including the Federal Elements of the Comprehensive Plan, District agency plans (including plans underway by the Department of Transportation and the Department of Parks and Recreation), plans of other local government agencies (including the DC Public Schools), and regional plans (or planning initiatives) prepared through the Metropolitan Washington Council of Governments.
- V. **Alternatives to the Proposed Action.** This section compares the proposed Comp Plan (the "preferred alternative") to other alternatives, including a "no project" alternative which would leave the current (1984, as amended through 1998) Plan in place.
- VI. **Conclusions.** This section describes the growth-inducing effects of the Plan, the cumulative effects of this Plan and others underway in the City and region, and a summary of the changes to the Plan made between July and November, 2006. This section also includes a summary of impacts, based on the findings of Section III.

II. PROJECT DESCRIPTION

This chapter provides the definition and location of the project, the basic objectives of the project, the specific themes and principles upon which the project is based, quantifiable data on the project, and a comparison between the proposed Comp Plan and the existing Comp Plan.

DEFINITION OF THE PROJECT

The project is the update of the District Elements of the Comprehensive Plan for the National Capital (“Comp Plan.”). The revised Plan introduces new land use designations, goals, policies, and actions for development in the District of Columbia for the next 19 years. Once adopted, the Plan will supersede the elements of the prior Comp Plan, including the eight ward plans and all other amendments made to the Plan between 1984 and 1998.

The project encompasses all land and water within the District of Columbia, a 69-square mile area located at the confluence of the Anacostia and Potomac Rivers in the Mid-Atlantic region of the United States. The District was created in 1791 to serve as the national capital, and today is home to approximately 580,000 residents and 745,000 jobs. The District is the 21st largest city in the United States in population and the central city of the 5th largest metropolitan area in the United States.

The District’s terrain varies from flat to gently rolling, with elevations rising from near sea level at the southernmost point to 410 feet at Tenley Hill. The historic core of the city, laid out by Pierre L’Enfant and Benjamin Banneker in 1791, sits in a bowl-shaped area above the Potomac lowlands. The bowl is defined by a low escarpment on its northern edge, Rock Creek on the west, and the Anacostia River on the east. Numerous low ridges, hills, and stream valleys lie beyond, the most prominent of which are the Rock Creek stream valley on the west and the Anacostia ridgeline on the east. Although natural topography has remained largely intact in the last two centuries, stream courses, wetlands, and vegetative cover have been altered by urbanization.

Although the Comp Plan project area includes the entire District of Columbia, its focus is on lands that are subject to District government jurisdiction. Thus, the Plan does not provide detailed guidance for the National Mall, Rock Creek Park, military bases, and other federal installations. These lands are covered by the Federal Elements of the Comprehensive Plan, which is a separate document adopted by the National Capital Planning Commission. Federal lands represent approximately 25 square miles, or 40 percent of the District. As appropriate, the District Elements provide advisory language for these lands, and acknowledge them as integral components of the city’s landscape and natural environment.

A comprehensive description of the natural and built environment in the District is provided in the “Setting” section under each topic heading in Chapter III of this Environmental Assessment.

PROJECT CONTEXT

Master plans for the development of the national capital date to the city’s inception in the 1790s. The L’Enfant Plan of 1791 and the McMillan Plan of 1901 are largely regarded as the great milestones of the city’s early planning history. Elements of these early plans define the city’s physical form today and are considered resources of national significance.

The era of contemporary comprehensive planning in the District began in the 1920s with creation of the National Capital Park and Planning Commission and legislation mandating comprehensive planning. Early plans by the Commission focused on transportation, subdivisions, parks and parkways, public buildings, sewerage, and commercial and industrial development. The 1950 Comprehensive Plan focused on freeway building and the redevelopment of “obsolete” areas, laying the groundwork for subsequent urban renewal activities. The 1961 Policies Plan for the Year 2000 proposed a network of “wedges and corridors” that shaped suburban land use patterns for decades to come. In 1965, the “Brown Book” provided a detailed statement of development policies for the District, eventually leading to the 1967 Comprehensive Plan (also known as the “Green Book”).

All of these historic plans were prepared at the federal level. The 1973 Home Rule Act called for joint comprehensive planning for the City by the Mayor and the National Capital Planning Commission and transferred some of this responsibility to District government. At that time, the Comprehensive Plan was divided into District Elements and Federal Elements.

The first Comp Plan District Elements were prepared in the early 1980s and were formally adopted in 1984. As initially adopted, the Plan was an illustrated statement of broad local policies and was approximately 150 pages in length. Background reports provided data and technical details to underpin the Plan. The background reports indicate that continued population decline was anticipated (from 638,000 in 1980 to 633,000 in 2000), accompanied by strong employment growth (from 666,000 jobs in 1980 to 776,000 jobs in 2000).

In 1985, the Plan was amended to add the Land Use Element and the Generalized Land Use Map and Policies Map. The Plan was subsequently amended in 1989, 1994, and 1998. The principal effect of the amendments was to add detailed policy plans for each of the city’s eight Wards; the Ward Plans followed the same format as the citywide elements, repeating the ten citywide chapters but focusing on Ward-level issues. A secondary effect of the amendments was that all graphics and maps were removed from the document and a text-only format was substituted. The addition of Ward Plans substantially increased the length of the Plan. By 1998, the Plan had grown from its initial 150 pages to nearly 700 pages.

The 2002 amendments to the Comprehensive Plan were deferred by the City Council to allow the Office of Planning (OP) to perform an assessment of the current Comp Plan and the District’s long-range

planning program. The assessment included a review of “best practices” in comprehensive planning in other large U.S. cities, interviews with stakeholders, and an evaluation of the strengths and weaknesses of the Plan. OP’s findings and recommendations were summarized in a “Comp Plan Assessment Report” published in February 2003.

The Assessment Report recommended that a major revision of the existing Plan be initiated, beginning with development of a long-range vision for the city. Numerous other recommendations were set forth, including the restoration of maps and graphics to the document, the addition of factual data, the cross-referencing of other city plans to ensure their consistency with the Comp Plan, the inclusion of measurable benchmarks and actions, and a shift away from Ward Plans.

In June 2003, OP began work on the “Vision” phase of the Comp Plan revision. A series of eight policy papers was prepared, and data was collected on land use, zoning, and development activity. A visioning exercise at the Mayor’s Citizen Summit in November 2003 engaged more than 3,000 residents in a discussion about the city’s future. The Summit was followed by eight ward-based public meetings in January 2004 with some 2,000 participants. A Draft Vision was produced in Spring 2004, circulated for review, revised, and presented to the City Council in May 2004. The Council endorsed the Vision as the Framework for the new Comp Plan in June 2004.

Work on the Comp Plan revision was initiated in September 2004. A 28-member Task Force was appointed by the Mayor and Council to advise OP on Plan policy and organizational issues. An aggressive public education and outreach program, including a website, large public meetings, small group discussions, briefings to Advisory Neighborhood Commissions and community groups, and media liaison, was initiated. Data collection, analysis, and mapping tasks were initiated. An audit of the existing Comp Plan was performed to determine the continued relevance of each policy and action.

These tasks continued through 2005, punctuated by major rounds of public workshops in January, May, and September. Plan drafting commenced in November 2005. Drafts of each chapter were produced between December 2005 and June 2006; each draft was publicly circulated for review and comment and subsequently edited. An additional round of workshops was held in May/June 2006, and a Mayor’s public hearing was conducted on June 13. The Mayor’s Draft Plan, incorporating extensive revisions in response to more than 700 pages of public comments, was submitted to the City Council on July 14, 2006. An addendum annotating edits to this draft (based on additional public comment) was submitted to Council on September 20, 2006. A second addendum was submitted on October 19, 2006, and a third addendum (the Council “mark-up”) was prepared on November 15, 2006.

The revised Comp Plan includes an updated Future Land Use Map and Policies Map. More than 800 land use map amendments have been proposed as part of the project, along with a major reformatting of the Policies Map.

Assumptions

A number of important assumptions were made during the preparation of the Comp Plan. These have been carried forward into this environmental analysis and are outlined below:

- The Comp Plan uses a horizon year of 2025. Thus, most of the analyses in this environmental assessment are based on the population, employment, and other conditions that are likely to exist by 2025, given the land use designations and policies contained in the Plan. For example, the transportation analysis is based on projected regional traffic conditions in 2025, using the Metropolitan Washington Council of Governments model with adjustments as needed to reflect the land use and transportation changes suggested by the Comp Plan.
- The analysis is not based on a “buildout” scenario in which all land is developed to the maximum density or intensity allowed by the Comp Plan (and the associated underlying zoning). Such a scenario would entail more development than the city could absorb and would also assume a level of redevelopment that would be inconsistent with the Plan’s conservation-oriented policies.
- The analysis is based on an assumption about how much of the region’s household and employment growth can realistically be absorbed by the District of Columbia based on the land use plan and policies contained in the Plan. MWCOG projects regional growth from 2005 to 2025 of approximately 550,000 households and 1,000,000 jobs. The Comp Plan presumes that the District will capture 10 percent of the household growth and 12 percent of the employment growth. This equates to 125,000 jobs and 57,100 households. These figures have been accepted by MWCOG as the city’s official forecasts and are already in use by COG for regional transportation planning purposes. As a benchmark, the District absorbed 7.8 percent of the region’s housing growth in 2005 and 16.1 percent of the region’s employment growth between July 2005 and July 2006.
- The allocation of projected households and jobs around the city is based on the location of projects now under construction or approved, projects in the pipeline or “concept” planning stages (including large sites), and land capacity as determined by zoning, existing land uses, and tax assessments. Patterns of growth are expected to be further influenced by policies which direct growth to specific corridors (e.g., Great Streets), Metrorail stations, and “new communities.”
- Household size did not decline as quickly in 2000-2005 as it did during the 1970s, 80s and 90s and is now leveling off. Average household size was 2.12 in 2005 and is projected to remain constant through 2025. Group quarters population is also projected to remain constant.
- Improvements to regional transportation infrastructure will be made to address expected population and employment growth. This includes development of BRT and streetcar systems within the District, Metrorail extensions to Dulles Airport and suburban employment centers, upgrading of the bridges across the Potomac and Anacostia Rivers, and other improvements consistent with DDOT, MDOT, and VDOT’s constrained long-range transportation plans.

Table II-1 summarizes Districtwide household, population, and job estimates for 2005 and 2025. The estimated distribution of growth by sub-area is shown in Table II-2.

Table II-1: Households, Population, and Employment, 2005 and 2025

	2005	2025	2005-2025 Increase
Households	254,700	311,800	57,100
Population	576,700	698,000	121,200
Employment	745,400	870,400	125,000

Source: *Comp Plan Framework Element, 2006*

Table II-2: Distribution of Growth by Sub-Area, 2005-2025

Planning Area	2005 Households	2025 Households	Net Increase	% of District's total growth in each area
Capitol Hill	21,600	25,400	3,800	6.7%
Central Washington	8,000	16,400	8,400	14.7%
Far NE/ SE	29,700	35,200	5,500	9.6%
Far SE/ SW	22,800	30,100	6,100	10.7%
Lower Anacostia Waterfront	8,100	17,500	9,400	16.5%
Mid-City	35,200	41,600	6,400	11.2%
Near Northwest	37,100	43,200	6,100	10.7%
Rock Creek East	25,400	28,800	3,400	6.0%
Rock Creek West	42,400	45,300	2,900	5.1%
Upper Northeast	24,400	29,500	5,100	8.9%
Total	254,700	311,800	57,100	100.0%

Source: *DC Office of Planning, 2006*

Planning Area	2005 Employment	2025 Employment	Net Change	% of District's total growth in each area
Capitol Hill	17,900	22,000	4,100	3.3%
Central Washington	424,000	490,800	66,800	53.4%
Far NE/ SE	12,400	16,100	3,700	3.0%
Far SE/ SW	21,800	27,800	6,000	4.8%
Lower Anacostia Waterfront	32,500	60,400	25,400	20.3%
Mid-City	28,300	32,900	4,600	3.7%
Near Northwest	89,400	93,300	3,900	3.1%
Rock Creek East	31,600	33,500	1,900	1.5%
Rock Creek West	48,500	51,600	3,100	2.5%
Upper Northeast	39,000	44,500	5,500	4.4%
Total	745,400	870,400	125,000	100.0%

Source: *DC Office of Planning, 2006*

SUMMARY OF PROJECT

Objectives and Principles

The Comp Plan outlines a vision for the District’s physical development through 2025 and establishes policies and actions which allow this vision to be achieved. The major concepts presented in the Plan are listed below:

1. *Grow more inclusively.* The overarching theme of the Comprehensive Plan is to “grow a more inclusive city.” This is a policy response to market trends of the past 50 years which have led to deepening social and economic divides within the city. The commitment to inclusive growth is also a response to concerns about the displacement of residents and businesses due to rising rents and home prices, and the loss of public and subsidized housing. It is also a response to historic geographic imbalances in the distribution of public facilities, parks and open space, mass transit, and other services.
2. *Conserve and enhance the city’s neighborhoods.* The Comp Plan seeks to sustain neighborhoods as the building blocks of community life in the District of Columbia. Policies and actions require compatible infill development, protection of character-defining architecture and historic resources, enhancement of neighborhood parks, and mitigation of development-related impacts such as traffic, parking, and noise. The Plan calls for attractive, walkable neighborhood centers (with retail services and community facilities) across the city, particularly in areas where such centers are lacking today. Policies are included to mitigate land use conflicts, promote the restoration of vacant and abandoned structures, and guide the siting of controversial land uses such as group homes and municipal-industrial facilities.
3. *Balance the city’s traditional economic base with an expanded “knowledge” economy.* The Comp Plan calls for continued sustenance and growth of the city’s core industries—government, education, tourism, and professional services—as well as the expansion of jobs in the creative and knowledge sectors of the economy. These sectors include information- and research-intensive industries, such as media, design, and international business. The Plan identifies the NoMA and Near Southeast as the primary locations for economic growth, but also calls for job growth on “campus” type sites (such as Reservation 13 and St. Elizabeths), along corridor streets, and throughout Central Washington. It also emphasizes retention of much of the city’s industrial land supply, to support municipal-industrial uses and accommodate the “back office” activities that underpin the city’s core sectors.
4. *Link residents to jobs.* The Comp Plan seeks to link a larger percentage of District residents to jobs in the city through improved educational quality, partnerships with universities and major employers, apprenticeships and vocational training, and expanded job training and placement initiatives. Although these measures are outside the traditional realm of comprehensive planning, they have important spatial implications. Among other things, increasing access to employment

for District residents affects transportation needs, housing needs, child care facility needs, the planning of educational facilities, and the location and character of future job centers.

5. *Address the city's housing crisis and growing unmet housing needs.* The Comp Plan responds to the precipitous rise in housing prices experienced since 2000, and the growing affordability burden and threat of displacement experienced by residents. It incorporates the recommendations of a 2006 Comprehensive Housing Strategy which calls for new programs to conserve the existing stock of subsidized units (including expiring Section 8 units), reconstruct the city's aging public housing projects as mixed income "new communities", and create 19,000 units of new affordable housing on scattered sites in the next 20 years. The Plan includes numerous provisions for special needs populations, including the homeless and disabled. It also endorses inclusionary zoning (the inclusion of subsidized units within market rate projects) as a tool for increasing the supply of permanently affordable units.
6. *Restore the Anacostia as a clean and healthy river and great urban waterfront.* The Plan incorporates the Anacostia Waterfront Framework Plan and its associated sub-area plans for the Southwest Waterfront, Near Southeast, Reservation 13, Poplar Point, and East-of-the-River gateways. The basic premise of the Framework Plan is to change the perception of the river as a "divider" between the east and west parts of the city to a "uniter" which ties the city together through parkland, trails, redesigned bridges, watercraft, and new waterfront communities. A network of new and enhanced parks and restored wetlands is planned along the shoreline, and capital improvements are proposed to improve water quality and restore natural habitat. The Comp Plan anticipates 10,000 new households and 30,000 jobs along the waterfront in the next 20 years.
7. *Strengthen Central Washington as a vibrant city center.* The Comp Plan supports the continued evolution of Central Washington as a mixed use urban center. Key themes include the development of high-density mixed income housing, expansion of the Downtown retail core, a stronger role for Downtown as a regional entertainment and cultural destination, and the development of great new public spaces. Major transportation investments are proposed, including construction of pedestrian tunnels between several Metrorail stations, expansion of Circulator service, and reconstruction of K Street with a dedicated transitway. Expansion areas for the center city's growth include Mount Vernon Triangle, NoMA (including the CSX rail air rights north of Union Station), the East End (including the I-395 air rights), the South Capitol corridor (ballpark area), the Near Southeast, and "catalytic" sites such as the Old Convention Center.
8. *Reintegrate large sites back into the fabric of the city.* A major theme of the Plan is to "connect the city" by reintegrating large self-contained sites that are today off-limits to the public. Such sites include District-owned properties like the McMillan Reservoir Sand Filtration site and DC Village, and federal sites which are the subject of pending land transfer legislation (Poplar Point, Reservation 13, etc.). These sites also include federal lands which are outside of District control,

but which are currently under discussion (by the federal government) for land use change (e.g., Walter Reed, the RFK Stadium area, and the Armed Forces Retirement Home). The Comp Plan sets forth different land use programs for each site based on existing uses, ownership, context, and municipal needs. These uses include mixed income housing, open space, cultural facilities, institutional uses, commercial uses, and public uses. For the federal sites, the Plan provides general principles only.

9. *Encourage mixed use pedestrian-oriented development along major corridors and around key transit stations.* Two key objectives of the Comprehensive Plan are to accommodate future growth in a manner that minimizes adverse impacts on established residential areas, and to accommodate growth in a way that reduces auto-dependence and promotes transit use. Both of these objectives are achieved by concentrating future housing and neighborhood-serving retail development on commercially-zoned land along major corridors and around key transit stations. This land use pattern provides the added benefits of revitalizing neighborhood shopping districts, providing an expanded market for neighborhood retail, and providing space for more affordable multi-family housing. While the current (1998) Plan already provides for additional density along corridors and around transit stations, the proposed Plan focuses more specifically on Georgia Avenue, Rhode Island Avenue, portions of 14th Street NW, H Street/ Benning Road, portions of Pennsylvania Avenue, Minnesota Avenue, North and South Capitol Streets, and Martin Luther King Jr Avenue—and on the Metro stations at Takoma, Fort Totten, Brookland, New York Avenue, Petworth, Columbia Heights, Shaw/Cardozo, Minnesota Avenue, Deanwood, Benning Road, Anacostia, and Congress Heights.
10. *Provide more viable alternatives to auto travel.* The Land Use and Transportation Elements of the Comp Plan emphasize alternatives to single passenger auto travel, recognizing the constrained traffic conditions on local streets and freeways, as well as the air quality and environmental issues associated with auto use and roadway expansion. The most far-reaching recommendation is to develop a new network of premium transitways comprised of streetcars and dedicated bus lanes (BRT). The Plan also incorporates improvements to the city’s bicycle and pedestrian infrastructure. Policy recommendations focus on transportation efficiency, particularly parking management and transportation demand management (carpools, vanpools, flextime, signal timing, reversible lanes, congestion pricing, etc.)—emphasizing the more efficient use of existing infrastructure rather than adding lane capacity or widening roadways.
11. *Green the city.* The Comp Plan incorporates principles of environmental sustainability, and places particular emphasis on the “greening” of the city. It calls for expanded urban forestry and tree planting programs, habitat (especially wetland) restoration initiatives, expanded stormwater management efforts to control urban runoff and improve water quality, expansion of the tree and slope overlay zone (to reduce erosion and limit the development and grading of steep slopes), and protection of stream valleys and other natural areas. The Plan also proposes expanded green building and low-impact development measures, energy and water conservation initiatives, expansion of the city’s recycling program, and expanded community gardening programs. Air

- quality goals are implicit in its land use and transportation policies (by reducing the necessity of driving, the city reduces per capita consumption of fossil fuels and the emission of greenhouse gases). The Comp Plan also proposes a more rigorous environmental screening and impact assessment process for future development.
12. *Preserve historic and cultural resources.* The Comp Plan strongly promotes the protection and enhancement of the District’s historic and cultural resources. Such resources are broadly defined to include not only “traditional” areas such as historic districts and landmarks, but also stable neighborhoods with well-established building forms—particularly row house neighborhoods. The Plan calls for a stronger correlation between zoning and historic districts, including actions to rezone areas (or develop new zoning classifications) where development allowed under current zoning could threaten such resources. Graphic diagrams and written guidelines are included to preserve important views, retain architectural integrity, and ensure the compatibility of alterations and additions with existing construction. Like the existing Comp Plan, the proposed Plan acknowledges that some parts of the city already have a strong sense of identity (and thus a need for policies to protect that identity) while others have a weak sense of identity (which can be strengthened through infill development and public realm improvements). The Plan’s Policy Map designates much of the city as a Conservation Area; this does not preclude development but indicates that there is little change anticipated and only limited opportunities for growth.
13. *Improve infrastructure and community services to keep pace with needs.* The Plan particularly emphasizes the need to link school facility planning with land use planning. However, it also recognizes the significant deferred maintenance and capital improvement needs of the city’s water distribution and sewerage systems—particularly the dilemma of having combined sanitary and storm sewers. DC-WASA’s plans to separate these two systems to reduce sewage overflow are incorporated by reference into the Comp Plan. The Plan also recognizes the need to greatly improve public facilities planning, not only to incorporate concepts such as the co-location of services but also to ensure that capital dollars are spent where they are needed most. Particular attention is given to the need for improved libraries, police and fire stations, health care facilities, recreation centers, and senior and child care facilities. In addition to linking capital improvements to the Comp Plan, the Plan suggests that impact fees and development agreements be explored to ensure that current residents do not bear the tax burden for public facilities serving new development.
14. *Live and grow safely.* The Comp Plan is cognizant of national security issues and the heightened threat of terrorism in the city. While the Plan does not include detailed provisions for emergency management (preparedness, evacuation, shelter, post-disaster recovery, etc.) since these are covered by the DC Emergency Management Agency’s plans, its land use and transportation policies do recognize the importance of safety as a planning and design factor. Policies seek to balance safety and aesthetic needs, provide transportation infrastructure which meets evacuation and emergency needs, and minimize potential exposure to hazardous rail cargo and other environmental hazards.

Components of the Comprehensive Plan

The proposed Comp Plan includes:

- An “Introduction” which describes the purpose of the Plan, the process used to prepare it, and an overview of its contents
- A “Framework” chapter which describes the forces driving change, 36 “guiding principles” to manage this change, and the Future Land Use and Policy Maps
- Twelve “Citywide” elements addressing the following topics:
 - Land Use
 - Transportation
 - Housing
 - Environmental Protection
 - Economic Development
 - Parks and Open Space
 - Urban Design
 - Historic Preservation
 - Community Services and Facilities
 - Educational Facilities
 - Infrastructure
 - Arts and Culture
- Ten “Area” elements addressing geographic sub-areas of the city (see Figure II-1). Each Area element provides statistical data about the area, a statement of planning and development priorities, policies for the entire area, and policies for “focus areas” within that Planning Area. A total of 57 “focus areas” are identified in the ten area elements. These are listed in Table II-3.
- An “Implementation” element with policies and actions on long-range planning, and a roll-up of all actions in the earlier chapters (including responsible parties and timeframes)

In all, the Plan contains 12 goals, 1,270 policies (800 citywide policies and 470 area-element policies), and 609 actions (382 citywide actions and 227 area-element actions).

MAJOR CHANGES BETWEEN THE EXISTING COMP PLAN (1984, as amended) AND THE PROPOSED COMP PLAN (2006)

Table II-4 compares the existing (1984, as amended through 1998) Comp Plan and the proposed (2006) Comp Plan. While the two documents are based on many of the same concepts and include some of the same policies, the 2006 document has been completely reformatted and reorganized. Most of the policies in the 1984/1998 Plan have been heavily edited; many have been merged to eliminate redundancy between the Citywide and Area (Ward) elements. Other policies have been eliminated because they are outdated, poorly worded, inconsistent with other policies, excessively detailed, or address topics not appropriate in a comprehensive plan.

Figure II-1: Comprehensive Plan “Planning Areas”



Table II-3: Policy Focus Areas

Area (listed alphabetically)	Planning Area	Area (listed alphabetically)	Planning Area
14th Street/ Columbia Heights	Mid-City	L'Enfant Plaza/ Near Southwest	Central
14th Street/ Logan Circle	Near Northwest	Lower Bladensburg/ Hechinger	Upper Northeast
18th Street/ Columbia Road	Mid-City	Marshall Heights/ Benning Ridge	Far NE/ SE
Armed Forces Retirement Home/ Irving Street Hospital	Rock Creek East	McMillan Sand Filtration Site	Mid-City
Barry Farm, Hillside, Fort Stanton	Far SE/ SW	Metro Center/ Retail Core	Central
Bellevue/ Washington Highlands	Far SE/ SW	Minnesota/ Benning	Far NE/ SE
Benning Road Metro	Far NE/ NW	Mount Pleasant Street	Mid-City
Brookland Metro/ CUA	Upper Northeast	Mount Vernon District	Central
Capitol Gateway/ NE Boundary	Far NE/ NW	Near Southeast	Lower Waterfront
Chinatown	Central	New York Ave corridor/ Brentwood	Upper Northeast
Congress Heights Commercial Area	Far SE/ SW	NoMA/ Northwest One	Central
Congress Heights Metro Station	Far SE/ SW	North Capitol/ Florida/ New York Ave	Mid-City
Connecticut Ave corridor	Rock Creek West	Northeast Gateway	Upper Northeast
DC Village	Far SE/ SW	Pennsylvania Avenue SE (east of river)	Far NE/ SE
Deanwood	Far NE/ SE	Pennsylvania Avenue SE (west of river)	Capitol Hill
Downtown East/ Judiciary Square	Central	Poplar Point	Lower Waterfront
Dupont Circle	Near Northwest	Reservation 13/ RFK Stadium	Capitol Hill
Foggy Bottom/ West End	Near Northwest	Rhode Island Av Metro and corridor	Upper Northeast
Fort Totten Metro	Upper Northeast	Shaw/ Convention Center	Central
Gallery Place/ Penn Quarter	Central	Skyland	Far NE/ SE
Georgetown Waterfront	Near Northwest	South Capitol/ Buzzard Point	Lower Waterfront
Georgia Avenue (lower)	Mid-City	Southwest Waterfront	Lower Waterfront
Georgia Avenue (middle)	Rock Creek East	St. Elizabeths Campus	Far SE/ SW
Georgia Avenue (upper)/ Walter Reed	Rock Creek East	Takoma Central District	Rock Creek East
Golden Triangle/ K Street	Central	U Street/ Uptown	Mid-City
H Street/ Benning Road	Capitol Hill	Upper Bladensburg/ Fort Lincoln	Upper Northeast
Historic Anacostia	Far SE/SW	US Capitol Perimeter	Capitol Hill
Kenilworth-Parkside	Far NE/ NW	Wisconsin Avenue corridor	Rock Creek West
Kennedy Street NW	Rock Creek East		

Table II-4: Major Changes Between the Existing and Proposed Comprehensive Plans

	Existing Plan	Proposed Plan
FORMAT		
Length	+/- 700 pages	+/- 700 pages (excl. Table 25-1, which summarizes all actions)
Printing	<i>Black and White</i>	<i>Full Color</i>
Report-scale Maps	<i>None</i>	<i>42 full-color maps</i>
Photographs	<i>None</i>	<i>Approximately 300 photos</i>
Figures and Charts	<i>None</i>	<i>58 figures, ranging from illustrative maps to pie charts and line graphs</i>
Tables	<i>None</i>	<i>44 tables</i>
Graphic Elements	<i>None</i>	<i>Sidebars, pullquotes, text boxes, icons, logos, footers, multiple font hierarchies</i>
Hierarchy of goals, policies, and actions	<i>Varies from chapter to chapter— not consistent.</i>	<i>Consistent from chapter to chapter. All actions are specifically structured to implement preceding policies.</i>
Cross-referencing	<i>None. Policies often repeated in multiple places.</i>	<i>Extensive</i>
CONTEXT		
Vision for the Future	<i>Expressed in 5 pages in the “General Provisions” of the Plan—emphasis on neighborhood stabilization, respecting the city’s physical character, and the Plan amendment cycle</i>	<i>Expressed in the 80-page “Vision for Growing an Inclusive City”—emphasis on creating successful neighborhoods, increasing access to jobs and education, bridging social and economic divides (“connecting the city”), and building green and healthy communities</i>
Regional context	<i>Minimally acknowledged. Maryland and Virginia do not appear on the maps.</i>	<i>Addressed extensively in “Framework” Element, as well as in Land Use, Housing, Economic Development, and Transportation. Maps show surrounding road network and natural features in Maryland and Virginia.</i>
Link to the Federal Elements of the Comp Plan	<i>Not mentioned</i>	<i>Discussed in the Introduction and throughout the document</i>
Link to other Agency Plans	<i>Not mentioned</i>	<i>Discussed in the Introduction and throughout the document</i>
Horizon Year	<i>Not explicitly mentioned, but Technical Reports cite projections for Year 2000</i>	<i>2025</i>
Growth forecasts	<i>The Technical Report accompanying the 1984 Plan cites decline to 633,000 residents by 2000. The Environmental Assessment for the 1998 Plan amendments cites projected decline to 523,000 residents by 2000.</i>	<i>2005-2025: 57,100 households (121,200 residents) 125,000 jobs</i>
Data and contextual discussion to support policies	<i>None to minimal, depending on topic. More in Ward Plans.</i>	<i>Extensive in each Element</i>

Table II-4, continued

	Existing Plan	Proposed Plan
ORGANIZATION		
Structure	<ul style="list-style-type: none"> ○ General Provisions ○ 10 Citywide Elements ○ 8 “Ward Plans” which repeat all topics addressed in the Citywide Elements. 	<ul style="list-style-type: none"> ○ Introduction ○ Framework ○ 12 Citywide Elements ○ 10 “Area Elements” which focus on land use issues in each of 10 areas ○ Implementation
Implementation	Some of the Elements include a section called “Public Action” which list actions. However, there is no indication of timing, priority, or responsible agency. Many actions are actually policies.	All actions are all measurable and benchmarked. Plan includes an Implementation chapter that summarizes each action in the document and lists responsible agencies, timing, and whether capital improvements are required.
Geographic sub-areas	Eight sub-areas are identified, based on the 8 wards. The ward boundaries change every 10 years, making it difficult to find policies in some cases. In some instances, ward boundaries split neighborhoods or combine unlike areas.	Ten sub-areas are identified, based on neighborhood edges. Central Washington is a distinct planning area, as is the Waterfront.
Small area land use policies	Plan identifies 12 “special treatment areas” and includes special policies to guide land use in each.	The Area Elements identify 57 “Policy Focus Areas.” Policies and actions are included for each area—in some cases providing an “executive summary” of adopted small area plans for these areas
CONTENT		
Introduction	“General Provisions” describes major themes and includes detailed step by step instructions on how to amend the Plan	Introduction describes what the Comp Plan is, its legal basis, how it was prepared, and how to use it.
Framework	NONE	Describes the forces driving change in the city, addresses the District’s regional and international context, provides data, lays out the vision for the future, and introduces the Plan’s maps
Land Use	The <u>last</u> of the citywide elements—includes policies, actions, and ends with 13 pages of metes and bounds descriptions of approved Map amendments	The <u>first</u> of the citywide elements. Provides a framework for growth and neighborhood conservation. Carries forward many policies from the previous Land Use Element (and the Ward Plans) on land use compatibility.
Transportation	12 pages of policies with an emphasis on transit	38 pages of narrative text, policies, and actions with an emphasis on transit—but also covering issues such as evacuation, car sharing, traffic calming, and transportation demand management
Housing	13 pages of policies, half of which consists of detailed provisions for calculating commercial linkage.	Focus on the immediate actions necessary to meet affordable and workforce housing needs for the next 20 years.

	Existing Plan	Proposed Plan
Environmental Protection	<i>Focus on air and water quality, solid waste, and conservation</i>	<i>Broad and far-reaching strategy to “green” the city, addressing the topics in the prior element but adding topics such as sustainability, green building, environmental justice, brownfields, hazardous materials, and urban forestry.</i>
Economic Development	<i>Policies to grow Downtown DC, boost neighborhood centers, and improve job skill levels among residents. Repeats 40 actions from the 1998 Strategic Economic Development Plan.</i>	<i>Provides data on DC’s economy and prospects for growth through 2025. Includes strategies to diversify the economy; expand the office, retail, and hospitality markets; retain industrial uses; strengthen neighborhood centers; compete globally; grow small businesses; address commercial gentrification; and structure the educational system to link residents to jobs.</i>
Parks, Recreation, and Open Space	<i>NONE</i>	<i>Policy foundation for managing the District’s parks, creating new parks and closing gaps in the park system, coordinating federal and DC park planning, reclaiming the waterfront, and expanding open space networks.</i>
Urban Design	<i>11 pages of policies and actions, focusing on constrained building sites, preserving stream valleys, waterfront, improving streetscape, and addressing areas in need of “new and improved character.” No illustrations.</i>	<i>Illustrated policies and actions focused on strengthening the identity of the city, and achieving sensitive and compatibly designed infill development. Focus on waterfront, boulevards, “place-making,” strategies, and design of streets and public spaces. Also addresses the balance between security and aesthetics</i>
Historic Preservation	<i>Establishes criteria for designation, and policies to protect and enhance historic resources.</i>	<i>Much of the prior content carried forward. New policies added on heritage tourism, protection of the recent past, education and outreach, and the links between preservation and econ dev</i>
Community Services and Facilities	<i>Covered in two chapters: “Human Services” focused on income maintenance (welfare) and health care and “public facilities” focused on schools and libraries</i>	<i>Scope broadened to cover police and fire services, child care, senior care, and emergency preparedness. Health care still covered.</i>
Educational Facilities	<i>NONE</i> <i>Previous Plan included one policy on schools, and it simply listed every school in the city (including those which are now closed)</i>	<i>Comprehensive set of policies on school modernization, facility planning, disposition of surplus property, planning for charter schools, and the role of schools as community anchors. Also includes colleges and universities.</i>
Infrastructure	<i>NONE</i>	<i>Comprehensive set of policies on water, sewer, storm drainage, solid waste, telecommunication, and energy facilities, and the cost of infrastructure.</i>
Arts and Culture	<i>NONE</i>	<i>Policies to strengthen the arts in the city, promote arts facilities/ districts, and recognize culture as an economic driver.</i>

As noted in Table II-4, the major changes include:

- Integration of graphics and maps into the document
- Addition of new elements (Framework, Parks/Recreation/Open Space, Educational Facilities, Infrastructure, Arts/Culture)
- Addition of an Implementation chapter
- Incorporation of population, household, and employment forecasts (which presume population growth over the planning period, rather than decline)
- More consistent structuring of goals, policies, and actions
- New policies on many topics to reflect changed conditions since 1984
- Shift from wards to planning areas for sub-area policies
- Shift from “Special Treatment Areas” to “Policy Focus Areas” for small area policies
- Changes to the definitions of categories on the Future Land Use Map
- Future Land Use Map amendments
- Format changes to the Policy Map

Of the topics listed above, those with the greatest potential to generate environmental impacts are the new policies and the map-related changes. These are addressed below.

Land Use Category Changes

The proposed Comp Plan land use categories describe the type and intensity of development that is allowed on land within the District of Columbia. Each category prescribes typical land uses, such as housing, commercial or industrial development, and open space.

Several changes to the categories are worth noting:

- Consistent with the existing Plan, quantifiable density ranges (e.g., units per acre and Floor Area Ratios) have not been prescribed for the land use categories. However, the proposed Plan includes narrative indicating the types of housing units (single family, townhomes, garden apartments, elevator apartments, etc.) or number of stories that are generally consistent with each of the residential and commercial categories.
- The proposed Plan goes one step beyond the existing Plan by indicating the zoning districts that are generally compatible with each land use category. Because there are multiple zones associated with each category, the Plan explicitly states that an area’s designation with a particular category does not automatically mean the most intense compatible zoning district is appropriate.
- The proposed Plan carries forward the existing Comp Plan’s hierarchy of low-density, moderate-density, medium-density, and high-density residential uses.

- The proposed Plan modifies the existing Comp Plan’s hierarchy of low-density, moderate-density, medium-density, medium-high density, and high-density commercial uses. The “medium-high” category has been eliminated and areas with this designation have generally been reassigned as “medium” or “high” (or mixed use “medium” or “high”)
- The “Production and Technical Employment” category has been retitled “Production, Distribution, and Repair” but the definition has not changed.
- The proposed Plan carries forward the existing Plan’s designations for “Local Public Facilities,” “Institutional,” “Federal,” and “Open Space.” As in the previous Plan, development intensity for these uses is not stated. Policies in the Plan speak to the importance of maintaining densities and intensities that are compatible with adjacent uses (or governed by Campus Plans, in some instances).
- The proposed Plan continues the convention of “striping” mixed use areas with multiple colors to indicate the combination of uses and intensities that are envisioned. To avoid confusion, the Plan avoids combining uses at opposite ends of the density scale (e.g., low density commercial and high density residential) and indicates that when one use is “preferred” or predominant it should be mapped as one step in the density scale above the other.
- The proposed Plan notes that within any given area, there may be parcels developed at densities/intensities that are higher or lower than the overall range described—both as a result of historic development patterns (e.g., 1920s era high-rise apartment buildings adjacent to row houses in Dupont Circle) and more contemporary planned unit developments.

Land Use Map Amendments

In most cases, the map designations on the proposed Plan match the designations on the Existing Plan. However, the Plan includes 802 specific map amendments—some of which are quite small.

Approximately 250 of the amendments correct errors on the existing map. Most errors were the result of “over-generalized” mapping in the 1980s (e.g., a linear park drawn too widely) and others are the result of cartographic mistakes (e.g., a school shown one block off its actual location).

Approximately 400 of the map amendments are intended to provide a better match between the Future Land Use Map and what is actually on the ground. These changes do not correct errors per se, but they do reflect areas where the existing Plan Map does not recognize the fine-grained character of the city’s neighborhoods. This is particularly true east of the Anacostia River, where neighborhoods have historically been mapped as “Moderate Density Residential” even where the existing use was single family detached housing. Moreover, past comprehensive plan maps for the eastern quadrants of the city did not recognize parks, schools, local institutions, and even neighborhood shopping districts to the same degree that these uses are recognized in the western quadrants. The proposed Plan corrects this imbalance

by applying the same level of mapping detail citywide. In addition, the use of GIS technology in the 2006 Plan permits a much finer level of map detail than was used in the 1980s.

Approximately 70 of the proposed amendments reflect small area plans completed between 2000 and 2006, including the Anacostia Waterfront Framework Plan and its associated sub-area plans. Another 30 or so changes reflect pending or recently approved development projects (such as the Parkside project near the Minnesota Avenue Metro station). About 10 of the changes are the result of the elimination of the “Medium High Density Commercial” land use category.

Only about 40 of the map amendments represent substantive shifts in policy not covered by the categories listed above. Most of these changes implement transit-oriented development or “Great Streets” land use policies and are characterized by increases in density or changes from non-residential categories to “mixed use” categories. For example, the Plan designates the area around the Fort Totten Metrorail station for Medium Density Mixed Use development rather than low density residential and industrial development.

A list of the areas where the 2006 Map shows more density than the 1998 Map is provided in Table II-5. Many of these changes are the result of Small Area Plans or Strategic Development Plans prepared between the last round of Comp Plan Amendments (in 1998) and the 2006 Plan Update. Although the Comp Plan formalizes the Small Area Plans by showing them on the city’s official Future Land Use Map, these changes are already District policy.

Table II-6 compares the total acreage in each category on the 1998 Future Land Use Map with the acreage on the 2006 Future Land Use Map. Because of the numerous permutations of “mixed use” on each Map (and the elimination of the Medium-High Density Commercial category), a one-to-one comparison of the two maps is difficult. However, the table provides an approximate comparison by assigning mixed use areas based on the most intense allowable use in the mix.

The conclusions can be drawn from Table II-6:

- The acreage mapped as “Low Density Residential” has increased by over 1,000 acres, largely as a result of the more accurate mapping of single family neighborhoods in the eastern quadrants.
- The acreage mapped as “Moderate Density Residential” has seen a commensurate decline for the same reason (the decline is also due to more complete mapping of parks, schools and institutions in areas formerly shown as Moderate Density Residential.)
- “Medium Density” acreage has declined somewhat (primarily due to more accurate mapping of the Southwest neighborhood). “High Density” acreage has increased somewhat (again, due to more accurate mapping of existing high-rise buildings).

**Table II-5:
 Areas Where the Proposed (2006) Plan Shows Greater Density than the Existing (1998) Plan**

Site	Current (1998) Plan designation	Proposed (2006) Plan designation	Policy change initiated prior to start of Comp Plan revision?
Takoma Metro	Low Density Mixed Use	Moderate Density Mixed	Yes, Takoma CD Plan
Fort Totten Metro	Low Density Res, Medium Density Mixed, Production and Technical Employment (PTE)	Medium Density Mixed Use	No
Rhode Island Metro	PTE / Moderate Commercial	Medium to High Density Mixed Use	No, although changes have been studied for many years
New York Ave Metro area	PTE	High Density Mixed Use	No, although change is consistent with NoMA Plan
Brookland Metro	Low Density Residential/ PTE	Moderate Density Mixed	No
Congress Hts Metro	Moderate Density Mixed Use	Medium Density Mixed Use	No
Anacostia Metro station and gateway	Moderate Density Res	Medium Density Mixed Use	Yes, Anacostia Strategic Development Plan
Rhode Island Avenue Corridor	Low Density Commercial	Moderate Density Mixed Use	No
Shaw Metro and 7 th /9 th area	Moderate Density Mixed Use	Medium Density Mixed Use	Yes, Shaw/ Convention Center Strategic Dev Plan
Uptown Area/ west of Howard U, U Street Metro area	Moderate Density Mixed Use	Medium Density Mixed Use	Yes, DUKE Strategic Development Plan
Central Georgia Avenue Corridor	Moderate Density Mixed Use	Medium Density Mixed Use	Yes, Georgia Avenue Corridor Plan
Upper Georgia Avenue Corridor	Low Density Mixed Use	Moderate Density Mixed Use	No—although this change reflects existing conditions
H Street NE Corridor	Moderate Density Mixed Use	Medium Density Mixed Use	Yes, H Street Strategic Development Plan
14 th Street NW, Mass Av to Park Rd.	Some Moderate, Some Medium, mostly residential	Medium Density Mixed Use	No
St. Elizabeths East	Local Public Facility	Medium Density Mixed Use	Yes, St. Elizabeths Plan
Reservation 13	Local Public Facility	Medium to High Density Mixed Use	Yes, Anacostia Framework and small area plan
Southwest Waterfront	Low Density Commercial	High Density Mixed Use	Yes, Anacostia Framework Plan and small area plan
Poplar Point	Park/ Open Space	High Density Mixed Use	Yes, Anacostia Framework
Southeast Federal Center	Federal	High Density Mixed Use	Yes, Anacostia Framework Plan and small area plan
Parkside	Medium Density Mixed Use	Medium to High Density Mixed Use	No

(*) The prevailing “before” and “after” designations are shown but in most cases multiple designations apply within each area on the list.

Table II-6: Comparison of Future Land Use Acreage Totals in the 1998 and 2006 Maps

Land Use Category	Existing Plan Map (1998)	Proposed Plan Map (2006)	Change 1998-2006
Low Density Residential	8,582.4	9,614.8	1,032.3
Moderate Density Residential	9,231.7	8,006.4	-1,225.3
Medium Density Residential	1,067.4	779.0	-288.5
High Density Residential	274.4	365.6	91.2
Low Density Commercial	573.8	513.2	-60.6
Moderate Density Commercial	318.2	219.8	-98.3
Medium Density Commercial	74.4	48.7	-25.7
Medium-High Density Commercial	280.5	0	-280.5
High Density Commercial	509.1	599.2	90.1
Mixed Use – Low	154.5	53.8	-100.7
Mixed Use – Moderate	556.1	670.4	114.3
Mixed Use – Medium	519.9	901.3	381.4
Mixed Use – High	564.0	712.5	148.5
Production/ Technical Employment (Production, Distribution, Repair)	1,330.1	1,108.7	-221.4
Local Public Facility	1,243.1	1,499.2	256.1
Institutional	1,554.7	1,651.8	97.1
Federal	2,680.5	2,578.5	-102.0
Parks, Rec, Open Space	9,927.5	10,135.2	207.7
TOTAL (*)	39,442.3	39,458.1	

(*) totals for 1998 and 2006 differ due to a .03 percent discrepancy between the two data sets

Source: Office of Planning, 2006

- The changes in residential acreage are largely due to more accurate mapping rather than policy shifts
- The area mapped as “Production, Distribution, and Repair” has decreased by 221 acres. Some of this land has been re-designated for residential or mixed use development.
- Many areas formerly mapped as “Commercial” have been re-mapped as “Mixed Use”, indicating that housing is explicitly encouraged. Total mixed use acreage has increased by 23 percent, or about 540 acres. The increase in “Mixed Use” acreage is also due to the redesignation of several sites formerly shown as “Local Public Facilities” (including the St. Elizabeths East Campus and Reservation 13)
- The area mapped as “Commercial” has decreased by 374 acres, with almost all of this decline due to these areas being remapped as “Mixed Use” (see bullet above)—in addition, the elimination of the Commercial “Medium High” category has caused a slight increase in the area mapped as Commercial “High”
- Local Public Facility acreage has increased by 256 acres, primarily due to the more accurate mapping of Schools and the designation of DC Village. A similar increase is shown for parks (207 acres) and institutions (97 acres), again due to more accurate mapping.

It is important to note that the existing (1998) Plan already allows significant growth and change, and that most of the development anticipated during the period 2006-2025 could occur under the current Plan as well as the proposed Plan. In addition, almost all of the additional development capacity created by the proposed Plan is associated with map changes on non-residential lands. This includes commercial corridors such as Georgia and Rhode Island Avenues, changes on former industrial lands, and the redesignation of large sites along the Anacostia River. The proposed Plan *reduces* development potential in several established single family neighborhoods by changing them from “Moderate” to “Low” Density Residential. The proposed Plan would not result in the “upzoning” of residential areas, and could result in “downzoning” in a number of already-developed areas where the existing Plan shows higher densities than the proposed Plan.

Policy Map Changes

The proposed Plan would replace the 1998 Policies Map with an updated Policies Map that uses different symbology and conveys different information. The key changes are:

- Neighborhood Centers, Multi-Neighborhood Centers, and Regional Centers are shown with their actual boundaries rather than with an icon. In addition, a new category (Main Street Mixed Use Corridors) has been added to note pedestrian-scale “walking streets” with ground floor retail and upper story housing.

- “Housing Opportunity Areas” and “Development Opportunity Areas” have been replaced with “Land Use Change Areas”, “Neighborhood Enhancement Areas,” and “Revitalization” Areas. Rather than using icons to show these areas, actual boundaries are mapped.
- Special Treatment Areas have been removed from the Map. Their 2006 equivalent—Policy Focus Areas—are mapped in the Plan’s Area Elements.
- Those areas not explicitly contained in the above boundaries are generally included in a “Conservation Area”—indicating that minimal change is expected over the next 20 years

Substantive changes to the Map include:

- Minor amendments to the Central Employment Area boundary
- Recognition of the potential for land use change in the Near Southeast, along South Capitol, at the Southwest Waterfront, at Reservation 13, and other sites not acknowledged by the 1998 Plan.
- Mapping of the “Great Streets” and several other corridors as “Revitalization” areas
- Recognition of the large number of vacant infill lots in neighborhoods like Anacostia, Deanwood, and Marshall Heights (and the resulting designation of these communities as “Enhancement” areas rather than Conservation areas).
- Historic Anacostia and Hechinger Mall are designated as “Multi-Neighborhood” Centers rather than “Regional” Centers.
- “Multi-Neighborhood Centers” are designated at the Florida Avenue Market, the Brentwood Shopping Center, and Fort Lincoln (these areas are not designated as commercial centers in the prior Plan).
- Mixed Use Main Streets have been mapped in a number of places where no commercial symbology appears on the current Map, including Upper Bladensburg Road, Barracks Row, 11th Street NW (near Logan Circle), and Pennsylvania Avenue (near the Potomac Avenue station). Commercial symbology has been deleted from 15th Street on Capitol Hill.

Policy Changes

As noted earlier in this chapter, the proposed District Elements contain 1,270 policies and 609 actions. Once adopted, these would replace the approximately 3,500 policies and actions in the existing (1998) Plan. Although the number of policy/action statements in the proposed Plan is approximately half the number in the existing Plan, the breadth of topics covered is greater since the proposed Plan eliminates

many redundant policies. Many of the proposed policies address topics not covered in the current Plan, such as the planning of educational facilities, promotion of green buildings, low impact development, creation of new arts districts, and protection of subsidized housing.

Much of the basic philosophy and underlying vision that guides the proposed Plan has been carried forward from the prior Plan. For example, the revitalization of the Anacostia waterfront and creation of a “living” Downtown are both concepts in the current (1998) Plan. Similarly, the 1998 Plan also contains policies supporting transit-oriented development. Probably the greatest shift in policy is the proposed Plan’s orientation toward “growing” the city—and the emphasis on “inclusive” growth. Other policy shifts include greater emphasis on environmental issues, non-vehicular modes of transportation, protection of row house neighborhoods, expansion of the city’s park system, protection of public lands for public benefit, and reduction of retail leakage.

The proposed Plan contains fewer policies than the existing Plan on human service issues such as income maintenance and nutrition, and operational issues such as trash pickup and rodent control. This does not mean the city has nullified its policies on these topics, or will decrease its support for these programs in the future. Rather, it recognizes that such topics are best addressed in documents other than the city’s Comprehensive Plan.

Capital Improvement Project Impacts

The proposed Comp Plan identifies specific public improvements that could be funded and developed in the future. These include roadway extensions, new mass transit systems, bike lanes, sidewalks, infrastructure replacement and expansion projects, streetscape and landscaping improvements, new parks and recreation centers, and new public facilities. While adoption of the revised Plan alone would not cause any of these projects to be built, the Plan could set in motion programs and processes leading to their eventual construction. These projects could have environmental impacts and will be subject to subsequent environmental review.

Major capital improvements identified by the Comp Plan are listed in Table II-7. The table lists projects in the citywide elements first, and projects in the area elements second. This is not intended to be an exhaustive list of all improvements needed during the lifetime of the Comp Plan. Rather it is an indication of projects that have already received some degree of study, either through agency master plans or parallel planning studies (such as Small Area Plans). Additional capital improvements will be needed as growth occurs. As the Plan itself notes, a high priority implementation task is to prepare a Master Public Facilities Plan which identifies all facility needs and ensures that dollars are allocated in the most systematic and rational way possible.

Table II-7: Capital Improvements Identified by the Comp Plan

Citywide Elements	
Action	Improvement
T-2.1-A	New streetcar and BRT lines
T-2.1-D/ T-2.2-E	Bus Stop Improvements/ New cross-town bus lines
T-2.1-G	Water taxi network
T-2.2-A	Intermodal transportation centers
T-2.2-B	Enhanced pedestrian connections at Metrorail
T-2.2-D	Enhanced commuter rail/ Metro connections
T-2.3-B/ PROS-3.3-A/ B	Integrated system of bike lanes and trails
T-2.4-B	Sidewalks on all major streets
T-2.6-A	Street improvements to achieve ADA compliance
T-3.5-A	Tour bus parking improvements
H-1.2-D/ H-1.2-E	Land acquisition for various housing programs
H-1.4-A	Public Housing renovation
H-2.1-C	Purchase of expiring Section 8 projects
E-1.1-A	Tree replacement and planting
E-4.5-A	Lead pipe replacement
ED-4.1-B	Vocational School development
PROS-2.1-A	Various park improvements and expansion
PROS-3.1-D	Fort Circle Park Trail
PROS-3.2-A	Anacostia River park improvements
PROS-3.2-B/C	Anacostia River park/trail signage
UD-1.5-A	Removal of barriers to waterfront access
UD-3.1-B	Streetscape improvements
HP-1.4-B/C	Historic district signage and markers
HP-2.6-A	Archaeological curation facility
CSF-2.1-A	New primary health care facilities
CSF-3.1-A	New central library
CSF-3.1-B	Modernization of the branch library system
EDU-3.1-A/ FSS-1.1-D	Satellite campus of UDC
IN-1.2-B/C	Replacement of water mains and improvement of water treatment facilities
IN-2.1-A	Improvements to the wastewater system
IN-2.2-A/ 2.3-A	Improvements to the stormwater system, incl. pumps and combined sewer separation
IN-3.1-A	Upgrade of Fort Totten Transfer station

Table II-7, continued

Area Elements	
Action	Improvement
AW-1.1-A	Implementation of Anacostia Waterfront Framework
AW-1.1-B/ FSS-1.1-F	Reconstructed bridges across the Anacostia river
AW-2.2-E	Reconstruction of South Capitol St. as grand urban boulevard
AW-2.3-B	Canal Blocks and Waterfront Parks
AW-2.4-B	Poplar Point (I-295/395) Long-Range Transportation Improvements
CH-1.1-C	Capitol Hill transportation improvements
CH-1.1-D	H Street/ Benning Road streetcar
CH-1.2-D	Rehab of Rosedale, Payne, Hine, Watkins, Rumsey Rec Centers; new Hill rec center
CH-1.2-E	New Capitol Hill NE Senior Center
CH-1.2-F	Rehab of old Penna Av. SE Navy Hospital
CH-2.1-A/ B	Implementation of H Street Plan and Benning Road Great Streets improvements
CH-2.1-C	Replacement of HL Christian Library
CH-2.2-A/ FNS-2.6-A/B	Pennsylvania Avenue Great Streets Improvements and transportation improvements
CH-2.2-C	Eastern Market renovation
CH-2.2-D	Potomac Gardens New Community
CW-2.3-C	Chinese Gardens at 5 th and Massachusetts
CW-2.5-B	Implementation of Judiciary Sq Transportation Improvements
CW-2.6-A/ NNW-1.1-C	K Street Busway
CW-2.8-A	NoMA Public Realm, Infrastructure, and Transportation Improvements
FNS-1.1-E	Kenilworth Av Transportation Improvements
FNS-1.2-B/ C	Marvin Gaye Park/ Fort Dupont Park Improvements
FNS-1.2-B	Minnesota Avenue Government Center
FNS-2.2-C	Minnesota Avenue extension
FNS-2.2-B/2.3-A	NHB and Division, and 61 st and Dix land acquisition for neighborhood commercial
FNS-2.3-B/ 2.5-A	Lincoln Heights New Community/ Eastgate Gardens redevelopment
FSS-1.1-D	Satellite campus of UDC
FSS-1.2-A	Oxon Run Trail and park improvements
FSS-2.1-A	Anacostia Government Center
FSS-2.1-B	Anacostia Strategic Development Plan transportation and public realm improvements
FSS-2.1-C	Restoration of cultural and public facilities in Historic Anacostia
FSS-2.2-B	New St. Elizabeths Mental Health hospital
FSS-2.3-A	Barry Farms New Community
FSS-2.6-A	Martin Luther King Jr Ave/ South Capitol Great Streets improvements
FSS-2.6-C	Reconstruction of Washington Highlands Library
MC-1.2-B	Modernize Mt Pleasant Library and consider new Columbia Heights library
MC-1.2-C	New recreation center in Bloomingdale/ Eckington
MC-2.1-D	Park Morton New Community
MC-2.1-E	Reuse of Bruce School
MC-2.2-A	Implementation of Columbia Heights Public Realm Plan

Action	Improvement
MC-2.2-B	Columbia Heights Park Improvements
MC-2.2-C	Columbia Heights/ Mt Pleasant Transportation Improvements
MC-2.3-A	DUKE Area Plan Improvements (Howard Theater rehab, etc.)
MC-2.3-B	U Street/ Shaw/ Howard Transportation Plan Improvements
MC-2.4-A	18 th Street/ Adams Morgan Transportation Plan Improvements
MC-2.7-C	North Capitol / Truxton Circle Transportation Plan Improvements
NNW-1.1-C	Expansion of DC Circulator
NNW-1.2-A/ 2.2-A-B	Streetscape improvements on Connecticut, P Street, M Street, 7 th , 9 th , 14 th , 17 th
NNW-1.2-B	New recreational facilities in Logan/ West End areas
NNW-2.1-G	Reconstruct Watha Daniel Library
NNW-2.4-A	Georgetown Waterfront Park
NNW-2.5-B	Washington Circle Open Space improvements
NNW-2.5-D	Second access point to Foggy Bottom Metro
RCE-1.1-D	Traffic flow improvements on Georgia, North Capitol, Missouri, New Hampshire
RCE-2.1-D	Takoma Station village green
RCE-2.2-A/ 2.3-A	Site acquisition on Georgia Avenue for public improvements
RCE-2.2-D	Improvements to Georgia/ New Hampshire intersection
RCE-2.5-A	AFRH Master Plan implementation (North Central DC park network)
RCW-1.2-A	Combined sewer separation in stream valleys
RCW-1.2-B	New Recreation Center in eastern part of Rock Creek West
RCW-1.2-D	Rock Creek West Senior Center
RCW-1.2-E	Renovation of Friendship/ Tenley Library
RCW-2.2-B	Traffic flow improvements on Wisconsin Avenue (WACTS)
UNE-1.1-C	Traffic safety improvements on Eastern, Franklin, Monroe, Bladensburg, Brentwood, Rhode Island, South Dakota, and New York Aves
UNE-1.2-A	Parkland acquisition for Upper Northeast
UNB-2.1-C	Reuse/ rehab of Crummell School
UNE-2.2-C	Redesign of the H Street/ Bladensburg starburst intersection
UNE-2.3-A	New York Avenue Transportation Study improvements
UNE-2.3-B	Brentwood Road Transportation improvements
UNE-2.4-A	Bladensburg façade and streetscape improvements
UNE-2.4-B/ 2.7-B	South Dakota Transportation improvements, including Riggs intersection redesign

III. SETTING, IMPACTS, AND MITIGATION

The following sections of the Environmental Assessment describe the existing environmental setting in the District, the anticipated impacts that may result following the adoption of the Comprehensive Plan, and proposed measures to mitigate any impacts that are potentially significant. All of the information presented herein has been previously disclosed on published via the Comp Plan background reports posted on the Comp Plan website in May 2006—or in the body of the Comp Plan itself.

The following sections are included:

- A. Land Use
- B. Population, Employment, and Housing
- C. Transportation
- D. Infrastructure
- E. Biotic Resources
- F. Water Resources
- G. Air Resources
- H. Land Resources
- I. Hazardous Materials
- J. Community Services
- K. Cultural Resources
- L. Visual Resources
- M. Economic Impacts

III.A LAND USE

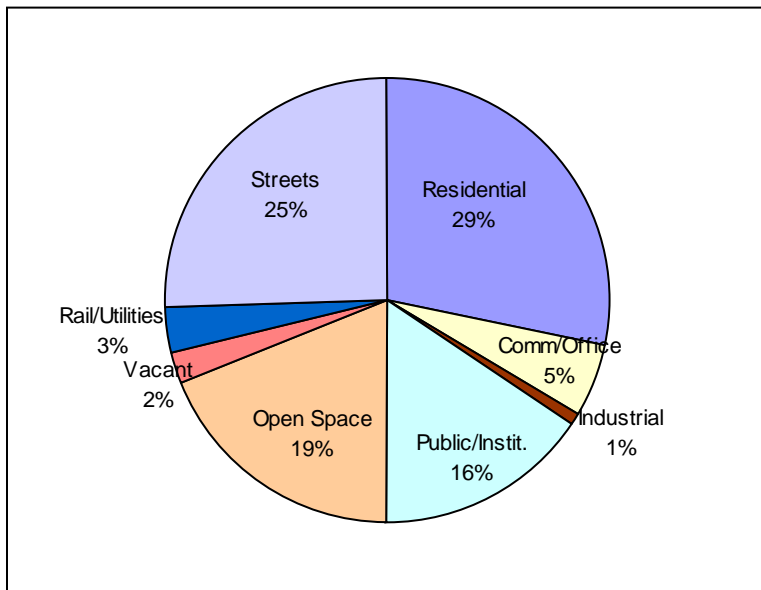
This section of the Environmental Assessment describes existing land use within the District of Columbia, the potential impacts of the proposed plan on land use, and mitigation measures to address any potentially significant impacts.

SETTING

A description of the District’s location and overview of its physical characteristics may be found in the Project Description of the Environmental Assessment. In 2006, the city encompassed 69 square miles, including 8 square miles of water.

The City conducted an inventory of existing land use in 2004 as part of the Comp Plan revision. The inventory utilized Office of Tax and Revenue Use Codes to approximate the actual use of each parcel of land. Land uses were generalized and mapped at the block level for the entire city, with finer-grained detail provided on blocks with many different land uses. Field surveys and aerial photos were used to verify the mapped data. The land use data collected through this process is summarized in Table III.A-1 and Chart III.A-1.

In 2004, the District contained about 11,100 acres of residential land, constituting 28 percent of its land area. Most of this acreage is developed at low- or low-medium densities (e.g., single family homes, townhomes, and rowhouses). Commercial and office uses represent about 5 percent of the city’s land area and industrial uses comprise less than 1 percent of the city’s land area. Park and open space lands cover 19 percent of the city and public/institutional land covers 16 percent. Streets, including rights-of-way as well as the curb-to-curb surfaces, cover 25 percent of the city.



**Chart III.A-1:
Existing Land
Use in the
District of
Columbia, 2004**

*Source:
Office of Planning,
based on actual uses
as of July 2004*

Table III.A-1: Existing Land Use by Planning Area, 2004

	Lower Anacostia Waterfront	Capitol Hill	Central Washington	Far Northeast & Southeast	Far Southeast & Southwest	Mid City	Near Northwest	Rock Creek East	Rock Creek West	Upper Northeast	Citywide	Percent
Road Rights-of-Way	690.2	719.8	898.8	1,196.4	906.1	648.1	695.8	1,232.9	1,760.5	1,269.2	10,018	25.5%
Single Family Detached Homes	52.0	6.2	0.1	730.5	163.8	15.6	83.8	877.6	2,324.4	682.2	4,936.2	12.6%
Single Family Attached Homes / Row Houses	67.9	519.3	9.7	605.1	327.8	515.6	321.2	550.2	290.0	666.9	3,873.6	9.9%
Low-Rise Apartments	192.9	43.1	9.7	349.3	555.2	142.7	103.1	81.1	185.4	193.1	1,855.6	4.7%
High-Rise Apartments	25.6	3.8	25.8	19.9	43.7	61.2	63.7	24.7	109.2	24.6	402.1	1.0%
Commercial	142.9	88.8	447.9	118.9	62.8	149.7	214.3	98.5	170.1	300.5	1,794.4	4.7%
Industrial	44.6	5.2	16.4	12.2	5.5	20.9	5.4	15.7	0.0	292.6	418.5	1.1%
Local Public Facilities	86.9	48.1	47.0	137.9	441.1	53.7	75.5	124.5	67.5	108.7	1,190.8	3.0%
Federal Facilities (excl. parks)	447.2	11.8	480.6	4.4	1,067.3	1.4	1.0	412.0	282.6	72.7	2,781.0	7.1%
Institutional	31.6	35.3	66.6	68.9	117.4	142.7	247.6	161.3	658.9	731.8	2,261.9	5.8%
Permanent Open Space	1,933.7	52.3	678.5	803.8	729.0	141.2	354.1	875.6	2,011.3	400.6	7,980.2	20.3%
Rail, Communication, Utilities	109.6	0.6	36.0	132.1	74.5	96.8	6.3	67.2	3.8	329.8	856.7	2.2%
Vacant	127.4	23.0	58.2	166.5	188.2	36.1	32.5	21.2	111.2	78.5	842.9	2.1%
TOTAL LAND	3,959.8	1,559.1	2,776.4	4,353.9	4,686.8	2,026.0	2,206.8	4,548.7	7,982.2	5,155.5	39,255.3	100.0
<i>Water</i>	<i>1,625.0</i>	<i>0.0</i>	<i>509.2</i>	<i>4.7</i>	<i>1,791.4</i>	<i>45.8</i>	<i>239.5</i>	<i>18.8</i>	<i>313.0</i>	<i>7.1</i>	<i>4,554.4</i>	
TOTAL	5,577.7	1,557.4	3,284.5	4,350.5	6,473.8	2,071.6	2,443.7	4,561.2	8,287.7	5,158.2	43,766	

Table III.A-2: Percent of City Area in Each Existing Land Use, 1981 v 2004

% of Land in each Land Use Category	1981	2004
Residential	25.7%	28.4%
Commercial/office	4.1%	5.2%
Industrial	1.3%	0.8%
Public/Semi-Public	17.2%	15.7%
Parks/Recreation	20.6%	19.0%
Vacant	5.7%	2.2%
Transportation, Communication & Utilities	Not calc.	3.4%
Street Rights of Way	25.4%	25.5
Total	100.0%	100.0%

Source for Tables III.A-1 and A-2: DC Office of Planning, 2004. Updated in 2006 based on Planning Area boundaries.

The distribution of land use in the District has remained relatively constant since the early 1980s, when the District Elements were first drafted. A comparison of data from 1981 and 2004 is shown in Table III.A-2. The comparison suggests that the residential and commercial acreage has increased slightly, while vacant acreage has declined slightly. Based on the table, about 1,400 acres of land in the District moved from “vacant” into an active use category between 1981 and 2004.

The spatial distribution of land uses in the city reflect historical development patterns, the transportation system, and natural features such as rivers and stream valleys. There is a large commercial city core of about four square miles, centered around the open spaces of the federal city. This core is surrounded by an inner ring of moderate to high density residential and mixed use neighborhoods, extending west to Georgetown, north to Columbia Heights and Petworth, east across Capitol Hill, and south to the Anacostia River and Near Southwest. Beyond the inner ring is an outer ring of less dense development, characterized largely by single family housing and garden apartments. The two rings generally correspond to historic development patterns, with most of the inner ring developed prior to 1910 and the outer ring developed after 1910.

Most of the commercial and higher density development beyond the core of the city follows radial avenues like Connecticut Avenue NW and Pennsylvania Avenue SE. Most of the District’s industrial development follows the railroad corridors running from Union Station east along New York Avenue and north to Silver Spring.

Other significant aspects of the city’s land use pattern include its open space networks, particularly those along Rock Creek and the Potomac and Anacostia Rivers. Large institutional uses—including some 2,000 acres of colleges, universities, hospitals, seminaries, and similar uses across the city—occur across the city, particularly in the northwest quadrant and in Upper Northeast. There are also large federal enclaves beyond the core of the city, such as Bolling Air Force Base, the St. Elizabeths Hospital Campus, Walter Reed Hospital, and the Armed Forces Retirement Home. These uses provide open space buffers, job centers, community anchors, and resources for the surrounding neighborhoods.

In 2000, the average density in the District of Columbia was 9,377 persons per square mile. In 1950, this figure was 13,150 persons per square mile. While population density has declined (due to falling household sizes), housing density has remained relatively stable. In DC, there are 275,000 units on approximately 11,100 acres. This equates to an average overall density of 25 units per acre in DC’s residential neighborhoods. Such densities are common in the city’s row house neighborhoods. Conversely, the average density in DC’s single family detached neighborhoods is about 7-10 units per acre while densities of 150-250 units per acre are common in the Penn Quarter, West End, Lower 16th Street corridor, and other high density areas.

In 2004, only about 2.2 percent of the District was vacant. About half of this land is located east of the Anacostia River, generally on scattered parcels in residential neighborhoods. About 75 percent of the city’s vacant land is residentially zoned.

While vacant land is an important part of the city's future land supply, most of the city's housing and employment growth is expected to occur on land that is currently classified as "developed." In fact, true vacant land (in other words, land with no improvements) is estimated to have the potential for 11,000 new housing units and 8 million square feet of commercial space—or only about 20 percent of the capacity required to satisfy population and employment projections. The remainder of the city's development potential is associated with older commercial and industrial properties, large public "campuses" (Reservation 13, St. Elizabeths, etc.), surface parking lots, vacant structures, and other properties where the value of existing improvements is far below the value of the land. These "underutilized" properties have the potential for thousands of additional dwelling units and commercial square footage. Most of the District's recent development and "pipeline" development is planned on such property.

SIGNIFICANCE CRITERIA

A project may be considered to have a significant impact on land use if it would disrupt or divide the physical arrangement of an established community; conflict with established recreational, educational, religious or scientific uses, or substantially alter an area's land use composition. Thus, the focus of this section is on the changes to the physical form of the community that could result from Comp Plan adoption, and the land use conflicts that could potentially result from the proposed land use designations and development policies.

IMPACTS AND MITIGATION MEASURES

ELIMINATION OF THE MEDIUM-HIGH DENSITY COMMERCIAL LAND USE CATEGORY

Impact A1. The proposed Comp Plan Generalized Land Use Map would eliminate the "Medium-High Density Commercial" (MHDC) land use category. Land formerly shown as MHDC would either be redesignated as "High Density Commercial" or "Medium Density Commercial." This is a less than significant impact.

The existing (1998) Comprehensive Plan includes five commercial land use map categories, stratified by building intensity. The proposed (2006) Comprehensive Plan map would eliminate the "Medium High" category, so that commercial land uses were stratified in the same manner as residential categories (High, Medium, Moderate, and Low). Approximately 280 acres are affected.

This change will improve the map's readability (the Medium-High and High categories are presently hard to distinguish on the map) and better express the intent of the Plan to concentrate growth and create buffers between higher density and moderate density areas. The primary areas affected are the Southwest Federal Center/ L'Enfant Plaza area, the Near Southeast, and the NoMA area. The Medium-

High designation currently appears only within the Lower Anacostia Waterfront and Central Washington Planning Areas.

The impact is less than significant for two reasons:

- First, since there is no corresponding zoning district for Medium-High Density Commercial (MHDC), there is no substantive difference in allowable intensity between the areas designated “Medium-High” and the areas designated “High” on the 1998 Plan Map . Areas with this Plan designation in the 1998 Plan are generally zoned C-3-C, which is the same designation that appears in much of the area zoned for High Density Commercial use. In addition, much of the area with this Plan designation has been identified as the receiving area for bonus density through the city’s Transfer of Development Rights (TDR) program—high-density development is already encouraged implicitly in these areas.
- Second, the re-designation has been mapped in a way that recognizes the existing land use character. Thus, the Near Southwest/ L’Enfant Plaza area has been changed to “High” Density because it is adjacent to Downtown and does not abut low density neighborhoods. On the other hand, where this designation formerly appeared on the eastern edge of NoMA, it has been mapped as “Medium Density Commercial” to recognize the row house neighborhoods to the east. Similarly, on Lower 16th Street, where the MHDC designation appears in a “Mixed Use” combination, the commercial portion of the mix has been mapped as “Medium” rather than “High” to recognize the historic, predominantly residential character of the street.

INCREASED DENSITY AROUND METRO STATIONS AND ALONG TRANSIT CORRIDORS

Impact A2. The proposed Comp Plan envisions additional density around transit stations, along major transit corridors, in Central Washington, and along the Anacostia River. Future Land Use Map changes along the six “Great Streets,” in NoMA, along the Southwest Waterfront and Near Southeast, and around Metro Stations in the Northeast and Southeast quadrants support future development densities and intensities that exceed those permitted today. This could lead to land use conflicts as more dense development occurs proximate to less dense neighborhoods. This impact is less than significant because of policies and actions in the proposed Plan.

Like the existing Comprehensive Plan, the proposed Plan focuses future development around transit stations, on transit corridors, and on underutilized commercial land. On a regional level, this would produce cumulative environmental benefits by reducing urban sprawl, auto reliance, and vehicle trips. On a local level, however, increased density could lead to the potential for land use conflicts as high density development occurs adjacent to low density neighborhoods.

The Land Use Map identifies the appropriate densities along major corridors and around transit stations to avoid such conflicts. For example, areas designated for “High Density Commercial” use are not cited

immediately next to areas designated for “Low Density Residential” use. Intervening uses such as Moderate or Medium Density Commercial, Mixed Use, or open space typically occur to avoid direct interface between uses of very different densities.

Despite the land use mapping, the potential for land use conflicts may still exist. Consequently, the Plan includes language which explicitly calls for buffering, transitions in density, “stepping down” in building heights between more dense and less dense areas, and recognition that each transit station must be treated differently. The Plan also calls for detailed station area and corridor planning to develop site-specific standards for land use compatibility.

The Plan includes the following specific policies to mitigate the potential for future conflicts:

Policy LU-1.1.7: Central Employment Area Edges

Support the retention of the established residential neighborhoods adjacent to the Central Employment Area. A stepping down in land use intensity and building height shall be required along the edges of the CEA to protect the integrity and historic scale of adjacent moderate density neighborhoods.

Policy LU-1.3.5: Edge Conditions Around Transit Stations

Ensure that development adjacent to Metrorail stations is planned and designed to respect the character and integrity of adjacent neighborhoods. For stations that are located within or close to low density areas, building heights should “step down” as needed to avoid dramatic contrasts in height and scale between the station area and nearby residential streets and yards.

Policy LU-1.3.7: TOD Boundaries

Tailor the reach of transit-oriented development (TOD) policies and associated development regulations to reflect the specific conditions at each Metrorail station and along each transit corridor. The presence of historic districts and conservation areas should be a significant consideration as these policies are applied.

Policy LU-2.3.3: Buffering Requirements

Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to mitigate adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height stepdowns, and other architectural and site planning measures that minimize potential conflicts.

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 which also may contain institutional, non-profit, embassy/chancery, and office-type uses. Zoning regulations for these areas (which currently include the SP-1 and SP-2 zones) should ensure that development is harmonious with its surroundings, achieves appropriate height and density transitions, and protects neighborhood character.

Policy LU-2.4.5: Encouraging Nodal Development

Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height and scale of development within nodes respects the integrity and character of surrounding areas.

Policy LU-2.4.6: Scale and Design of New Commercial Uses

Ensure that new uses within commercial districts are developed at a scale and design that is appropriate and compatible with surrounding areas.

Action LU-1.3-B: Station Area and Corridor Planning

Conduct detailed station area and corridor plans prior to the application of TOD overlays in order to avoid potential conflicts between TOD and neighborhood conservation goals. These plans should be prepared collaboratively with WMATA and local communities and should include detailed surveys of parcel characteristics, existing land uses, structures, street widths, the potential for buffering, and possible development impacts on surrounding areas. Plans should also address joint public-private development opportunities, urban design improvements, traffic and parking management strategies, integrated bus service and required service facilities, capital improvements, and recommended land use and zoning changes.

In addition to the policies listed above, the Area Elements of the Comprehensive Plan include many provisions to mitigate the potential for land use conflicts resulting from increases in density around specifically named Metro stations and along specifically named corridor streets. Implementation of these policies, plus the policies listed above, would reduce the potential for land use conflicts to a less than significant level.

POTENTIAL FOR LAND USE CONFLICTS AROUND “LARGE SITES”

Impact A3. The Comprehensive Plan supports the redevelopment of 11 “large sites” with new land uses. Some of these sites are located close to residential areas and open space. Their redevelopment with substantially different or new land uses could create conflicts with adjacent uses. This impact is less than significant because of policies in the proposed Plan.

The Draft Plan supports the redevelopment of Reservation 13, Poplar Point, the Southwest Waterfront, the Southeast Federal Center/Near Southeast, St. Elizabeths Hospital, and McMillan Sand Filtration Site with mixed uses. It also supports the continued buildout of the Fort Lincoln New Town and Kenilworth-Parkside community in Northeast DC, the restructuring of uses at DC Village to achieve greater efficiency. The Plan also acknowledges federal plans for the redevelopment of the Armed Forces Retirement Home and the Walter Reed Army Medical Center.

Development of any of these large sites could have significant environmental impacts, triggering the need for project-level Environmental Assessments (EAs) or EIS’s. While these assessments are outside the scope of the Comprehensive Plan, the analysis in the Comp Plan EA does account for the cumulative impacts of these large sites on transportation, natural resources, infrastructure, and other factors.

From a land use perspective, the principal impact is the potential for conflict as large-scale development occurs on these sites. Some (like St. Elizabeths) are already heavily urbanized while others (like the McMillan Sand Filtration Site and Poplar Point) are predominantly open space. Development could create the potential for land use compatibility issues along the edges, particularly where these sites abut established residential communities. This is particularly true on sites like the Armed Forces Retirement Home, where the western edge of the site consists of passive open space abutting row house neighborhoods like Petworth and Pleasant Plains.

The potential for land use conflicts is mitigated through the following general policies:

Policy LU-1.2.2: Mix of Uses on Large Sites

Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses.

Policy LU-1.2.3: Federal Sites

Work closely with the federal government on re-use planning for those federal lands where a change of use or transfer of ownership may take place in the future. Even where such properties will remain in federal use, the impacts of new activities on adjacent District neighborhoods should be acknowledged and proactively addressed by federal parties.

Policy LU-1.2.6: New Neighborhoods and the Urban Fabric

On those large sites that are redeveloped as new neighborhoods, integrate new development into the fabric of the city to the greatest extent feasible. Incorporate extensions of the city street grid, public access and circulation improvements, new public open spaces, and building intensities and massing that complement adjacent developed areas. Such sites should not be developed as self-contained communities, isolated or gated from their surroundings.

The potential for conflicts is further mitigated through the designation of each large site as a “Focus Area” with more detailed language guiding development in the Area Elements. Some of the Area Element policies addressing land use compatibility on large sites include:

Policy AW-2.4.5: Scale of Development at Poplar Point

Provide a scale and pattern of development in Poplar Point that is compatible with the fine-grained pattern found in nearby Historic Anacostia. Development should be pedestrian-oriented and should include active ground floor uses. The massing, height, and bulk of buildings and related features such as parking also should respect adjacent park uses and environmentally sensitive areas.

Policy AW-2.5.5: Reservation 13 Building Heights

Achieve a gradual progression in building heights on Reservation 13, with the lowest heights along 19th Street SE to buffer the adjacent low-scale row house neighborhoods. Taller buildings should be located near the interior and eastern edges of the site. Buildings should be designed to maximize waterfront views and vistas, and minimize impacts on nearby residences.

Policy AW-2.6.3: Density Transitions at Parkside

Provide appropriate height and scale transitions between new higher density development at Kenilworth-Parkside neighborhood and the established moderate density townhomes and apartments in the vicinity. Buildings with greater heights should generally be sited along Kenilworth Avenue and Foote Street, and should step down in intensity moving west toward the river.

Policy MC-2.6.5: Scale and Mix of New Uses

Recognize that development on portions of the McMillan Sand Filtration site may be necessary to stabilize the site and provide the desired open space and amenities. Where development takes place, it should consist of moderate- to medium-density housing and retail uses. Any development on the site should maintain viewsheds and vistas and be situated in a way that minimizes impacts on historic resources and adjacent development.

Policy RCE-2.5.1: AFRH Redevelopment

Ensure that any future development of the Armed Forces Retirement Home is sensitive to and compatible with surrounding uses. The scale of development should reflect prevailing densities in adjacent communities. The highest densities should be clustered along North Capitol Street and near the Irving Street Hospital area. Lower densities and open space are preferred near the Park View, Pleasant Plains, Petworth, and University Heights areas.

Policy RCE-2.3.3: Walter Reed Development

Work with federal officials in ongoing discussions and on the disposition of Walter Reed Hospital. The District will seek outcomes that preserve the stability and quality of neighborhoods around the site, minimize the potential for future land use and transportation conflicts, preserve open space buffers between the site and its neighbors, provide community amenities wherever feasible, and create educational and employment opportunities that benefit District residents.

Implementation of these, and other Citywide and Area Element land use policies—coupled with adherence to the Future Land Use Map—will mitigate the potential for land use conflicts on a cumulative basis. Detailed site plans, zoning plans, design guidelines, and buffering standards will be needed as individual large sites are developed to address more specific concerns.

INCREASED POTENTIAL FOR “INTERNAL” LAND USE CONFLICTS WITHIN MIXED USE AREAS

Impact A4. The Comp Plan increases the acreage designated as “Mixed Use” by 540 acres. The Mixed Use designation encourages the combination of different uses such as housing and retail on the same site. Such combinations could increase the potential for land use conflicts within individual mixed use projects. Additionally, the introduction of large quantities of housing units in commercial districts could create conflicts for existing businesses which have previously operated in an exclusively commercial environment. These impacts are mitigated to a less than significant level by policies and actions in the proposed plan.

Like the adopted 1998 Comp Plan, the proposed Plan encourages Mixed Use development as a way to create more vibrant neighborhood shopping streets, accommodate future housing growth without disrupting stable neighborhoods, and reduce auto dependence. Whereas the existing (1998) Plan designates about 1,800 acres for mixed use, the proposed Plan designates 2,300 acres. Many neighborhood shopping districts and corridor streets previously mapped as low or moderate density commercial are proposed for mixed use designations. Additionally, several of the “large sites” that were designated for federal or local public uses on the prior Comp Plan Maps are designated for “mixed uses” on the proposed Plan Map.

The Land Use Element of the proposed plan acknowledges that without sensitive design and appropriate development standards, mixed use projects have the potential to generate land use conflicts. For instance, new housing built over a restaurant or entertainment use creates the potential for noise, odor, vibration, and similar problems for new residents.

Similarly, introducing housing to neighborhood commercial districts could create challenges for existing businesses, many of whom are used to operating in a non-residential environment. Businesses could be subject to increasing complaints as residents move in. Traffic problems could become more pronounced as these areas become denser and residents, businesses, and business customers compete for a limited number of parking spaces.

The Comp Plan anticipates and responds to the potential for such impacts through the following policies:

Policy LU-2.3.2: Mitigation of Commercial Development Impacts

Mitigate the potential adverse effects of new commercial development, such as traffic, parking, litter, shadows, view obstruction, odor, noise, and vibration, on surrounding residential areas. Before commercial development is approved, establish requirements for traffic and noise control, parking and loading management, building design, hours of operation, and other measures as needed to reduce the possibility of conflicts or adverse effects on nearby neighborhoods.

Policy LU-2.4.6: Scale and Design of New Commercial Uses

Ensure that new uses within commercial districts are developed at a scale and design that is appropriate and compatible with surrounding areas.

Policy LU-2.4.13: Monitoring of Commercial Impacts

Maintain a range of monitoring, inspection, and enforcement programs for commercial areas to ensure that activities are occurring in accordance with local planning, building, zoning, transportation, health, alcoholic beverage control, and other District rules and regulations. Prompt and effective action should be taken in the event non-compliance with these rules and regulations is observed.

Action LU-2.4-B: Zoning Changes to Reduce Land Use Conflicts in Commercial Zones

As part of the comprehensive rewrite of the zoning regulations, consider text amendments that:

- (a) more effectively control the uses which are permitted as a matter-of-right in commercial zones;
- (b) avoid the excessive concentration of particular uses with the potential for adverse effects, such as convenience stores, fast food establishments, and liquor-licensed establishments; and
- (c) consider performance standards to reduce potential conflicts between certain incompatible uses, if they do not require frequent and extensive monitoring.

In addition, a proposed major revision of the Zone Regulations will establish performance standards and other guidelines for mixed use development which mitigate the potential for conflicts. Individual mixed use developments will also be subject to review by DCRA, OZ, and OP (as well as the Zoning Commission and BZA as appropriate), providing a means of reducing the potential for land use conflicts on a case by case basis.

DISPLACEMENT OF INDUSTRIAL AND MUNICIPAL LAND USES

Impact A5. Designation of industrial land as “Mixed Use” on the Future Land Use Map could lead to increased pressure to redevelop such land with non-industrial uses. Important municipal functions (such as salt domes, bus garages, tow yards, etc.) could be displaced, with no viable sites for relocation. Similarly, private businesses such as printers, caterers, laundries, wholesalers, distributors, auto repair shops, wrecking yards, and others requiring low cost land could be displaced. As residential or commercial uses move into such areas, industrial businesses on adjacent sites could also face hardships due to complaints and more restrictive operating requirements. This impact is mitigated to a less than significant level by policies and actions in the Draft Plan.

Among the objectives of the Comprehensive Plan are the more efficient use of land around Metrorail stations and the beautification of major gateways into the city. Much of the land around Metro stations such as Fort Totten, Brookland, Rhode Island Avenue, New York Avenue, Navy Yard, and Minnesota Avenue is currently used for industrial or “heavy commercial” business. Some of this land includes

District functions such as the Fort Totten Waste Transfer Station and nearby salt dome. Similarly, the New York Avenue, Bladensburg, and Kenilworth corridors are all characterized by industrial zoning and a mix of heavy commercial and industrial zoning. Programs to upgrade or revitalize these corridors could result in the loss of established businesses.

As noted in Statement A5 above, the impacts of industrial displacement are both direct and indirect. Industrial properties that are adjacent to sites undergoing redevelopment could find themselves isolated from other industrial uses, or subject to increasing complaints about noise, odors, truck traffic, and other industrial activities. This could eventually cause such businesses to relocate out of the District. This is true not only in areas like Buzzard Point, where redevelopment is supported by Plan policy but in areas like Brentwood, where industrial uses should be retained for the long run.

The Land Use and Economic Development Elements of the Plan each include discussions of the need to protect industrial land, particularly land to support municipal services of an industrial nature. The Plan reports that there is already a shortfall of 70 acres of land for such functions in the city. It specifically calls for the re-designation of the 200-acre DC Village property for “Local Public Facilities” to ensure that the city retains a large campus for municipal uses (the site was designated for mixed use, with production and technical employment in the 1998 Plan). The Plan also includes policies supporting co-location of municipal-industrial uses to improve efficiencies, and presents a series of zoning actions to protect industrial land.

The following policies are included in the document to mitigate displacement impacts:

Policy LU-3.1.1: Conservation of Industrial Land

Recognize the importance of industrial land to the economy of the District of Columbia, specifically its ability to support public works functions, and accommodate production, distribution, and repair (PDR) activities. Ensure that zoning regulations and land use decisions protect active and viable PDR land uses, and that economic development programs work to retain such uses in the future.

Policy LU-3.1.4: Rezoning of Industrial Areas

Allow the rezoning of industrial land for non-industrial purposes only when the land can no longer viably support industrial or PDR activities or is located such that industry cannot co-exist adequately with adjacent existing uses. Examples include land in the immediate vicinity of Metrorail stations, sites within historic districts, and small sites in the midst of stable residential neighborhoods. In the event such rezoning results in the displacement of active uses, assist these uses in relocating to designated PDR areas.

Policy LU-3.1.6: Siting Of Industrial-Type Public Works Facilities

Use performance standards, minimum distance requirements, and other regulatory and design measures to ensure the compatibility of industrial-type public works facilities such as trash transfer stations with surrounding land uses. Improve the physical appearance and screening of such uses and strictly regulate operations to reduce the incidence of land use conflicts, especially with residential uses.

Policy LU-3.1.8: Co-Location of Municipal Public Works Functions

Improve the performance of existing industrial areas through zoning regulations and city policies which encourage the more efficient use of land, including the co-location of municipal functions (such as fleet maintenance, record storage, and warehousing) on consolidated sites rather than independently managed scattered sites.

Policy LU-3.1.9: Central Management of Public Works

Promote the central management of municipal public works activities to avoid the displacement of essential government activities and the inefficiencies and increased costs resulting from more distant locations and future land acquisition needs. Consider “land banking” appropriately located District-owned properties and vacant sites to accommodate future municipal space needs.

Policy LU-3.1.10: Land Use Efficiency Through Technology

Encourage the more efficient use of PDR land through the application of technologies which reduce acreage requirements for public works. Examples of such applications include the use of diesel-electric hybrid buses (which can be accommodated in multi-level garages), using distributed power generation rather than large centralized facilities, and emphasizing green building technologies to reduce infrastructure needs.

Action LU-3.1-A: Industrial Zoning Use Changes

Provide a new zoning framework for industrial land, including:

- Prohibiting high impact “heavy” industries in the C-M zones to reduce the possibility of land use conflicts
- Prohibiting certain civic uses that detract from the industrial character of C-M areas and that could ultimately interfere with business operations
- Requiring special exceptions for large retail uses in the C-M zone to provide more control over such uses
- Limiting non-industrial uses in the M zone to avoid encroachment by uses which could impair existing industrial and public works activities (such as trash transfer)
- Creating an IP (industrial park) district with use and bulk regulations that reflect prevailing activities
- Creating a Mixed Use district where residential, commercial, and lesser-impact PDR uses are permitted, thereby accommodating live-work space, artisans and studios, and more intensive commercial uses.

Once these changes have been made, pursue the rezoning of selected sites in a manner consistent with the policies of the Comprehensive Plan. The zoning changes should continue to provide the flexibility to shift the mix of uses within historically industrial areas and should not diminish the economic viability of existing industrial activities.

Policy ED-2.5.1: Industrial Land Retention

Retain an adequate supply of industrially zoned land in order to accommodate the production, warehousing, distribution, light industrial, and research and development activities which sustain the local economy, support municipal services, and provide good employment opportunities for District residents.

Policy ED-2.5.2: Retaining Heavy Industry

Ensure that basic manufacturing (M-zoned) land is retained within the District to support the heavy industries that are essential to the local economy, such as concrete and asphalt batching plants and waste transfer facilities.

CONTINUED GROWTH OF INSTITUTIONAL USES

Impact A6. The Plan supports the continued growth of a “knowledge” economy, including institutional uses such as colleges, universities, and non-profits. Many of these uses occupy sites in predominantly residential areas. Their expansion could encroach on residential uses, or exacerbate traffic, parking, and other problems on neighborhood streets. This is a less than significant impact due to the city’s Campus Plan requirements, the designations on the Future Land Use Map, and the policies in the Comp Plan to mitigate the impacts of institutional uses.

Institutions are among the largest land uses in the District of Columbia, totaling over 2,000 acres. The Comp Plan supports the continued growth of the city’s colleges, universities, think tanks, and non-profits, and recognizes the potential for such growth to create jobs and educational opportunities for District

residents. The Plan acknowledges the potential for partnerships between institutions of higher education and the city's public and charter schools, as well as its businesses and social service programs.

“Horizontal” expansion of institutional uses beyond their current boundaries could create land use conflicts, and could potentially result in a reduction in the city's taxable land. Uncontrolled institutional expansion could also result in the loss of open space and the loss of housing and/or commercial building space. Secondary impacts, including increased demand for student housing, also may occur. For many years, the District has addressed this issue by requiring campus plans for colleges on residentially zoned land—and by establishing enrollment and employment caps on some of its largest institutions. The Comprehensive Plan re-states the District's commitment to maintaining campus plan requirements, and further encourages satellite campuses to help universities satisfy their space needs.

The following policies are provided in the Plan to mitigate potential impacts:

Policy EDU-3.3.1: Satellite Campuses

Promote the development of satellite campuses to accommodate university growth, relieve growth pressure on neighborhoods adjacent to existing campuses, spur economic development and revitalization in neighborhoods lagging in market activity, and create additional lifelong learning opportunities for DC residents.

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

Encourage the growth of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District's character, culture, and economy, and is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the quality of life in surrounding residential areas.

Policy EDU-3.3.3: Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that ensure that the institution is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other similar conditions.

Policy EDU-3.3.4: Student Housing

Continue to encourage the provision of on-campus student housing to reduce college and university impacts on the housing stock in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches.

Policy LU-3.2.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by District institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures.

Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations

Work with large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas, to ensure that their operations are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities.

Action LU-3.2-A: Zoning Actions for Institutional Uses

Complete a study of residential zoning requirements for institutional uses other than colleges and universities. Determine if additional review by the Board of Zoning Adjustment or Zoning Commission should be required in the

event of a change in use. Also determine if the use should be removed as an allowable or special exception use, or made subject to additional requirements.

In addition to the measures cited above, the Area Elements of the plan speak to the concerns around particular campuses. Strict adherence to these policies, and to the designations on the Future Land Use Map, should effectively mitigate potential impacts.

III.B POPULATION, HOUSING, AND EMPLOYMENT

This section of the Environmental Assessment describes population, housing, and employment within the District of Columbia, the potential impacts of the proposed Comp Plan on population, housing, and employment; and mitigating policies that address potentially significant impacts.

SETTING

Population

The 2000 Census reported the population of the District of Columbia to be 572,000. The District's State Data Center uses several indicators, including housing starts, demolitions, tax returns, utility connections, school enrollment, and dormitory construction to estimate the annual change in population in intercensal years. Based on the District's analysis, the city's population increased approximately one percent between 2000 and 2005, to about 577,000. The city's estimate reflects a net gain of 6,000 housing units, a decline in household size from 2.16 to 2.12, and a slight increase in the group quarters population between 2000 and 2005.

In July 2006, the US Census released its adjusted estimate for the District for 2005, which indicated a population of 582,000. The Census estimate presumes no change in household size or group quarters and is based primarily on the net gain in housing units since 2000.

The increase in population of since 2000 marks the first time in five decades the city has gained residents. As Table III.B-1 indicates, the District lost residents during each decade since 1950, when its population peaked at 802,000. The major factor in the city's population decline has been a drop in household size. Declining household size was the result of demographic changes occurring at the national level, but also the outcome of a decline in the number of families living in the city. The greatest decline in the city's population took place during the 1970s, when the city lost 120,000 residents.

Table III.B-1: District of Columbia Population, 1950-2005

Year	Total Population (US Census)	Estimated Population (State Data Center)
1950	802,000	
1960	764,000	
1970	756,000	
1980	638,000	
1990	607,000	
2000	572,000	
2005 (est.)	582,000	577,000

Source: 1950-2000, US Census, DC State Data Center

In 2000, the District's 2000 population included approximately 536,000 residents in households and 36,000 residents in group quarters. There were 248,338 households in the city, including about 114,000 defined by the Census as "families" and 134,000 defined as "non-families" (mostly single person households). Only 10 percent of the city's households consisted of a married couple with related children under 18 living at home. About 44 percent consisted of one-person households. The number of married couples with children in the District declined 25 percent between 1980 and 2000, while the number of one person households increased by 8 percent.

In 2000, the city's population was 60 percent Black, 31 percent White, 3 percent Asian and Pacific Islander and 2 percent Multi-racial, and 4 percent "Other". Approximately 8 percent of the city's residents are of Hispanic descent. Since 1990, the Black population of the city has been declining and the White population has been relatively stable. The greatest percentage gains have been in the Asian and Latino populations, although the total numbers are relatively low compared to the total population. In 2000, 3.8 percent of the city's residents had limited proficiency in English.

About 12 percent of the city's residents are over 65 and about 20 percent are under 18. There are significant geographic variations in the number of children in the city. In the Far Southeast/ Southwest Planning Area, approximately 36 percent of the residents are under 18, whereas in the Near Northwest Planning Areas, the figure is just 9 percent. Between 1980 and 2000, the number of children in the city declined from 143,000 to 114,000—more than twice the rate of decline of the general population.

Adjusted to 1999 dollars, average family income in the District was \$59,070 in 1979 and \$78,192 in 1999. Despite growing prosperity in the city and region, poverty in the city became more concentrated between 1980 and 2000. The District has 13 percent of the region's households but 24 percent of its low income households. In 1980, the percentage of residents below the poverty line was 18.6 percent; in 2000, it was 20.2 percent. Between 1980 and 2000, the number of residents in "high poverty" neighborhoods in the city increased from 106,000 to 126,000. At the same time, the District experienced a decline in "middle income" households—the percentage of residents earning \$45,000-\$60,000 (in 1999 dollars, adjusted for inflation) declined from 18 percent in 1980 to 11 percent in 2000.

In 2000, 59 percent of the city's households were renters and 41 percent were owners. The percentage of homeowners increased slightly from 1980, when it was 35 percent. The homeownership rate has continued to rise since 2000, as most of the new construction in the city has consisted of owner-occupied housing.

In 2000, 35 percent of the city's renters paid more than 30 percent of their income on housing. About 23 percent of the city's homeowners paid more than 30 percent of their incomes on housing. These figures have almost certainly increased since 2000, as housing costs have inflated at a much faster rate than income.

Housing

The 2000 Census counted 274,845 housing units in the District of Columbia. About one-third of these units consisted of apartments in buildings of 20 units or more, and about one-quarter consisted of row houses. Only 13 percent of the District’s homes are single family detached dwellings. Table III.B-2 compares housing composition in 1980 and 2000. The number of single family homes and rowhouses/ townhouses has increased by nearly 15,000 units. The number of multi-family units has decreased by 16,000.

According to the U.S. Census, the average value of a home in the city was \$52,900 in 1980 and \$157,200 in 2000. According to the Greater Capital Area Association of Realtors, the median sales price for a single family home in the city was \$178,250 in 2000. Between 2000 and 2005, the median sales price increased 174 percent, to \$489,000. Condominiums and cooperatives increased from a median sales price of \$138,000 to \$377,950.

About 35 percent of the city’s housing units were constructed before 1940. This figure includes much of the row house and single family home construction, however, and occupies a majority of the city’s residential acreage. Multi-family construction tends to be newer. A majority of the units added since 1960 have been in multi-family buildings.

In 2000, the Census reported that there were 26,500 vacant housing units in the District. Of these, 12,200 (46%) were for rent or sale. The rental vacancy rate was 5.9 percent in 2000; the owner vacancy rate was 2.9 percent. According to the Office of the Deputy Mayor for Planning and Economic Development, the number of abandoned buildings in the District declined from 4,000 in 1999 to 2,300 in 2002.

Table III.B-2: Composition of Housing Units in the District of Columbia, 1980 and 2000

Unit Type	1980		2000	
	Units	Percentage	Units	Percentage
1 unit detached	31,500	11.0	36,331	13.2
1 unit attached	62,700	23.0	72,669	26.4
2-4 units	31,000	11.0	30,248	11.0
5 or more units	151,400	55.0	135,111	49.1
Mobile/Trailer/Boat	300	--	487	0.3
TOTAL	277,000	100.0	274,845	100.0

Source: US Census, 1980 and 2000

Employment

The Metropolitan Washington Council of Governments, working in tandem with the District Department of Employment Services, estimated that there were 745,000 jobs in the District in 2005. Based on District figures, this is an increase of 32,000 jobs since 2000. The District has more jobs than residents—and its employment base has been growing at a faster rate than its population. The jobs-housing ratio in the city is currently 3:1.

In 2005, the District accounted for approximately one-quarter of the metropolitan area's employment. This share is down considerably from 1950, when it represented over 80 percent of the region's employment.

The District is primarily an office economy, with a mix of jobs in the services and government industries. Although the District lost federal jobs during the 1990s, the federal government still accounts for more than one-quarter of the jobs in the city. Conversely, the manufacturing, wholesale, and retail trade sectors are much smaller in the District than they are in the nation as a whole. The largest private sector industry—accounting for more than one in five of the city's non-government jobs—is Professional and Technical Services. This includes lawyers, architects, engineers, and consultants. The second largest category is Membership Associations and Organizations, which includes the many industry, trade, and interest groups in the city. Close behind are Administrative and Support Services, Educational Services (including universities) and Hospitals.

The District currently has one of the largest inventories of office space in the nation, with over 112 million square feet. Among American cities, only Midtown Manhattan, Lower Manhattan, and Downtown Chicago boast a greater concentration of office buildings. The office vacancy rate was 6.7 percent in 2005, the lowest of any major U.S. market.

The Department of Employment Services indicates that employment growth in the city is expected to be sustained at the rate of 7,000 jobs per year through 2015. The Office of Planning anticipates a slowdown to 5,000 jobs per year after that time, resulting in a 2005-2025 increase of 125,000 jobs. This translates into space demand for 35 million to 65 million square feet, depending on the types of jobs and space utilization trends.

SIGNIFICANCE CRITERIA

A project may be considered to have a significant impact on population, housing, and employment if it induces substantial growth or concentration of population, or if it displaces a large number of people. An impact may also be significant if it alters the location, distribution, density, or growth rate of an area's population or creates the demand for additional housing.

IMPACTS AND MITIGATION MEASURES

POPULATION INCREASES

Impact B1: Adoption of the Comprehensive Plan would encourage residential development along the “Great Streets” corridors, on the eastern side of Central Washington (e.g., in NoMA), along the Lower Anacostia River and Washington Channel, and around the city’s Metrorail stations. It would also reclassify several properties currently designated for commercial or industrial development (Production and Technical Employment) for “mixed use” development, which encourages housing. The policy and map changes are expected to accommodate 57,100 new households over the next 20 years. This is a less than significant impact, as the great majority of this growth is already accommodated by the existing Plan.

As mentioned in the Project Description (Chapter II), the proposed Comp Plan encourages the production of housing in the city to meet existing housing needs, respond to future demand, and achieve a better jobs-housing balance. The existing (1998) Plan also supports housing production, but without setting quantified targets. The proposed (2006) Plan builds on a mayoral initiative launched in 2002 to “grow” the city by 100,000 residents. While the initiative was initially tied to a 10-year target, the Comp Plan takes demographic and market supply/ demand factors into consideration and suggests that it will take 15 to 20 years to reach that goal, along with a concerted effort to attract families (larger households) back to the District.

The Plan incorporates many of the recommendations of the 2006 Comprehensive Housing Strategy, an ambitious program which would leverage public \$2 billion in public funds to produce 19,000 units of affordable housing over the next 20 years. Among the housing production recommendations in the Comp Plan are an inclusionary zoning policy (which would allow density bonuses to offset the requirement to set aside affordable units).

To meet the production targets, the proposed Plan designates additional land for residential or mixed use development, primarily on sites that were designated for Local Public Facilities, Commercial uses, and Production and Technical Employment uses in the existing (1998) Plan. The designation of these additional areas for housing, coupled with more pro-active housing policies, could enable the District to attract a larger share of the region’s housing demand in the future than it has in the recent past. Relative to the region, the District captured less than 5 percent of the region’s housing growth during the 1970s, 80s, and 90s. The Comp Plan anticipates that the capture rate will rise to 10 percent.

At the regional level, the additional housing demand accommodated by the Comp Plan would have positive environmental impacts by supporting “smart growth” principles, encouraging transit use, relieving the demand for land on the perimeter of the region, and balancing job and housing growth within the city. On a local scale, however, the additional housing create address increased demand for

public services such as schools, and could have impacts on transportation, noise, and other environmental factors. These impacts are addressed elsewhere in this Environmental Assessment.

DEMOGRAPHIC CHANGES

Impact B2. The Draft Comp Plan’s goal of directing housing growth to Central Washington, the Waterfront, transit station areas, and commercial corridors—rather than to single family neighborhoods—means that most of the new housing in the city will consist of multi-family units. These units are likely to be occupied by smaller households with fewer children. Household size in the city could continue to drop, and the demographic composition of the city could shift over time. The potential for this impact is mitigated by policies in the Draft Plan, and by the re-designation of over 1,000 acres of land from Moderate to Low Density Residential to conserve the single family housing supply.

Based on the land use analysis conducted during the Comp Plan revision, about 85 percent of the city’s housing production potential is associated with commercial land, public land, or land zoned for multi-family housing (zoned R-5-A or higher). Consequently, much of the city’s future housing supply will consist of smaller units, including studios and one- and two-bedroom apartments. This was the case between 2000 and 2005, a period during which household size continued to decline. While the fiscal impacts of this trend have generally been positive, the impacts on the diversity of the city are largely seen as negative.

Continued production of multi-family rather than single family housing could pose a challenge for the Comp Plan’s stated objective to attract families back to the District of Columbia. The Plan recognizes and speaks to this dilemma. One of the guiding principles on which the Plan is based is that “the District cannot sustain itself by only attracting small, affluent households.” (Framework Element, Sec 217.2). The guiding principles further state that the mix of housing types should be maintained and enhanced, and that “housing should be developed for households of different sizes, as well as singles and couples.”

There is a natural tension between the city’s goal of attracting and retaining families, and the reality of its land supply—most of which is better suited for higher density multi-family housing. Three strategies are set forth to reconcile this tension. First, preservation of the existing “family” housing stock, including row houses and single family homes. Second, a policy to produce a substantial number of new “family” (e.g., townhome or single family) housing units on large sites such as Fort Lincoln and the Armed Forces Retirement Home—even where the opportunity may exist to build denser multi-family housing. And third, assurance that a substantial number of new multi-family units along the corridors and around transit stations will be suitable for families. This can be achieved by encouraging larger (three and four bedroom) units at rents or sales prices that are affordable to working families. These policies do not exist—or are weakly stated—in the 1998 Comprehensive Plan.

The following policies in the Plan speak to this issue:

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing.

Policy H-1.3.1: Housing for Families

Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments.

Policy LU-2.1.5: Conservation of Single Family Neighborhoods

Carefully manage the development of vacant land and the alteration of existing structures in single family neighborhoods in order to protect low density character, preserve open space, and maintain neighborhood scale.

Policy LU-2.1.8: Zoning of Low and Moderate Density Neighborhoods

Discourage the zoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through R-4) for multi-family apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood.

Action H-1.3-A: Review Residential Zoning Regulations

During the revision of the city's zoning regulations, review the residential zoning regulations, particularly the R-4 (row house) zone. Make necessary changes to preserve row houses as single-family units to conserve the city's inventory of housing for larger households.

Policies in the area elements also speak to this issue. For example, the Rock Creek East Area Element includes a policy to "develop larger units suitable for families on the [Armed Forces Retirement Home] site" (Sec 2215.7). A similar policy in the Upper Northeast Area Element calls for "family-oriented, owner occupied housing" at Fort Lincoln.

The Plan also supports families through its policies to reinvest in public schools and libraries, improve parks and open spaces, enhance public safety, and provide family services such as child care and youth activities. An important goal of such policies is to retain families that are already in the District, and to encourage young District residents to remain in the city, rather than relocate to the suburbs, as they form families.

As noted in the project description, the Plan also re-designates large areas east of the Anacostia River formerly mapped as "Moderate Density Residential" for "Low Density Residential" uses. While the primary purpose of this change is to protect established single family neighborhoods, a secondary purpose is to encourage the production of one- and two-family homes in these areas. As noted elsewhere in this Environmental Assessment, the re-designated neighborhoods contain numerous vacant infill lots that could support family housing. Under the 1998 Plan, many of these lots could be developed with small apartments, which would be less likely to house families.

Despite these policies and map changes, it will still be a challenge to attract and retain families given nationwide demographic shifts. The decline in the number of families residing in central cities is a well-documented national trend, affecting metropolitan areas across the country. Although the Comp Plan clearly directs the city to address this trend head-on, the reality of high housing costs, the larger and more

diverse suburban housing stock, decentralized job growth, and suburban amenities (schools, parks, shopping, etc.) will continue to draw families from the city. Clearly, other strategies (such as the Master Education Plan and School Facilities Master Plan) must be implemented in tandem with the Comp Plan to make family retention and attraction a realistic and attainable goal.

DISPLACEMENT

Impact B3. Without strong anti-displacement policies, the level of development envisioned by the Comp Plan could increase economic pressure on lower income renters, seniors, small businesses, and others vulnerable to rising rents and tax assessments. Additionally, the Plan supports the redevelopment of public housing projects as “new communities.” The potential for displacement is mitigated in the proposed Plan through explicit policies and actions. The 2006 Plan proposes new anti-displacement strategies that are missing in the existing (1998) Plan in order to address and mitigate this impact.

The Comp Plan supports reinvestment in the city’s transitional and distressed neighborhoods by the private and public sectors. The Plan indicates that development and reinvestment in such areas is essential to the city’s long-term well being and the health of its neighborhoods. One of the potential risks of revitalization is the displacement of long-time lower-income residents due to rising rents, property taxes, property sale, or demolition. The recent real estate boom and run-up in prices has elevated this concern, especially in neighborhoods like Columbia Heights and Shaw.

Sustaining—or increasing—the pace of development through the Great Streets program and the other District revitalization initiatives that are incorporated by reference into the Comp Plan could further exacerbate this concern. For example, as part of the “New Communities” initiative, the Comp Plan supports the redevelopment of subsidized housing at Sursum Corda/ Northwest One, Barry Farm, Lincoln Heights, Park Morton, and Potomac Gardens with new mixed income housing. In this instance, mitigation of displacement impacts is provided through a commitment to one-for-one replacement of any assisted units that is removed. This was not the case in some of the HOPE VI projects developed in the early 2000s. As a result of HOPE VI, there was a net reduction in the number of public housing units east of the Anacostia River.

The Plan includes numerous policies which ensure that a substantial share of new housing is affordable to lower income households. The Housing Element is oriented toward the production and preservation of housing for lower income residents and persons with special needs. This includes policies to reduce the threat of displacement. The Economic Development Element includes policies to reduce the threat of displacement for small businesses.

The Plan mitigates displacement impacts through the following specific policies:

Policy H-2.1.3: Avoiding Displacement

Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units.

Policy H-2.1.4: Conversion of At-Risk Rentals to Affordable Units

Support efforts to purchase affordable rental buildings that are at risk of being sold and converted to luxury apartments or condominiums, in order to retain the units as affordable. Consider a variety of programs to manage these units, such as land banks and sale to non-profit housing organizations.

Policy H-2.1.6: Rent Control

Maintain rent control as a tool for moderating the affordability of older rental properties and protecting long-term residents, especially the elderly. In considering future refinements to the rent control program, the District should be careful to determine whether the proposed changes improve effectiveness, fairness and affordability without discouraging maintenance and preservation of rental housing units.

Policy H-1.4.4: Public Housing Renovation

Continue efforts to transform distressed public and assisted housing projects into viable mixed-income neighborhoods, providing one-for-one replacement within the District of Columbia of any public housing units that are removed. Target such efforts to locations where private sector development interest can be leveraged to assist in revitalization.

Policy H-1.2.1: Affordable Housing Production as a Civic Priority

Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city.

Policy H-1.2.2: Production Targets

Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the areawide median income (AMI). Newly produced affordable units should be targeted towards low-income households in proportions roughly equivalent to the proportions shown in Figure 5.2.

Policy H-1.2.4: Housing Affordability on Publicly Owned Sites

Require that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households.

Policy H-2.2.3: Tax Relief

Maintain tax relief measures for low income homeowners and low income senior homeowners faced with rising assessments and property taxes. These measures should reduce the pressure on low income owners to sell their homes and move out of the District.

Action H-1.4-E: Additional Public Housing

Support efforts by the DC Housing Authority to use its authority to create 1,000 additional units of public housing, subsidized by funding from the US Department of Housing and Urban Development under the public housing Annual Contributions Contract (ACC). This action is contingent on the availability of funds for a local rent subsidy to cover the annual operating costs for the new units.

Action H-2.1-A: Rehabilitation Grants

Develop a rehabilitation grant program for owners of small apartment buildings, linking the grants to income limits for future tenants. Such programs have been successful in preserving housing affordability in Montgomery County and in many other jurisdictions around the country.

Action H-2.1-B: Local Rent Subsidy

Implement a local rent subsidy program targeted toward newly created public housing units, newly created extremely low income housing units, and newly created units of housing for formerly homeless individuals and families.

Action H-2.1-C: Purchase of Expiring Section 8 Projects

Consider legislation that would give the District the right to purchase assisted, multi-family properties (and to maintain operating subsidies) where contracts are being terminated by HUD or where owners are choosing to opt out of contracts.

Action H-2.1-D: Tax Abatement for Project-Based Section 8 Units

Implement the program enacted in 2002 that abates the increment in real property taxes for project-based Section 8 facilities. Consider extending the abatement to provide full property tax relief as an incentive to preserve these units as affordable.

Action H-2.1-E: Affordable Set-Asides in Condo Conversions

Implement a requirement that 20 percent of the units in all condo conversions be earmarked for qualifying low and moderate income households. The requirement should ensure that at least some affordability is retained when rental units are converted to condominiums. In addition, require condominium maintenance fees to be set proportionally to the unit price so as not to make otherwise affordable units out-of-reach due to high fees.

Action H-2.2-C: Low Income Homeowner Tax Credit

Implement the ordinance passed by the District in 2002 to provide tax credits for long-term, low-income homeowners.

Action H-2.2-D: Tax Relief

Review existing tax relief programs for District homeowners and consider changes to help low-income households address rising property assessments.

Action H-2.2-E: Program Assistance for Low and Moderate Income Owners

Continue to offer comprehensive home maintenance and repair programs for low and moderate income owners and renters of single family homes. These programs should include counseling and technical assistance, as well as zero interest and deferred interest loans and direct financial assistance.

Policy ED-3.2.6: Commercial Displacement

Avoid the displacement of small and local businesses due to rising real estate costs. Programs should be developed to offset the impacts of rising operating expenses on small businesses in areas of rapidly rising rents and prices.

Policy ED-3.2.7: Assistance to Displaced Businesses

Assist small businesses that are displaced as a result of rising land costs and rents, government action, or new development. Efforts should be made to find locations for such businesses within redeveloping areas, or on other suitable sites within the city.

Action ED-3.2-A: Anti-Displacement Strategies

Complete an analysis of alternative regulatory and financial measures to mitigate the impacts of “commercial gentrification” on small and local businesses. Measures to be assessed should include but not be limited to income and property tax incentives, historic tax credits, direct financial assistance, commercial land trusts, relocation assistance programs, and zoning strategies such as maximum floor area allowances for particular commercial activities.

It is important to note that almost all of these policies are new, and are absent in the existing (1998) Comprehensive Plan.

The Plan also mitigates displacement through programs to increase the income-earning potential of District residents. The Economic Development Element includes policies to lift residents out of poverty through job training, job placement, and apprenticeship programs, vocational and technical schools, better child care services, and improved public transit to regional employment centers. Increasing disposable income and earning potential can provide personal financial resources for housing and other expenses, thereby reducing cost burdens.

JOB-INDUCED HOUSING DEMAND

Impact B4. The proposed Plan anticipates that the number of jobs in the city will grow at more than twice rate of the number of households in the next 20 years. This could contribute to the demand for housing, and could increase the number of persons who are employed within the District but live in other states. While this impact is potentially significant, it will be far less significant under the proposed 2006 Plan than it is under the existing 1998 Plan (which anticipated similar levels of job growth but almost no household growth). Relative to the existing Plan, the net environmental impact of the proposed Comp Plan on the jobs/housing balance will be positive.

According to the September 1982 Technical Report which accompanied the Comp Plan, the existing Comp Plan envisioned an increase of 25,000 households and 110,000 jobs between 1980 and 2000. Jobs were expected to grow at 4.4 times the rate of households, and the city's jobs/housing ratio was expected to increase from 2.63 in 1980 to 2.78 by 2000. In actuality, the number of households in the city dropped by 4,000 between 1980 and 2000 and the number of jobs grew by 47,000. As a result, the jobs/housing ratio rose to 2.87 in the year 2000. The growing imbalance between jobs and housing resulted in a larger number of workers commuting into the District from the suburbs, producing increased traffic congestion (with attendant air and water quality impacts) and the loss of potential income tax revenue for the city.

While the proposed Plan also anticipates that job growth will exceed household growth, it seeks to correct the imbalance to a much greater extent than the current Plan. By 2025, the jobs housing ratio is projected to drop to 2.79. Policies in the Plan call for a higher capture rate of regional housing demand, offsetting the impacts of increased employment growth. Unlike the existing (1998) Plan, the proposed Plan also includes policies and actions to mitigate the impacts of job-induced housing demand, including a study of the commercial linkage fee program and employer-assisted housing programs.

Mitigation is also provided through policies to link a greater number of District residents to jobs within the city, both to reduce unemployment and reduce the "leakage" of income tax revenue from the city to the suburbs due to non-resident workers. Such policies call for increased vocational and technical training programs which prepare DC students for jobs in the city's economy, and increased partnerships with local colleges, universities, and hospitals. However, it is important to bear in mind that even if every working-age resident in the District was actually employed in the city, there would still be a need to "import" 400,000 workers from other states to fill the city's jobs.

From a regional perspective, the Draft Comp Plan's emphasis on housing production and improving the balance between job and housing growth will have positive environmental impacts. The emphasis on "matching" District residents to local jobs will also have positive environmental impacts, particularly if such programs reduce the need for District workers to commute long distances to suburban jobs. Even if those who reside in new housing units work in close-in suburban employment centers (such as Rosslyn and Bethesda), the cumulative environmental impacts will be positive. Increasing the potential for "reverse commuting" can make more efficient use of transportation infrastructure and reduce auto reliance.

The Metropolitan Washington Council of Governments has warned of a growing imbalance between jobs and housing, noting that the inner ring counties of Montgomery, Prince Georges, and Fairfax Counties are planning to add 620,000 jobs during the next 25 years but only 273,000 households. If the region continues to grow this way, more workers will seek housing outside the region, creating more congestion, more urban sprawl, poorer air quality, more fossil fuel consumption, and costlier housing in the core jurisdictions. Increasing the supply of housing in the central city of the region at a rate that more closely approximates the rate of job growth, coupled with programs to match District residents with local jobs, can address this imbalance and reduce the problems that would otherwise occur. The proposed Plan pursues that very objective.

III.C TRANSPORTATION

This section of the Environmental Assessment describes existing transportation conditions within the District of Columbia, the potential impacts of the proposed Comp Plan on transportation, and the major policies that are included in the Plan to mitigate potentially significant impacts.

SETTING

The following text presents a broad overview of the transportation system in the District. For more detailed discussion, please consult the Comprehensive Plan Transportation Technical Report at: <http://inclusivecity.org/docs.php?ogid=1000001120>

Like similar cities that developed in the 19th century, the District was envisioned as a walkable city, designed for horse and carriage by planners who did not anticipate the automobile or present day volume of traffic and congestion. In the last 200 years, the District (and its regional and federal partners) have constructed 1,153 miles of roadway, 229 vehicular and pedestrian bridges, approximately 7,700 intersections^[1] and a world-class mass transit system. This infrastructure is regulated by District agencies as well as multi-jurisdictional regional entities^[2]. The District Department of Transportation, the District Department of Public Works, Metropolitan Washington Council of Governments (MWCOG), and the Washington Metropolitan Area Transit Authority (WMATA) all have oversight on transportation planning and policy.

Over the years the District has worked with different agencies and jurisdictions to improve accessibility and transportation choice. In 1976, WMATA's Metrorail commenced service, supporting and eventually overtaking the bus system in terms of daily ridership. Today, Metrorail is the second largest rail transit system in the country, and Metrobus is the country's fifth largest bus network. The system serves a population of 3.5 million within a 1,500 square-mile area. Metro is an evolving transit system; the initially planned network of 83 stations and 103 miles has grown to 86 stations and 106 miles. There are plans for a new spur extending to Tyson's Corner, Reston, and Dulles and a "Purple Line" connecting Glenmont and Shady Grove. Commuter rail services such as the Virginia Railway Express (VRE) and the Maryland Rail Commuter (MARC) have also been developed to provide access to District jobs from the outer reaches of the Washington Metropolitan area.

Currently, more than 13 percent of District residents bicycle or walk to work, and more than 43 percent car pool or use transit to get to work^[3]. Among large US cities, only New York has a higher percentage of residents who commute by public transit, and only Boston has a higher percentage that walk to work. DC Comprehensive Plan Policies seek to encourage, capitalize and expand on these positive trends.

^[1] Source: "Framework for Transportation Strategies: A Policy Paper for the DC Vision and Policy Framework"

^[2] Of the 1153 miles of roadway, 61 miles are under the jurisdiction of the National Park Service and three under the Architect of the Capitol

^[3] Except where noted, work statistics are based on the 2000 Census.

More than 71 percent of those who work in the District live in the suburbs. Core areas of the city, with multiple transit options and more restricted or costly parking, achieve much higher than average carpool, vanpool, and transit usage, from suburban commuters as well as District residents. For example, over 55 percent of suburban commuters into Central DC use car pools, vanpools, or transit, compared with 34 percent using these modes to travel to work in other areas of the District. The overall city-wide transit, carpool and vanpool rate of 46 percent for suburban commuters is made possible in part because Central DC hosts such a large portion of the region's employment. DC Comprehensive Plan policies encourage continued expansion of transportation alternatives for residents, commuters and visitors.

The District is experiencing significant growth in transportation demand superimposed on a roadway network that is already at or over capacity in many places. As a result, the District's transportation policy is based on three comprehensive and interdependent initiatives. The first advocates linking land use and transportation; the second advocates an increase in multimodal choices; and the third advocates an increase in system efficiency and management.

SIGNIFICANCE CRITERIA

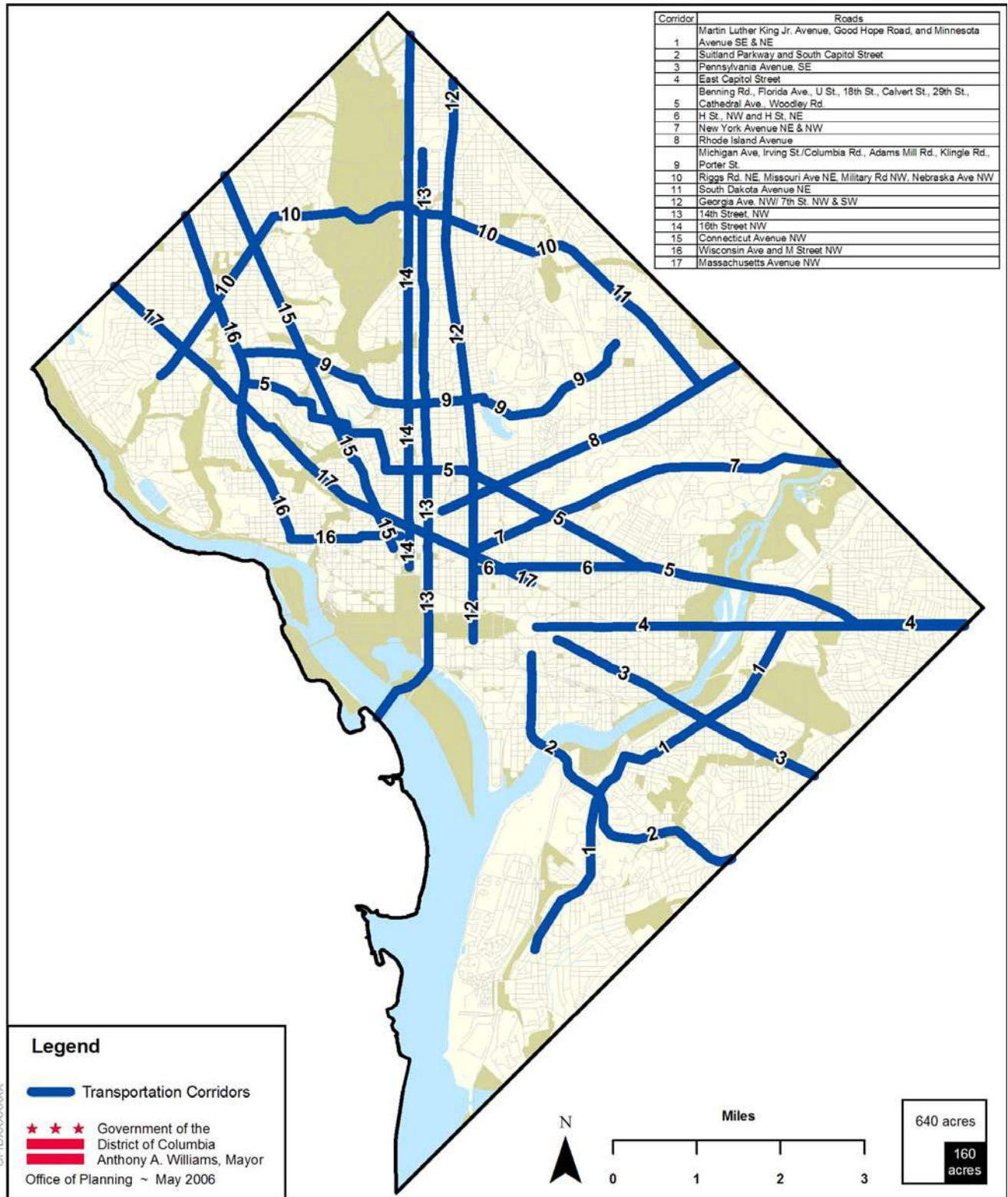
A project may have be considered to have a significant impact on transportation if it would cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, cause an unacceptable degradation in circulation, or substantially decrease the level of accessibility and mobility in the city. The District does not have a formally adopted transportation "level of service" standard—although the Draft Plan proposes that such a standard be adopted in the future. Such a standard could help assess the impacts of future projects and determine the extent of traffic mitigation that is required as future development is proposed.

IMPACTS AND MITIGATION MEASURES

Methodology

As part of the Comp Plan process, a transportation analysis was conducted to estimate the impacts of projected population and employment growth on the local transportation network. The methodology for this analysis is described below and is described in greater detail in the Comp Plan Transportation Technical Report. The analysis focused on 17 major transportation corridors, as identified in Figure III.C-1. These are the same corridors studied by DDOT in its Transportation Vision Plan.

Figure III.C-1: Transportation Corridors Studied in the Comp Plan Traffic Model



The first step in the analysis was to identify the 2002 Average Annual Daily Vehicle Traffic (AADT) Counts along the 17 study corridors. These figures are utilized by the District Department of Transportation and are based on observations throughout the year along different sections of the road network.

The base level for future (2025) vehicle traffic was based on the latest version of the Travel Demand Forecasting Model from the Metropolitan Washington Council of Governments (MWCOG). Modifications to population, households and employment figures for the 319 traffic analysis zones (TAZ) within the District of Columbia were made based on the land use designations proposed in the Comprehensive Plan. Data for the TAZs in the remainder of the region are based on COG's Round 6.3 forecasts.

The District's TAZ-level forecasts reflect recent trends in redevelopment, approved projects, employment changes such as the proposed closing of Walter Reed Hospital, and implementation of Comp Plan policies such as mixed-use zoning and higher density development around key transit stations. The MWCOG model was used to estimate future traffic for major road segments based on inputs such as proposed land use (population, households and employment), roadway characteristics (number of lanes, width, signals, etc.) and transit constraints (capacity and frequency of different routes of Metro, buses, etc.).

An additional analysis was required to estimate the impact that an expanded transit system would have on the transportation system. By comparing the current and future volumes from the model for each relevant segment, person-trip growth as well as traffic growth between 2005 and 2025 was estimated. In addition, for corridors where dedicated bus lanes or street car lanes are proposed (e.g., Georgia Avenue), or where new roadway and transit capacity is proposed (e.g., the South Capitol Street Bridge), the change in transit or roadway capacity was calculated.

Particular attention was given to the three periods when daily traffic could be examined: AM peak, PM peak and Off peak periods. Certain corridors have measures in place to accommodate peak directional flows, such as reversible lanes or restricting parking to provide an additional travel lane. Traffic volumes are weighted in corridors with fixed numbers of lanes in either direction to account for the peak directional flow. As congestion increases, much of the future traffic growth will occur in the off-peak periods, especially where the corridor traffic has reached a saturation point. The shifting and expansion of congestion into the off-peak periods is a condition that has been experienced by many other large urbanized areas and was accounted for by the MWCOG model.

The transit volumes were obtained from previous studies performed for WMATA. These studies include WMATA's latest plans for future operations, including streetcars, light rail, and bus rapid transit in different corridors. These model runs produced estimates of existing and future transit mode shares.

Using average vehicle occupancy rates from the 2000 Census, vehicle trips were converted to auto-person trips. With the estimation of auto person trips and transit mode shares, estimates of total person trips were made.

As a measure of how well the current system is operating, the average vehicle ridership (AVR) was calculated for each of the 17 corridors. Average vehicle ridership is obtained by dividing all person trips by the number of private vehicle trips. "All person trips" includes the trips made by Metro, buses, vans, carpools, automobile, and bicycle (if the number of trips are available). The average vehicle ridership rate characterizes the entire population's need for vehicles and not just the rate at which private vehicle users are occupying private vehicles.

Typical average vehicle ridership rates vary based on land use. Shown below are rates that may be expected based on the type of land use.¹ A low value of 1.13 indicates that the segment is used almost exclusively by autos, whereas a higher number indicates a corridor that is better served by public transit.

1. Low Density Suburb – AVR 1.13
2. Activity Center – AVR 1.35
3. CBD – AVR 1.90

Three future scenarios were considered as part of the analysis. Each scenario assumed different levels of TDM and TSM activities and improvements. TDM programs aim to shift trips from auto to transit or other alternative modes, shift trips to off-peak periods, and reduce the number of trips made altogether, thereby mitigating the impact of anticipated growth. TSM activities are usually developed on a project- or corridor-level basis. The text box on the next page provides an overview of TDM and TSM measures.

For the purpose of this analysis, Scenario 1 corresponds to a low level of TDM/TSM activities, Scenario 2 corresponds to a medium level, and Scenario 3 corresponds to a high level. The outcome of the low TDM/TSM strategy is a 2 percent reduction in overall trip generation, whereas the high TDM/TSM strategy results in a 6 percent reduction. These percentages are based on empirical information from other urbanized areas.

In each scenario, the analysis identified where particular segments were under-capacity, at-capacity and over-capacity. For purposes of the Comprehensive Plan traffic study, any segment that operates over-capacity after the implementation of a district or regional level TDM/TSM program may require additional transportation improvements at the corridor level to mitigate the impact of the growth in traffic.

¹ Taken from 'Implementing Effective Travel Demand Management Measures: Inventory of Measures and Synthesis of Experience.'

What Are TDM and TSM and What Do They Include?

Travel Demand Management refers to a series of transportation strategies designed to maximize the people-moving capability of the transportation system by increasing the number of persons in a vehicle, or by influencing the time of, or need to, travel. To accomplish these types of changes, TDM programs rely on incentives or disincentives to make shifts in behavior attractive. The primary purpose of TDM is to reduce the number of vehicles using the road system while providing a variety of mobility options to those who wish to travel. TDM programs at employment sites include carpools and vanpools; public and private transit; bus pools and shuttles; and provisions for non-motorized travel, such as showers and bike lockers (to encourage bicycling and walking).

TDM programs can also include alternatives to influence when travel occurs during the day or whether it occurs at all on some days. These efforts include compressed work weeks, flexible work schedules, and telecommuting (at home or satellite work centers). TDM strategies also include improvements in alternative modes of transportation; financial or time incentives for the use of these alternative modes; and information dissemination and marketing activities. Examples of these TDM strategies include preferential parking for ridesharers, subsidies for transit riders, and transportation allowances; parking management programs; and areawide cost surcharges or subsidies designed to make the cost of driving single occupant vehicles higher than for high occupancy vehicles.

Transportation System Management, or TSM, focuses on the supply side of transportation network capacity, and can be used to reinforce TDM measures. TSM measures include improvements such as turning lanes, modernization of signal systems and signal timing, access management, and other facility-related improvements. Historically, TSM improvements have increased capacity in the range of 10 to 15 percent when systematically implemented for transportation corridors. Many of the improvements identified in the DDOT 2030 Transportation Vision Plan Action Plan are typically included as part of a comprehensive TSM program.

Experience has shown that complementary TDM strategies when applied to individual employment sites can be very effective and result in vehicle reductions of 30 to 40 percent. However, areawide TDM programs are not likely to produce such significant reductions because in most cases they are affecting only a portion of the traveling market segments.

Listed below in Table III.C-1 are the AVRs in the peak hour in the peak direction for each of the 17 corridors identified in the study according to each TDM/TSM scenario level. For a detailed analysis for each corridor segment, please refer to the Transportation Technical Report.

Summary of Capacity Forecasts

The 17 corridors include 50 distinct segments. In 2005—the “baseline” year—14 of these segments were over capacity, 24 segments were at capacity, and 12 segments were under capacity. Current capacity status is shown in Table III.C-2.

**Table III.C-1:
 Average Vehicle Ridership by Corridor and Scenario**

Num	Name of Corridor	Scenarios			
		Existing	1	2	3
1	Martin Luther King Jr. Avenue, Good Hope Road, and Minnesota Avenue SE & NE	1.29	1.34	1.35	1.37
2	Suitland Parkway and South Capitol Street	1.32	1.36	1.37	1.39
3	Pennsylvania Avenue, SE	1.58	1.63	1.65	1.68
4	East Capitol Street	1.44	1.48	1.50	1.52
5	Benning Rd., Florida Ave., U St., 18th St., Calvert St., 29th St., Cathedral Ave., Woodley Rd.	1.42	1.61	1.63	1.66
6	H St., NW and H St, NE	1.83	1.93	1.96	1.99
7	New York Avenue NE & NW	1.95	2.03	2.06	2.09
8	Rhode Island Avenue	1.60	1.62	1.64	1.67
9	Michigan Ave, Irving St./Columbia Rd., Adams Mill Rd., Kingle Rd., Porter St.	1.52	1.55	1.57	1.59
10	Riggs Rd. NE, Missouri Ave NE, Military Rd NW, Nebraska Ave NW	1.34	1.36	1.37	1.38
11	South Dakota Avenue NE	1.32	1.34	1.36	1.37
12	Georgia Ave. NW/ 7th St. NW & SW	1.41	1.46	1.64	1.67
13	14th Street, NW	2.03	2.09	2.15	2.18
14	16th Street NW	1.59	1.63	1.68	1.70
15	Connecticut Avenue NW	1.71	1.76	1.79	1.81
16	Wisconsin Ave and M Street NW	1.49	1.52	1.56	1.58
17	Massachusetts Avenue NW	1.87	1.94	1.98	2.01

Note: Corridor number corresponds with the map from the DDOT Vision Plan Action Plan

Source: Louis Berger Group, 2006

In 2025 with the proposed DDOT Action Plan Improvements and expanded TDM programs under Scenario 3, the number of segments operating over capacity will increase from 14 to 19. The number of segments that are “at capacity” will decrease from 24 to 20, and the number that are “below” capacity will decrease from 12 to 11. On most corridors, the proposed TSM and TDM improvements will allow the transportation operations not to significantly deteriorate while accommodating increases in traffic flow. Conditions on some corridors will actually improve.

The increased transit capacity and expanded TDM/TSM programs will improve the transportation efficiency as shown by the increase in average vehicle ridership from 1.37 in 2005 to 1.70 in 2025. Table III.C-2 identifies the corridors and the major segments of each corridor, along with the capacity for each segment for each forecast scenario for 2025.

Table III.C-3 summarizes anticipated peak hour travel speeds on the various segments. Figures III.C-2 through III.C-5 show projected volumes in 2005 and 2025 based on the three scenarios. For details on the procedure followed to estimate the Level of Service (LOS) please refer to the Transportation Technical Report.

Table III.C-2: 2005 and 2025 Congestion Levels by Corridor Segment for Three Scenarios

Name of Corridor	Roadway	Segment	Key: Green = Under capacity, Yellow = At capacity, Red= Over capacity			
			Existing	Scenario 1	Scenario 2	Scenario 3
Martin Luther King Jr. Avenue, Good Hope Road, and Minnesota Avenue SE & NE	Martin Luther King Jr.	South Capitol St. to Good Hope Rd.	Under	Over	Over	Over
	Good Hope Road	Martin Luther King Jr. to Minnesota Ave.	Under	Over	Over	Over
	Minnesota Ave SE	Good Hope to Pennsylvania Ave	Under	Under	Under	Under
	Minnesota Ave NE	Pennsylvania Ave. to East Capitol St.	At	At	At	Under
Suitland Parkway and South Capitol Street	South Capitol Street	D St. to Suitland Pkwy.	Over	At	At	At
	Suitland Parkway	South Capitol St. to DC border	At	At	At	At
Pennsylvania Avenue, SE	Pennsylvania Avenue, SE	Independence Ave. to DC border	At	At	At	At
East Capitol Street	East Capitol Street	22nd St. NE to Benning Rd.	Over	Over	Over	Over
	East Capitol Street	Benning Rd. to DC border	Under	At	At	At
Benning Rd., Florida Ave., U St., 18th St., Calvert St., 29th St., Cathedral Ave., Woodley Rd.	Benning Rd.	East Capitol St. to Florida Avenue	Over	Over	Over	Over
	Florida Ave.	9th St and U St NW to Benning Rd	At	At	At	At
	U St. NW	18th St. to Florida Ave.	At	At	At	At
	18th St. NW	Adams Mill/ Calvert St. to U St.	Over	Over	Over	Over
	Calvert Street NW	29th St. to 18th St.	At	At	At	Under
	Cathedral Ave. NW	Woodley Rd. to Cathedral Ave.	At	At	At	At
	Woodley Road, NW	Wisconsin Ave. to Cathedral Ave.	At	At	At	At
H St., NW and H St, NE	H Street NW	7th St. NW to North Capitol St.	Under	Over	Over	Over
	H Street NE	North Capitol St. to Florida Ave. NE	Under	Over	Over	Over
New York Avenue NE & NW	New York Avenue NW	7th St. NW to North Capitol St.	At	At	At	At
	New York Avenue NE	North Capitol St. to DC border	At	At	At	At
Rhode Island Avenue	Rhode Island Avenue NW	13th St. NW to North Capitol St.	At	Over	Over	Over
	Rhode Island Avenue NE	North Capitol St. to DC border	Under	Under	Under	Under
Michigan Ave, Irving St./Columbia Rd., Adams Mill Rd., Kingle Rd., Porter St.	Michigan Avenue, NE	12th St. NE to North Capitol St.	At	Over	Over	Over
	Michigan Avenue, NW	North Capitol St. to Irving St.	At	At	At	At
		Irving St. to Porter St.	Under	At	At	Under
		Porter St. to Wisconsin Ave.	Over	Over	Over	Over

Table III.C-2 (cont.) 2005 and 2025 Congestion Levels by Corridor Segment for Three Scenarios

Name of Corridor	Roadway	Segment	Key: Green = Under capacity, Yellow = At capacity, Red= Over capacity			
			Existing	Scenario 1	Scenario 2	Scenario 3
Riggs Rd. NE, Missouri Ave NE, Military Rd NW, Nebraska Ave NW	Riggs Rd. NE	South Dakota Ave to Missouri Ave	Over	Over	Over	Over
	Missouri Ave.	Riggs Rd to Military Rd.	At	Over	Over	Over
	Military Rd.	Missouri Ave. to Nebraska Ave.	Over	Over	Over	Over
	Nebraska Ave.	Military Rd. to Foxhall Rd.	Under	Under	Under	Under
South Dakota Avenue NE	South Dakota Avenue, NE	Riggs Rd. to New York Ave NE	At	Under	Under	Under
Georgia Ave. NW/ 7th St. NW & SW	7th St. NW	Independence Ave to New York Ave	At	At	At	At
	Georgia Ave.	New York Ave to Piney Branch Rd	Over	Over	Over	Over
	Georgia Ave.	Piney Branch Rd to DC border	Over	Over	At	At
14th Street, NW	14th St.	14th St. bridge to Massachusetts Ave NW	Over	Over	Over	Over
	14th St.	Massachusetts Ave NW to Piney Branch Rd	At	At	At	At
	14th St.	Piney Branch Rd to Aspen St	Over	At	At	At
16th Street NW	16th Street	K St. to Massachusetts Ave	Under	Over	Over	Over
	16th Street	Massachusetts Ave to Piney Branch Rd.	At	Over	Over	Over
	16th Street	Piney Branch Rd. to DC border	Over	Over	Over	Over
Connecticut Avenue NW	Connecticut Ave.	L St to Massachusetts Ave	Over	At	At	At
	Connecticut Ave.	Massachusetts Ave to Calvert St	At	Over	Over	Over
	Connecticut Ave.	Calvert St to DC border	At	Under	Under	Under
Wisconsin Ave and M Street NW	M St	17th St NW to Wisconsin Ave	Over	At	At	At
	Wisconsin Ave	M St to Whitehaven Pkwy	At	At	At	At
	Wisconsin Ave	Whitehaven Pkwy to DC Border	At	At	At	Under
Massachusetts Avenue NW	Massachusetts Ave	North Capitol St to 7th St NW	Under	At	At	At
	Massachusetts Ave	7th St NW to Dupont Cir	At	At	At	At
	Massachusetts Ave	Dupont Cir to Whitehaven Pkwy	At	Under	Under	Under
	Massachusetts Ave	Whitehaven Pkwy to DC border	Under	Under	Under	Under

Note: Corridor number corresponds with the map from the DDOT Vision Plan Appendix A.

Table III.C-3: 2005 and 2025 Anticipated Peak Hour Travel Speeds by Corridor Segment for Three Scenarios

Name of Corridor	Roadway	Segment	Scenarios			
			Existing	1	2	3
Martin Luther King Jr. Avenue, Good Hope Road, and Minnesota Avenue SE & NE	Martin Luther King Jr.	South Capitol St. to Good Hope Rd.	25 mph	< 7 mph	< 7 mph	< 7 mph
	Good Hope Road	Martin Luther King Jr. to Minnesota Ave.	25 mph	< 7 mph	< 7 mph	< 7 mph
	Minnesota Ave SE	Good Hope to Pennsylvania Ave	20 mph	20 mph	20 mph	20 mph
	Minnesota Ave NE	Pennsylvania Ave. to East Capitol St.	10 mph	10 mph	10 mph	20 mph
Suitland Parkway and South Capitol Street	South Capitol Street	D St. to Suitland Pkwy.	< 7 mph	10 mph	10 mph	10 mph
	Suitland Parkway	South Capitol St. to DC border	15 mph	15 mph	15 mph	15 mph
Pennsylvania Avenue, SE	Pennsylvania Avenue, SE	Independence Ave. to DC border	15 mph	15 mph	15 mph	15 mph
East Capitol Street	East Capitol Street	22nd St. NE to Benning Rd.	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	East Capitol Street	Benning Rd. to DC border	25 mph	15 mph	15 mph	15 mph
Benning Rd., Florida Ave., U St., 18th St., Calvert St., 29th St., Cathedral Ave., Woodley Rd.	Benning Rd.	East Capitol St. to Florida Avenue	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	Florida Ave.	9th St and U St NW to Benning Rd	10 mph	10 mph	10 mph	10 mph
	U St. NW	18th St. to Florida Ave.	10 mph	10 mph	10 mph	10 mph
	18th St. NW	Adams Mill/ Calvert St. to U St.	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	Calvert Street NW	29th St. to 18th St.	10 mph	10 mph	10 mph	20 mph
	Cathedral Ave. NW	Woodley Rd. to Cathedral Ave.	15 mph	15 mph	15 mph	15 mph
	Woodley Road, NW	Wisconsin Ave. to Cathedral Ave.	15 mph	15 mph	15 mph	15 mph
H St., NW and H St, NE	H Street NW	7th St. NW to North Capitol St.	20 mph	< 7 mph	< 7 mph	< 7 mph
	H Street NE	North Capitol St. to Florida Ave. NE	20 mph	< 7 mph	< 7 mph	< 7 mph
New York Avenue NE & NW	New York Avenue NW	7th St. NW to North Capitol St.	10 mph	10 mph	10 mph	10 mph
	New York Avenue NE	North Capitol St. to DC border	15 mph	15 mph	15 mph	15 mph
Rhode Island Avenue	Rhode Island Avenue NW	13th St. NW to North Capitol St.	10 mph	< 7 mph	< 7 mph	< 7 mph
	Rhode Island Avenue NE	North Capitol St. to DC border	25 mph	25 mph	25 mph	25 mph
Michigan Ave, Irving St./Columbia Rd., Adams Mill Rd., Klingle Rd., Porter St.	Michigan Avenue, NE	12th St. NE to North Capitol St.	15 mph	< 7 mph	< 7 mph	< 7 mph
	Michigan Avenue, NW	North Capitol St. to Irving St.	10 mph	10 mph	10 mph	10 mph
		Irving St. to Porter St.	25 mph	15 mph	15 mph	25 mph
		Porter St. to Wisconsin Ave.	< 7 mph	< 7 mph	< 7 mph	< 7 mph

Table III.C-3 (cont.): 2005 and 2025 Anticipated Peak Hour Travel Speeds by Corridor Segment for Three Scenarios

Name of Corridor	Roadway	Segment	Scenarios			
			Existing	1	2	3
Riggs Rd. NE, Missouri Ave NE, Military Rd NW, Nebraska Ave NW	Riggs Rd. NE	South Dakota Ave to Missouri Ave	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	Missouri Ave.	Riggs Rd to Military Rd.	15 mph	< 7 mph	< 7 mph	< 7 mph
	Military Rd.	Missouri Ave. to Nebraska Ave.	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	Nebraska Ave.	Military Rd. to Foxhall Rd.	25 mph	25 mph	25 mph	25 mph
South Dakota Avenue NE	South Dakota Avenue, NE	Riggs Rd. to New York Ave NE	15 mph	25 mph	25 mph	25 mph
Georgia Ave. NW/ 7th St. NW & SW	7th St. NW	Independence Ave to New York Ave	10 mph	10 mph	10 mph	10 mph
	Georgia Ave.	New York Ave to Piney Branch Rd	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	Georgia Ave.	Piney Branch Rd to DC border	< 7 mph	< 7 mph	15 mph	15 mph
14th Street, NW	14th St.	14th St. bridge to Massachusetts Ave NW	< 7 mph	< 7 mph	< 7 mph	< 7 mph
	14th St.	Massachusetts Ave NW to Piney Branch Rd	15 mph	15 mph	15 mph	15 mph
	14th St.	Piney Branch Rd to Aspen St	< 7 mph	15 mph	15 mph	15 mph
16th Street NW	16th Street	K St. to Massachusetts Ave	20 mph	< 7 mph	< 7 mph	< 7 mph
	16th Street	Massachusetts Ave to Piney Branch Rd.	15 mph	< 7 mph	< 7 mph	< 7 mph
	16th Street	Piney Branch Rd. to DC border	< 7 mph	< 7 mph	< 7 mph	< 7 mph
Connecticut Avenue NW	Connecticut Ave.	L St to Massachusetts Ave	< 7 mph	10 mph	10 mph	10 mph
	Connecticut Ave.	Massachusetts Ave to Calvert St	15 mph	< 7 mph	< 7 mph	< 7 mph
	Connecticut Ave.	Calvert St to DC border	15 mph	25 mph	25 mph	25 mph
Wisconsin Ave and M Street NW	M St	17th St NW to Wisconsin Ave	< 7 mph	10 mph	10 mph	10 mph
	Wisconsin Ave	M St to Whitehaven Pkwy	10 mph	10 mph	10 mph	10 mph
	Wisconsin Ave	Whitehaven Pkwy to DC Border	15 mph	15 mph	15 mph	25 mph
Massachusetts Avenue NW	Massachusetts Ave	North Capitol St to 7th St NW	20 mph	10 mph	10 mph	10 mph
	Massachusetts Ave	7th St NW to Dupont Cir	10 mph	10 mph	10 mph	10 mph
	Massachusetts Ave	Dupont Cir to Whitehaven Pkwy	10 mph	20 mph	20 mph	20 mph
	Massachusetts Ave	Whitehaven Pkwy to DC border	25 mph	25 mph	25 mph	25 mph

Note: Corridor number corresponds with the map from the DDOT Vision Plan Appendix A.

Figure III.C-2: Existing Congestion Levels by Corridor Segment, Year 2005

Existing Conditions 2005 Peak Volume/Capacity on Major Corridors

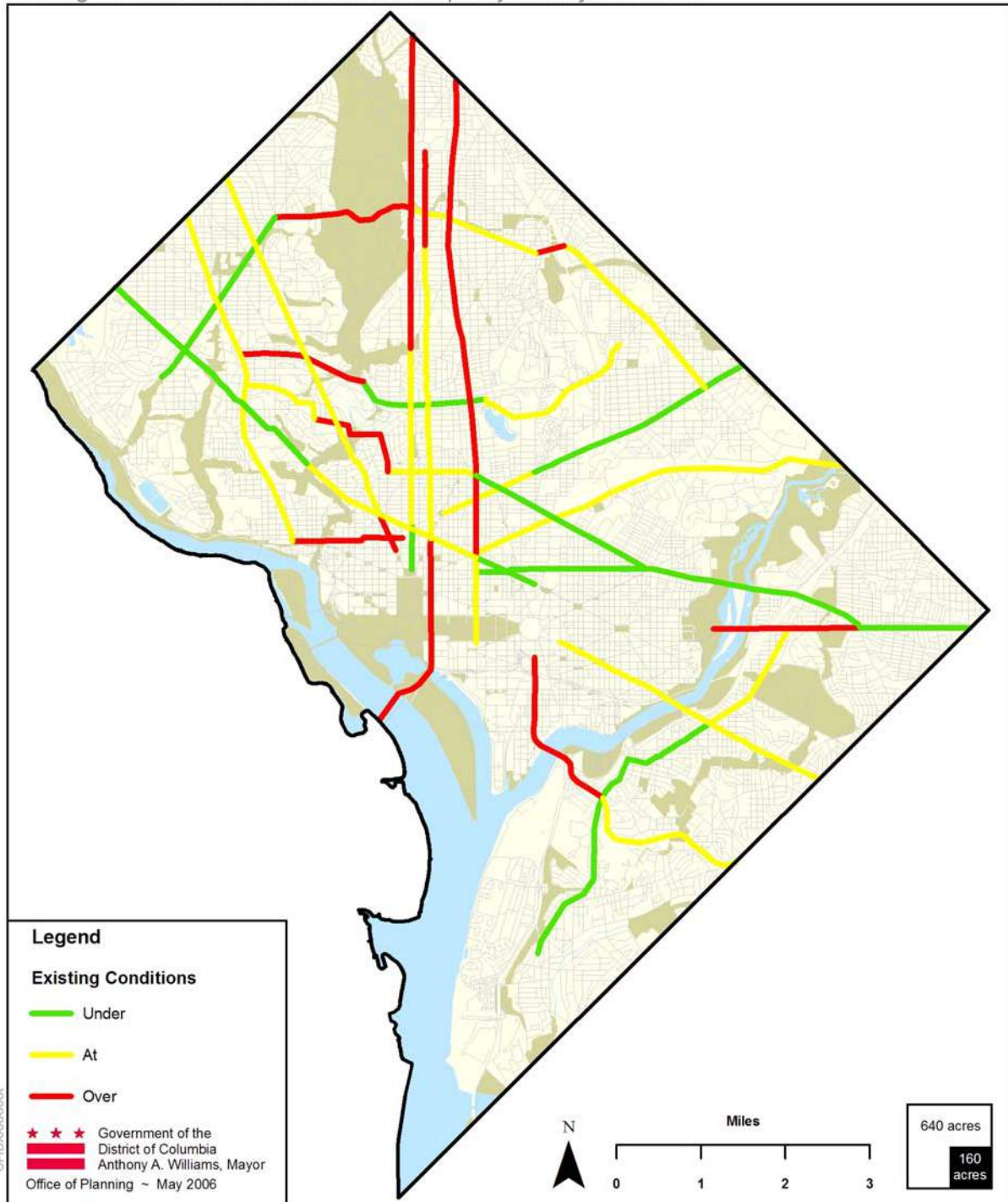


Figure III.C-3: Scenario 1 Congestion Levels by Corridor Segment, Year 2025

Scenario 1 2005 Forecast Limited TDM/TSM Peak Volume/Capacity on Major Corridors

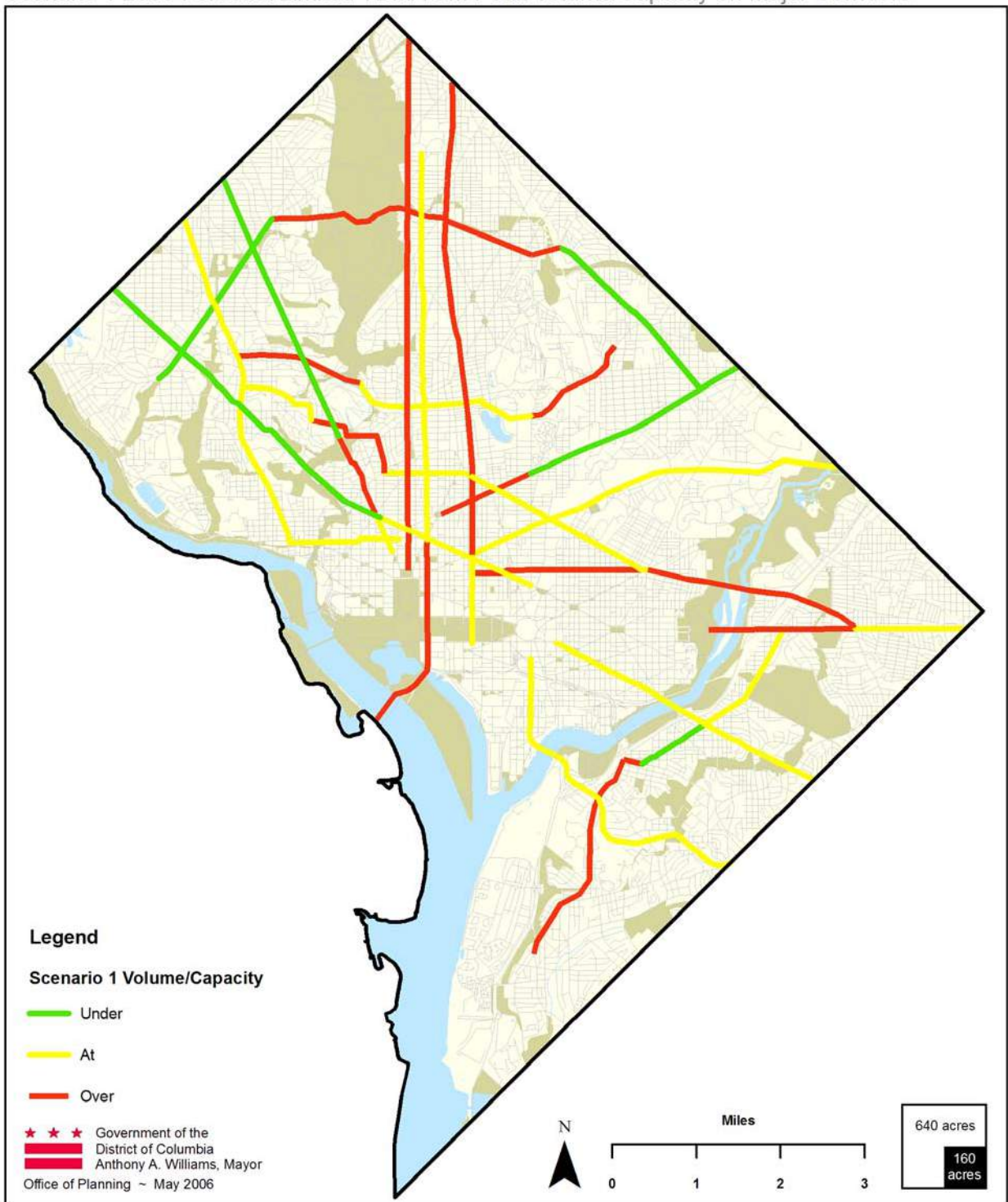


Figure III.C-4: Scenario 2 Congestion Levels by Corridor Segment , Year 2025

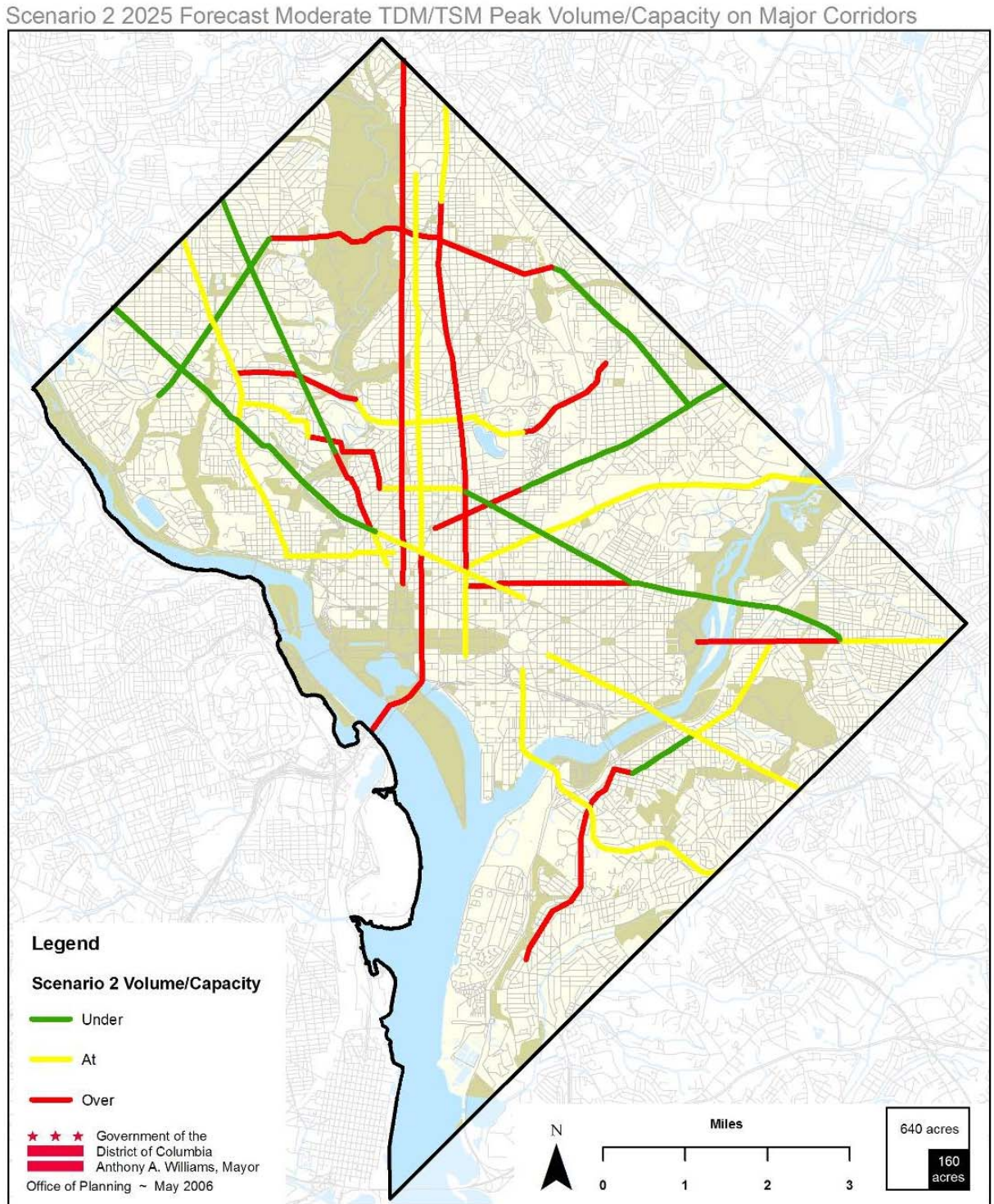
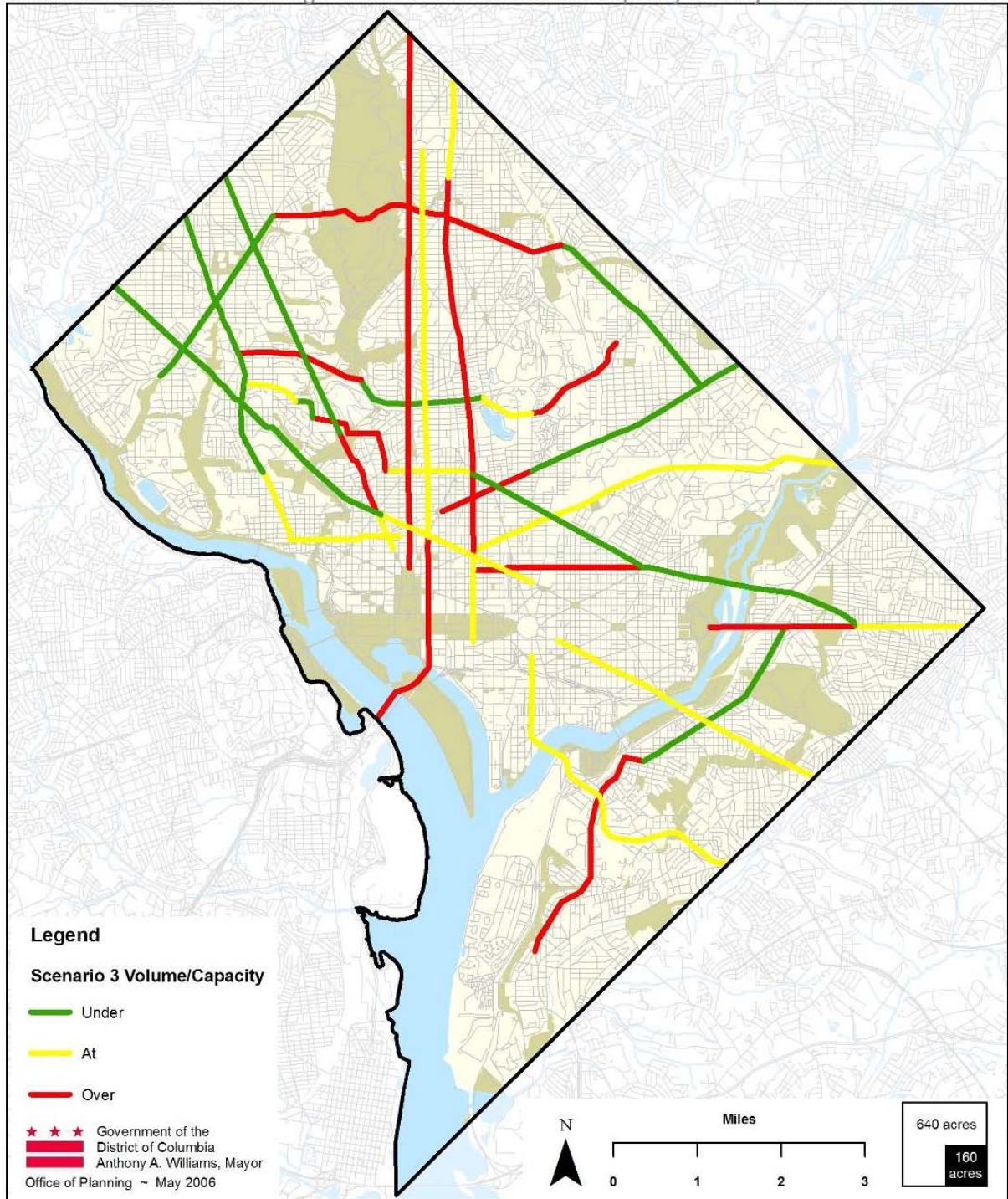


Figure III.C-5: Scenario 3 Congestion Levels by Corridor Segment, Year 2025

Scenario 3 2025 Forecast High TDM/TSM Peak Volume/Capacity on Major Corridors



TRAFFIC CONGESTION

Impact C1: The projected increase in population from 578,000 to almost 700,000, and the projected increase in employment from 745,000 to 870,000, will place greater demands on a transportation system that has already reached or exceeded capacity on many of its corridors. The region as a whole is expected to grow at an even faster rate than the District, putting even more pressure on the District’s highway and transit system as commuter traffic increases. Extensive mitigation measures are proposed within the Comp Plan to address this impact, reducing its potential significance.

The land use changes identified in the Comp Plan and associated changes in transportation infrastructure envisioned by the DDOT Plan will contribute to a moderate rate of growth in traffic in the District based on the MWCOG forecast model. These increases in traffic may be partially mitigated through increased transportation demand management and transportation systems management, consistent with the DDOT 2030 Transportation Vision Plan. In particular, policies that encourage bicycle, pedestrian, transit, and ridesharing, and policies that promote transit oriented and mixed use development, will build on the significant strengths of District neighborhoods and centers, to make full use of expanded transportation investments.

Table III.C-4 summarizes the net daily vehicle and person trips for the three 2025 forecast scenarios compared with the 2005 base. As expected, peak person travel trips increase at a slower rate than off-peak travel trips. As key corridors become congested, not only does travel shift to other routes, it also shifts to other times and modes.

Table III.C-4: Daily Vehicle Trip and Person-Trip Summary by Scenario

	Scenarios			
	Existing	1	2	3
Peak Person Trips- Transit	383,400	453,203	464,603	475,967
Off-Peak Person Trips - Transit	175,566	219,023	219,023	219,023
Total Person Trips - Transit	558,966	672,226	683,626	694,990
Peak Person Trips- Auto	1,032,073	1,110,023	1,090,807	1,068,078
Off-Peak Person Trips - Auto	1,234,588	1,409,993	1,421,393	1,432,755
Total Person Trips - Auto	2,266,661	2,520,016	2,512,200	2,500,833
Total Peak Person Trips	1,415,473	1,563,226	1,555,410	1,544,045
Total Off-Peak Person Trips	1,410,154	1,629,016	1,640,416	1,651,778
Total Person Trips	2,825,627	3,192,242	3,195,826	3,195,823
Peak Vehicle Trips	897,457	965,234	948,529	928,763
Off-Peak Vehicle Trips	1,073,554	1,226,079	1,235,990	1,245,873
Total Vehicle Trips	1,971,010	2,191,314	2,184,519	2,174,636

Source: Louis Berger Group, 2006

Metropolitan growth trends also play a key role in the shape and condition of the District's transportation system. Job growth is expected to outpace residential growth in the suburbs during the next 20 years. As a result, trips originating in the District by residents and ending in suburban job centers may increase. To mitigate the impacts of this trend on District and regional roadways, it will be critical for the District to work cooperatively with its suburban neighbors to encourage suburban job development in areas served by transit, or in concentrations that facilitate formation of carpools and vanpools. It will also be critical for the District to sustain programs that assist its residents in finding employment locally.

Concurrently, the District should also encourage and support suburban efforts to provide transit to employment centers currently unserved or underserved by transit. These efforts will assist District residents who work in the suburbs to use transit rather than driving to their jobs.

The Draft Plan proposes a wide variety of measures to mitigate the impacts of increasing travel demand. Most of these are summarized in the Transportation Element. One of the overarching premises of the entire Plan is to coordinate land use and transportation decisions to mitigate possible traffic impacts and improve environmental quality.

The following specific Plan policies and actions are intended to reduce congestion through coordinated land use and transportation planning, transportation improvements, and TDM/TSM measures:

Policy T-1.1.2: Land Use Impact Assessment

Assess the transportation impacts of development projects using multi-modal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network.

Policy T-1.1.4: Transit-Oriented Development

Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points.

Action T-1.2-A: Cross-Town Boulevards.

Evaluate the cross-town boulevards that link the east and west sides of the city including Florida Avenue, Michigan Avenue, and Military Road/ Missouri Avenue, to determine improvements that will facilitate cross-town movement.

Policy T-1.3.1: Transit-Accessible Employment

Work closely with suburban jurisdictions to support transit-oriented and transit-accessible employment throughout the region. This would maximize the use of major transportation investments such as Metrorail, and enhance the efficiency of the regional transportation system.

Policy T-1.3.2: Reverse Commuting

Utilize data on the travel patterns of District workers as the basis for programs to improve transit service, particularly programs that increase reverse commuting options for District workers employed in major suburban employment centers.

Policy T-2.5.1: Creating Multi-Modal Corridors

Transform key District arterials into multi-modal corridors that incorporate and balance a variety of mode choices including bus or streetcar, bicycle, pedestrian and auto.

Policy T-2.5.3: Road and Bridge Maintenance

Maintain the road and bridge system to keep it operating safely and efficiently and to maximize its useful life.

Policy T-2.5.4: Traffic Management

Establish traffic management strategies that separate local traffic from commuter or through-traffic and reduce the intrusion of trucks, commuter traffic, and “cut-through” traffic on residential streets

Action T-2.5-B: Signal Timing Adjustments

Regularly evaluate the need for adjustments to traffic signal timing to minimize unnecessary automobile idling.

Policy T-3.1.1: TDM Programs

Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system.

Policy T-3.1.2: Regional TDM Efforts

Continue to pursue TDM strategies at the regional level and work with regional partners to promote a coordinated, integrated transportation system.

Policy T-3.1.3: Car-Sharing

Encourage the expansion of car-sharing services as an alternative to private vehicle ownership.

Action T-3.1-A: TDM Strategies

Develop strategies and requirements that reduce rush hour traffic by promoting flextime, carpooling, transit use; encouraging the formation of Transportation Management Associations; and undertaking other measures that reduce vehicular trips, particularly during peak travel periods. Identify TDM measures and plans as appropriate conditions for large development approval. Transportation Management Plans should identify quantifiable reductions in vehicle trips and commit to measures to achieve those reductions.

Action T-3.1-C: Private Shuttle Services

Develop a database of private shuttle services and coordinate with shuttle operators to help reduce the number of single-occupant trips.

Action T-3.1-D: Transit Ridership Programs

Continue to support employer-sponsored transit ridership programs such as the federal Metro Pool program where, pursuant to federal legislation, public and private employers may subsidize employee travel by mass transit each month.

Policy LU-1.3.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide.

Policy LU-1.3.2: Development Around Metrorail Stations.

Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas.

Policy LU-1.3.4: Design To Encourage Transit Use

Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots.

Policy ED-4.3.1: Transportation Access to District Jobs

Improve access to jobs for District residents through sustained investments in the city's transportation system, particularly transit improvements between neighborhoods with high unemployment rates and the city's major employment centers.

Policy ED-4.3.2: Links to Regional Job Centers

Continue to seek inter-jurisdictional transportation solutions to improve access between the District neighborhoods and existing and emerging job centers in Maryland and Virginia. These solutions should include a balance between transit improvements and highway improvements. They should also include transportation systems management initiatives such as shuttles, ridesharing, and vanpooling.

Policy ED-4.3.4: Regional Access to Central Washington

Provide sustained investments to the District's transportation network to ensure that both District and regional workers can access the growing employment areas of Central Washington and the Anacostia Waterfront.

Policy UD-1.4.4: Multi-Modal Avenue/Boulevard Design

Discourage the use of the city's major avenues/boulevards as "auto-only" roadways. Instead, encourage their use as multi-modal corridors, supporting bus lanes, bicycle lanes, and wide sidewalks, as well as conventional vehicle lanes.

The Comp Plan transportation analysis concluded that, despite the implementation of these policies and actions, and despite the construction of major transportation improvements (such as BRT and streetcar), several segments of the city's roadway network will shift from being at or under capacity today to "over capacity" in the future. These segments include Missouri Avenue NW (in Brightwood), Good Hope Road (in Historic Anacostia), Martin Luther King Jr Avenue (in Congress Heights), H Street NE, Rhode Island Av NW, Michigan Ave NE, Connecticut Avenue (in Dupont Circle), and 16th Street NW (Downtown).

For these corridors, additional improvement projects beyond the citywide TDM/TSM program and the Transportation Vision Plan may be needed to mitigate congestion impacts. Future corridor level studies will be required to identify specific improvements. These studies could recommend improvements above and beyond those listed in the Comp Plan, including on-street parking management programs (removal of parking and commercial loading zones, etc.), signal optimization, intersection redesign, additional transit improvements, lane management, turning lanes, and other measures.

PUBLIC TRANSIT IMPACTS

Impact C2. Future development consistent with the Comp Plan would increase demand for public transportation services, particularly in Central Washington, along the Anacostia River, along the six “Great Streets” corridors, and near Metro stations. This is a potentially significant impact that is addressed by policies and actions in the Draft Plan.

More than 80 percent of the housing and 90 percent of the job growth anticipated by the Comp Plan will take place within areas that are served by Metrorail or that are located along major bus corridors. A growing number of residents and workers will rely on public transit for travel, increasing demand on the commuter train, subway, and bus systems. Meeting this demand will require both increasing the capacity of existing systems (through longer Metro trains, more frequent headways, additional station ingress/egress points, etc.) and the development of additional transit services (such as streetcars, Metrorail extensions, and BRT).

The following policies are included in the proposed Comp Plan to mitigate transit impacts:

Policy T-2.1.1: Transit Accessibility

Work with transit providers to develop transit service that is fast, frequent, and reliable and that is accessible to the city’s residences and businesses. Pursue strategies that make transit safe, secure, comfortable, and affordable.

Policy T-2.1.2: Bus Transit Improvements

Enhance bus transit service by improving scheduling and reliability, reducing travel time, providing relief for overcrowding, increasing frequency and service hours, and improving both local access and cross-town connections.

Policy T-2.1.3: WMATA Funding

Support the creation of dedicated, reliable funding sources for Metro, generated through the equitable participation of all jurisdictions in the region that benefit from the system.

Policy T-2.1.4: Maintenance of Transit Facilities

Work with the WMATA Board to ensure that necessary investments to the transit system are made to keep it operating safely and to maximize its useful life.

Action T-2.1-A: New Streetcar or Bus Rapid Transit Lines

Investigate and construct a network of new bus rapid transit or streetcar lines to provide travel options, better connect the city, and improve surface-level. As needed, replace existing travel and/or parking lanes along selected major thoroughfares with new rapid bus or streetcar lines to improve mobility within the city.

Action T-2.1-B: Eight-Car Trains

Increase Metrorail train lengths from six cars to eight cars for rush hour commuting and other peak periods.

Action T-2.1-C: Circulator Buses

In addition to the circulator bus routes planned for Downtown, consider implementing circulator routes in other areas of the city to connect residents to commercial centers and augment existing transit routes.

Action T-2.1-D: Bus Stop Improvements

Improve key bus stop locations through such actions as: Extending bus stop curbs to facilitate reentry into the traffic stream; Adding bus stop amenities such as user-friendly, real-time transit schedule information; Improving access to bus stops via well-lit, accessible sidewalks and street crossings; Utilizing GPS and other technologies to inform bus riders who are waiting for buses when the next bus will arrive.

Action T-2.1-G: Water Taxis

Explore public-private and regional partnership opportunities to provide water taxis on the Potomac and Anacostia Rivers to serve close in areas around the District as well as longer-distance routes from points south such as Indian Head on the east side of the Potomac and Woodbridge on the west.

Policy T-2.2.1: Multi-modal Connections

Create more direct connections between the various transit modes consistent with the federal requirement to plan and implement intermodal transportation systems

Policy T-2.2.2: Connecting District Neighborhoods

Improve connections between District neighborhoods through upgraded transit, auto, pedestrian and bike connections, and by removing or minimizing existing physical barriers such as railroads and highways

Policy T-2.2.4: Commuter and Intercity Rail

Support the expansion of commuter and intercity rail. Intercity rail could include magnetic levitation (MAGLEV) high-speed trains that could provide access to New York in 90 minutes and to Boston in three hours.

Action T-2.2-A: Intermodal Centers

Plan, fund, and implement the development of intermodal activity centers both at the periphery of the city and closer to Downtown. These intermodal centers should provide a “park-once” service where travelers including tour buses, can park their vehicles and then travel efficiently and safely around the District by other modes. The activity centers surrounding the District’s Downtown should be located at Union Station, the Kennedy Center, and Banneker Overlook.

Action T-2.2-D: Commuter Rail Connections

Increase capacity and connectivity at Union Station and at the L’Enfant Plaza VRE station to accommodate additional commuter rail passenger traffic and direct through-train connections between Maryland and Virginia.

Action T-2.2-E: Bus Connections

Promote cross-town bus services and new bus routes that connect neighborhoods to one another and to transit stations

In addition to the policies and actions above, the Comp Plan outlines the capital improvements that are planned to expand public transit capacity. These include the K Street busway, the Anacostia and H Street streetcars, the Georgia Avenue BRT, and the pedestrian connections between Farragut North and Farragut West and Gallery Place and Metro Center stations. Rapid bus and BRT improvements are under study on other corridors in the city.

Construction of these improvements and implementation of Comp Plan land use policies would have positive environmental impacts by making transit more viable, reducing travel demand on the region’s roadways, and concentrating travel demand in the corridors where transit infrastructure exists.

Ultimately, however, the Plan’s impact on public transit will depend on successful completion of the capital projects described above and efficient operation of the transit system. If additional funding sources for Metro are not secured, however, impacts could be significant.

PEDESTRIAN AND BICYCLE IMPACTS

Impact C3. Future development consistent with the Comp Plan would increase the demand for pedestrian and bicycle facilities. The increased presence of pedestrians and bicyclists on District streets may also increase traffic safety hazards. This is a less than significant impact because of mitigating policies and actions in the proposed Plan. In addition, positive environmental impacts could occur as walking and bicycling become more viable.

The Comp Plan emphasizes development in Central Washington, along corridors, and around Metro stations. As this development takes place, the demand for bike lanes, bike racks and facilities, pedestrian crosswalks, wider sidewalks, and other facilities will rise. Increased population and employment, coupled with a shift toward higher density pedestrian-oriented development, would result in a larger number of pedestrians and bicyclists on streets in these areas.

The Plan recommends the expansion of the city's bike lane network and completion of its sidewalk system to make bicycling and pedestrian movement more viable. This will generally have positive effects on the environment by reducing the necessity of driving for a large segment of the population. It will, however, create the potential for more accidents and conflicts between pedestrians and bicyclists. A number of specific policies and actions in the Plan address this issue and seek to mitigate impacts.

The following policies and programs are included:

Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks.

Policy T-2.3.2: Bicycle Network

Provide and maintain a safe, direct, and comprehensive bicycle network connecting neighborhoods, employment locations, public facilities, transit stations, parks and other key destinations. Eliminate system gaps to provide continuous bicycle facilities.

Policy T-2.3.3: Bicycle Safety

The District's population density, interconnected grid of streets, wide sidewalks, and renowned park system have long contributed to a favorable environment for walking. In 2000 nearly 31,000 District residents (12 percent of the city's labor force) walked to work.

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city.

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals.

Policy T-2.4.3: Traffic Calming

Continue to address traffic-related safety issues through carefully considered traffic calming measures.

Action T-2.3-A: Bicycle Facilities

Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users.

Action T-2.3-B: Bicycle Master Plan

Implement the recommendations of the Bicycle Master Plan to:

- (a) Improve and expand the bike route system and provide functional and distinctive signs for the system
- (b) Provide additional bike facilities on roadways
- (c) Complete ongoing trail development and improvement projects to close gaps in the system
- (d) Improve bridge access for bicyclists
- (e) Provide bicycle parking in public space and encourage bicycle parking in private space
- (f) Update the District laws, regulations and policy documents to address bicycle accommodation
- (g) Review District projects to accommodate bicycles
- (h) Educate motorists and bicyclists about safe operating behavior
- (i) Enforce traffic laws related to bicycling
- (j) Establish a Youth Bicycle and Pedestrian Safety Education Program
- (k) Distribute the District Bicycle Map to a wide audience
- (l) Set standards for safe bicycle operation, especially where bikes and pedestrians share the same space

Action T-2.3-C: Performance Measures

Develop, apply, and report on walking and bicycle transportation performance measures to identify strengths, deficiencies, and potential improvements and to support the development of new and innovative facilities and programs.

Action T-2.4-A: Pedestrian Signal Timing

Review timing on pedestrian signals to ensure that adequate time is provided for crossing, in particular for locations with a large elderly population.

Action T-2.4-B: Sidewalks

Install sidewalks on all major streets throughout the District where there are missing links. Continue to monitor the sidewalk network for needed improvements.

Action T-2.4-C: Innovative Technology for Pedestrian Movement

Explore the use of innovative technology to improve pedestrian movement, such as Segways, personal transportation systems and enhanced sidewalk materials.

Action T-2.4-D: Pedestrian Access on Bridges

Ensure that the redesign and/or reconstruction of bridges, particularly those crossing the Anacostia River, includes improved provisions for pedestrians, including wider sidewalks, adequate separation between vehicle traffic and sidewalks, guard rails, pedestrian-scaled lighting, and easy grade transitions.

PARKING IMPACTS

Impact C4. Development accommodated by the Comprehensive Plan would result in increased parking demand in Central Washington, on large sites, along corridors, around Metrorail stations, and in neighborhood commercial districts across the city. Managing and mitigating this demand is the subject of several Plan policies, reducing the potential for significant impacts.

The proposed Plan anticipates more than 57,000 housing units and as much as 65 million square feet of new commercial space over a 20-year period. Despite public transportation improvements and provisions for bicycles and pedestrians, this development will generate the demand for additional parking. The

clustering of activities such as housing and retail uses in neighborhood commercial districts may also increase parking demand.

Around Metrorail stations, increased demand from new development could exacerbate existing conflicts resulting from an already constrained supply of parking. These conflicts could be heightened by increased congestion and increases in transit ridership. At the same time, infill development envisioned along corridors, around transit stations, and in Central Washington could eliminate commercial surface parking lots. This is particularly true in areas like NoMA and Mount Vernon Square. Parking demand from these areas could spill over into adjacent neighborhoods such as Shaw, Capitol Hill, and Eckington. Similar situations could arise in other parts of the city.

The Comp Plan anticipates these potential impacts and responds proactively through policies and action programs. The measures listed below are included in the Land Use and Transportation Elements. In addition, policies and actions in the Area Elements address localized parking issues and the need for area-specific parking management programs.

Policy T-3.2.1: Parking Duration in Commercial Areas

Encourage the supply and management of public parking in commercial areas to afford priority to customers and others on business errands, and discourage the use of these spaces by all-day parkers, including establishment employees.

Policy T-3.2.2: Innovations in Parking

Consider and implement new technologies to increase the efficiency, management, and ease of use of parking. These include consolidated meters, changeable parking meter fees by time of day or day of the week, shared-use parking, vertical/stacked parking, electronic ticketing of parking offenders and other innovations.

Action T-3.2-A: Short-Term Parking

Continue to work with existing private parking facilities to encourage and provide incentives to convert a portion of the spaces now designated for all-day commuter parking to shorter-term parking. The purpose of this action is to meet the demand for retail, entertainment, and mid-day parking.

Action T-3.2-B: Car-Share Parking

Continue to provide strategically placed and well-defined curbside parking for car-share vehicles, particularly near Metrorail stations, major transit nodes, and major employment destinations, and in medium and high density neighborhoods.

Action T-3.2-C: Curbside Management Techniques

Revise curbside management and on-street parking policies to:

- (a) adjust parking pricing to reflect the demand for and value of curb space
- (b) adjust the boundaries for residential parking zones
- (c) establish parking policies that respond to the different parking needs of different types of areas
- (d) expand the times and days for meter parking enforcement in commercial areas
- (e) promote management of parking facilities that serve multiple uses (e.g., commuters, shoppers, recreation, entertainment, churches, special events, etc.)
- (f) improve the flexibility and management of parking through mid-block meters
- (g) preserve, manage, and increase alley space or similar off-street loading space
- (h) increase enforcement of parking limits, double-parking and other curbside violations, including graduated fines for repeat offenses and towing for violations on key designated arterials.

Policy LU-2.4.8: Addressing Commercial Parking Impacts

Ensure that the District's zoning regulations consider the traffic and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery.

Policy LU-1.3.6: Parking Near Metro Stations

Encourage the creative management of parking around transit stations, ensuring that automobile needs are balanced with transit, pedestrian, and bicycle travel needs. New parking should generally be set behind or underneath buildings and geared toward short-term users rather than all-day commuters.

Policy LU-2.1.11: Residential Parking Requirements

Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated.

Policy LU-2.4.8: Commercial Parking Impacts

Ensure that the District's zoning regulations consider the traffic and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery.

III.D INFRASTRUCTURE

This section of the Environmental Assessment describes existing infrastructure conditions within the District of Columbia, the potential impacts of the proposed Plan on infrastructure, and the major policies that are included in the Plan to mitigate potentially significant impacts. For the purposes of this Assessment, Infrastructure is defined as water supply and distribution facilities, sanitary and storm sewer collection and treatment facilities, energy facilities, telecommunication facilities, and solid waste transfer and disposal facilities.

SETTING

The following text presents a broad overview of the infrastructure system in the District. For more detailed discussion, please consult the Comprehensive Plan Infrastructure Technical Report at: <http://inclusivitycity.org/docs.php?ogid=1000001120>

Water Supply, Treatment, and Distribution

The Potomac River is the District's main source for potable water. Water is taken in and treated through the Washington Aqueduct system, which is comprised of the Great Falls & Little Falls intakes on the Potomac River, the Dalecarlia and McMillan Reservoirs, the Georgetown Conduit and Reservoir, the Washington City Tunnel, and the East Shaft Pump Station. The current water supply will adequately meet projected 2025 demand, even under a repeat of the worst meteorological and stream flow conditions in the historical record.

Water treatment capacity exceeds current day-to-day water demand. However, potable water quality has been a recurrent issue in the District. Although the water supplied by the Washington Aqueduct Division meets or exceeds all standards currently in effect under federal regulations, water in the DC Water and Sewer Authority system (WASA) contains high levels of lead, which have been determined to originate in lateral service pipes or a building's internal plumbing. Additionally, over 50% of the water mains are over 100 years old, and over 80% are 12-inch diameter or smaller, contributing to the low water pressure experienced in many parts of the District.

Wastewater and Storm Drainage

WASA collects and treats wastewater from the District, portions of Montgomery and Prince George's counties in Maryland, and portions of Fairfax and Loudoun counties in Virginia. Separate sanitary and storm sewers serve approximately two-thirds of the District, while the remaining one-third is served by combined sanitary and storm sewer systems (CSS). WASA treats collected wastewater and peak stormwater flows from over two million people at the Blue Plains Wastewater Treatment Plant.

When the capacity of the CSS is unable to convey the mixture of wastewater and stormwater to the treatment plant, a combined sewer overflow occurs in which untreated water is discharged into the Potomac River, Anacostia River, and Rock Creek. Current estimates show that the overflows from the combined sewer systems may reach approximately 2,500 million gallons per year. The District has implemented a *Combined Sewer System Long Term Control Plan* (CSS LTCP) in an attempt to reducing the overflows. Upon completion of this Plan, overflows will be reduced by approximately 95 percent.

Energy

The District lacks the necessary natural resources to produce its own energy and imports nearly all of its electricity and natural gas. District consumers can choose to receive electricity from a number of electric generation and transmission suppliers (located mostly in Maryland), but the distribution of electricity is provided solely by Pepco. Likewise, customers in the Washington Metro area can purchase natural gas from several competing energy companies, but the gas is delivered to District neighborhoods by Washington Gas.

Telecommunications

The 1996 Telecommunications Act opened local telephone service to competition and offered consumers choice and greater availability for more advanced broadcasting, cable, telecommunications, and information and video services. Demand will increase concurrently with growing population and employment, which is becoming increasingly reliant on wireless technology. Cable and telephone service is responding to this demand by developing new communication towers. The District's Office of the Chief Technology Officer and the Office of Property Management manage the Telecommunications Asset and Location Leverage program for leasing space on government property and buildings to telecommunication and wireless companies.

Solid Waste

The District generates roughly 650,000 tons of Municipal Solid Waste (MSW) per year, which is collected and processed by five public and private trash transfer facilities. There are no active incinerators or landfills in the District; solid waste is removed by truck to landfills in other states.

The Fort Totten and Benning Road Trash Transfer facilities are maintained by the District. The Benning Road Station has been recently renovated and the Fort Totten Station is scheduled for improvement. The improvements will expand capacity to handle more than 4,000 tons daily. Currently, there is not a transfer station to handle construction and demolition debris (C&D), but the District allows a limited amount to be disposed at the Fort Totten processing station.

Approximately 10% of the municipal waste generated in the District is recycled. Residential recycling is voluntary, while commercial recycling is required by law.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant environmental effect if it would interfere with or substantially change the demand for utility services, generate a need for new utilities, or require substantial alteration to utility systems. Thus, the proposed Comp Plan would have an impact on infrastructure if its implementation would require or result in:

- The extension or reconstruction of major water, sewer, or storm drainage lines to serve additional development
- The addition of new reservoirs or new water storage capacity
- The extension of a sewer trunk line to serve a new development area
- The expansion of a wastewater treatment plant
- The construction of major new telecommunication or energy transmission or generation facilities
- Energy or natural gas demands which exceed available supply

The impact on infrastructure would be considered significant and adverse if it exceeded the ability of local service providers to meet additional demand.

IMPACTS AND MITIGATION MEASURES

WATER SUPPLY AND DISTRIBUTION

Impact D1. Future development consistent with the Comp Plan would increase the demand for water. This is a less than significant impact because of policies and actions in the proposed Plan, and because existing supply is adequate to meet projected demand.

The DC Water and Sewer Authority (WASA) estimates that average daily water demand within the District will increase by approximately 20 million gallons per day between 2000 and 2020. This is about a 14% increase over a twenty year period. The main issue identified in evaluating the adequacy of water supply and distribution systems to meet this demand is sub-optimal water pressure. The primary causes of this problem are narrow pipes (12 inch diameter or less), aging infrastructure, out-of-service facilities, elevation differentials, and ineffectively used reservoirs. Low pressure problems could be exacerbated by future development and increased density.

In the recent past, another concern for District residents has been poor water quality associated with lead leaching from pipes and stagnant water accumulating in the water mains. Some of the mains were originally installed with a dead-end rather than a looped configuration, which creates the potential for the accumulation of stagnant water during low flow conditions. In 2003, drinking water was found to contain levels of lead that exceeded the federal action level (about 15 parts per billion). Since the water mains are lead-free, the problem was attributed to lead that was leaching out or dissolving from the service pipes

connecting the water mains in the street to residences, or from solder or fixtures in internal plumbing. WASA has aggressively acted to correct these problems.

The Comp Plan includes the following policies and actions to mitigate the impacts of increased water demand and deteriorating water infrastructure:

Policy IN-1.2.1: Modernizing and Rehabilitating Water Infrastructure

Work proactively with WASA to repair and replace aging infrastructure, and to upgrade the water distribution system to meet current and future demand. The District will support water system improvement programs that rehabilitate or replace undersized, defective, or deteriorating mains. The District will also support concurrent programs that ensure that lines are flushed in order to eliminate the potential for stagnant water to accumulate at the ends of water mains.

Policy IN-1.2.2: Ensuring Adequate Water Pressure

Work proactively with WASA to provide land for new storage tanks and other necessary operations so that adequate water supply and pressure can be provided to all areas of the District.

Action IN-1.2-B: Small Diameter Water Main Rehabilitation Program

Continue the implementation of the Small Diameter Water Main Rehabilitation as identified in the WASA CIP. Work includes rehabilitating small diameter (12-inch diameter and smaller) water mains to improve water pressure, system reliability, and flows in the system, as well as to maintain water quality.

Action IN-1.2-C: Water Treatment Plant (WTP) Improvements

Implement the planned improvements for the McMillan and Dalecarlia WTPs as identified in the Washington Aqueduct CIP. Planned improvements at McMillan include elevator and crane replacements and building renovations. Planned improvements at Dalecarlia include building, roadway and security improvements and clearwell cleaning and disinfection.

In addition, the Plan proposes the following policies to conserve water, thereby assuring that water supply continues to be adequate:

Policy E-2.1.1: Promoting Water Conservation

Promote the efficient use of existing water supplies through a variety of water conservation measures, including the use of plumbing fixtures designed for water efficiency, drought-tolerant landscaping, and irrigation systems designed to conserve water.

Action E-2.1-A: Leak Detection and Repair Program

Continue WASA efforts to reduce water loss from leaking mains, including reducing the backlog of deferred maintenance, using audits and monitoring equipment to identify leaks, performing expeditious repair of leaks, and instructing customers on procedures for detecting and reporting leaks.

Action E-2.1-B: Building Code Review

Continue efforts by the DC Building Code Advisory Committee to review building, plumbing, and landscaping standards and codes in order to identify possible new water conservation measures.

Action E-2.1-C: Water Conservation Education

Work collaboratively with WASA to promote greater awareness of the need for water conservation, and to achieve a reduction in the daily per capita consumption of water resources. Special efforts should be made to reach low income customers and institutional users. At least once a year, each customer should receive printed or electronic information on efficient water use practices, costs associated with leaking fixtures, benefits associated with conversation, and guidelines for installing water-saving plumbing devices.

WASTEWATER AND STORMWATER IMPACTS

Impact D2. Development consistent with the Comp Plan will lead to higher sanitary sewer flows and could increase urban runoff. This is a particular concern in areas within the Combined Sewer System Service Area, given the limited capacity of the wastewater collection system. The volume of waste requiring treatment at Blue Plains could increase, and the incidence of combined sewer overflow could increase. This impact is mitigated to a less than significant level by policies and actions in the proposed Plan. Positive impacts would result from the plan's emphasis on low impact development and tree planting---both absent from the 1998 Plan.

Current projections indicate that the total flow to the Blue Plains Wastewater Treatment Plant will be accommodated through 2027. As noted earlier, wastewater overflow is an issue in areas served by the combined sewer and stormwater system. Combined sewer overflows occur during certain storm events when the capacity of the combined sewer system is unable to convey the mixture of wastewater and stormwater to the treatment plant.

Development consistent with the Comp Plan is projected to increase wastewater flows by approximately 17 to 20 million gallons per day (mgd). About two-thirds of this increase will occur within the combined sewer system area. The increase in flow will be compounded by increased impervious surface resulting from development. This could result in more overflows to the Anacostia and Potomac Rivers, and Rock Creek.

The Plan includes the following policies to mitigate these impacts:

Policy IN-2.1.2: Investing In Our Wastewater Treatment Facilities

Provide sustained capital investment in the District's wastewater treatment system to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment.

Action IN-2.1-A: Wastewater Treatment Capital Improvements

Continue to implement wastewater treatment improvements as identified in the WASA CIP. These projects include the replacement of undersized, aging, or deteriorated sewers; the installation of sewers to serve areas of new development or changed development patterns; and pumping station force main replacement and rehabilitation. Capital projects are required to rehabilitate, upgrade or provide new facilities at Blue Plains to ensure that it can reliably meet its NPDES permit requirements and produce a consistent, high quality dewatered solids product for land application.

Policy IN-2.2.1: Improving Stormwater Management

Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process with clear lines of responsibility with regard to oversight, guidelines, and resources.

Action IN-2.2-A: Stormwater Capital Improvements

Continue the implementation of stormwater capital improvements as identified in the WASA Capital Improvement program.

Action IN-2.2-B: Stormwater Management Responsibilities

Develop an integrated process to manage stormwater that enhances interagency communication and formally assigns responsibility and funding to manage stormwater drainage. This process should include:

- an appropriate funding mechanism to consistently maintain Clean Water standards and reduce surface runoff;
- clear lines of responsibility with regard to which agency provides oversight, guidelines, and resources for the stormwater system and its management
- consistent and reliable funding sources to maintain Clean Water standards and reduce surface water runoff;
- assurance that stormwater improvements associated with new development are coordinated with the WASA Capital Improvement Plan.

In addition, the Plan includes policies to mitigate combined sewer overflow by limiting further increases in impervious surface coverage. The Plan strongly supports “Low Impact Development,” green building, and tree planting so that rainwater is absorbed on site rather than channeled to storm drains and ultimately, to local rivers and streams.

The following policies and programs are included in Environmental Protection Elements to limit impervious surfaces:

Policy E-3.1.1: Maximizing Permeable Surfaces

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff.

Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.

Policy E-3.1.3: Green Engineering

Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated.

Action E-3.1-A: Low Impact Development Criteria

Establish Low Impact Development criteria for new development, including provisions for expanded use of porous pavement, bio-retention facilities, and green roofs. Also, explore the expanded use of impervious surface limits in the District’s Zoning Regulations to encourage the use of green roofs, porous pavement, and other means of reducing stormwater runoff.

Action E-3.1-B: LID Demonstration Projects

Complete one demonstration project a year that illustrates use of Low Impact Development (LID) technology, and make the project standards and specifications available for application to other projects in the city. Such demonstration projects should be coordinated to maximize environmental benefits, monitored to evaluate their impacts, and expanded as time and money allow.

Action E-3.1-C: Road Construction Standards

Explore changes to DDOT’s street, gutter, curb, sidewalk, and parking lot standards that would accommodate expanded use of porous pavement (and other low impact development methods) on sidewalks, road surfaces, and other paved surfaces, or that would otherwise aid in controlling or improving the quality of runoff.

ENERGY FACILITY IMPACTS

Impact D3. Implementation of the proposed Comp Plan could increase citywide energy demand. Although no deficiencies in the city's gas and electric transmission and distribution systems have been identified, this increase would contribute to higher systemwide demands for electricity and natural gas. Policies and actions in the proposed Plan mitigate this impact to a less than significant level.

Although the population in the District has declined over the last 50 years, energy consumption has remained relatively constant. Given the projected population and employment growth that is now forecast, energy consumption is expected to increase in the next 20 years. Part of the reason is that household electricity use is expected to increase as more appliances are used. Given the District's dependence on external sources for energy, steps must be taken to ensure an adequate and efficient energy supply. Pepco estimates that two new substations will be needed in the District to meet growth demands for the next ten years.

Continuous maintenance of the electric and gas distribution systems is also critical. Pepco conducts routine assessments of its 1,400 overhead and underground feeder cables to improve the safety and reliability of its services. Despite these efforts, there are still occasional power outages due to equipment failure, weather, and accidents.

The following policies and actions are included in the Comp Plan to meet projected increases in energy demand, and to encourage continued energy conservation:

Policy IN-5.1.1: Adequate Electricity

Ensure adequate electric supply to serve current and future District of Columbia needs. This will require collaboration with Pepco and other service providers.

Policy IN-5.1.2: Undergrounding Electric Distribution Lines

Plan for the undergrounding of electric distribution lines throughout the District to provide increased reliability of service and enhanced aesthetics and safety, and seek equitable means to cover the high costs associated with undergrounding. Use the opportunity for undergrounding to relocate other above-ground communication lines, such as telephone lines.

Policy E-2.2.2: Energy Availability

Improve energy availability and buffer District consumers from fluctuations in energy supply and prices. This should be achieved through the District's energy purchasing policies, financial assistance programs for lower income customers, incentives for "green" power, and regulatory changes that ensure that local energy markets are operating efficiently.

Policy E-2.2.5: Energy Efficient Building and Site Planning

Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals.

Policy E-2.2.9: Energy Security

Promote energy security through partnerships that enable the District to respond to energy emergencies and interruptions in supply. Participate in regional efforts to plan for such emergencies, including those organized by the Metropolitan Washington Council of Governments.

Action E-2.2-E: Energy Emergency Plan

Prepare an energy emergency response plan by updating and consolidating existing emergency plans. Regularly scheduled training for energy emergencies should be provided to appropriate District personnel.

TELECOMMUNICATION IMPACTS

Impact D4. Increased residential and commercial development would increase the demand for telecommunication services. This could lead to proposals for new antennae or communication towers. This impact is mitigated by policies and actions in the proposed Plan.

Demand for communications infrastructure is expected to increase as the employment sector and third generation wireless services continue to expand. There may be a need for new antennae to meet this demand. Issues associated with the siting and use of antennas include functional and aesthetic concerns, the protection of operational needs of federal installations and parkland, the preservation of important viewsheds, and human health concerns attributed to radiofrequency exposure. All of these potential impacts are addressed through Plan policies, as follows:

Policy IN-4.1.1: Development of Communications Infrastructure

Plan and oversee development and maintenance of communications infrastructure, including cable networks, fiber optic networks, and wireless communications facilities to help support economic development, security, and quality of life goals.

Policy IN-4.1.2: Digital Infrastructure Accessibility

Promote digital infrastructure that provides affordable broadband data communications anywhere, anytime to the residents of the District. Implement programs to help residents, businesses, schools, and community organizations make effective use of this technology.

Action IN-4.1-A: Guidelines for Siting/Design of Facilities

Establish locational and design criteria for above-ground telecommunication facilities including towers, switching centers, and system maintenance facilities.

Policy E-4.7.2: Co-Location of Antennas

Consider the joint use and co-location of communication antennas to reduce the number of towers necessary, thereby reducing aesthetic impacts and limiting the area of radiofrequency exposure.

SOLID WASTE TRANSFER AND DISPOSAL

Impact D5. Future development consistent with the Comp Plan would increase solid waste disposal requirements and contribute to a regionwide need for additional landfill capacity and transfer facilities. This is a less than significant impact because of the continued implementation and expansion of the District's recycling program, as well as the policies and actions in the Draft Comp Plan. Impacts will generally be positive, as these policies are largely absent in the 1998 Plan.

With the planned infill/redevelopment and population growth, the amount of trash generated is expected to increase, generating the need for additional public and private processing facility capacity. The District needs at least one private facility to process construction and demolition waste, since the two District-operated stations cannot perform this function in the quantities needed. Moreover, one of the three private transfer stations is being displaced by the new baseball stadium and another is operating without a permit.

The following policies and programs are included in the Infrastructure and Environmental Protection Elements to address solid waste collection needs, and to encourage the continued diversion of waste through source reduction and recycling programs:

Policy IN-3.1.1: Solid Waste Collection

Ensure safe, reliable, adequate solid waste collection from residences, business establishments, institutions and other facilities.

Action IN-3.1-A: Upgrade Fort Totten Facility

Upgrade the Fort Totten transfer facility to provide a fully enclosed, modern solid waste transfer station to meet the District's solid waste needs. Consider expansion of this facility to provide adequate space to meet other solid waste needs, including vehicle storage, "white goods" such as washing machines, refrigerators and other large household appliances, and other special waste disposal.

Action IN-3.1-B: Trash Transfer Regulations

Enact regulatory changes that enable the private sector to provide more efficient trash transfer stations, be in compliance with enforceable regulations, and potentially provide a much needed state-of-the-art construction and demolition waste processing site under private operation and ownership.

Policy E-2.3.1: Solid Waste Source Reduction and Recycling

Actively promote the reduction of the solid waste stream through reduction, reuse, recycling, recovery, composting, and other measures. Use appropriate regulatory, management, and marketing strategies to inform residents and businesses about recycling and composting opportunities, and best practices for reducing the amount of waste requiring landfill disposal or incineration.

Policy E-2.3.2: Construction and Demolition Recycling

Support the recycling of construction and demolition debris as a key strategy for reducing the volume of waste requiring landfill disposal. To carry out this policy, encourage the "deconstruction" of obsolete buildings rather than traditional demolition. Deconstruction dismantles buildings piece by piece and makes the components available for resale and reuse.

Action E-2.3-A: Expanding District Recycling Programs

Continue implementation of the citywide recycling initiative started in 2002, which sets the long-term goal of recycling 45 percent of all waste generated in the District. Special efforts should be made to expand workplace

recycling through a combined education and inspection/enforcement campaign, conduct “best practices” studies of successful recycling programs in other jurisdictions, and plan for the recycling of yard waste.

Action E-2.3-B: Expand Recycling Efforts in District Institutions

Work with the DC Public Schools and Public Charter Schools to expand school recycling programs and activities. Encourage private schools, universities, colleges, hospitals, and other large institutional employers to do likewise.

Action E-2.3-C: Revisions to Planning and Building Standards for Solid Waste

Review building code standards for solid waste collection to ensure that new structures are designed to encourage and accommodate recycling and convenient trash pickup.

Action E-2.3-D: Installation of Sidewalk Recycling Receptacles

Install receptacles for sidewalk recycling in Downtown DC and other neighborhood commercial centers with high pedestrian volume as a way of increasing waste diversion and publicly reaffirming the District’s commitment to recycling.

Action E-2.3-E: E-Cycling Program

Establish E-cycling programs and other measures to promote the recycling of computers and other electronic products in an environmentally sound manner.

Action E-2.3-F: Commercial and Industrial Waste Reduction

Work with the commercial and industrial sectors to foster appropriate source reduction and waste minimization activities, such as the environmentally sound recycling and disposal of mercury-containing fluorescent lamps and electronic equipment.

III.E BIOTIC RESOURCES

This section of the Environmental Assessment describes the impact of the proposed Comprehensive Plan on biotic resources (vegetation and wildlife) in the District of Columbia. The analysis includes a summary of existing biotic resources, a description of the impacts to these resources resulting from adoption of the Comp Plan, and measures to mitigate any potentially significant impacts.

SETTING

Regulatory Framework

The regulation of biotic resources in Washington, DC is governed by federal, multi-state, and District laws and programs. The major regulations impacting biotic resources in the District are summarized below.

Federal Laws and Programs

Endangered Species Act. The Endangered Species Act of 1973 (ESA) requires Federal agencies to conserve plant and animal species that have been listed as endangered or threatened. Federal agencies are required to consult as necessary with the US Fish and Wildlife Service (USFWS) to ensure that any actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction of or substantial damage to critical habitat. While this consultation is in progress, an agency must not make an irretrievable commitment of resources to its project. A consultation typically leads to the USFWS's suggestion of alternatives or mitigating measures that can be incorporated into the project, thereby allowing its completion.

Migratory Bird Treaty Act of 1918, as amended. The Migratory Bird Treaty Act of 1918, as amended, implements various treaties and conventions between the U.S. and Canada, Japan, Mexico and the former Soviet Union for the protection of migratory birds. Under this Act it is prohibited, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention . . . for the protection of migratory birds . . . or any part, nest, or egg of any such bird" (16 U.S.C. § 703). Subject to limitations in the Act, the Secretary of the Interior may adopt regulations determining the extent to which, if at all, hunting, taking, capturing, killing, possessing, selling, purchasing, shipping, transporting or exporting of any migratory bird, part, nest, or egg will be allowed, having regard for temperature zones, distribution, abundance, economic value, breeding habits and migratory flight patterns.

Noxious Weed Act. The Federal Noxious Weed Act (7 U.S.C. 2801-2814, January 3, 1975, as amended 1988 and 1994) provides for the control and management of nonindigenous weeds that injure or have the potential to injure the interests of agriculture and commerce, wildlife resources, or the public health.

Executive Order 11990, Protection of Wetlands (May 24, 1977). This E.O. requires Federal agencies to take action to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agencies' responsibilities for managing and disposing of Federal lands and facilities.

Executive Order 13112, Invasive Species (February 3, 1999). This E.O. directs Federal agencies to expand and coordinate their efforts to combat the introduction and spread of plants and animals not native to the United States. The Federal Highway Administration has developed guidance to implement the E.O. It provides a framework for preventing the introduction of and controlling the spread of invasive plant species on highway rights-of-way.

Presidential Executive Memorandum on Environmentally and Economically Beneficial Landscaping Practices (April 1994). This E.M. directs agencies of the Federal government to follow principles for environmentally and economically beneficial landscape practices in order to improve their current landscape practices. These practices include use of regionally-native plants for landscaping; design, use, or promotion of construction practices that minimize adverse effects on natural habitat; implementation of water and energy efficient practices; and creation of outdoor demonstration projects. The FHWA has developed guidance for this E.M. that states that at every opportunity where it is determined to be appropriate and cost-effective, the guiding principles of the E.M. to use native plants should be considered to the maximum extent practicable. The FHWA guidance defines what a native plant is and provides guidance on design, plant management and how to use native plants.

Multi-State Laws and Programs

Chesapeake Bay Agreement 2000. In June 2000, the Chesapeake Bay Program partners, comprised of the District of Columbia, Virginia, Maryland, and Pennsylvania, adopted the Chesapeake 2000 agreement, a strategic plan to achieve a vision for the future of the Chesapeake Bay. This vision includes abundant and diverse populations of living resources, fed by healthy streams and rivers, sustaining strong local and regional economies. To restore an ecosystem as complex as the Chesapeake Bay requires work on many fronts. The agreement details nearly one hundred commitments important to Bay restoration, organized into five strategic focus areas. These are Protecting and Restoring Living Resources; Protecting and Restoring Vital; Habitats; Improving Water Quality; Sound Land Management; and Engaging Individuals and Local Communities.

District Laws and Programs

The Urban Forest Preservation Act of 2002 (D.C. Act 14-614). The Urban Forest Preservation Act established an urban forest preservation program requiring a Special Tree Removal Permit and community notification prior to the removal or replacement of a tree with a circumference of 55 inches or more. It also established a Tree Fund to be used to plant trees and defray costs associated with the implementation of this act. The Act makes it unlawful for any person or governmental entities, without a Special Tree Removal Permit issued by the Mayor, to top, cut down, remove, girdle, break, or destroy any Special Tree.

Regulating Agencies

The regulations and programs listed above are implemented by the following District and federal agencies:

District of Columbia Department of the Environment

The Department of the Environment works to protect and preserve the ecological health of the District of Columbia. Prior to 2006, many of the DOE functions were assigned to the Environmental Health Administration (EHA) in the Department of Health. The EHA is comprised of three bureaus: Hazardous Material and Toxic Substances, Environmental Quality, and Community Hygiene. The EHA also coordinates inspections, reviews submissions for requests received pursuant to the District of Columbia Environmental Policy Act, represents the departmental environmental interest on boards, commissions, and committees, and provides staff support for environmental outreach events. Many of these functions are being transferred to DOE.

Two of the EHA divisions are directly related to the protection of wildlife and the urban ecosystem. These include the divisions of Fisheries and Wildlife, in the Bureau of Environmental Quality, and Animal Disease Prevention, in the Bureau of Community Hygiene. The Fisheries and Wildlife Division has three major components: the Aquatic and Wildlife Education Branch, the Fisheries Research and Management Branch, and the Wildlife Management and Research Branch. Collectively these branches serve to monitor the District's aquatic and wildlife resources and to provide public education and outreach. The mission of the Animal Disease Prevention Division is to prevent and control the spread of diseases transmitted from animals to humans.

District Department of Transportation-Urban Forestry Division

The Urban Forestry Administration (UFA), formerly the Tree and Landscape Division, is located within the District Department of Transportation (DDOT). The mission of the Urban Forestry Administration is to manage and increase the District's street trees and to maintain healthy trees. Since 1999, UFA has planted 14,500 trees, pruned more than 40,000 trees, and removed approximately 7,000 dead or dying trees.

District of Columbia Department of Parks and Recreation

The Department of Parks and Recreation (DPR) operates and maintains a variety of recreational facilities to enhance the leisure and recreational opportunities in the Nation's Capital. DPR maintains over 381 acres of park land incorporating 354 parks and 71 playgrounds.

National Park Service

There are more than 6,700 acres of lands administered by the National Park Service in the District. This includes 23 park sites (including monuments, memorials, and national historic sites).

Characterization

According to the recently completed District of Columbia Comprehensive Wildlife Conservation Strategy, there are approximately 782 species recorded within the District. Invertebrates comprise the largest percentage of the total number of species at 40%, while birds comprise over 30%. These species reside in three major habitat types: parks and open lands, residential and commercial areas, and industrial areas.

Parks and Open Lands

Parks and open lands create habitats for the largest variety of wildlife species. With over 100 parks and other open space areas in the District totaling roughly 6,750 acres, these areas represent the highest quality habitat areas in the city for wildlife. For the purposes of this discussion, open area habitats not only include national, federal, and city parks but also include open lands on university campuses, golf courses, cemeteries, and other institutions.

Small Parks. Within the District of Columbia, there are 231 triangle parks, 34 neighborhood parks, and 157 playgrounds/sports fields (DPR, 2005 a, b). They are typically used as recreational areas, and therefore experience high human traffic. The vegetation in these areas is predominantly composed of maintained grassy fields with low density tree cover, and may include garden plots, sparse woody vegetation, and a variety of landscaping shrubs. Small city parks such as triangle parks (formed when diagonal avenues intersect with grid streets), neighborhood parks, and playgrounds/sports fields represent isolated habitats that support a range of common urban wildlife species (Growing DC, 2003).

Wildlife expected to be found within these areas include eastern chipmunks (*Tamias striatus*), pigeons (*Columba livia*), grey squirrels (*Sciurus carolinensis*), mocking birds (*Mimus polyglottos*), common grackles (*Quiscalus quiscula*), European starlings (*Sturnus vulgaris*), gulls (*Larus* spp.), and English sparrows (*Passer domesticus*). Because many small parks have no aquatic ecosystems except for fountains, bird baths, or small ornamental ponds, few to no aquatic species are expected to be found outside of goldfish (*Carassius auratus*), koi (*Cyprinus carpio*), or other ornamental fish (StreamNet,

2005). Streams are typically piped under small parks resulting in a sparse or unhealthy benthic ecosystem.

As an example, Linclon Park is an eight acre city park located in the Capitol Hill area. Woody vegetation in the park is characterized by southern magnolias (*Magnolia grandiflora*), American beech (*Fagus grandiflora*), American elm (*Ulmus americana*), pin oak (*Quercus palustris*), white oak (*Quercus alba*), little leaved linden (*Tilia Cordata*), sugar maple (*Acer saccharum*), red maple (*Acer rubrum*), American holly (*Ilex opaca*), crape myrtle (*Lagerstroemia fauriei*), and winged euonymus (*Euonymus alatus*) (The Architect of the Capitol, 2005). Wildlife likely to be found within this park include eastern chipmunks (*Tamias striatus*), grey squirrels (*Sciurus carolinensis*) along with non-native bird species such as pigeons (*Columba livia*), European starlings (*Sturnus vulgaris*), and house sparrows (*Passer domesticus*). Trees and hedges may also provide nesting sites for several native bird species, including mourning doves (*Zenaida macroura*), American robins (*Turdus migratorius*), gray catbirds (*Dumetella carolinensis*), northern mockingbirds (*Mimus polyglottos*), crows (*Corvus brachyrhynchos*), blue jays (*Cyanocitta cristata*), Carolina chickadees (*Parus carolinensis*), and northern cardinals (*Cardinalis cardinalis*). In addition, a variety of migratory bird species have been recorded to briefly stop within this park to rest or forage during migration.

Large Parks. Large parks include areas such as national monuments, golf courses, cemeteries, and open areas within institutional/large commercial properties. Large parks include areas such as the National Mall, portions of college campuses, and federal government campuses. There are four golf courses within the District under this category which together account for more than 206 acres. In addition, the District of Columbia contains over 19 cemeteries and some, such as Mount Olivet are as large as 75 acres. Since these areas are often used for recreation, large open park areas tend to have a high amount of human activity affecting the wildlife composition.

The habitat available for wildlife species within open parks typically includes large areas of maintained grasses, some tree cover, shrubs, and both native and planted non-native annual and perennial plant varieties. Habitat edges are often distinct, with forested areas abruptly transitioning to broad areas of manicured grasses. Areas that are infrequently maintained develop greater proportions of woody vegetation, often improving habitat structure and allowing for more diverse and abundant wildlife populations. In general, open area parks provide greater wildlife diversity than small parks.

Wildlife species likely to occur within these parks include pigeons (*Columba livia*), grey squirrels (*Sciurus carolinensis*), mocking birds (*Mimus polyglottos*), common grackles (*Quiscalus quiscula*), European starlings (*Sturnus vulgaris*), gulls (*Larus spp.*), and English sparrows (*Passer domesticus*) (The Architect of the Capitol, 2005). White-tailed deer (*Odocoileus virginianus*) may also be found within these areas if the park borders forested land. In addition, migratory birds can be found within these areas. The *DC Birdscape*, a study which compiled a variety of data on neotropical birds in the District, showed that 67% of migratory avian species can be found in parkland which was composed of district and federal parks, recreation centers, and open space (Sauer et al. 1995). Ball fields and golf courses can provide foraging habitats for barn swallows (*Hirundo rustica*) and Northern rough-winged swallows

(*Stelgidopteryx serripennis*) in the summer, as well as loafing and foraging areas for Canada geese (*Branta canadensis*) and ring-billed gulls (ring-billed gulls) throughout the year. Birds that may be found in open park areas located near waterbodies include: great blue herons (*Ardea herodias*), Canada geese (*Branta canadensis*), and mallards (*Anas platyrhynchos*). During the winter these birds may be joined by American coots (*Fulica Americana*), double-crested cormorants (*Corvus marinus*), buffleheads (*Bucephala albeola*), hooded mergansers (*Mergus cucullatus*), and ruddy ducks (*Oxyura jamaicensis* (USGS, 2005).

Aquatic habitats in large open area parks include small to medium sized ornamental or highly modified ponds and streams. These habitats are likely to contain benthic communities with poor biodiversity due to urban runoff from the surrounding land use, as well as minimal aquatic vegetation as a result of maintenance. These aquatic habitats usually have little or no sediment cover at the bottom layer. Often the only fish species present in these managed habitats are goldfish (*Carassius auratus*) and koi (*Cyprinus carpio*) (StreamNet, 2005). Some turtle species, such as painted turtles (*Chrysemys picta*), may be found but in small populations.

Large Forested Parks. Large forested park lands include such parks as Rock Creek Park, Kenilworth Gardens, the National Arboretum, Oxon Run, and Roosevelt Island. These areas are dominated by forest cover with some interspersed open maintained grassy areas, and support a greater diversity and proportion of native tree and shrub species than the categories listed above. Large forested park areas provide habitat for wildlife adapted to urban forest conditions, including grey squirrels (*Sciurus carolinensis*), whitetail deer (*Odocoileus virginianus*), red fox (*vulpes vulpes*) raccoons (*Procyon lotor*), and opossums (*Didelphis virginiana*). Avian species include those found in urban areas as well as larger populations of woodland and migratory bird species.

Aquatic habitats within large forested parks include small streams and ponds, as well as river habitats for those found along the Anacostia and Potomac Rivers. Streams tend to have a greater biodiversity in these habitats than in other urban habitat types. However, biodiversity is still low compared to more natural condition due to impacts associated with urban runoff water quality, flow variability, and sedimentation. Fish species likely to occur within these streams include species that are tolerant to moderately tolerant of pollution and sediment.

The largest forested park and contiguous forested area within the District is Rock Creek Park. Rock Creek Park is located in the center of the District and extends from the boundary with Maryland through the middle of the city to the Potomac River. Vegetation coverage includes managed grass and lawn, shrub areas, floodplains, ash swamps, and several types of forest. Major vegetative community types include mixed oak-beech (*Fagus grandifolia-Quercus alba/ Podophyllum peltatum*) forest, tulip poplar (*Liriodendron tulipifera*) forest, chestnut oak (*Quercus prinus, Q. velutina*) forest, sycamore- green ash (*Platanus occidentalis*) forest, loblolly pine/ mixed oak forest (*Pinus taeda- Quercus alba, Q. falcate, Q. stellata*) forest, Virginia pine-oak (*Pinus virginiana-Quercus (Q. alba, Q. stellata, Q. falcata, velutina)*) forest and blackberry/porcelain berry (*Rubus allegheniensis/ Ampelopsis brevipedunculata*) shrubland (USGS-NPS, 2005).

Within Rock Creek Park, over 30 mammalian species have been inventoried. Examples of wildlife species include raccoon (*Procyon lotor*), red fox (*Vulpes vulpes*), grey fox (*Urocyon ciceroargenteous*), opossum (*Didelphis virginiana*), beaver (*Castor Canadensis*), grey squirrel (*Sciurus carolinensis*), eastern chipmunk (*Tamias striatus*), and white tailed deer (*Odocoileus virginianus*). In addition, over 180 avian species of breeding or migrating birds have been documented in Rock Creek Park including 33 of 34 warbler species found in the northeastern U.S. In addition, 9 reptile species including the northern ringneck snake (*Diadophis penctatus*), eastern box turtle (*Terrapene carolina*), and black rat snake (*Elaphe obsoleta*) have been recorded within the Park (NPS, 2005).

Rock Creek itself is home to approximately 35 species of fish. Eleven native species have been observed with the creek including the migrating blueback herring (*Alosa aestivalis*) and the alewife (*Alosa pseudoharengus*). The most recent biological assessments indicate that the tributaries of Rock Creek which flow through the urbanized areas of DC are more severely affected by urban runoff than the main channel (NPS, 2005; DOH, 2002).

Wetlands. Within the District, wetlands are most commonly found within large forested parks and provide unique habitats for many animals and plants. Likely wildlife species include wood ducks (*Aix sponsa*), beaver (*Castor canadensis*), raccoons (*Procyon lotor*), and white-tailed deer (*Odocoileus virginianus*). In addition, wetlands are valuable bird habitats used for breeding, nesting, rearing young, feeding, and social interactions (Stewart R.E., 2005). Many of the U.S. breeding bird populations, including ducks, geese, woodpeckers, hawks, wading birds, and many song-birds feed, nest, and raise their young in wetlands (CWP, 1997).

There are approximately 280 acres of vegetated wetlands within the District which are primarily found within protected park areas. Wetlands are commonly divided into the following four vegetative classes: forested (182 acres), emergent (37 acres), scrub/shrub (10 acres), and aquatic bed wetlands (51 acres). The largest remaining wetland areas within the Anacostia watershed are in the Kenilworth Aquatic Gardens and in the area opposite the Aquatic Gardens on the west bank of the Anacostia River (CWP, 1997).

Wetlands serve many functions, many of which counteract impacts associated with urban environments. These include improving water storage capacity, transforming nutrients, growing living matter, and increasing biodiversity (Novitski R.P., Smith D.R., Fretwell J.D., 2005). The Center for Watershed Protection surveyed wetlands within the district and classified each wetland as having a “high”, “average”, or “low” relative value based on the diversity, quality and functionality of the wetland. According to this study, the wetlands in the National Arboretum and in Watts Branch Park are considered “average” since they exhibit a lesser variety of vegetative species and strata and perform only a few common wetland functions. Together, these wetland areas comprise approximately 50% of the total wetland acreage within the city.

In contrast, within the Potomac River watershed, the largest remaining wetlands are found in the C&O Canal Park, Theodore Roosevelt Island, and Rock Creek Park. Wetlands within these areas comprise approximately 30% of the total wetland acreage within the District and were ranked as “high value” by the Center for Watershed Protection since they provide a wide variety of vegetative species and strata, support diverse habitats, are minimally impacted, and perform most wetland functions. According to the same assessment methodology, “artificial” wetlands such as reservoirs and the reflecting pools are classified as “low value” resources since they exhibit poor diversity and limited wetland functions (CWP, 1997).

Residential and Commercial Areas

High Density Areas. High density areas include central city neighborhoods comprised of offices, apartments, and townhouses with a low amount of tree and herbaceous cover. The vegetative community within these areas includes street trees and some strips of maintained grass along sidewalks and street travel lanes. Wildlife populations within these areas are limited due to a lack of suitable habitat for most species. Streams within these areas are typically piped underground, and are therefore largely devoid of aquatic life. Typical trees in such areas include willow oaks (*Quercus phellos*), Norway maples (*Acer pseudoplatanus*), American elm (*Ulmus rubra*), Pin Oak (*Quercus palustris*), and London Planetree (*Platanus hybrida*) (Casey Trees, 2005). Wildlife species include Norwegian rats (*Rattus norvegicus*), grey squirrels (*Sciurus carolinensis*), mocking birds (*Minus polygottos*), and pigeons (*Columba livia*).

Moderate Density Areas. Moderate density areas are composed primarily of row homes, townhouses, and commercial storefronts with small yards and gardens. These areas provide wildlife habitats that have slightly more vegetative cover than high density areas due to gardens and green spaces between structures. The vegetative community found in this habitat type includes mostly street trees and small yard areas with maintained grass, trees, gardens, and some cultivated shrubs along with perennial and annual plant varieties. Wildlife species within this area would include the same species as those found in high density areas with the possible addition of eastern chipmunk (*Tamias striatus*), raccoon (*Procyon lotor*) and opossum (*Didelphis virginiana*). Streams found within these areas would also be primarily piped underground, while those not underground are generally channelized and heavily impacted by urban runoff. Aquatic species diversity is generally low within these habitats.

Low Density Areas. Low density residential areas are comprised of single family homes with properties ranging in size between one-tenth of an acre to over an acre. These areas contain more vegetative cover than moderate density residential areas and typically include more garden space. The vegetation found within these areas includes street trees and some small, primarily noncontiguous areas of woodland cover, maintained grass, gardens, shrubs and annual and perennial herbaceous species. Wildlife species would be similar to those that are found in moderate density residential areas with the possible addition of red fox (*Vulpes vulpes*) and white tailed deer (*Odocoileus virginianus*) in areas adjacent to larger woodland areas. Some migratory birds may stop within these areas to frequent bird feeders. Small streams and ponds found within low density residential areas would also be heavily modified, culverted, and channelized, in general providing only limited and poor aquatic habitat.

Industrial Areas

Industrial areas in the District include harbors, railyards, and factories. These areas are generally clustered along the Anacostia River and along the New York Avenue and CSX rail corridors. Industrial areas consist of buildings, processing plants, and other paved areas with sparse vegetative cover and poor habitat value. Vegetation types expected in these areas include street trees in low densities and small patches of maintained grass. Industrial and former industrial areas, however, may offer great potential for habitat if they are remediated and reclaimed for open space and certain recreational uses. Since industrial areas generally lack vegetative cover, they provide suitable habitat for only a few wildlife species. Many of the species in these areas are considered pests, and may include the Norwegian rat (*Rattus norvegicus*) and pigeons (*Columba livia*), as well as the grey squirrel (*Sciurus carolinensis*) and seagulls. Aquatic habitats in the industrial areas include the Anacostia River, and may include underground piped streams.

Habitat Management Efforts

A variety of habitat management programs have recently been completed, are currently ongoing, or are planned in the District. Many parks in the city have detailed habitat management plans that focus on creating and maintaining forested and native habitat areas. Other areas within the city are also implementing management programs. A sample of these projects and programs is listed in Table III.E-1.

The Comprehensive Wildlife Conservation Strategy (CWCS) was developed in 2005 by the DC Fisheries and Wildlife Division in partnership with local wildlife agencies and organizations, as well as the public. The strategy is an action plan for conserving wildlife and their habitats over the next 10 years. It identifies conservation actions that target threats to species in greatest conservation need as well as their habitats. The CWCS captures the best scientific expertise in the District, with local biologists and resource managers working in coordination with local and national conservation planners, along with guidance from District residents. The plan was completed in September 2005 and was approved with conditions by the US Fish and Wildlife Service in December 2005. (DOH, 2006).

Management plans within the District have not only targeted improving terrestrial species habitats, they have also focused on improving aquatic habitats. Collaborative efforts between the National Park Service, Federal Highway Administration, the Virginia Department of Transportation, the District of Columbia, and the Smithsonian National Zoological Park have resulted in the implementation of stream restoration projects. Since December 2004, construction has been in progress removing or modifying over 23 fish barriers in streams feeding the Potomac River. This will help migratory fish such as the American shad and river herring reach their breeding grounds and help restore populations of these species within the District (NPS(c), 2005). In addition, the Interstate Commission on the Potomac River Basin along with various partners instituted an American Shad restoration project.

Table III.E-1: Habitat Management Projects within the District of Columbia

Agency	Project Title	Facility	Site
USN	Storm Water Pollution Prevention Plan (SWPPP)	Anacostia Annex	Anacostia, Washington DC
USN	NPDES Permit and associated Water Quality Monitoring	Anacostia Annex	Anacostia, Washington DC
USN	Upgrade of Aboveground Storage Tanks (ASTs)	Anacostia Annex	Anacostia, Washington DC
USN	Low Impact Development	Anacostia Annex	Anacostia, Washington DC
USN	Storm Water Pollution Prevention Plan (SWPPP) - Revision	Washington Navy Yard	Washington DC, SE
USN	RCRA Facility Investigation	Washington Navy Yard	Washington DC, SE
USN	NPDES Permit and associated Water Quality Monitoring	Washington Navy Yard	Washington DC, SE
USN	Illicit Discharge Survey Update	Washington Navy Yard	Washington DC, SE
USN	Upgrade of Aboveground Storage Tanks (ASTs)	Washington Navy Yard	Washington DC, SE
USN	Storm Sewer Rehabilitation Project	Washington Navy Yard	Washington DC, SE
USN	Low Impact Development	Washington Navy Yard	Washington DC, SE
USN	Bioretention cells	Washington Navy Yard	Washington DC, SE
USN	Permeable Pavers	Washington Navy Yard	Washington DC, SE
USACE	Lower Kingman Island Section 1135	n/a	Lower Kingman Island near RFK Stadium, DC
USACE	Lower Anacostia Park Stream Restoration	n/a	Pope Branch, Lower Anacostia Park
USGS	Monitor Progress of Kingman Marsh Restoration - Vegetation and Soils	n/a	Kingman Marsh
USACE	Anacostia Watershed Restoration Phase 1	n/a	Montgomery County, District of Columbia
USACE	Northwest Branch Stream Restoration, Section 206	n/a	Northwest Branch
USGS	Monitoring Benthic Organisms	n/a	Kingman/Kenilworth Marshes
USGS	Avi-fauna monitoring at Reconstructed Sites in the Tidal Anacostia	n/a	Kingman and Kenilworth Marshes
USACE	Fort Dupont and Fort Chaplin Creek Restoration	n/a	Fort Dupont and Fort Chaplin Creeks
USACE	Heritage Island Restoration	n/a	Heritage Island in Kingman Lake
USFWS	Tumors and biomarkers of exposure in brown bullheads from the Anacostia River, Washington, DC and Tuckahoe River, Maryland		Tidal Anacostia River, Washington, DC
USFWS	Using the sediment quality triad to characterize baseline conditions in the Anacostia River, Washington, DC		Tidal Anacostia River
USFWS	Seasonal movement patterns, home ranges, and		Tidal Anacostia River

Agency	Project Title	Facility	Site
	habitat use of the brown bullhead in the Anacostia River		
USFWS	Contaminant Monitoring in the Kingman Lake Restored Wetland		Kingman Lake
USFWS	Larval fish toxicity studies in the Anacostia River		Anacostia R. from Bladensburg to mouth
USFWS	Assessing the bioavailability of organic contaminants in the Anacostia River using semi-permeable membrane devices and filter-feeding clams		Anacostia R. from NE and NW Branch to river mouth
NPS	Design and Construction of Installation of Sewer Line at Kenilworth Maintenance Facility	Kenilworth Maintenance Facility	Anacostia Park
NPS	Kenilworth Marsh Interpretive Boardwalk ("Additive A")	Kenilworth Aquatic Gardens	Anacostia Park
NPS	Anacostia Park General Management Plan (GMP)	National Capital Parks-East	Anacostia Park
USACE	Kingman and Heritage Islands Habitat and Passive Recreation Study	n/a	Kingman and Heritage Islands
USEPA	Approval of DC Water and Sewer Authority (DCWASA) Long Term Control Plan		All District of Columbia pervious areas
USEPA	Chesapeake Bay Urban Stormwater Initiative	Watershed-wide federal facilities	Watershed-wide
USEPA	Potomac-Anacostia River Flagging Project	none	Anacostia River
GSA	Bioretention Cell	National Building Museum (Pension Building)	Southeast Parking Lot
GSA	Bioretention Strip (Low Impact Development Feature)	Southeast Federal Center	Anacostia River frontage
GSA	Sustainable Design Program	NA	National Capital Region
GSA	Environmentally Beneficial Landscaping Program	NA	National Capital Region
GSA	Stormwater Management Plan	NA	National Capital Region
USFWS	Hickey Run Stream Assessment	National Arboretum & upper watershed	Hickey Run
USFWS	Watts Branch Stream Assessment	Kenilworth Park	Watts Branch
USN	Tree box	Washington Navy Yard	Washington DC, SE
USN	Rain garden	Washington Navy Yard	Washington DC, SE
USN	Sand Filters	Washington Navy Yard	Washington DC, SE
USN	LID Maintenance	Washington Navy Yard	Washington DC, SE
USN	Storm Drain Maintenance	Washington Navy Yard	Washington DC, SE
USN	Sand Filter Maintenance	Washington Navy Yard	Washington DC, SE
USFS	Riparian Forest Buffer Planting	Various	Watershed-wide
USFS	Urban Forestry Technical Assistance	Any	Watershed-wide

Agency	Project Title	Facility	Site
USFS	Growing Native Seed Collection	Public Parks and Facilities and Private lands	Watershed-wide
USFS	Potomac Watershed Partnership	Various	Watershed-wide
USA	Riparian Buffer Zone creation at various locations at Fort Myer	Fort Myer	five stormwater outfalls
USGS	Hydrogeology and Ground-Water Quality of the Anacostia River Watershed, Washington, D.C.	n/a	Lower tidal Anacostia River
USGS	Discrete and Continuous Water-Quality Monitoring for Nutrients, Sediment, Metals, Bacteria, and Organics, Anacostia Watershed, Maryland	n/a	Riverdale and Hyattsville
USEPA	A Toxics Management Strategy for the Anacostia River	All	River and tributaries

Source: Chesapeake Bay Program, 2005

Other management plans that affect water quality include stormwater management plans which have been designed and implemented in areas of the city to reduce the impact of pollutants on the aquatic community. For example, in the Washington Navy Yard, bioretention cells were constructed to reduce runoff volume and provide pollutant filtering functions (Chesapeake Bay Program, 2003).

Such watershed protection projects not only benefit the aquatic community, they also create habitat for terrestrial species. In 1997, the District of Columbia signed the Chesapeake Bay Agreement which calls for “no net loss” and the restoration of wetlands (DC 303(d), 305 (b) list, 2004). Under this agreement, the Environmental Health Administration’s Watershed Protection Department restored over 33 acres of emergent marsh in Kenilworth Aquatic Gardens, as well as 42 acres of emergent marsh and 15 acres of river fringe wetlands in Kingman Lake. These restored wetland areas create new habitat for a variety of species. A breeding bird census taken within the marsh area noted the return of red winged blackbird (*Agelaius phoeniceus*), common yellowthroat (*Geothlypis trichas*), and tree swallow (*Tachycineta bicolor*) populations. Until the completion of this marsh restoration project, a migratory bird species, the long-billed wren (*Thryothorus longirostris*) had not been seen within the District for more than 30 years (NPS (d), 2005).

Within the lower section of Anacostia Park there have been additional habitat enhancements. For example, along Pope Branch, Watts Branch, Hickey Run, Oxon Run and on Heritage Island a variety of native planting programs, stream stabilization programs, wetland restoration projects, and stream daylighting projects have been implemented with funding from the US Army Corps of Engineers (USACE) (DC 303(d), 205 (b) list, 2004).

Trends

Biotic communities have declined and changed over the past century as the District has become more urbanized. Habitat has been lost and altered due to an increase in developed areas and a decrease in forest cover. Invasive species have increased. Some of these trends may reverse with time, particularly on a local scale, as implementation of conservation projects and programs continue.

The effect of habitat loss is observable through the decrease in several wildlife populations. Although data is not available for all wildlife species within the District, DOH has noted that populations of the following species are potentially declining: American bittern, Virginia possum, bog turtle, and American eel. Both the American bittern and Bog turtle require pristine wetland habitats which represent a small proportion of the District. Virginia opossums require wooded habitats which are declining while the numbers of their largest threats, cars and domestic pets, increase (DOH, 2006). In addition, migratory bird species populations within the city may begin to decrease if open space is not protected. Conservation actions that may help restore these populations include wetland and forest habitat restoration and protection, removal of invasive plants, and deer management to protect and restore the plant diversity many wildlife species require.

Aquatic habitat within the District has declined due to pollutants and disturbance. Stream health continues to decline due to the decrease in forest cover and presence of point and non-point source pollutants. Populations of the American eel, found in the Potomac River, Anacostia River, and Rock Creek, may be declining due to overharvest and lack of quality habitat (DOH, 2006). Although both the alewife and blueback herring populations within the District are considered to be stable, the populations of both of these species are low due to a lack of quality spawning and juvenile habitat.

Although some fish populations may be continuing to decline, recent conservation actions may help to improve aquatic habitats. Information collected by DOH shows that migratory American shad and hickory shad populations are rebounding from historically low levels (DOH, 2006). The continual recovery of these species may be due to ongoing conservation actions such as fish barrier removal, stream restoration, and stock enhancement.

SIGNIFICANCE CRITERIA

A project may have a significant effect on the environment when it has the potential to substantially reduce the habitat of a fish and wildlife population species, cause a fish or wildlife species to drop below self-sustaining levels, threaten or eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered species. Impacts would be considered significant if they caused a change in species composition, abundance, or diversity beyond that of normal variability. The measurable degradation of wetlands, riparian areas, or other sensitive habitats directly resulting from the implementation of a project would be considered significant. Similarly, if a project directly caused the destruction of the habitat or breeding grounds of a special status species it would also be considered significant.

IMPACTS AND MITIGATION MEASURES

LOSS OF TREE COVER

Impact E1. Development consistent with the Comprehensive Plan could result in the removal of trees and the loss of tree cover. This would aggravate the trends of the last 30 years, in which mature tree cover in the city has declined substantially. This impact is mitigated to a less than significant level by policies and actions in the Plan. In fact, the Plan would have a positive environmental impact by promoting reforestation and more active tree preservation efforts in the city than the existing (1998) Plan.

Trees are an essential component of habitat in an urban environment, often serving as the primary source of food, shelter, and breeding habitat. Figure III.E-1 shows the distribution of tree cover within the District based on a 2000 assessment of forest cover of the region by American Forests. Based on this analysis, tree cover comprises approximately 28% of the District, while the remaining areas are comprised of impervious surfaces (41%), open space, grass, scattered trees (19%), water (10%), and bare earth (2%).

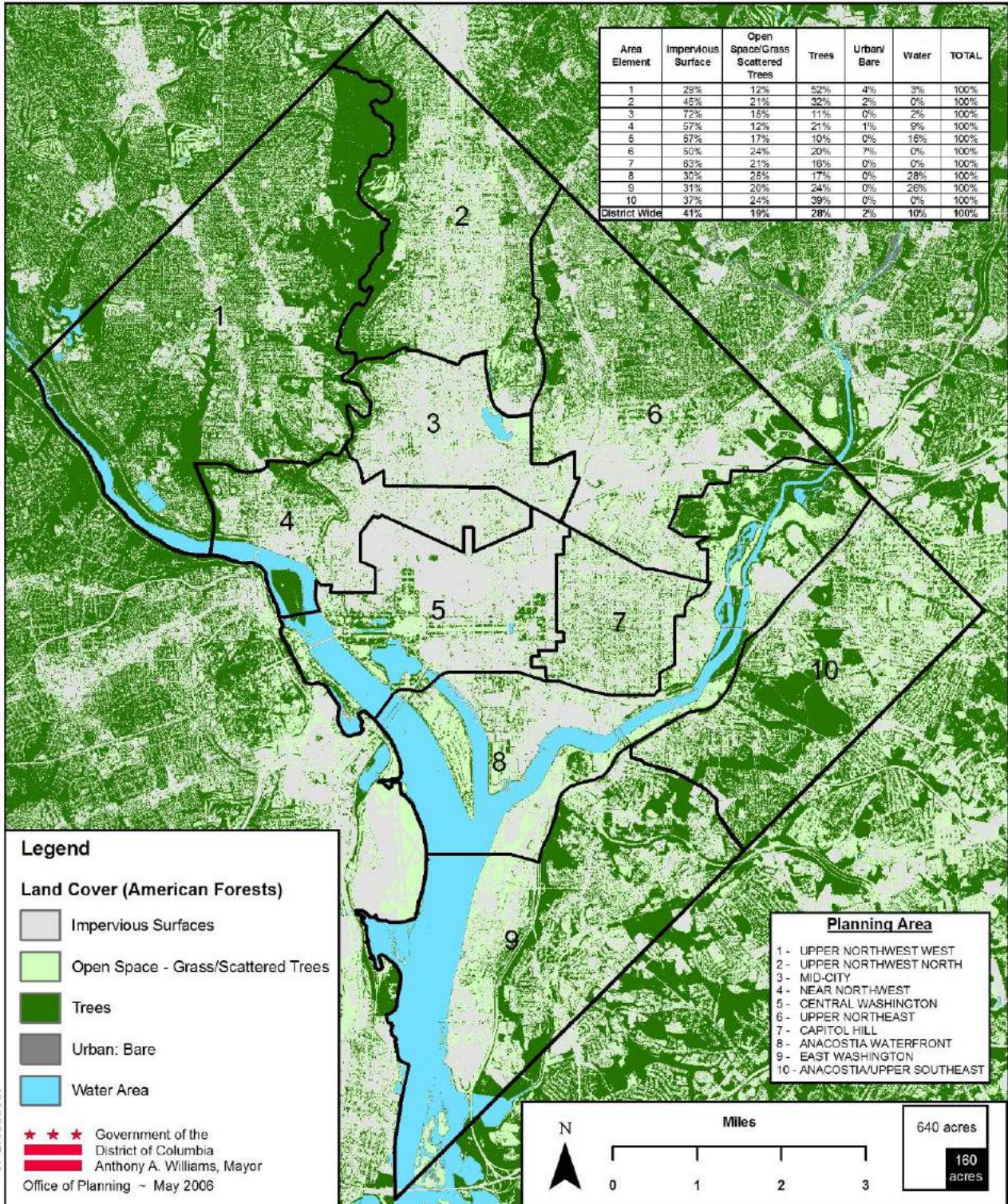
Tree cover is not evenly distributed throughout all areas of the city. The Upper Northwest area has the highest proportion of forest cover (52%). Similarly, areas east of the River have a relatively high amount of forest cover at about 30%. In contrast, Central Washington and areas to the immediate north have the lowest amount of tree cover at around 10%. Similar low tree cover conditions also exist along the southern end of the Anacostia Riverfront.

Between 1972 and 1997, areas containing heavy tree cover decreased by 64%, mostly in ecologically important areas such as those bordering parklands. Specifically, high canopy tree cover during this time period decreased from 37% (16,440 acres) to 13% (5,871 acres). Over this same period, the District has been recorded as losing up to 25-30% of its street trees annually (Casey Trees, 2003). On average, street trees only live 7-10 years depending on the species and their ability to react to stresses from disease, injury, limited root space, lack of water and nutrients, poor soils, and poor drainage. It is estimated there are as many as 23,000 empty but available spaces for trees to be planted in the District.

Not surprisingly, the highest density of tree cover is found in forested parks. Loss of forest cover in these areas would cause a direct loss of habitat for resident species and result in reduced habitat connectivity between smaller peripheral forested areas. Gradual tree loss and decline of forest cover on the edges of larger forested areas may also result in a reduction in the amount of available habitat for forest interior species in these areas.

Figure III.E-1: Tree Cover in the District of Columbia

Tree Cover in the DC Metro Area



In high and moderate residential and commercial areas, street trees are the primary habitat for several wildlife species. Because of this, the loss of one tree in a highly urbanized area causes more habitat degradation than the loss of one tree in a park or forest. Wildlife corridors within the District can exist in the form of connections between park areas via parkways, street trees, and small open areas. Decrease in the tree cover composition within both stream valley parks and automobile parkways could adversely affect wildlife from traveling between areas, negatively effecting not only species composition, but also population dynamics.

The Comprehensive Plan includes the following policies to mitigate the loss of trees, and promote the replacement of trees and reforestation of areas where tree cover has declined in the past:

Policy E-1.1.1: Street Tree Planting and Maintenance

Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods.

Policy E-1.1.2: Tree Requirements in New Development

Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance.

Policy E-1.1.3: Landscaping

Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity.

Action E-1.1-A Tree Replacement Program

Continue working towards a goal of planting 4,000 street trees and 2,000 trees on public open space each year. Components of this program should include the removal of dead and dying trees and their replacement with suitable species, and the pruning and maintenance of trees to eliminate hazards and increase their rate of survival.

Action E-1.1-B: Street Tree Standards

Formalize the planting, pruning, removal, and construction guidelines in use by the city's Urban Forestry Administration by developing official city street tree standards (see text box above on the city's Tree Bill). These standards should provide further direction for tree selection based on such factors as traffic volumes, street width, shade and sunlight conditions, soil conditions, disease and drought resistance, and the space available for tree wells. They should also include provisions to increase the size of tree boxes to improve tree health and longevity, and standards for soils and planting.

Action E-1.1-C: Tree Inventories

Continue partnership agreements with the federal government, the Casey Trees Endowment Fund and other groups to develop a live database and management system for the District's trees using Geographic Information System (GIS) mapping. Efforts should be made to inventory trees on parkland as well as along city streets.

Action E-1.1-D: Operating Procedures for Utility and Roadwork

Develop standard operating procedures to minimize tree damage by public utility and road crews. All activities that involve invasive work around street trees should be reviewed by Urban Forestry Administration personnel.

Action E-1.1-E: Urban Forest Management Plan

Consistent with the District's Tree Bill, develop an Urban Forest Management Plan to protect, maintain, and restore trees and native woodlands across the city. The Plan should include a detailed inventory of trees and woodlands and should provide a means of coordinating urban forest management activities on all public lands managed by the city

(e.g., street trees, city parks, public school grounds, etc.). It should also promote coordination with federal agencies and other large landowners, and include comprehensive strategies to manage insects and diseases.

Action E-1.1-F: Urban Tree Canopy Goals

Determine the extent of the District's tree canopy at a sufficient level of detail to establish tree canopy goals for neighborhoods across the city. Such goals have recently been developed by the USDA and tested in other cities as a way of evaluating the existing tree canopy and setting specific goals for its restoration.

In addition to the policies above, the Urban Forestry Administration (UFA) is working to improve tree density and health. UFA manages approximately 135,000 street trees in the District. On average, 18,000 trees per year are pruned, 4,500 are planted, and about 2,500 are removed due to poor health or death. This year, with additional funding, the UFA will plant approximately 8,000 trees. Tree planting is done both to replace trees that have died, and to fill in areas that are suitable for planting. Trees will not be replanted in areas that are deemed unsuitable or in high risk areas such as those too close to driveways, in sites that could create traffic hazards, or in sites that are too close to fire hydrants.

UFA is currently working to replace Norway (*Acer platanoides*) and silver maple (*Acer saccharinum*) with other tree species such as sugar maple (*Acer saccharum*) that have a lower chance of succumbing to blights and other diseases. In addition, UFA is planting smaller trees such crape myrtle (*Lagerstroemia fauriei*), dogwood (*Cornus sp.*) and redbud (*Cercis Canadensis*), in the areas where electrical wires are located.

The Urban Forestry division has also obtained a grant from WASA to replace trees and implement management techniques such as rain-gardens. The UFA also receives grants from the US Forest Service to use and disseminate to community groups, non-profit groups, and other organizations that propose that support Urban Forestry. Money from the grants is used to train UFA staff and help with technology support for the urban forestry program. UFA reviews public space permits, construction drawings, and other projects that affect the urban forest within DC, and also provides protection measures for existing trees and recommendations for green space enhancement.

Other organizations also address the decline of trees within the city. For example, the Casey Trees Endowment Fund, in cooperation with neighborhood residents and community organizations, city government, federal agencies, and others has inventoried every street tree in the city, has planted more than 2,700 trees and seedlings in projects throughout the city, held community meetings, and trained several hundred volunteers in the Citizen Forester program.

INVASIVE AND NUISANCE SPECIES

Impact E2. Future development envisioned by the Comprehensive Plan could increase non-native landscaping and result in a larger number of invasive or nuisance plant species. This could threaten native species and habitat. This is a less than significant impact.

There are many exotic invasive species in the District including plants, wildlife, and aquatic species. Many have been present for several decades and comprise a large component of the area's flora and fauna. Non-native invasive species are able to spread rapidly due to a lack of predators, disease, and competition from native species. Since the District of Columbia is a highly urbanized fragmented landscape, invasive plant species tend to comprise a large proportion of the population. Many of these species were originally ornamentals planted in gardens or parks that have overtaken the native vegetative community.

Although invasive species are mainly found in open disturbed areas, aggressive invaders can penetrate forests. This invasion can deplete wildlife food and habitat resources. In Rock Creek Park alone, more than one-third of the 656 documented plant species are non-native, and 41 of these species are considered aggressive which means they tend to spread and can eventually dominate large areas in just a few years. Ornamental vines such as English Ivy (*Hedera helix*), Asiatic bittersweet (*Celastrus orbiculatus*), and porcelain berry (*Ampelopsis brevipedunculata*) strangle trees along the edge of forest openings. Other species, such as Multiflora rose (*Rosa multiflora*) and garlic mustard (*Alliaria petiolata*), Japanese honeysuckle (*Lonicera japonica*), and Japanese Barberry (*Berberis thunbergii*) form dense thickets that out-compete native shrubs and ground covers. Lesser celandine (*Ranunculus ficaria*) and Japanese Stilt Grass (*Microstegium vimineum*) can be found covering floodplains in Rock Creek Park (NPS, 2005).

Invasive species have also become well established in waterbodies surrounding the District. Common methods of introduction of these species into the river include the release of bait fish, unwanted aquarium fish, escape from aquaculture facilities, and discharge of ship ballast water. Impacts of invasive fish species on the ecosystem include competition with native species for food and habitat, reduction of natives by predation, and transmission of diseases or parasites. The USGS has recorded 10 exotic fish species within the Potomac River Drainage (USGS-NAS, 2005) including carp (*Cyprinidae spp.*), and snakeheads (*Channidae spp.*). In addition, over 50 species recorded within the Potomac watershed are considered to be native transplants.

Along with exotic invasive species, other wildlife species have been noted as potentially affecting urban wildlife and their habitats. Species such as rats and raccoons, as well as stray dogs and feral cats, can negatively affect other wildlife through the spread of disease and attacks. Other animal species can pose a threat to urban habitats since they affect the success of reforestation especially in forested park areas. Species such as white-tailed deer, beavers, and voles can negatively affect forested areas by either damaging or destroying young trees, and or interfering with the natural regeneration of the forests. If populations of such species such as white-tail deer reach a critical level, they can drastically impact vegetation composition.

The District has an abundance of park-like open spaces with short grass adjacent to small bodies of water, providing ideal habitat for the Canadian goose, which has led this normally migratory species into developing large resident populations within the city. Resident geese can become a nuisance as they can overgraze lawns and degrade water quality through the build-up of fecal matter that fosters bacteria and adds nitrogen and phosphorus to waterbodies. In addition, along roadways and near airports, resident Canada geese have become a significant safety threat.

Within Rock Creek Park, monitoring has indicated that the deer population is approximately 59.4 deer/square mile (NPS, 2005). In comparison, forested areas in Maryland are reported to have around 15 deer/square mile in suburban areas and around 25 deer/square mile in forested areas (MD DNR, 2005). Night monitoring of deer in Rock Creek Park since 1996 has shown an annual increase of more than 31% per year. Data within the park has shown that deer appear to be reducing both vegetative density and species richness particularly for native species.

Many communities are working to reduce invasive species and increase native seed planting. The US Fish and Wildlife Service works with the Potomac Conservancy to host an annual volunteer seed collection effort within the Potomac Watershed. Over 5,000 volunteers have participated in this event to increase the number of native trees within the watershed. Over the last 10 years, invasive plant management has been occurring within Rock Creek Park by both manually removing non-native invasive plant species and using herbicides. Also, Rock Creek Park and the U.S. National Arboretum have implemented integrated pest management (IPM) plans to control and prevent pests using several methods to minimize environmental impacts.

Potential impacts associated with the growth of invasive and nuisance species are mitigated by the following policies in the Draft Comprehensive Plan:

Policy E-5.1.4: Sustainable Landscaping

Encourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides.

Policy E-1.5.3: Habitat Management on Private Land

Encourage environmentally sound landscaping and gardening techniques by DC homeowners and institutional landowners to maximize the habitat value of privately owned land. Such techniques should include reduction of herbicide and pesticide use; the selection of disease, drought-resistant, and native species; the removal of invasive plants; the use of rain gardens to reduce urban runoff; and landscaping that provides food and cover for wildlife.

Policy E-4.6.1: Vector Control

Continue and strengthen efforts to control rats, mice, mosquitoes, and other disease vectors and pests. A variety of related strategies should be used to support these programs, including public outreach and education, garbage control and containment, adequate trash and refuse collection services, ongoing maintenance of public space, enforcement of littering and dumping regulations, clean-up of construction and demolition debris, structural controls and integrated pest management, and a reduction in the number of vacant and abandoned buildings.

Action E-4.4-E: Reductions in Pesticide Use

Maintain a pesticide management program that complies with the District's Municipal Regulations for pesticide registration, certification, and use. Implement new programs to promote integrated pest management by the private sector and discourage the use of harmful pesticides and herbicides by District residents and employers.

Action E-1.5-A: Implementation of the Wildlife Conservation Plan

Implement the 2005 Wildlife Management Plan for the District of Columbia, including programs to control the white-tailed deer and Canada goose population, and to improve water quality and habitat in the Anacostia River.

COMMUNITY HYGIENE

Impact E3: Increased population and employment in the District, coupled with mixed use development in neighborhood commercial districts, could result in a larger number of residences in areas proximate to dumpsters, odors, and associated pests such as rodents. The possibility of illegal dumping could increase as population rises and greater demand is placed on the solid waste collection system. Associated public health and community hygiene issues are addressed by policies in the Draft Plan. The environmental impact of the Comprehensive Plan on community hygiene is less than significant.

Despite recycling programs, the amount of waste discarded in trash cans and dumpsters is greater today than it was ten years ago in 1996. This trash is an attractant for scavengers such as grey squirrels (*Sciurus carolinensis*), pigeons (*Columba livia*), Norwegian Rats (*Rattus rattus*), and raccoons (*Procyon lotor*) (Davies and Darnall, 1996)

Another source of residential waste comes from illegal dumping in the District, particularly in the Northeast and Southeast sections of the city. It is estimated there are over 200 illegal dumps within the District. In one case, an illegal dump in 1995 resulted in the evacuation of three apartment buildings in a public housing development because it contained toxic chemicals. Runoff from these dumps may be carried to aquatic habitats, compromising the water quality and endangering human health and wildlife (Versar, 1997).

The Comprehensive Plan includes the following policies to mitigate such impacts in the future:

Action E-2.3-C: Revisions to Planning and Building Standards for Solid Waste

Review building code standards for solid waste collection to ensure that new structures are designed to encourage and accommodate recycling and convenient trash pickup.

Action E-2.3-F: Commercial and Industrial Waste Reduction

Work with the commercial and industrial sectors to foster appropriate source reduction and waste minimization activities, such as the environmentally sound recycling and disposal of mercury-containing fluorescent lamps and electronic equipment.

Policy E-4.6.2: Clean City Programs

Improve environmental quality through programs that promote efficient trash removal, neighborhood clean-ups, and levying of fines and penalties for abandonment of personal property (including cars) and illegal dumping.

Policy E-4.6.3: Discouraging Illegal Dumping

Develop and maintain effective public education and enforcement tools to curb littering and illegal dumping, and to promote the safe disposal of solid waste (including hazardous waste, medical waste, construction debris, used oil, and scrap tires) and bulky items.

Policy E-4.6.4: Environmental Health Activities

Maintain and improve existing District programs to ensure community hygiene, food and restaurant safety, animal and welfare control, and the control of disease vectors. Promote continuous coordination among District agencies to ensure healthful and sanitary conditions throughout the District.

Action E-4.6-A: Expanded Trash Collection and Street Sweeping

Explore the feasibility of expanding trash collection services and street sweeping schedules to improve the cleanup of vacant properties, roadsides, public spaces, parks, and city-owned lands.

Action E-4.6-B: Neighborhood Clean-Ups

Co-sponsor and participate in neighborhood and citywide clean-up activities such as those currently held along the Potomac and Anacostia Rivers, and those held around schoolyards and District parks. Encourage Advisory Neighborhood Commissions and other community groups to develop and announce cleanup campaigns in conjunction with the city's bulk trash removal schedule.

Action E-4.6-C: Strengthening and Enforcement of Dumping Laws

Take measures to strengthen and enforce the District's littering, rodent and disease vector control, and illegal dumping laws. These measures should include: (a) providing adequate funding to carry out anti-littering programs; (b) empowering the community to report illegal dumping activities; (c) increasing public education on dumping laws, including posting of signs where appropriate; and (d) expanding surveying and enforcement activities.

Action E-4.6-D: Publicizing Bulk Waste Disposal Options

Continue to sponsor and publicize options for bulk waste disposal, including information on the Fort Totten transfer station and the District's schedule for curbside bulk trash waste removal.

IMPACTS ON AQUATIC SPECIES

Impact E4: Increased urban runoff associated with development could harm aquatic and benthic species, particularly in the Anacostia River, Rock Creek, and local streams such as Watts Branch. The potential for this impact is mitigated to a less than significant level by Draft Plan policies to limit increases in impervious surfaces and further by Draft Plan policies to reduce nutrient loads in local waterways. Positive impacts are anticipated due to water quality improvement efforts and habitat restoration.

Pollutants are carried by litter, automobile exhaust, machinery discharge, exterior paints, lawn fertilizers, and animal droppings. Runoff from rain events transport metals, oil, toxic substances, bacteria, and sediments to storm drains and surface waters. This runoff primarily ends up in the Anacostia River, though in the year 2000, the EPA estimated that approximately 700 million gallons of sewage also entered the Potomac from the District (Carey R., 2001). Water contamination also occurs due to combined sewer overflows (CSOs), which are contributing organic and toxic substances into District waterbodies (Versar, 1997). Without proper mitigation measures, the additional development envisioned by the Comp Plan could contribute to these problems.

An excellent indicator of water and waterbed sediment quality for biota is benthic macroinvertebrate communities. The composition of these communities usually reflects the expected conditions for thriving aquatic habitats. Most macroinvertebrate communities were rated as fair to poor in the Potomac River, Anacostia River and tributaries, and in Rock Creek and its tributaries. Habitat and biological assessment studies show that locations throughout the watershed have been impacted by high nutrient levels and isolated toxic effects (Versar, 1997). Currently, only 36% of the District's rivers and streams support aquatic life.

The Draft Plan contains the following policies to mitigate aquatic habitat impacts:

Policy E-4.2.1: Improving Water Quality

Improve the quality of water in the District's rivers and streams to meet public health and water quality standards, and maintain the physical, chemical, and biological integrity of these watercourses for multiple uses, including recreation and aquatic life.

Policy E-4.2.3: Control of Urban Runoff

Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands.

Policy E-4.2.4: Riverbed Sediment

Reduce the level of toxins in Anacostia and Potomac River sediment. Remediation measures should minimize the possibility of water contamination resulting from dredging or disturbances of the river bottom.

Policy E-1.3.3: Reducing Sedimentation

Prevent sedimentation of rivers and streams by implementing comprehensive stormwater management measures, including regular maintenance of storm drains and catch basins and the use of sedimentation ponds where appropriate.

Policy E-1.4.2: Management of Uplands Along Stream Valleys

Protect stream valley parks by limiting construction, requiring sensitive design, and retaining vegetation on adjacent upland properties. Development of land draining to stream valleys shall be managed as needed to protect flora, fauna, and water quality; prevent erosion and siltation of streams; minimize intrusion of views from the parks; and retain a green buffer between the built environment and these natural areas.

Policy E-1.4.4: Channelization of Streams

Retain streams and ravines in their natural condition, rather than constructing man-made channels. Where alteration is necessary, encourage design solutions which retain or recreate natural ecological values.

Policy E-4.2.6: Control of Illicit Discharges

Provide public outreach and education, and maintain inspection and enforcement procedures to control illicit discharges into the city's storm drains and waterways.

Action E-4.2-A: Stormwater Management Plan

Create a comprehensive multi-agency stormwater management plan covering such topics as low impact development, (LID), maintenance of LID infrastructure, education, impervious surface regulations, fees, and water quality education. The plan should include output and outcome measures that achieve specific water quality standards and should propose fee levels that are sufficient to maintain an effective stormwater management program and encourage residents and businesses to reduce stormwater pollution.

Policy IN-2.3.1: Reducing CSO Outfalls

Reduce the Combined Sewer Overflow (CSO) outfall to the region's rivers by implementing WASA's Long Term Control Plan (LTCP).

Policy E-1.4.3: Open Space Protection Along Stream Valleys

Preserve land adjacent to streams and ravines as densely vegetated open space. Natural drainage channels and buffer zones in these areas should be protected from the adverse effects of nearby urban uses. Particular focus should be given to areas adjacent to Rock Creek Park and to Watts Branch, Pope Branch, Oxon Run, Battery Kemble, and Glover-Archbold Parks.

Policy E-3.1.1: Maximizing Permeable Surfaces

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff.

Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff:

Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.

Policy E-3.1.3: Green Engineering

Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated.

Action E-3.1-A: Low Impact Development Criteria

Establish Low Impact Development criteria for new development, including provisions for expanded use of porous pavement, bioretention facilities, and green roofs. Also, explore the expanded use of impervious surface limits in the District's Zoning Regulations to encourage the use of green roofs, porous pavement, and other means of reducing stormwater runoff.

Action E-3.1-B: LID Demonstration Projects

Complete one demonstration project a year that illustrates use of Low Impact Development (LID) technology, and make the project standards and specifications available for application to other projects in the city. Such demonstration projects should be coordinated to maximize environmental benefits, monitored to evaluate their impacts, and expanded as time and money allow.

Action E-3.1-C: Road Construction Standards

Explore changes to DDOT's street, gutter, curb, sidewalk, and parking lot standards that would accommodate expanded use of porous pavement (and other low impact development methods) on sidewalks, road surfaces, and other paved surfaces, or that would otherwise aid in controlling or improving the quality of runoff.

Implementation of the above policies and actions would have a net positive effect on the aquatic habitat in the District of Columbia.

IMPACT ON SPECIAL STATUS SPECIES

Impact E.5: Increased urbanization within the District of Columbia could affect the habitat of rare, threatened, endangered and other special status species. This is a less than significant impact due to the highly urbanized character of the District, the limited presence of such species, and the fact that most development will occur in settings that are already highly urbanized. The potential for adverse impacts is further mitigated by policies and actions in the Draft Plan.

As of March, 2006, there were seven federally protected listed wildlife species in the District: the bald eagle, Hay's Spring amphipod, eastern puma, American burying beetle, curlew eskimo, dwarf

wedgemussel, and grey wolf. As noted in Table III.E-2, although these species may be listed for the region, the urban environment of DC does not provide suitable habitat for four out of these seven species. The small whorled pogonia, a threatened plant species, is also listed in the District (NatureServe, 2006).

In the District of Columbia Comprehensive Conservation Strategy, the DOH Fisheries and Wildlife Division designated wildlife species within the District requiring the greatest conservation need. Prioritization was based on input from neighboring states and with entities such as the National Park Service, US Fish and Wildlife Service, National Heritage Program, and American Fisheries Society. In order to make best use of funds, any species that was considered infeasible to conserve was not included on the list. Out of 782 wildlife species inventoried by DOH, 182 (19%) were placed on the list of species of greatest concern. Of these species 34% are invertebrates, 24% are birds, 16% are amphibians, 8% are fish, and 7% are mammals. Invertebrate species listed include, copepods, butterflies, dragon and damselflies, and amphipods. Bird species included migratory species such as the Cerulean Warbler, since maintaining the integrity of a migratory stopover point such as the District benefits the entire migration path of the species. Resident and breeding fish species such as the American Shad, a threatened fish species, were also included on this list (DOH 2006).

Since the most effective way to protect a species is to preserve its habitat, the DOH Plan also includes a prioritized list of 13 important habitats to be protected based on the number of species of greatest conservation need living within each habitat. The habitat given the greatest conservation priority was rivers, followed by hardwood forests, emergent non-tidal wetlands, grasslands, forested wetlands, early successional forest, emergent tidal wetlands, urban landscapes, tidal mudflats, springs and seeps, submerged aquatic vegetation, and vernal ponds and pools (DOH, 2006).

Table III.E-2: Special Status Species in the District of Columbia

Species	Status	Local Habitat*	Threats*
Bald Eagle (<i>Haliaeetus leucocephalus</i>)	Threatened	Rock Creek Park, Kenilworth Park, Anacostia Park, Oxon Cove Park, and the Fort Circle Park Areas	Loss of limited breeding habitat and disturbance to breeding pairs.
Hay's Spring Amphipod (<i>Stygobromus hayi</i>)	Endangered	Found in Rock Creek Park in 5 groundwater springs	Predators, alterations of flows, groundwater pollution, disturbance
Puma, eastern (<i>Puma concolor cougar</i>)	Endangered in NE but extirpated in DC	N/A	N/A
Beetle, American burying (<i>Nicrophorus americanus</i>)	Endangered in NE, but extirpated in DC	N/A	N/A
Curlew, Eskimo (<i>Numenius borealis</i>)	Endangered in NE, but extirpated in DC	N/A	N/A
Wedgemussel, dwarf (<i>Alasmidonta heterodon</i>)	Endangered	The Potomac River	Pollution and habitat disturbance
Wolf, gray (<i>Canis lupus</i>)	Endangered in NE, but extirpated in DC	N/A	N/A

* Source: DOH, 2005

Protection of sensitive avian and fish populations is particularly important, as noted below:

Avian Population

There are over 325 species of birds recorded within the District. The DC Birdscape, which is one study that was conducted in the city between 1993 and 1995 listed over 46 species that were considered migratory (1997). According to the Maryland Ornithological Society, bird ranges can change over time even without obvious or extensive habitat or climate change. As a result, new studies such as the Maryland/DC bird breeding project, are currently being conducted to see how the bird populations are changing in the District (MOS, 2005). Park areas within the city provide habitat for migrant, breeding, resident, and wintering birds. For example, the ridge of forested land that borders the west bank of Rock Creek between Broad Branch and Military Roads is the best warbler “trap” in the city (Wilds, 1992). The combination of a north-south ridge of forested land, its location on the Fall line dividing the Piedmont and Coastal Plain physiographic regions, as well as its function as open space in the center of an urban area, serves to concentrate migrant birds during spring and fall (Wilds 1992).

In addition to the federal, state, and heritage lists, the National Audubon Society published a Watch List in 2002 based on scientific assessments that categorized avian species into red, yellow, and green lists based on severity of threats and population decline. The golden-winged warbler is a red-listed species declining rapidly and facing major conservation threats; yellow-listed species include blue-winged warbler (*Vermivora pinus*), bay-breasted warbler (*Vermivora pinus*), Canada warbler (*Dendroica castanea*), Kentucky warbler (*Oporornis formosus*), prairie warbler (*Dendroica discolor*), prothonotary warbler (*Protonotaria citrea*), olive-sided flycatcher (*Contopus cooperi*), willow flycatcher (*Empidonax traillii*), and wood thrush (*Hylocichla mustelina*). Yellow listed species are those with populations declining at a rate less than those in the red category. There have been substantive changes to avian species present within the District of Columbia since 1998 (pre-permit conditions) with the introduction of West Nile Virus into the avian population.

Fish Population

Compared to historic levels, fish species abundance and diversity has declined. Hickory shad (*Alosa mediocris*), white and yellow perch (*Morone americana* and *Perca flavescens*), red-breasted sunfish (*Lepomis microlophus*), striped bass (*Morone saxatilis*), catfish (*Ictalurus sp.*), and river herring (*Alosa pseudoharengus*) were much more abundant in the past than they are today. Pollution-sensitive species are present in large numbers, such as the cutlips minnow (*Exoglossum maxillingua*) and tessellated darter (*Etheostoma olmstedi*) in Rock Creek Park. The fish species which contain the most toxins in their tissue are bottom feeders such as catfish, eel, and carp, suggesting that bottom sediments are the source of toxicity. Other factors that may be contributing to population declines may be barriers to passage of migratory species and overexploitation by anglers. However, there is evidence of some migratory populations being more abundant than semi-migratory populations. In Rock Creek Park, yellow and white perch populations, semi-migratory species, have been reduced. Contrasting this, alewife and

blueback herring which are migratory species, have not been reduced. This may indicate the largest issue affecting fish populations is water quality.

The potential impacts of increased urbanization on sensitive fish and wildlife habitats are mitigated by the following policies and actions in the Draft Comp Plan:

Policy E-1.5.1: Habitat Restoration

Encourage interagency efforts to restore native habitat along the District's rivers, streams, and woodlands, and public-private partnerships to recreate native habitat within the city.

Policy E-1.5.2: Protected and Rare Species

As required by the federal Endangered Species Act, protect endangered, threatened, and other special status species from the adverse effects of construction and development.

Policy E-1.5.3: Habitat Management on Private Land

Encourage environmentally sound landscaping and gardening techniques by DC homeowners and institutional landowners to maximize the habitat value of privately owned land. Such techniques should include reduction of herbicide and pesticide use; the selection of disease, drought-resistant, and native species; the removal of invasive plants; the use of rain gardens to reduce urban runoff; and landscaping that provides food and cover for wildlife.

Action E-1.5-B: Data Improvements

Improve the collection and monitoring of data on plant and animal life within the District, particularly data on rare, endangered, threatened, and candidate species, and species of greatest conservation need.

Action E-3.4-A: Citywide Natural Resource Inventory

Compile and maintain a citywide natural resources inventory that catalogs and monitors the location and condition of the District's natural resources. The inventory should be used as a benchmark to evaluate the success of environmental programs and the impacts of land use and development decisions.

DIRECT LOSS OF HABITAT AND WILDLIFE

Impact E6. Development consistent with the Comp Plan could result in the reduction of urban habitat, including pockets of forested infill land in predominantly residential areas. Such development is already permitted under the current Plan, and in fact would be less likely under the proposed Plan due to the redesignation of many areas from "Moderate" to "Low" density residential, and the development focus on Central Washington, already urbanized corridors, transit station areas, and the already-urbanized waterfront. Moreover, policies in the proposed Plan mitigate the potential for habitat loss and reduce this impact to a less than significant level.

The Comp Plan would allow continued development on the remaining vacant private land in the District of Columbia, including privately-owned sites that currently contain woodland and riparian vegetation. Development on these sites could displace wildlife, remove habitat, and impair wildlife movement. Mortality of resident species would be possible as a result of construction activities. However, the most environmentally sensitive areas in the city, including the vast majority of wetland and woodland acreage, would remain public parkland and would continue to be unavailable for development.

The proposed (2006) Plan would have lesser potential for adverse impacts on habitat than the existing Plan. As noted in the Project Description, the Plan re-designates more than 1,000 acres from “Moderate” to “Low” Density Residential, reducing the possible level of disturbance to woodlands on infill sites east of the Anacostia River. Furthermore, the Plan aims to capture a larger share of the region’s growth than the past Comp Plan, thereby reducing development pressure on open space on the perimeter of the region. This would have positive impacts on habitat by reducing the area that would otherwise be converted from woodlands to urban uses.

The following policies in the Draft Plan address habitat management and further mitigate habitat impacts related to development:

Policy E-1.5.1: Habitat Restoration

Encourage interagency efforts to restore native habitat along the District’s rivers, streams, and woodlands, and public-private partnerships to recreate native habitat within the city.

Action E-1.5-B: Data Improvements

Improve the collection and monitoring of data on plant and animal life within the District, particularly data on rare, endangered, threatened, and candidate species, and species of greatest conservation need.

Action E-3.4-A: Citywide Natural Resource Inventory

Compile and maintain a citywide natural resources inventory that catalogs and monitors the location and condition of the District’s natural resources. The inventory should be used as a benchmark to evaluate the success of environmental programs and the impacts of land use and development decisions.

Policy E-1.5.3: Habitat Management on Private Land

Encourage environmentally sound landscaping and gardening techniques by DC homeowners and institutional landowners to maximize the habitat value of privately owned land. Such techniques should include reduction of herbicide and pesticide use; the selection of disease, drought-resistant, and native species; the removal of invasive plants; the use of rain gardens to reduce urban runoff; and landscaping that provides food and cover for wildlife.

Action E-1.5-A: Implementation of the Wildlife Conservation Plan

Implement the 2005 Wildlife Management Plan for the District of Columbia, including programs to control the white-tailed deer and Canada goose population, and to improve water quality and habitat in the Anacostia River.

Policy E-1.2.1: River Conservation

Improve environmental conditions along the Anacostia River and other waterbodies, including shorelines, wetlands, islands, tributaries, and the rivers themselves. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitat, creating new wetlands, and reducing litter.

Policy E-1.2.2: Retention of Environmentally Sensitive Areas as Open Space

Retain environmentally fragile areas such as wetlands and riparian areas along the Anacostia and Potomac Rivers as open space or parkland. In areas under federal jurisdiction such as Rock Creek Park, work with the National Park Service to conserve and carefully manage such areas, and to implement the federal “no net loss” policy.

Policy E-1.2.3: Identification, Protection, and Restoration of Wetlands

Identify and protect wetlands and riparian habitat on private and public land. Require official surveys when development is proposed in areas where wetlands are believed to be present to ensure that wetlands are preserved. Undertake wetlands restoration, enhancement, and creation projects to mitigate the impacts of stormwater runoff and improve plant and animal habitat.

Policy E-1.2.4: Wetland Buffers

Maintain open space buffers around existing and restored wetlands in order to reduce the likelihood of environmental degradation from urban runoff and human activities.

Action E-1.2-B: Wetland Setback Standards

Establish clear District of Columbia regulations for wetland setbacks and ensure compliance with these regulations during plan review, permitting, and inspections.

Action E-1.2-A: Anacostia River Habitat Improvements

Work collaboratively with federal agencies, upstream jurisdictions, the Anacostia Waterfront Corporation, and environmental advocacy groups to implement conservation measures for the Anacostia River, including:

- Removing litter and trash on tidal flats
- Restoring tidal wetlands around Kingman Island and along lower Watts Branch
- Creating new stormwater wetlands along tributary streams
- Daylighting streams (i.e., taking streams out of buried pipes and allowing them to run uncovered), particularly Pope Branch, Fort Dupont Stream, and Stickfoot Creek
- Creating naturalized or bio-engineered river edges that maximize habitat value
- Improving bulkheads and seawalls to provide protection from flooding and erosion
- Requiring open space buffers consistent with the recommendations of the Anacostia Waterfront Initiative Framework Plan
- Preventing the net loss of parkland and improving access to the waterfront and river trails.

HUMAN/ WILDLIFE INTERACTIONS

Impact E7. Localized loss of habitat and wildlife displacement could lead to increased interactions between humans (and their domestic pets) and wildlife. Some of these interactions could be hazardous, for example, the increased risk of car accidents (caused by deer), rabies, and West Nile Virus. This is a less than significant impact, as the habitat that could potentially be disturbed by Plan-related development is minimal. There are also policies in the Plan that mitigate the potential for impacts.

Several diseases affecting humans in the District of Columbia are transmitted by wildlife vectors. Rabies in particular is a virus spread through the saliva of raccoons, foxes, and bats (CDC, 2003). One common misconception about rabies is that domestic animals are the most likely carriers of the disease. However, in 2001 the CDC (Centers for Disease Control and Prevention) found that 93% of cases in domesticated animals were contracted through interactions with raccoons. In the District, raccoons are currently the most likely vector for the virus (CDC, 2003b). Although rabies is fatal if post-exposure treatment is not sought out, very few people die from exposure to the virus. This is due to management strategies from local health departments. The Animal Disease Prevention Division of the District of Columbia's Department of Health implements specific services that minimize exposure of rabid wildlife to humans. These activities include: investigations, follow-up calls on rabies cases, making recommendations for rabies prophylaxis, ordering quarantine for animal bites, performing humane intravenous euthanasia, performing inspections and recommending methods for exclusion, and providing education via pamphlets/classroom visits (DOH, 2005).

West Nile Encephalitis, another epizootic virus spread by wildlife in the District of Columbia, is transmitted by a mosquito virus, *Culex Spp.* Mosquitoes become infected when they first feed on birds, and later can spread the virus to humans through their saliva. As of 2003, West Nile virus had been detected in dead 128 dead bird species (CDC, 2003a). The spread of the virus geographically has been very rapid. In 2004, the virus was reported to be found throughout the continental United States, including the District of Columbia (CDC, 2003a). The Animal Disease Prevention Division of the District of Columbia's Department of Health runs management projects for West Nile that include disease surveillance and education. Within the District, pesticides have not been used as a mosquito management tool for this disease (DOH, 2005).

Although Rabies and West Nile are the best known epizootic diseases in the District of Columbia, a myriad of lesser-known diseases are also spread by ticks. Tick diseases endemic to the District include Erlichiosis, Lyme Disease, and Rocky Mountain Spotted Fever (CDC, 2005).

Raccoons are a particular threat to domestic animals since they often have home-ranges that are the same as domestic cats and dogs. Not only are raccoons the most likely carrier of rabies, but 40-60% of raccoons have roundworm. The District's Department of Health's current management strategy is to pick up dangerous and stray animals found within the District (DOH, 2005). Besides disease, pets also face the possibility of wildlife attacks in the District. In the District, these attacks are almost exclusively by foxes, as there are no larger predators.

Although urban motorists run less of a chance of hitting wildlife in the city than in suburban areas, there are still a substantial number of urban road collisions especially within park areas. In Rock Creek Park alone between 1991 and 2001, 1,088 squirrels, 455 raccoons, 303 deer, 135 opossums, three grey fox, 90 birds, 22 box turtles, and 15 black rat snakes were hit by cars (NPS, 2005).

The Plan includes the following policies and actions to mitigate human/wildlife interaction hazards:

Policy E-4.6.1: Vector Control

Continue and strengthen efforts to control rats, mice, mosquitoes, and other disease vectors and pests. A variety of related strategies should be used to support these programs, including public outreach and education, garbage control and containment, adequate trash and refuse collection services, ongoing maintenance of public space, enforcement of littering and dumping regulations, clean-up of construction and demolition debris, structural controls and integrated pest management, and a reduction in the number of vacant and abandoned buildings.

Policy E-4.6.4: Environmental Health Activities

Maintain and improve existing District programs to ensure community hygiene, food and restaurant safety, animal and welfare control, and the control of disease vectors. Promote continuous coordination among District agencies to ensure healthful and sanitary conditions throughout the District.

III.F WATER QUALITY

This section of the Environmental Assessment describes the impact of the proposed Comp Plan on water quality and hydrology in the District of Columbia. The analysis includes a summary of existing water quality in the city, a description of possible impacts resulting from adoption of the Plan, and measures to mitigate these impacts.

SETTING

Regulatory Framework

Table III.F-1 shows the regulatory framework for water resource management and compliance in the District. Until 2006, the regulatory agency in charge of protecting water resources for the District of Columbia was the Department of Health (DOH). Many of DOH's responsibilities are being transferred to the new Department of the Environment (DOE). DOH/DOE adheres to the main objective of the Clean Water Act (CWA) which is to *"restore and maintain the chemical, physical, and biological integrity of the Nation's water."* To meet this objective, the District and the States must adopt water quality standards (WQS) for all *"waters of the United States"* within their boundaries. At a minimum, these standards must consist of three major components: 1) designated beneficial uses; 2) narrative or numeric water quality criteria to support each beneficial use; and 3) an anti-degradation statement. In addition, the CWA requires frequent reporting on the status of the waters.

Table III.F-1: Regulatory Framework for Stormwater Management in the District

Regulating Agency	Division	Responsibility
The District Department of Health (DOH), Environmental Health Administration (EHA)	Watershed Protection Division, Sediment and Stormwater Technical Services Branch	<ul style="list-style-type: none"> Adheres to main objective of the Clean Water Act (CWA) Reviews construction and grading plans for stormwater management, erosion and sediment control, and floodplain management. Implements MS4 permit
The District Department of Public Works	Environmental Services & Solid Waste Management	Implements MS4 permit
District Water & Sewer Authority (DCWASA)	Stormwater Permit Compliance Administration	<ul style="list-style-type: none"> Ensures Potable Water Quality Implements MS4 permit Collects fees towards the Stormwater Permit Compliance Enterprise Fund
Environmental Protection Agency	NPDES permits	EPA issues NPDES permits and general permits for Municipal Separate Storm Sewer Systems (MS4s) . In August 2004, EPA issued a second permit to the District, primarily for compliance with TMDL's issued by the District's DOH

Source: Louis Berger Group, 2006

In 2005, Congress approved several acts of legislation by the governments of Maryland, Virginia, and the District of Columbia to improve the region’s water quality. These included:

- The Chesapeake Bay Restoration Enhancement Act of 2005, which amended Section 117 of the Clean Water Act. It increases support to local governments in the region while requiring more accountability by federal and state agencies for water quality.
- The Chesapeake Bay Watershed Nutrient Removal Assistance Act, which authorized \$132 million annually until 2007 to fund nitrogen removal upgrades at the 310 major sewage treatment plants in the Chesapeake Bay Watershed.
- The Anacostia Watershed Initiative Act of 2005, which amended the Federal Water Pollution Control Act and the Water Resources Development Act of 1992 to provide for the restoration, protection, and enhancement of the environmental integrity, and social and economic benefits of the Anacostia Watershed.

The District’s Water Quality Standards (§ 1101 of the District of Columbia Municipal Regulations) define five categories of “designated water uses”, upon which the development of water quality criteria are based. The designated uses are based on the use and value of each water body for public water supply; protection of fish, shellfish, and wildlife; and recreational, agricultural, industrial, and navigational purposes. The five designated use categories and the corresponding classes defined by the District are presented in Table III.F-2.

According to the District’s Water Quality Standards (DOH, 2003a), “the surface waters of the District should be classified on the basis of their (i) current uses, and (ii) future uses to which the waters will be restored.” As noted in Table III.F-3, none of the waters are meeting the primary contact recreation use designation at this moment.

Table III.F-2: Designated Use Categories for District of Columbia Waters

Designated Use Categories for District of Columbia Waters	Designated Use Classes
Primary contact recreation ¹	A
Secondary contact recreation and aesthetic enjoyment ²	B
Protection and propagation of fish, shellfish, and wildlife	C
Protection of human health related to consumption of fish and shellfish	D
Navigation	E
¹ Any recreational activities with prolonged and intimate contact by the human body with the water (ingesting water, swimming, diving, water skiing, and surfing). ² Any recreational activities with minimal contact by the human body with the water (probability of ingesting water is low, boating, and fishing).	

Source: Louis Berger Group, 2006

Table III.F-3: Classification of the District’s Waters

Surface waters of the District	Use Classes	
	Current Use	Designated Use
Potomac River	B, C, D, E	A, B, C, D, E
Potomac River tributaries (except as listed below)	B, C, D	A, B, C, D
Battery Kemble Creek	B, C, D	A, B, C, D
C & O Canal	B, C, D, E	A, B, C, D, E
Rock Creek and its tributaries	B, C, D, E	A, B, C, D, E
Tidal Basin	B, C, D, E	A, B, C, D, E
Washington Ship Channel	B, C, D, E	A, B, C, D, E
Oxon Run	B, C, D	A, B, C, D
Anacostia River	B, C, D, E	A, B, C, D, E
Anacostia River tributaries (except as listed below)	B, C, D	A, B, C, D
Hickey Run	B, C, D	B, C, D
Watts Branch	B, C, D	A, B, C, D
Wetland	C, D	C, D

Source: Louis Berger Group, 2006

Water quality criteria are the foundation of the pollution control program mandated by the Clean Water Act (CWA). The CWA requires the States and the District to adopt water quality criteria with coverage of sufficient parameters and adequate stringency to protect designated uses. Numeric criteria are relevant when the cause of toxicity is known or for protection against pollutants with potential human health effects. Narrative criteria (non-numeric) are also issued, and often serve to limit the toxicity or other detrimental impacts of waste discharges on aquatic species and the environment. Specific water quality criteria for the District can be found at <http://doh.dc.gov/>.

As noted above, the CWA requirement also includes “antidegradation” of existing water quality conditions and a mandate that all existing uses be protected. The CWA further requires that deterioration be avoided or at least minimized when water quality meets or exceeds standards; and that outstanding waters be strictly protected. The District’s DOH follows a tiered approach to implement antidegradation water quality protection:

- Tier I Protect Existing Uses: Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected.
- Tier II Maintain "High Quality" Waters: Avoid, or at least hold to a minimum the lowering of quality on waters that currently meet or exceed water quality standards.
- Tier III Protect "Outstanding" Waters: Give strict protection to the most ecologically significant and sensitive, the cleanest, and the most recreationally important waters. Those waters shall be designated Outstanding National Resource Waters (ONRW) and the water quality in the ONRW shall be maintained and protected.

DOH submits an annual report on the District's water quality to the U.S. Environmental Protection Agency (EPA) pursuant to Section 305(b) of the federal Clean Water Act. The Report provides water quality information to the general public and serves as the basis for EPA 's National Water Quality Inventory Report to Congress.

Section 303(d) of the Clean Water Act requires the District and States to identify waters that do not meet water quality standards. This is known as the Section 303(d) list of impaired waters. As part of this process, States and the District are required to prioritize waters/watersheds for future development of [Total Maximum Daily Load](#) (TMDL) standards. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. It is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and an allocation of that amount to the pollutant sources.

TMDL calculations are based in part on five attainment categories which reflect water quality status (See Table III.F-4). As reported in the District's 2004 303(d) list, there are 51 impaired water bodies in which 13 are categorized in subcategory 4A and the remaining 38 in category 5. The impaired water body categories are listed in Table III.F-5.

Current 303(d) list determinations were made based on ambient water quality monitoring data from 1997 through 2002, municipal separate storm sewer system monitoring data from 2001 to 2002, biological data collected between 2002 and 2003, and the DC Fish Tissue Contamination Report from 2001.

Waterbodies on this list are impaired due to toxics, sediments, pathogens, organic enrichment, and low dissolved oxygen concentrations. Impairment is also caused by high flow triggered by excessive runoff, resulting in eroding riverbeds and shorelines of several of the listed waterbodies (DOH, 2003d). None of the monitored waterbodies support primary contact recreation (DOH, 2004a).

Table III.F-4: TMDL Attainment Categories & Descriptions

1	Waters attaining all designated uses
2	Waters were attaining all of the designated uses for which they were monitored
3	Insufficient data to make a determination as to attainment of use
4	Waters which were impaired but not requiring a TMDL
4a	TMDL has been approved or established by EPA
4b	Expected to meet all designated uses within a reasonable timeframe
4c	Not impaired by a pollutant
5	Waters that were impaired and required a TMDL

Source: Louis Berger Group, 2006

Table III.F-5: Status of Impaired Segments of Streams in the District of Columbia

Category 4A										
Waterbody	Drainage Area	Bacteria	BOD¹	Dissolved Oxygen	Fecal Coliform	Metals²	Oil and Grease	Organics³	pH	TSS⁴
Watts Branch	Anacostia River	✓						✓		✓
Kingman Lake	Anacostia River	✓				✓	✓	✓		
Fort DuPont Creek	Anacostia River	✓				✓				
Fort Davis Tributary	Anacostia River	✓				✓				
Fort Stanton Tributary	Anacostia River	✓				✓		✓		
Fort Chaplin Tributary	Anacostia River	✓				✓				
Popes Branch	Anacostia River	✓				✓		✓		
Texas Avenue Tributary	Anacostia River	✓				✓		✓		
Rock Creek	Rock Creek	✓				✓		✓		
Anacostia River	Anacostia River	✓	✓			✓	✓	✓		✓
Category 5										
Nash Run	Anacostia River	✓				✓		✓		
Potomac River	Potomac River	✓						✓	✓	
Oxon Run	Oxon Run	✓				✓		✓		
Washington Ship Channel	Potomac River	✓						✓	✓	
Battery Kemble Creek	Potomac River	✓				✓				
Foundry Branch	Rock Creek	✓		✓		✓				
Broad Branch	Rock Creek							✓		
Dumbarton Oaks	Rock Creek				✓			✓		
Fenwick Branch	Rock Creek				✓			✓		
Klinge Valley Creek	Rock Creek				✓			✓		
Luzon Branch	Rock Creek				✓			✓		
Melvin Hazen Valley Branch	Rock Creek				✓					
Normanstone Creek	Rock Creek				✓			✓		
Pinehurst Branch	Rock Creek				✓			✓		
Portal Branch	Rock Creek				✓			✓		
Piney Branch	Rock Creek				✓	✓		✓		
Soapstone Creek	Rock Creek				✓			✓		
Dalecarlia Tributary	Potomac River	✓						✓		
Tidal Basin	Potomac River	✓						✓	✓	
Hickey Run	Anacostia River	✓						✓		
Chesapeake and Ohio Canal	Potomac River	✓								

¹ BOD Biochemical Oxygen Demand

² Metals Arsenic, Copper, Lead, and Zinc

³Organics Chlordane, DDD, DDE, DDT, Dieldrin, Dioxin, Heptachlor Epoxide, PAH1, PAH2, and PAH3

⁴ TSS Total Suspended Solids

Source: Louis Berger Group, 2006

Waterbody Impairments

Waterbody impairments in the District are caused by sources located both within the District and outside of the District transported through major rivers (Potomac River, Anacostia River, Rock Creek, and Oxon Creek). Pollutant loads from outside the District are the major contributor to the total load of pollutants observed in the District. Within the District, the greatest source of pollutants stems from Combined Sewer Overflows (CSOs). Outside of the District, CSOs are minor or not present, and non-point sources are the major contributor of pollutants. Municipal point sources only play a role in the Potomac River from Blue Plains Wastewater Treatment Plant (DOH 2003d).

Potomac River Impairments

The entire Potomac River in the District is considered impaired. For listing purposes, the river contains three sections; upper, middle, and lower. All three sections are listed for bacteria and organics, and the middle section is listed for pH. Although not listed, the upper and lower sections also showed occasional violations for pH, and the middle section for dissolved oxygen. In addition, the upper section had observed toxics in the sediment and elevated levels of contaminants such as Chlordane and PCBs (Poly Chlorinated Biphenyls) in fish sampled tissues. For all sections, the Public Health Advisory urges non-consumption of catfish, carp, or eel and limited consumption of other fish caught in District's waters (DOH, 2004a).

The cause of the impairments in the Potomac River is a combination of pollutants originating from the upstream drainage area of the Potomac River, its major tributaries in the District (Rock Creek and Anacostia River), diffuse sources from the Potomac River shore line, and the only POTW (Publicly Owned Treatment Works) point source in the District, Blue Plains Wastewater Treatment Plant. The upstream drainage area of the Potomac River delivers elevated concentrations of sediments, nutrients (nitrate and ortho-phosphorus), fecal coliform, organics (pesticides), and heavy metals (lead and mercury). Violations for fecal coliform and pesticides were usually found under wet conditions (Ator, Scott W. *et al.*, 1998, DOH, 2002).

DOH implemented a watershed model to estimate annual average loads for sediments, nitrogen, phosphorus, fecal coliform, and pesticides. The results of the modeling suggested that agriculture and pasture, both non-point sources, are by far the major sources for these pollutants; point sources only contribute to nutrient loads. Furthermore, most pollutants have only minor impact on the Potomac River because of dilution. Fecal coliform violates the criterion only under storm flow conditions downstream of the source. Atrazine concentrations are moderately low, violating the criterion only under high flow conditions when excessive erosion due to severe rain storm events follow an atrazine application on fields (DOH, 2002).

The watershed model estimations are similar to conclusions drawn by USGS in 1998 (Ator *et al.*, 1998). Based on water quality data from the Potomac River between 1992 and 1995, USGS concluded that in most cases nutrients do not pose a threat to human life or wildlife. Pesticides were found mostly in

agricultural areas of the Potomac River Basin and some urban streams, but rarely at levels threatening to aquatic life. During spring and early summer floods, elevated concentrations of pesticides can be encountered in the District. The USGS study also found the presence of organic contaminants (chlorinated organic compounds such as PCB and chlordane) and heavy metals (mercury and lead) in sediments at critical concentration for aquatic life.

Rock Creek Impairments

Rock Creek feeds into the Potomac River and is listed for bacteria, metals, and organics. Most of its tributaries are also listed for organics and metals. The organic contaminants include chlordane, DDD, DDE, DDT, dieldrin, heptachlor epoxide, PAH1, PAH2, and PAH3 and the metals arsenic, copper, lead, and zinc. A Public Health Advisory advises against consuming fish caught in Rock Creek (DOH 2004c and DOH 2004d).

Although the entire length of Rock Creek in the District is lined with publicly owned park land covering approximately 17 % of the Rock Creek watershed (9.3 miles long and up to one mile wide), Rock Creek shows degradation due to riverbed scouring, bank erosion, and contamination of the sediments and water. The degradation has several sources. Agricultural and urban runoff originating outside of District provide high flows, sediments, and pollutant loads. Inside of the District, most of the Rock Creek drainage area has been urbanized, resulting in an increase in impervious area. In addition, large sections of Rock Creek's tributaries have been rerouted into artificial channels or conveyed via underground pipes, thus drastically minimizing flow travel times, and destroying aquatic communities. The increase in impervious areas and channelization of many Rock Creek tributaries has resulted in increased storm water and sanitary sewage overflow discharges. Approximately 29 CSOs and 188 other outfalls (storm sewer, private owned drains) have been discharging into Rock Creek (CH2M Hill, 1979, DOH, 2003e, 2004b).

Anacostia River Impairments

The Anacostia River is the largest tributary of the Potomac River within the District. The section of the Anacostia River in the District is listed for bacteria, Biochemical Oxygen Demand (BOD), metals, oil and grease, organics, and Total Suspended Sediments. The Anacostia River showed occasional violations for dissolved oxygen. There is a Public Health Advisory urging non-consumption of catfish, carp, and eel and limited consumption of other fish caught in the Anacostia's waters (DOH, 2004a).

The causes of the impairments are similar to those in Rock Creek. CSOs and non-point sources are the major sources. The upstream section of the Anacostia River is mostly channelized and drains from a heavily urbanized area. The pollutants are quickly transported to the tidal section of the Anacostia River where they accumulate and remain on average for approximately 40 days due to poor flushing. The accumulation of oxidizable organic material can cause severe dissolved oxygen depletion and fish kills during summer months. The Anacostia River in the District also receives large loads of sediment, originating from active surface mines, abandoned sand and gravel mines and stream bank erosion. The

River therefore shows high turbidity. Algal blooms have never been reported presumably because of limited light penetration through the water column (DOH, 2003, 2004).

Sources of Pollution

Sources contributing to water quality impairment in the District are varied and consist of point source pollution which is discharged from the region’s sewage treatment plants and combined sewer overflow outfall pipes, and non-point source pollution produced principally from storm water runoff. Sources of pollution are regulated through the National Pollutant Discharge Elimination System (NPDES) permit program, created through an amendment of the Clean Water Act. The NPDES permit program regulates wastewater discharging into waters of the United States.

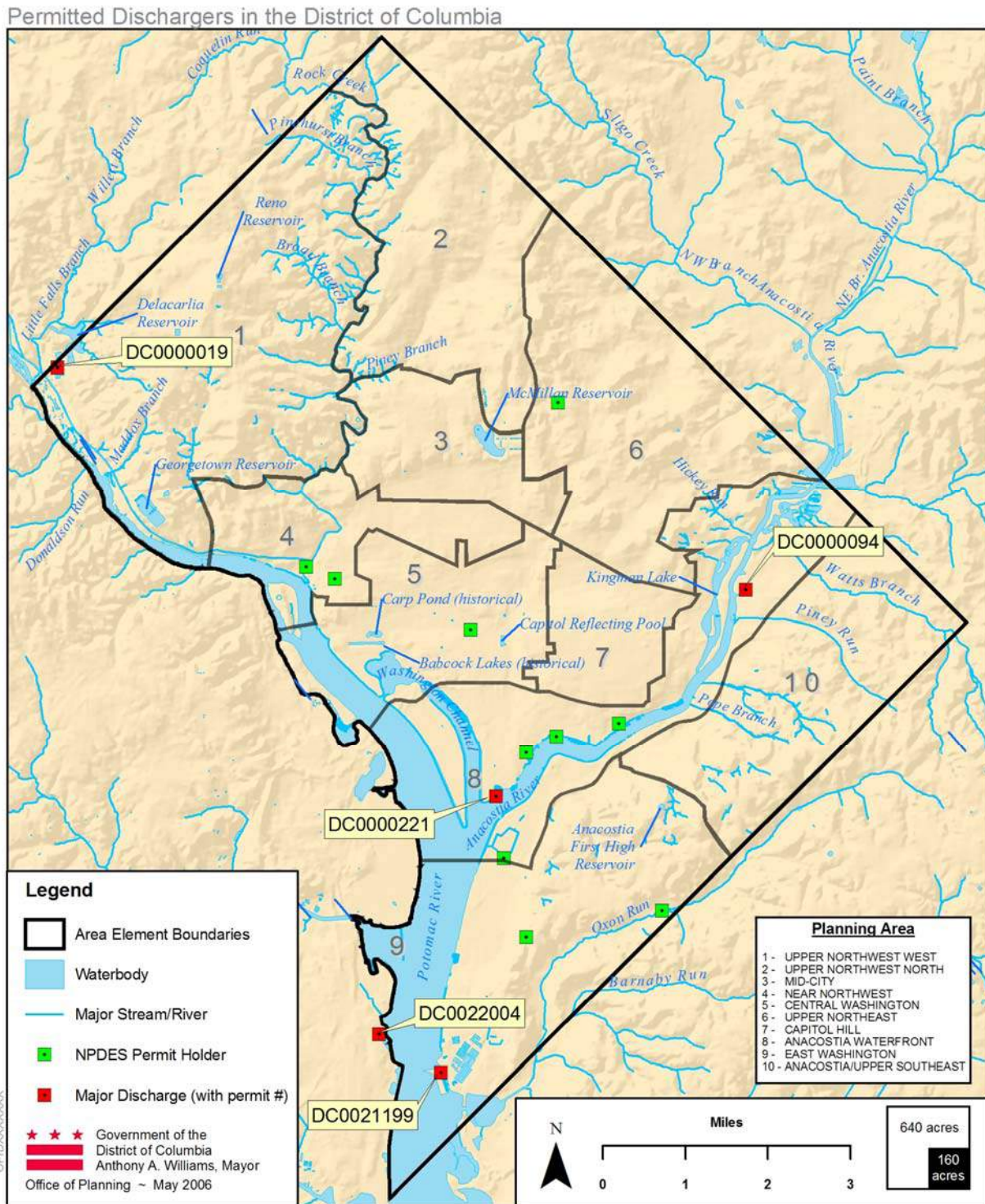
The NPDES permit program covers technology-based limits, ability of the discharger to treat wastewater, and water quality-based limits when technology-based limits are not able to protect the waterbody (U.S. EPA 1997). The NPDES permit program in the District is administered by EPA, Region III. Final NPDES regulations are promulgated by U.S. EPA in the Code of Federal Regulations every year (DOH 2004a, U.S. EPA 2005). Table III.F-6 lists the NPDES dischargers in the District and Figure III.F-1 shows the location of these facilities.

Table III.F-6: NPDES Dischargers in the District of Columbia, 2005

NPDES Permit #	Location Name	Flow rate (MGD)	Receiving Waters	Type of Ownership
DC0000019	Washington Aqueduct	1.00	Potomac River	Federal
DC0000035	GSA - (West Heating Plant)	0.15	Rock Creek	Federal
DC0000051	Ameraga Hess Corp	0.016	Anacostia River	Private
DC0000094	Pepco – Benning	370	Anacostia River	Private
DC0000141	Washington Navy Yard	5000	Anacostia River	Federal
DC0000159	Anacostia Naval Station	2.01	Anacostia River	Federal
DC0000167	National Gallery of Art	4723	Washington Ship Channel	Federal
DC0000175	Super Concrete Corp.	0.008	Anacostia River	Private
DC0000191	CTIDC	3150	Anacostia River	Private
DC0000221	Government of the DC	4453	Potomac Riv. Anacostia Riv. and Tributary.	Public
DC0000248	JFK Center for Performing Arts	1800	Potomac River	Public
DC0000299	Southeast Federal Center	0.0001	Anacostia River	Federal
DC0000337	WMATA-Mississippi Ave DPS	0.0072	Oxon River	Public
DC0021199	WASA (Blue Plains)	370	Potomac Anacostia and Piney Rivers	Public
DC0022004	Potomac River Generating Station	448	Potomac River	Private

Source: EPA, Permit Compliance System Data Element Dictionary, June 2, 1997

Figure III.F-1: Permitted Dischargers in the District of Columbia



The NPDES permit program applies to all three watersheds in the District of Columbia (Anacostia River, Rock Creek, and the Potomac River) and issues Municipal Separate Storm Sewer System (MS4) and POTW permits (EPA, 2005). On November 16, 1990, EPA issued permit requirements for its Phase I storm water program for medium and large MS4s. The Phase I storm water program applies to storm water discharges associated with industrial activities and from municipal separate storm sewer systems located in municipalities serving a population of 100,000 or more (EPA, 1996). Storm water is a major problem in the District and therefore has been given high priority for issuing MS4 and POTWs permits (EPA, 2005).

In January of 2001, the District City Council enacted the Stormwater Permit Compliance Amendment Act of 2000 which allocated responsibility for implementing the MS4 permit to DOH, DPW, and WASA. The Department of Transportation was added later. Among other things, the Act created the Stormwater Permit Compliance Administration within WASA to coordinate agency activities necessary to meet the permit requirement. It also established the Stormwater Permit Compliance Enterprise Fund to provide funds for compliance with the permit. WASA collects the stormwater fee along with the fee for water and sewer service and manages the fund. Permits for stormwater release or water used for cooling have been issued for the National Gallery, Kennedy Center, Government of the District of Columbia, and Navy Yard. Their permitted flow rates are higher than other dischargers in the District.

Point Source Dischargers

Point source pollution originates from a specific source, such as a pipe, and can easily be identified. In Greater Washington, major point sources include the region's sewage treatment plants and combined sewer overflows.

Municipal point sources (POTWs) predominantly receive domestic sewage from residential and commercial customers. They apply to specific NPDES programs such as the National Pretreatment Program, Municipal Sewage Sludge Program, Combined Sewer Overflows (CSOs), and the Municipal Storm Water Program. Non-municipal sources receive wastewater from industrial and commercial facilities. They also apply to specific NPDES programs such as the Process Wastewater Discharges, Non-Process Wastewater Discharges, and the Industrial Storm Water Program (U.S. EPA 1997).

The Blue Plains Wastewater Treatment Plant is the largest discharger in the District with a treatment capacity of 370 MGD and a peak capacity of 1,076 MGD. In addition to primary and secondary treatment, it provides nutrient removal, filtration, and disinfection. In fact, the District handles wastewater and peak storm water flows from over two million people including 68 significant industrial users by the Blue Plains Wastewater Treatment Plant. Blue Plains has a peak full-treatment capacity of 740 mgd for four hours during storm events, which then is reduced to 511 mgd to protect the biological treatment process. The additional flows of up to 336 mgd receive excess flow treatment, consisting of screening, grit removal, primary treatment, and disinfection before discharge to the Potomac River.

Combined Sewer Overflow

As noted above, the District's sewer system is comprised of both combined sewers and separate sanitary sewers. Combined sewers collect wastewater and storm water flow in a single system of pipes and transport it to a wastewater treatment plant. The major disadvantage of combined sewer systems is that during heavy rains, storm water flows exceed pipe capacity and cause an overflow into waterways through constructed overflow points. These overflows prevent street flooding and backups into homes and businesses. However, the untreated water adversely impacts water quality. Approximately one-third of the city is served by combined sewers, with 60 permitted outfalls on the Potomac River, Anacostia River, and Rock Creek.

Non-Point Source Pollution

Non-point source pollution (NPS) is a broader and more complex form of pollution to identify. It is defined as the pollution that cannot be traced to a single point (outlet or pipe) because it comes from many diffuse places. NPS mainly originates with storm water runoff when the overland flow washes off pollutants and deposits them in surface waters or introduces them into groundwater.

NPS is regulated by the Department of Health in the Division Watershed Protection (DC WPD). The Division includes sections for sediment and storm water, technical services, and inspection and enforcement. The NPS Plan of the WPD is promulgated in its approved *NPS Management Plan* (1989) and the *Nonpoint Source Management Plan II, Addressing Polluted Runoff in an Urban Environment* (2000). Plan II gives a comprehensive strategy for managing NPS by 2015 and additional uses by 2025 (DOC, 2005).

NPS pollution in the District is mainly caused by storm water runoff. In addition, NPS pollution originates from development and redevelopment activities, urbanization of surrounding areas and agricultural activities upstream in the watershed (DOH 2004a). Urban runoff is considered to be one of the major causes of impairment of all of the District's waters. Approximately 63% of the District is covered by impervious surface providing high potential for surface runoff and associated pollutant loads (EPA, 2005b). Construction usually includes redevelopment of abandoned areas, replacement of old buildings with new buildings, or rebuilding of roads. Depending on planning and inspection, construction activities can have a negative effect on water quality conditions.

High runoff can also impact the hydrologic regime of streams, especially for small suburban and urban streams. Storm water runoff increases flood flows and velocities, contributing to erosion and sedimentation. The erosion results in scoured streambeds and banks as well as a loss of riverine vegetation and benthic habitat. In addition, pollutants delivered by storm water degrade water quality and adversely effect resident aquatic communities. Urban runoff can carry nitrogen, phosphorus, heavy metals, toxic organic chemicals, petroleum-based oils, and floatable trash (Versar, Inc, 1997).

Characterization and Inventory

Watersheds

Four major watersheds drain the District of Columbia (Figure III.F-2). A small portion of the District (3%) in its northwestern most corner is drained by Little Falls Branch. Immediately east lies the Rock Creek watershed (Maryland HUC# 02140206) which is the second largest in the District, draining approximately 30% of its area. To the east and south is the Anacostia River Watershed (Maryland HUC# 02140205), which drains a majority of the District land area (54%). Lastly, the Oxon Creek watershed (Maryland HUC# 02140204) drains the lands east of the Anacostia River watershed, and accounts for 12% of the District. Table III.F-7 summarizes the watershed areas, their total area within the District, and the proportion of the District drained by each watershed. Table III.F-8 indicates average flows in the receiving waters.

Table III.F-7: Areas of Major District of Columbia Watersheds

Name	HUC # ¹	Total Drainage Area (sq. mi.)	Area in District (sq. mi.)	Proportion of Total District Area (Area in District / 69 sq.mi.) ²
Anacostia River	02140205	182	37	54%
Rock Creek	02140206	82	21	30%
Oxon Creek	02140204	18	8	12%
Little Falls/ Cabin John/ Potomac, et al.	02140202	140	2	3%

¹ HUC # Hydrologic Unit Code Number based on Maryland 8 digit subwatershed codes
² Proportions add up to less than 100%. Approximately 1% of the District area falls within Potomac River Upper Tidal watershed (02140201).

Source: Louis Berger Group, 2006

Table III.F-8: Average Flows for the Potomac and Anacostia Rivers and Rock Creek

Waterbody	Location	USGS Unit	Flow (cfs) ²
Potomac River	DC Little Falls Pump Station, MD	01646500	13666
NW Branch	At Hyattsville, MD	01651000	60
NE Branch	At Riverdale, MD	01649500	103
Anacostia River ¹		-	164
Rock Creek	At Sherril Drive, Washington DC	01648000	73

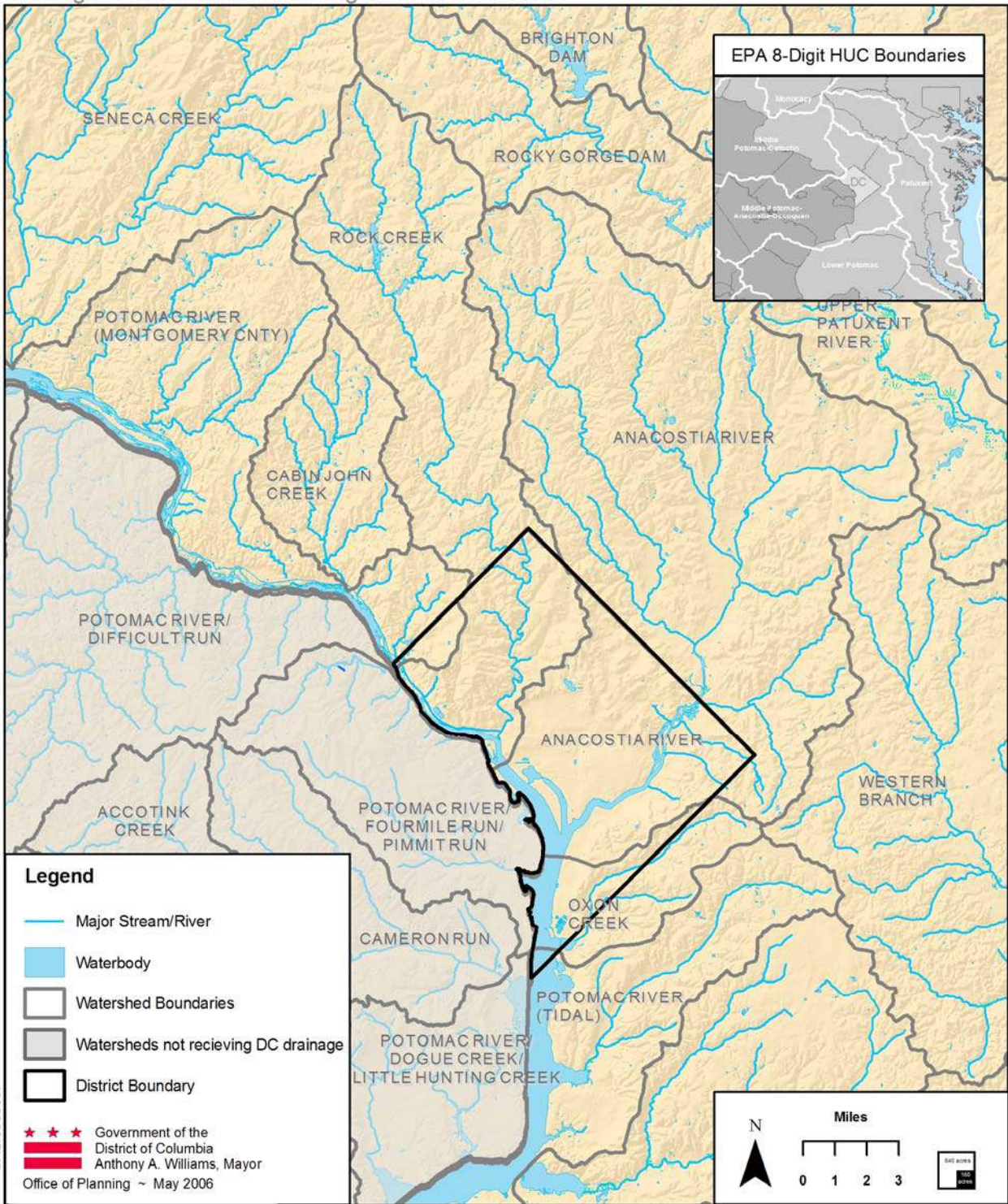
¹ Flow for Anacostia River is the sum of NW and NE Branch

² Flow is based on an average of 10 hydraulic consecutive years from 1994 through 2004
 NW Northwest; NE Northeast

Source: Louis Berger Group, 2006

Figure III.F-1: Major Watersheds in the District of Columbia

Drainage Areas of the Intersecting River and Streams

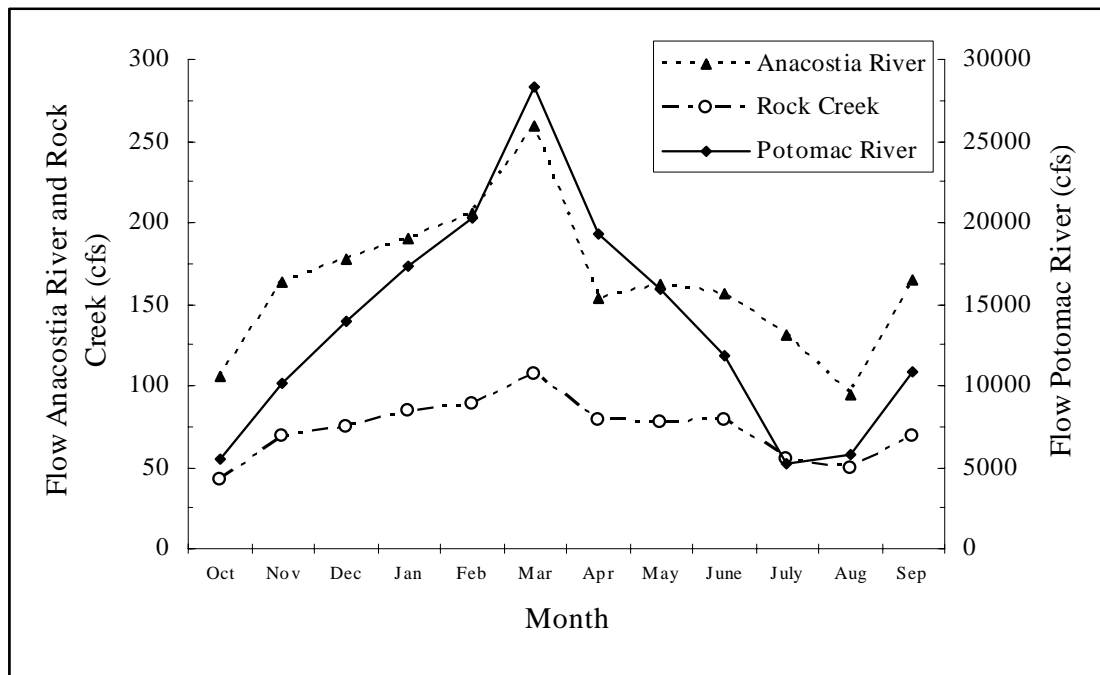


Rivers and Streams

Several flowing waterbodies begin or pass through the District, all of which feed into the Potomac River. The portion of the Potomac River falling within the boundaries of the District is its largest flowing waterbody, which is also tidally influenced up to Little Falls. The Potomac River drainage area at this point is approximately 11,560 square miles and encompasses portions of the states of Virginia, West Virginia, Pennsylvania, and Maryland.

The Anacostia River flows through the eastern side of the District draining into the Potomac near its southernmost border. Its total drainage area is approximately 182 square miles. The entire length of the Anacostia River (proper) is tidally influenced with a tidal cycle of approximately three feet (DOH, 2003). The tides move up to the location of the USGS gages on the Northeast (USGS 01649500) and the Northwest Branch (USGS 04651000). Ten small tributaries flow into the Anacostia River (Fort Chaplin Tributary, Fort Davis Tributary, Fort Dupont Creek, Fort Stanton Tributary, Hickey Run, Stickfoot Creek, Nash Run, Popes Branch, and Watts Branch) and eleven small tributaries into Rock Creek (Fenwick Branch, Portal Branch, Pinehurst Branch, Luzon Branch, Broad Branch, Soapstone Creek, Melvin Hazen Valley Branch, Piney Branch, Klinge Creek, Normanstone Creek, and Dumbarton Oaks).

Figure III.F-2: Comparison of Flow throughout a Hydrologic year for the Potomac River, Anacostia River, and Rock Creek



Source: Louis Berger Group, 2006

Rock Creek drains the majority of Northwest DC, and has a total drainage area of approximately 82 square miles. Rock Creek is a free-flowing stream with no dams or regulated sections. It has short residence times for flows and is not tidally influenced (DCWASA, 2002).

Based on average flows of 15 consecutive years from 1989 through 2004, all three rivers show elevated flows throughout the winter and spring, with peak flows at the beginning of spring and lowest flows during the summer between July and September (Figure III.F-2).

Drinking Water

The District receives its water from the DC Water and Sewer Authority (DC WASA), a distribution agency which purchases water from the Washington Aqueduct Division of the U.S. Army Corps of Engineers (WAD). WAD withdraws approximately 180 million gallons of water per day from the Potomac River through intakes at Great Falls and Little Falls for residential and commercial uses (DOH, 2002, DC WASA, 2003). Three other water suppliers (Washington Suburban Sanitary Commission, WSSC, Fairfax County Water Authority (FCWA), and the City of Rockville) also withdraw their water from the Potomac River, which serves more than 2.8 million customers. Intakes for these suppliers are located upstream of Great Falls (DOH, 2002, DC WASA, 2003).

The water withdrawn by WAD is conveyed by gravity flow and pumps in large conduits to the Dalecarlia Reservoir for storage and pre-sedimentation, and from there it is transported for further treatment to the McMillan and Dalecarlia plants. The treatments performed include: filtration for particle removal, fluoridation, pH adjustment, disinfections with chlorine and chloramines. Both treatment facilities process 170 million gallons per day of water on average, with plant capacity between 280 and 320 million gallons per day (DOH, 2002, DC WASA, 2003).

The current average annual water use for all water suppliers in the metro area is approximately 488 million gallons per day. Water withdrawal is lowest in the winter months and highest over the summer when outdoor water uses increase. During droughts when the demand for water is higher than the Potomac flow (mid-July through late October or early November), the three major Washington Metropolitan Area (WMA) suppliers jointly use water from the Jennings Randolph, Little Seneca Reservoir, Occoquan, and Patuxent reservoirs to augment water supply and maintain adequate flows in the Potomac River (Kame'enui *et al.* 2005).

The 1974 Safe Drinking Water Act protects the quality of drinking water in every State. Under this Act, the Washington Aqueduct and WASA must conform to EPA mandated health and non-health related standards for the surface water supply. Regulated contaminants include microbial contaminants, inorganic contaminants, pesticides and herbicides (from agriculture, urban storm water runoff, and residential uses), and organic chemical contaminants, including synthetic and volatile organic chemicals, as well as radioactive contaminants. In 2003, the DOH conducted a Source Water Assessment of the Potomac River watershed and upstream of the water supply intakes. The assessment identified potential contamination sources and found that the most likely source of potential contamination to the water supply are urban

runoff, toxic spills, agricultural activities and inadequate wastewater treatment (WASA 2004 Water Quality Report).

Waterbodies within the District of Columbia are not designated for either public water supply (PWS) or drinking water (DW) uses. The EPA standards for drinking water are applied to DC's drinking water. Samples are analyzed for turbidity, total coliform bacteria, chloride and other disinfection byproducts, inorganic metals, inorganic ions, and synthetic organic compounds (DOH, 2004).

According to water quality analysis data in 2001 and 2004, samples were in compliance with the majority of EPA criteria. Violations of the fecal coliform standard were recorded in the DC water once in 2004 as well as several times in 1995 and 1996. Disinfection of potable water used to be accomplished by use of free chlorine. However, since November 1, 2000, chloramines have been used instead, since free chlorine tends to bind with organic components to form potentially carcinogenic molecules such as trihalomethanes (THMs) and haloacetic acids (HAAs) (WASA, 2004).

Samples taken in 2001 showed that 4 out of 50 samples were above the EPA standard for lead (15 ppb). If 5 out of 50 samples are above the standard, then EPA regulations require that corrective action be taken (EPA, 2005 and WASA, 2004). Monitoring ending in 2002, 2003, and 2004 showed that more than 10% of the lead sampling test results exceeded the lead action level. As long as WASA continues to exceed the Lead Action level, federal regulations require the replacement of 7% of all lead service lines each year (EPA, 2005).

Raw water supply, treatment, and distribution systems do not contribute to increased lead levels in the DC WASA system. The presence of lead in tap water is the result of lead leaching out or dissolving from the service laterals (between the street and residences) or from soldered fixtures in the home's internal plumbing. As a result, orthophosphate is being used to inhibit corrosion of lead and reduce lead levels. Also, DC WASA has an aggressive lead pipe replacement program. Test results show an overall decline in the lead concentrations in homes connected by service pipes treated with orthophosphate (Washington Aqueduct, 2005).

There are several other sources besides corrosion that can affect drinking water quality. For example, the Potomac River is subject to contamination by upstream activities. Soil runoff can affect the water's turbidity, erosion from natural deposits can introduce inorganic contaminants, and herbicide runoff and discharge from chemical factories can introduce organic contaminants (EPA, 2005).

Groundwater

Groundwater is defined as subsurface water found in the saturated soils and water-bearing bedrock of the earth's surface. The water bearing formation of unconsolidated deposits and fractured zones (cracks and fissures) in bedrock is called an aquifer. Two physiographic areas are defined in the District. Both areas are divided by the Fall Line, a boundary which separates younger sediments of the Coastal Plain and the older, crystalline rocks of the Piedmont (USGS, 2002, DOH, 2004a).

The semi-consolidated and unconsolidated sediments of the Coastal Plain Province are productive aquifers ("Potomac Aquifer"), with the Patapsco and Patuxent Formations the most productive (DOH, 2004a, USGS, 2002). The lower part of the Potomac Aquifer is an interstate confined aquifer which has supplied water to industry, agriculture, and the District's public for two centuries. The confining unit of the Potomac Aquifer consists of clay and sandy clay (DC VVMRC, 1992).

In contrast, the Piedmont Province (Crystalline-rock aquifers) has only a moderate extent of water bearing formations in limited areas where a mantle of weathered materials covers the rock, or within cracks and fissures (USGS, 2002, DOH, 2004a).

The water in the District's aquifer originates from precipitation. Approximately one quarter (10 inches) of the average annual precipitation (40 inches, based on data from 1951 through 1980) recharges the District's aquifer (DC VVMRC, 1992, USGS, 2002).

Although the District of Columbia obtains its drinking water entirely from the Potomac River, groundwater in the District is protected by D.C.'s Department of Health for beneficial uses, including surface water recharge, drinking water in other jurisdictions, and potential future use as a raw drinking water source. In order to guarantee the best protection of the groundwater in the District, DOH classified all ground waters as Class G1 until sufficient information is obtained to determine otherwise. Class G1 is groundwater that is highly vulnerable to contamination, located in recharge areas of drinking water aquifers of adjacent jurisdictions, hydrologically connected to surface waters of the District, or discharges to a sensitive ecological system that supports a unique habitat (DOH, 2003b).

Groundwater contamination is usually caused by human activity but can also be encountered naturally as a result of leaching from rocks and soils (Fetter, 1999). Groundwater contamination usually occurs when contaminated water from an ambient groundwater aquifer or the vadose zone (unsaturated zone located on top of the groundwater aquifer) penetrates through unconsolidated sediments and rocks such as fissures and fracture zones. The cause of contamination might be from point sources such as above and underground storage tanks, non-point sources such as pesticide application, or leaching from contaminants left behind from prior land uses, such as municipal solid waste disposal.

In the District, eleven major sources of potential groundwater contamination have been located, with eight listed on the CERCLIS list¹. No information on groundwater contamination at these sites is known yet, since they are currently being investigated (DOH, 2004a).

Based on sampling data collected from the Potomac River Basin Study Unit between 1992 and 1996, nitrate, dissolved solids, volatile organic compounds, and pesticides were detectable in the groundwater in

¹ The CERCLIS Database is the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) that contains information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation. The database includes sites that are on the National Priorities List (NPL) or being considered for the NPL.

the District. However, these parameters did not violate any established criterion. One observation was that radon, a noble gas considered to cause cancer, was found in 69 % of groundwater samples violating EPA's proposed standard in Federal Register, July 18, 1991 and November 2, 1999 (Ator *et al.*, 1998). Radon originates primarily from the decay of radium in metamorphic rocks and is highly volatile and therefore able to enter homes by water or vapor intrusion.

The elevated radon concentrations are mostly found in areas underlain by crystalline rocks of the Piedmont Province (Ator *et al.*, 1998, Fetter, 1999). The proposed standard, however, does not apply to systems receiving their drinking water from surface water, in which radon concentrations are low (EPA, 2000). In a more recent study in 2002, DOH and USGS conducted a groundwater assessment of the Lower Anacostia Watershed analyzing organics, metals, biochemical and chemical oxygen demand, and suspended solids. The results support the finding by Ator *et al.* (1998) that generally only low levels of dissolved contaminants are found in District groundwater (USGS, 2003, DOH, 2004a).

Changes in Impervious Surface Coverage

Imperviousness, or the amount of impervious surface cover, is an important indicator for predicting the impacts of land development on aquatic ecosystems. Studies have linked the amount of imperviousness to changes in the hydrology, habitat structure, water quality, and biodiversity of aquatic ecosystems. Increasing levels of imperviousness can change the hydrology of a receiving stream, increase runoff volume and rate, and decrease a receiving stream's capacity to handle floods.

For the purposes of this baseline study, impervious surface change in the District was estimated based on a comparison of remote sensing-derived impervious surface cover data layers for 1990 and 2000 (for methodology, see Jantz *et al.*, 2004). The data layers provide satellite imagery-derived estimates of the percent of impervious surface cover for every 30 by 30 meter square area (or 30 meter 'grid cells') across the District. To identify areas of impervious cover change, the degree of impervious surface cover estimated in 1990 was subtracted from impervious surface cover estimates from 2000 for each 30 meter grid cell. From this calculation, the total acreage of areas showing greater than 10% change in impervious surface cover was then tabulated (Table III.F-9). Figure III.F-3 shows the impervious surface cover data layer for 2000 for current reference.

Figure III.F-3: Impervious Surface Cover in the District

Estimated Percent Imperviousness in the District of Columbia (2000)

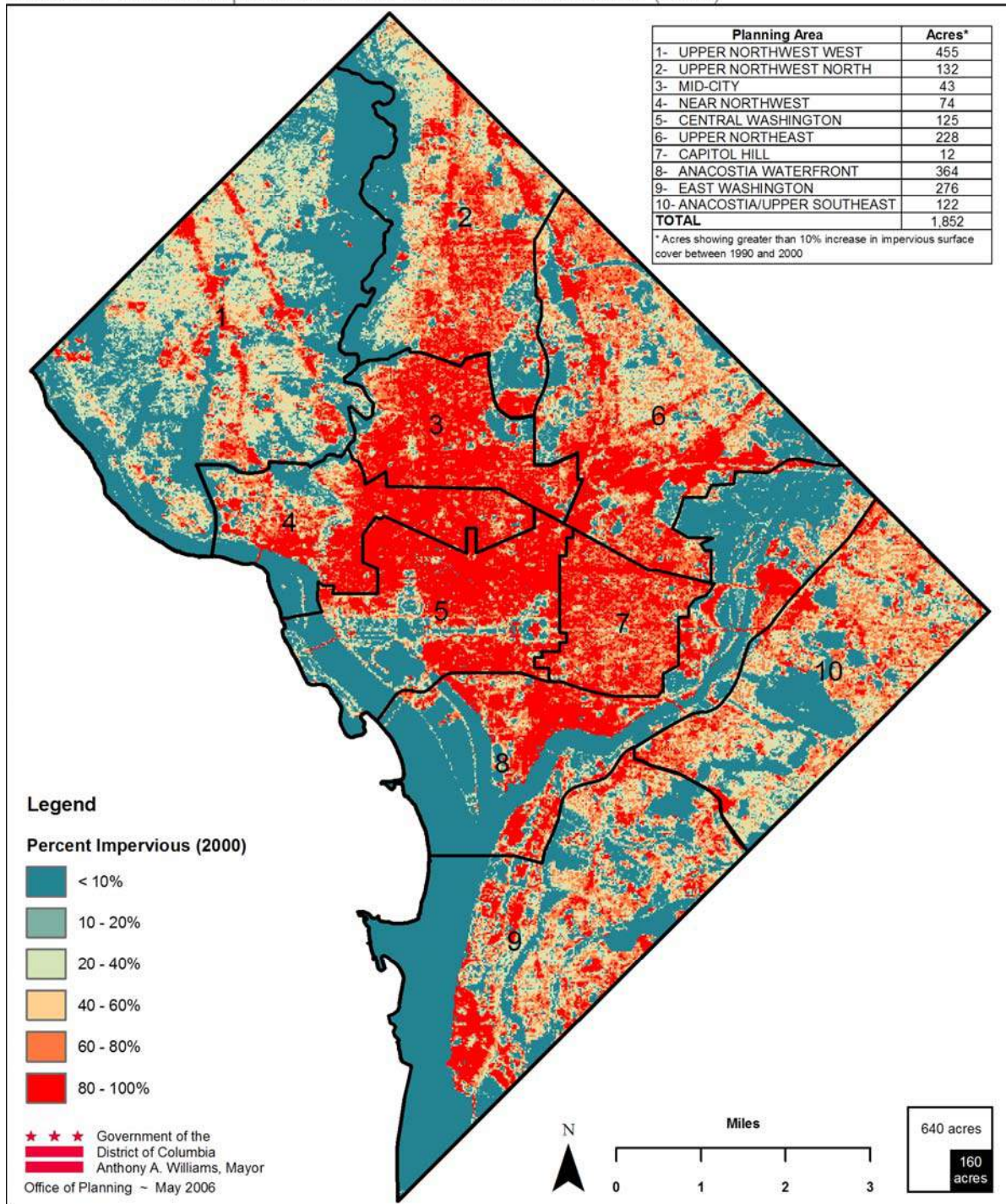


Table III.F-9: Impervious Surface Coverage and Relative Change, 1990-2000i

Planning Area	Acres	Change in Imperviousness (Acres)	Rate of Change in Level of Imperviousness (%)
1 - Upper Northwest-West	8092	455	5.6
2 - Upper Northwest-North	4556	132	2.9
3 - Mid-City	2069	43	2.1
4 - Near Northwest	2210	74	3.3
5 - Central Washington	2762	125	4.5
6 - Upper Northeast	5165	228	4.4
7 - Capitol Hill	1559	12	0.8
8 - Anacostia Waterfront	4059	384	9.5
9 - Anacostia and Upper Southeast	4709	276	5.9
10 - East Washington	4355	122	2.8
Total	39535	1851	4.7

Source: Louis Berger Group, 2006

The results of the analysis suggest that between 1990 and 2000, approximately 1,852 acres in the District have experienced an increase in impervious surface cover of more than 10 percent. This represents 4.7% of the District land area. The greatest increase occurred in the Anacostia Waterfront area where it is estimated that almost 10% of the land area experienced greater than a 10% increase in imperviousness (Table III.F-9). This increase is due to development in the Anacostia corridor including the Southeast Federal Center and Washington Navy Yard.

Trends

Continued urbanization and growth are inevitable in the Anacostia and Potomac watersheds. The likely increase in impervious surface suggests continued erosion of stream banks and additional pollution of the rivers from stormwater runoff. On the other hand, the impacts of urbanization have been mitigated during recent decades through collaborative efforts between the District, Maryland, and Virginia. These improvements have slowed the deterioration of water quality—although both the Anacostia and Potomac Rivers continue to be impaired. Both rivers cannot support fish and other wildlife populations and their submerged aquatic vegetation (SAV) continues to struggle.

Sedimentation continues to be a critical problem in the Chesapeake Bay. Over the last century, the net deposition of sediment that has entered the Maryland portion of the Bay was 155 million metric tons (USGS, 1996). A variety of factors influence increased sedimentation rates, including land use changes. These sedimentation rates have been disruptive to the Chesapeake and have clouded the water to the impairment of SAV.

Phosphorus concentrations in the Potomac River in the Washington D.C. area have decreased since the 1970s. Ammonia and organic nitrogen loadings have also decreased, and total nitrogen concentrations in the Potomac River have been stable since the mid 1980s. These improvements are likely due to

conservation measures such as the implementation of best management practices, improved wastewater treatment, goals for improving the Bay such as Chesapeake 2000, as well as a ban on phosphate detergents. Although many priority organic compounds such as chlordane or PCBs persist in the environment for long periods of time, many of these compounds are currently banned, and therefore no additional load associated with these chemicals should enter the Potomac River Basin.

Combined sewer overflows (CSOs) are currently the greatest source of pollutants within the District. However, the separation of many CSOs, the construction of storage tunnels, and the implementation of improvements and biological nutrient removal at the Blue Plains wastewater treatment plant have improved water quality conditions.

SIGNIFICANCE CRITERIA

A project's impact could be considered significant if its implementation would substantially degrade water quality, degrade or deplete groundwater resources, interfere with groundwater recharge, or contaminate a public water supply. A substantial increase in construction related erosion and sedimentation also could be considered significant.

IMPACTS AND MITIGATION MEASURES

DRINKING WATER IMPACTS

Impact F1: New development could affect the quality of drinking water if drinking water sources and conveyance systems are not appropriately managed. This is a less than significant impact due to established water supply protection and treatment programs and lead pipe replacement efforts.

Development consistent with the Comprehensive Plan is very unlikely to affect the public water supply, since water is piped in to the District through a reservoir, intake, and aqueduct system located outside of District boundaries. The risk of lead contamination (or other sources of contamination) to the distribution system attributable to the Comp Plan is similarly low. Lead pipes are no longer used in new construction, and are primarily associated with laterals from the street to existing development in older parts of the city. The Comp Plan would not place additional demand on these laterals, and in fact supports their replacement through collaborative WASA/ District efforts.

The following policies in the Draft Plan address this impact:

Policy E-4.5.1: Drinking Water Safety

Ensure the safety of the city's drinking water supply and distribution system. Maintain sustained efforts to reduce health hazards associated with lead and other contaminants.

Action E-4.5-A: Lead Pipe Testing and Replacement

Aggressively implement programs to test for lead, replace lead feeder pipes, and educate the community on safe drinking water issues and stagnant water control.

Action E-4.5-B: Source Water Protection

Implement measures to protect natural systems and abate pollution sources in the Potomac Basin that could potentially impact the District's drinking water quality.

Action E-4.5-C: Interagency Working Group

Create an interagency working group on safe drinking water to address drinking water emergencies; coordination between DCWASA and DOH, and expanded public education on water supply.

Action E-2.1-A: Leak Detection and Repair Program

Continue DC-WASA efforts to reduce water loss from leaking mains, including reducing the backlog of deferred maintenance, using audits and monitoring equipment to identify leaks, performing expeditious repair of leaks, and instructing customers on procedures for detecting and reporting leaks.

GROUNDWATER QUALITY

Impact F2. Future development consistent with the proposed Comp Plan could further degrade groundwater quality. This is a less than significant impact because of Comp Plan policies and actions which address this issue.

The additional development accommodated by the Comp Plan could include uses requiring underground storage tanks and the handling or storage of hazardous chemicals. In general, however, the Plan does not envision expansion of industrial uses or other uses that would present an elevated risk of groundwater contamination. The residential and commercial development accommodated by the Plan would include additional landscaped areas, some of which may be treated with herbicides, fertilizers, or pesticides. Such activities could pose a threat to groundwater.

The following policy is included in the Plan to address this hazard:

Policy E-4.2.5: Groundwater Protection

Protect Washington's groundwater from the adverse effects of urban uses. Contaminated groundwater should be investigated to determine whether long term monitoring or treatment is necessary or feasible. Future land uses and activities should be managed to minimize public exposure to groundwater hazards and reduce the likelihood of future contamination.

INCREASED VOLUMES OF RUNOFF

Impact F3: Development consistent with the Comp Plan could exacerbate water pollution by increasing the amount of impervious surface in the City, thereby leading to increased incidences of combined sewer overflow. This is a less than significant impact due to the Plan's emphasis on low impact development and green construction, and its direction that future development should occur on previously urbanized lands rather than on "greenfields" and erodible soils. Moreover, the Plan

would implement a number of water quality protection and improvement programs that are not currently in place, creating the potential for a positive environmental impact.

Some increase in paved surface area is possible as development consistent with the proposed Comp Plan occurs. This increase would not be substantially different than the increase that would occur under the existing Comp Plan—in fact, it might be less, since the proposed Plan directs growth to previously urbanized sites along corridors and in Central Washington, and designates most privately owned vacant land for “low” density residential use rather than “moderate” density use. The relative increase in impervious surface coverage is expected to be relatively small.

The Plan also includes policies and actions to reduce increases in impervious surface coverage. These are described in this Environmental Assessment under Impact E4, in Section III.E. In particular, Policy E-3.1.1 calls for increased use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. Policy E-3.1.2 calls for green roofs and tree planting as a way to reduce runoff.

NON-POINT SOURCE POLLUTION OF SURFACE WATERS

Impact F4. Development consistent with the Comp Plan could exacerbate non-point source pollution by increasing the number of people living and working within the District’s watersheds. The possibility of water pollution attributable to fertilizers, herbicides, oil, household chemicals, spills, and other sources could increase as population and employment grow, and as traffic volumes increase. The potential for this impact is mitigated to a less than significant level through policies and action programs in the Plan. In this regard, the environmental impacts of Plan adoption would be positive as most of these policies and actions are not included in the existing (1998) Plan.

The addition of 57,100 new homes and 125,000 jobs to an already urbanized watershed would create the potential for additional urban runoff, with attendant impacts on water quality. For example, the volume of herbicides and pesticides used could increase (since there will be a larger number of residents). A larger number of residents could also mean a higher probability of improper disposal of household chemicals, motor oil, and other water contaminants. Without mitigation, increased development near the Anacostia River could lead to additional urban runoff from streets, parking lots, and storm drainage systems, potentially increasing pollutant loads. Construction activities across the city could result in additional stream sedimentation, as soil is exposed to wind and rain. Improper management on construction sites could increase turbidity in local streams

The Plan mitigates these impacts through extensive and proactive direction on water quality improvements, including the implementation of TMDL standards and preparation of a citywide stormwater management plan. Among the policies specifically addressing urban runoff are:

Policy E-4.2.3: Control of Urban Runoff

Continue to implement water pollution control and “best management practice” measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands.

Policy E-4.2.6: Control of Illicit Discharges

Provide public outreach and education, and maintain inspection and enforcement procedures to control illicit discharges into the city’s storm drains and waterways.

Policy E-4.2.7: Regional Coordination

Promote planning at the watershed level, particularly cooperative efforts with Maryland to address existing pollution loads in the Anacostia River basin. Undertake similar efforts with jurisdictions in the Potomac watershed to address water quality in the Potomac River.

Policy IN-2.2.1: Improving Stormwater Management

Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process with clear lines of responsibility with regard to oversight, guidelines, and resources.

Policy E-3.1.3: Green Engineering

Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated.

Action E-3.1-A: Low Impact Development Criteria

Establish Low Impact Development criteria for new development, including provisions for expanded use of porous pavement, bioretention facilities, and green roofs. Also, explore the expanded use of impervious surface limits in the District’s Zoning Regulations to encourage the use of green roofs, porous pavement, and other means of reducing stormwater runoff.

Action E-3.1-C: Road Construction Standards

Explore changes to DDOT’s street, gutter, curb, sidewalk, and parking lot standards that would accommodate expanded use of porous pavement (and other low impact development methods) on sidewalks, road surfaces, and other paved surfaces, or that would otherwise aid in controlling or improving the quality of runoff.

Action E-4.2-E: TMDL Program Implementation

Implement Total Maximum Daily Load (TMDL) plans for the Potomac and Anacostia Rivers, Oxon Run, Watts Branch, Rock Creek, Kingman Lake, the Washington Channel, and other tributaries as required by the Clean Water Act. A TMDL sets the quantity of a pollutant that may be introduced into a water body. As a critical step in implementing these requirements, waste load allocations for individual sources or discharges (including city entities) into the municipal stormwater system should be assigned and the technologies and management practices to control stormwater should be identified.

Action E-4.2-A: Stormwater Management Plan

Create a comprehensive multi-agency stormwater management plan covering such topics as low impact development, (LID), maintenance of LID infrastructure, education, impervious surface regulations, fees, and water quality education. The plan should include output and outcome measures that achieve specific water quality standards and should propose fee levels that are sufficient to maintain an effective stormwater management program and encourage residents and businesses to reduce stormwater pollution.

Action E-4.2-B: Funding

Continue to aggressively lobby for funding for water quality improvements, including abatement of combined sewer overflow, removal of toxins, and Anacostia River clean-up. Seek additional funding from Maryland and Virginia and set incentive-based fee structures for DC residents.

Action E-4.2-C: Monitoring and Enforcement

Maintain a District water pollution control program that implements water quality standards, regulates land disturbing activities (to reduce sediment), monitors and inspects permitted facilities in the city, and comprehensively monitors DC waters to identify and stop violations. This program should be adequately staffed to carry out its mission and to implement innovative stormwater management programs. Other environmental programs, including underground storage tank regulation, contaminated site remediation, and pesticide control programs, must take groundwater impacts into account in their regulatory and enforcement activities

Action IN-2.2-B: Stormwater Management Responsibilities

Develop an integrated process to manage stormwater that enhances interagency communication and formally assigns responsibility and funding to manage stormwater drainage. This process should include:

- an appropriate funding mechanism to consistently maintain Clean Water standards and reduce surface runoff
- clear lines of responsibility with regard to which agency provides oversight, guidelines, and resources for the stormwater system and its management
- consistent and reliable funding source to maintain Clean Water standards and reduce surface water runoff
- assurance that stormwater improvements associated with new development are coordinated with the WASA Capital Improvement Plan.

Action E-4.2-D: Clean Water Education

Working with DC-WASA and the newly created DC Department of the Environment, increase public information, education, and outreach efforts on stormwater pollution. These efforts could include such measures as community clean-ups, storm drain stenciling, school curricula, demonstration projects, signage, and advertisement and media campaigns.

Most of these are new policies, not currently contained in the 1998 Plan.

POINT SOURCE POLLUTION IMPACTS

Impact F5. Without proper mitigation, development consistent with the Comp Plan could increase direct wastewater discharges to local waterways through a variety of sources, including the Blue Plains Wastewater Treatment Plant, combined sewer overflow outfall pipes, and houseboats. This is a less than significant impacts due to policies and actions in the proposed Plan which mitigate these impacts.

As noted in the Infrastructure section of this Assessment, development consistent with the Comp Plan could result in an additional 17-20 MGD of wastewater at the Blue Plains Treatment Plant. Although this wastewater receives a high level of treatment, it is ultimately discharged to the Potomac River. The possibility of direct sewage releases to the river as a result of inadequate collection system capacity (through Combined Sewer Flows) could increase as population and employment increase. Additionally, the Plan supports additional watercraft along the Anacostia River, and the continuation of marinas with live-aboards. If not properly managed and regulated, these communities could affect water quality through illegal dumping and sewage releases. The Plan also supports reconstruction of the bridges across the Anacostia; this could disturb toxic bottom sediments, which would impact water quality.

The Draft Plan includes extensive policy language to mitigate these impacts, including:

Policy IN-2.3.1: Reducing CSO Outfalls

Reduce the Combined Sewer Overflow (CSO) outfall to the region's rivers by implementing WASA's Long Term Control Plan (LTCP).

Policy E-4.2.2: Wastewater Treatment

Provide sustained capital investment in the District's wastewater treatment system in order to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment.

Policy IN-2.1.2: Investing In Our Wastewater Treatment Facilities

Provide sustained capital investment in the District's wastewater treatment system to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment.

Action IN-2.1-A: Wastewater Treatment Capital Improvements

Continue to implement wastewater treatment improvements as identified in the WASA CIP. These projects include the replacement of undersized, aging, or deteriorated sewers; the installation of sewers to serve areas of new development or changed development patterns; and pumping station force main replacement and rehabilitation. Capital projects are required to rehabilitate, upgrade or provide new facilities at Blue Plains to ensure that it can reliably meet its NPDES permit requirements and produce a consistent, highquality dewatered solids product for land application.

Policy E-4.2.4: Riverbed Sediment

Reduce the level of toxins in Anacostia and Potomac River sediment. Remediation measures should minimize the possibility of water contamination resulting from dredging or disturbances of the river bottom.

Action E-4.2-F: Houseboat Regulations

Improve regulation of houseboats and other floating structures in the Washington Channel, Anacostia River, and Potomac River to reduce water pollution.

Action E-4.2-G: Green Marinas

Promote the Green Marina Program of the Marine Environmental Education Foundation, encouraging boat clubs and marinas to voluntarily change their operating procedures to reduce pollution to District waters.

III.G AIR RESOURCES

This section of the Environmental Assessment describes the impact of the proposed Comp Plan on air quality in the District of Columbia. The analysis includes a summary of existing air quality conditions, a description of the impacts to air quality resulting from adoption of the Comp Plan, and measures to mitigate any potentially significant impacts.

SETTING

Regulatory Framework

Air resources in the District are regulated at the federal, regional, and local level. These regulations create the framework within which the District must operate for its planning efforts. The EPA defines ambient air in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.”

Federal

At the federal level, air emissions in the District are regulated by the 1970 Clean Air Act (CAA) and the 1977 and 1990 Clean Air Act Amendments (CAAA). In compliance with the CAA and the CAAA, the EPA has promulgated ambient air quality standards and regulations, known as National Ambient Air Quality Standards (NAAQS). These standards were established for the protection of public health in order to allow for an adequate margin of safety for six criteria pollutants. To date, the EPA has issued NAAQS for carbon monoxide (CO), sulfur dioxide (SO₂), particles with a diameter less than or equal to a nominal 10 micrometers (PM₁₀), ozone (O₃), nitrogen dioxide (NO₂), and lead (Pb). The EPA promulgated a standard for fine particulates (PM_{2.5}) in April 2005; however, PM_{2.5} *de minimis* thresholds are not yet finalized and federal actions with conformity determinations prior to April 2006 will be grandfathered from these requirements.

Areas that do not meet NAAQS are called non-attainment areas, indicating that the pollutant has reached levels determined to have adverse effects on human health. When a state is in non-attainment for a pollutant, it must create a State Implementation Plan (SIP) that demonstrates how it plans to come into attainment.

Under the NAAQS, primary and secondary standards are designated for each pollutant. Primary standards are designed to protect sensitive populations such as children and the elderly from adverse health effects due to exposure to the pollutant. Secondary standards are designed to protect the environment, both natural and manmade, from known adverse effects from a pollutant.

In 1997, the NAAQS were revised and more stringent standards were created for both ozone and particulate matter. Ozone had previously been held to a one hour standard of 0.12 parts per million (ppm). Under these revisions, the EPA supplanted the one hour standard with an 8 hour standard of 0.08 ppm. Additionally, the PM₁₀ standards were left in place but 24 hour and annual standards were created for PM_{2.5} at 65 and 15 micrograms per cubic meter, respectively. The new standards were challenged in the courts but as of February 2001, the Supreme Court upheld the EPA's authority to set the national ambient air quality standards. Table III.G-1 provides the NAAQS set forth by EPA. The DC standards for these pollutants are identical, except no secondary standard has been established for PM_{2.5}.

Table III.G-1: Federal Ambient Air Quality Standards

Pollutant	Primary	Secondary
Carbon Monoxide (CO)		
1-hour Average	35 ppm	--
8-hour Average	9 ppm	--
Sulfur Dioxide (SO₂)		
3-hour Average	--	1300 µg/m ³
24-hour Average	365 µg/m ³	--
Annual Arithmetic Mean	80 µg/m ³	--
Particulates (PM₁₀)		
24-hour	150 µg/m ³	--
Annual Geometric Mean	50 µg/m ³	50 µg/m ³
Particulates (PM_{2.5})*		
24-hour	65 µg/m ³	--
Annual Geometric Mean	15 µg/m ³	15 µg/m ³
Ozone (O₃)		
1-hour Average	0.12 ppm	0.12 ppm
8-hour Average**	0.08 ppm	0.08 ppm
Nitrogen Dioxide (NO₂)		
Annual Arithmetic Mean	100 µg/m ³	100 µg/m ³
Lead (Pb)		
Quarterly Average	1.5 µg/m ³	1.5 µg/m ³
Notes: ppm = parts per million µg/m ³ = micrograms per cubic meter Annual Standards never to be exceeded; short-standards not to be exceeded more than once a year. *: Standards attained when the highest 99 th percentile of 24-hour concentration over 3 years is below 65 µg/m ³ **: Standards attained when the 3-year average of 4 th -highest maximum 8-hour concentration is below 0.08 ppm Source: 40 CFR 50, July 1991, revised July 1997 and march 26, 2002 EPA Announcement, Ambient Air Quality Standards.		

Source: Louis Berger Group, 2006

Regional

Recognizing that air quality is a regional resource, the Metropolitan Washington Council of Governments (MWCOG) has been established as the agency responsible for coordinating air quality planning initiatives. As part of this responsibility, elected officials of the MWCOG member jurisdictions make up the Metropolitan Washington Air Quality Committee (MWAQC). This committee is certified by the Mayor of the District of Columbia and the governors of Maryland and Virginia to prepare an air quality plan for the DC-MD-VA Metropolitan Statistical Area under Section 174 of the CAAA. Other members of the committee include the air management and transportation directors of the District of Columbia, Maryland, and Virginia; members of the Maryland and Virginia General Assemblies; and the chair of the Transportation Planning Board.

A primary purpose of the committee is to coordinate air quality planning activities among MWCOG, other external committees, and the Transportation Planning Board; review policies; resolve policy differences; and adopts an air quality plan for transmittal to the District, Maryland, and Virginia. As part of a greater regional air basin, the District must work within this regional framework.

Another regional air quality entity is the Interstate Air Quality Council (IAQC). The IAQC was established in 2005 by the Mayor of the District of Columbia and the Governors of the State of Maryland and the Commonwealth of Virginia. The Council, comprised of six secretaries of the Environment and Transportation from Maryland, Virginia, and the District, will review and improve the regional air quality planning process to ensure that the jurisdictions effectively meet new federal standards for ozone and fine particulates. Maryland will chair the council (Ehrlich, 2005).

In addition to COG and the IAQC, the Ozone Transport Commission (OTC) is a multi-state organization created under the Clean Air Act (CAA) responsible for advising the EPA on transport issues and for developing and implementing regional solutions to the ground-level ozone problem in the Northeast and Mid-Atlantic regions (OTC, 2004).

Local

Within the District, the Department of Health's (DOH) Air Quality Division is responsible for monitoring source and criteria pollutants in order to maintain compliance with the CAA and issuing permits to facilities within the District. Daily monitoring results are submitted to the EPA on a monthly basis, and daily measurements taken each morning and afternoon are provided to MWCOG to determine the area's daily Air Quality Index (AQI), or level of air quality.

The MWCOG index creates a uniform regional system of ambient air quality measure. In addition to daily air quality monitoring, DOH also has permitting responsibilities for air quality pollutant sources. For stationary source pollutants, each source must submit a written report stating all names and amounts of chemicals used. For sources that emit over 25 tons a year of a criteria air pollutant, records must be

submitted annually stating pertinent operating information, emissions, methods for obtaining emissions, a statement of accuracy, and the control equipment currently in use.

Overview of Criteria Pollutants

Ozone

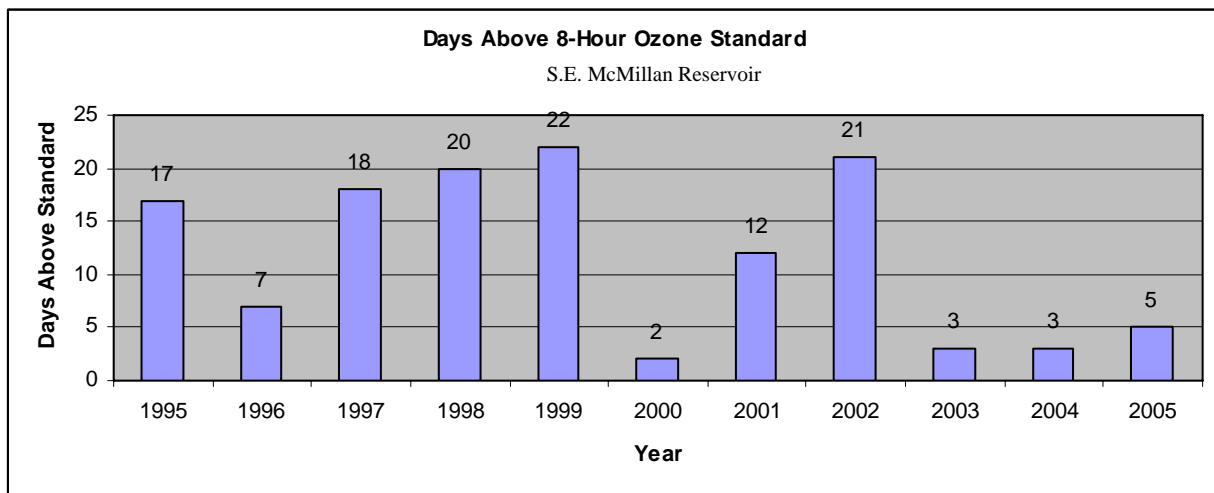
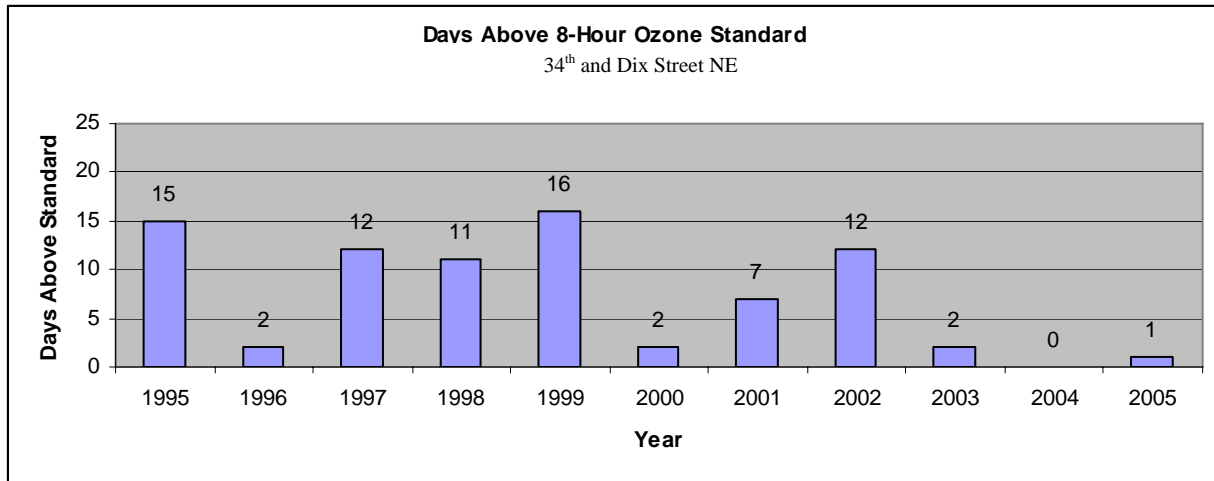
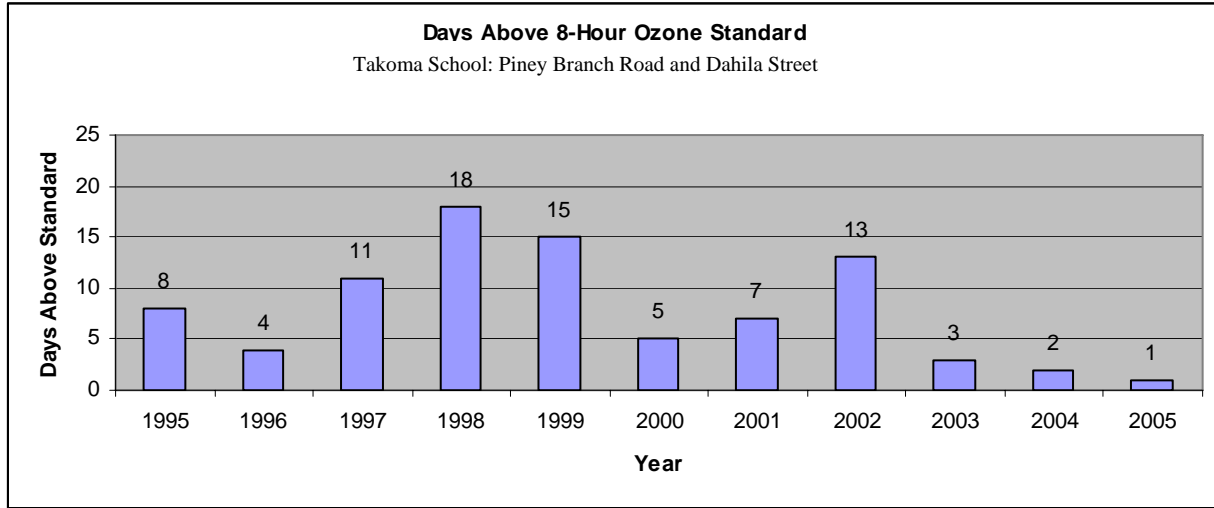
There are two types of ozone, stratospheric (upper-level) and tropospheric (lower level). Upper level ozone protects the earth by preventing harmful UV rays from entering the atmosphere and does not constitute a risk to human health. In terms of the CAA and the NAAQS, the ozone discussed is lower level ozone, which is harmful to human health. Lower level ozone is formed when volatile organic compounds (VOCs) and NO₂ combine and react with heat in the troposphere. VOCs and NO₂ are created by stationary sources, such as power plants. These stationary sources are issued permits for NO₂ and VOCs to regulate emission levels (Table III.G-2). Figure III.G-1 shows the number of days above the 8-hour ozone standard at three monitoring stations in the District from 1995 to 2005.

The main contributors to NO₂ and VOC emissions in the District are vehicles and industrial utilities. For 2005, the American Lung Association rated the District as an F with 36 days above the 8 hour standard for the summer months, when ozone is at its worst (ALA, 2005). Overall, in 1999 the District emitted fewer ozone precursors than other cities in the northeast region, such as New York and Philadelphia, but experienced more days above the 8 hour standard.

Table III.G-2: 2003 Emissions of NO_x, CO, NMVOCs, and SO₂

Activity	NO _x	CO	NMVOCs	SO ₂
Stationary Fossil Fuel Combustion	7,222	4,454	1,007	12,477
Mobile Fossil Fuel Combustion 45 G St. NW	10,418	75,526	6,351	634
Industrial Processes	648	2,431	1,711	1,029
Solvent Use	4	65	4,138	2
Waste	2	8	125	1
<i>Sources: EPA, Greenhouse Gas Emissions Inventory- 2005</i>				

Figure III.G-1: Number of Days Above 8-Hr Ozone Standard at DC Air Quality Sampling Stations



Source: Louis Berger Group, 2006

In addition to stationary sources that can be controlled and regulated at the local level, ozone is also transported into the District from other areas of the county by a change in air flows during the summer months. Wind action known as a Bermuda High begins south of the District and creates a large clockwise air formation that flows up towards Ohio. Once reaching the Ohio area, the clockwise motion continues and air pollution from Ohio River Valley power plants is carried into the DC region. Air pollution sources that come from outside the DC region, but contribute to the air quality are studied by the University of Maryland. The University monitors ozone transport into the area and has measured as much as 0.11 ppm of ozone floating in from the west at any one time. That level is nearly the entire 1-hour standard of 0.12 ppm and is above the 8 hour standard of 0.08 ppm (MDE, 2004).

At the local level, emissions of NO₂ and VOC in the District are regulated by a regional SIP in order to come into attainment for both ozone standards. The revised *Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan* (“Severe Area SIP”) for Washington, DC-MD-VA Ozone Nonattainment Area focuses on improving air quality in the Washington region to meet the national air quality standard.

Carbon Monoxide

Carbon Monoxide levels in the region have been declining since 1990. The District used to be in non-attainment for this pollutant, but now all of the monitors in the area register at levels below the standard. Carbon Monoxide levels are below the health standards for all monitors in the region and are expected to stay below regulatory levels.

Sulfur Dioxide

Sulfur Dioxide levels are low within the DC metro area and continue to decline. During the entire analysis period, the levels of SO₂ never exceeded the NAAQS standard, and in most recent years was as low as ¼ of the standard. It is expected that SO₂ levels will remain low in future years and stay below regulatory levels.

Nitrogen Dioxide

MWCOG found that NO₂ held no trend throughout the study period from 1993 to 2003. The levels were neither increasing or decreasing, and the highest values at the monitors were still all well below the standards. MWCOG believes that NO₂ will continue to remain in attainment for the region and stay below regulatory levels.

Particulate Matter

Particulate matter is any solid or liquid that exists in a finely divided form. Health effects associated with particular matter emissions include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems. The NAAQS regulate the

larger PM₁₀ and the newly added PM_{2.5}. PM_{2.5} standards were created in 1997 and include dust and soot. The main sources of PM are diesel combustion, dust particles, and construction. As of 2002, the District is in non-attainment for PM_{2.5}.

While there have been NAAQS standard for PM_{2.5} since 1997, recent events have changed how these standards are applied and interpreted. When first promulgated, these new standards were challenged by many state and business groups. In 2001, the Supreme Court upheld EPA's authority under the CAA to set NAAQS that protect the public from harmful effects of air pollution. In March 2002, the DC Circuit Court rejected all remaining legal challenges to EPA's 1997 ambient air quality standards for PM-2.5. Designations for non-attainment for this pollutant, such as found in the District, became effective in April 2005.

On September 8, 2005, EPA proposed requirements that state and local governments have to meet as they implement the new standard. This proposed rule is the next step toward improving particle pollution air quality for millions of Americans. States must meet the PM 2.5 standard by 2010. However, in their 2008 implementation plans, states may propose an attainment date extension for up to five years. Those areas for which EPA approves an extension must achieve clean air as soon as possible, but no later than 2015. The District will need to incorporate these new standards in future air quality planning.

The EPA is finalizing the criteria for determining which transportation projects must undergo a local air quality analysis (i.e., a "hot-spot analysis") as part of conformity determinations in areas not meeting PM_{2.5} air quality standards. A "hot-spot analysis" is an estimation of pollutant concentrations in a localized area resulting from the use or operation of a transportation project, and a comparison of those concentrations to the National Ambient Air Quality Standards (NAAQS). The proposed changes are to lower the 24 hour standard for PM 2.5 from 65 ug/m³ to 35 ug/m³. This final rule also streamlines existing hot-spot requirements in PM₁₀ areas lowering the PM₁₀ 24 hour standard from 150 ug/m³ to 70 ug/m³.

Lead

All monitors in the area are well below the regulatory levels for lead, a fact that has been a result of lead being removed from gasoline. Lead levels should remain well within the standard in the future and below the regulatory level.

Existing Air Emission Sources

Although not all sources of air pollution can be easily regulated or controlled, the District is able to regulate mobile and non-mobile sources at the local level in an attempt to influence air quality. The NAAQS breaks down air pollution sources into two categories: stationary and mobile.

Stationary Sources

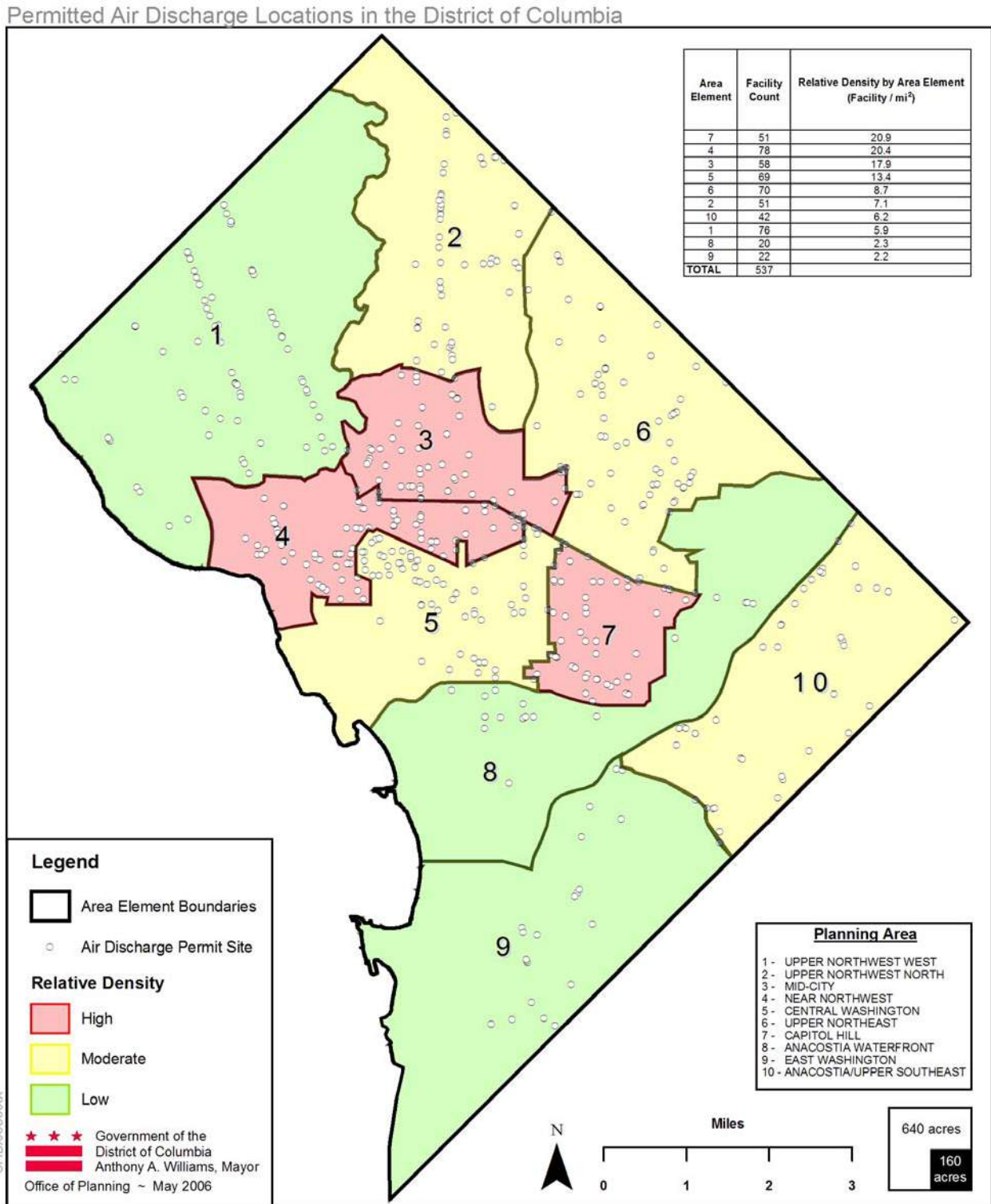
Within the stationary sources, pollution sources are again categorized as either a small or large stationary source. As of October 2005, a total of 564 stationary sources were permitted or regulated by the CAA within the District (EPA, 2005). Of these sources, 554 were designated as small stationary, such as dry cleaners or gas stations, and remaining ten as large stationary sources. These 10 sources emit above the reporting threshold and therefore have to monitor and report their emissions annually to the EPA. Sources of emissions are shown in Figure III.G-2. The EPA has data from 1999 detailing the amount of pollution generated by the large stationary sources, as shown in Table III.G-3.

Table III.G-3: Large Facility Emissions Data

Facility Name	Facility ID	NOx Emissions	VOC Emissions	PM 2.5 Emissions	Total Emissions
U.S. Soldiers and Airmen's Home	11001-0011	NA	NA	NA	0.032
U.S. Government Printing Office*	11001-7347879	NR	145,442	NR	NR
U.S. Bureau of Engraving and Printing*	11001-00134	NR	251,760	NR	NR
St. Elizabeth's Hospital	11001-0009	42	0.54	3.16	277
PEPCO Buzzard Point Generating Station	11001-0040	101	7.08	9.47	302
PEPCO Benning Road Generating Station	11001-0001	447	13	28	1,197
Howard University	11001-0022	NA	NA	NA	1.55
GSA West Heating Plant	11001-0024	NA	NA	NA	0.39
GSA Central Heating Plant	11001-0025	247	1.6	42	345
Georgetown University Power Plant*	11001-00059	NR	2381	NR	NR
Capitol Power Plant	11001-0006	329	1.74	131	1,247

Sources: EPA, 2005, *AIRS/AFS Database, 1996
 Notes: NA = Not applicable, emission not produced
 Totals include all emissions (NOx, VOC, CO, SO₂, PM₁₀, PM_{2.5}, NH₃)
 NR- Not reported

Figure III.G-2: Permitted Air Discharge Locations in the District of Columbia



According to the EPA AIR Data database, as of 2003, the large stationary sources were in compliance with all regulations with the exception of Howard University and the GSA Central Heating Plant. The two US printing sources only emit VOCs and no other criteria pollutants above the reporting threshold. They account for almost all VOC emissions in the district, emitting 397,202 pounds per year (lbs/yr) out of the District's total of 433,605 lbs/yr. The major sources of PM (monitored as total suspended particles, TSP) are the Benning Road PEPCO plant, St. Elizabeth's Hospital, and the US Soldiers and Airmen's Home. The Benning Road PEPCO Plant and St. Elizabeth's Hospital were also major sources of SO₂. Capitol Power Plant is the only large stationary source that emits a large amount of CO, at 159,215 lbs/yr. The Benning Road power plant is second for CO emissions at only 90,390 lbs/yr. (Versar, Inc., 1997).

Mobile Sources

The EPA's 2005 Greenhouse Gas Emissions Inventory states that transportation activities accounted for 32 percent of CO₂ emissions from fossil fuel combustion in 2003. Over 60 percent of the emissions resulted from gasoline consumption for personal vehicle use. The remaining emissions came from other transportation activities including the combustion of diesel fuel in large heavy-duty vehicles and jet fuel.

The primary criteria pollutants associated with mobile sources, such as vehicles, are CO and the ozone precursors, VOCs and NO_x. Mobile source combustion was the second largest source of NO₂ emissions in the US between 1990 and 2003. During that period, numerous control technologies were being implemented to reduce the CO, NO_x, NMVOC, and CH₄ emissions. While the goal was a net reduction of harmful emissions, the additional industrial processes required to mitigate the emissions actually generated a 26 percent increase in NO₂ emissions 1990 and 1998 (EPA, 2005) (Table III.G-4). However, since 1998 new control technologies have resulted in a steady decline in NO₂ from mobile sources.

Table III.G-4: Mobile Source Emissions

Mobile Fossil Fuel Combustion	1991	1998	2000	2003
NO _x Emissions	12,134	11,592	10,823	10,418
CO 45 G St. NW	119,482	87,940	83,680	75,526
NMVOCs 14th St. & C St. SW	10,933	7,742	7,230	6,351
SO ₂	793	665	632	634
Sources: EPA, Greenhouse Gas Emissions Inventory- 2005				

In the DC area it has been estimated that approximately one quarter of all person trips involve travel to and from work. According to the 2000 Census, nearly 2.4 million workers live in the Washington region, up from 2.2 million in 1990. The majority of DC area drivers commute to work alone, a number that rose from 60% in 1990 to 67% in 2000 (COG, 2004). This upward trend in population and work force is expected to continue in the District and surrounding areas, making mobile sources a concern for future air management planning.

In addition to daily commuters, the District and the surrounding area contain many highways that are used for the transportation of goods. Trucks represent between 3 percent and 8 percent of the traffic on most of the major routes in the Washington area. On the southern portion of I-495/I-95, however, between 12 and 15 percent of the traffic is comprised of trucks (COG, 2004). Diesel trucks emit a large amount of PM_{2.5}.

The EPA categorized the District's total emissions by source category with 1999 data and for CO. This study showed that mobile sources account for nearly 94 percent of the District's total emissions. Vehicles were found to account for 77 percent of all NO_x emissions and 46 percent of all VOC emissions. CO emissions tend to affect health and environment on a local scale while ozone, as already stated, impacts surroundings on a regional level (EPA, 2005).

Health Issues

Potentially negative health effects associated with poor air quality are decreased lung function, respiratory disease, and cancer. A strong correlation has been found between air quality and asthma rates. The groups at-risk for asthma are children, the elderly, and those who have a pre-existing respiratory condition.

Asthma

According to the American Lung Association (ALA), out of a population of 564,353 in the District, there were 9,225 cases of pediatric asthma and 35,784 cases of adult asthma in 2005. In 2003, there were 6,359 cases of pediatric asthma and 33,828 cases of adult asthma with a total population of 572,059. Both categories of asthma grew with pediatric asthma increasing by over 33 percent.

The ALA also produces an annual report of the high ozone days in the District. The days are designated as Yellow, Red, Orange, or Purple. Yellow days are when ozone is at a level that may be unhealthy for unusually sensitive groups at 0.085-0.104 ppm. Orange days are when ozone is at an unhealthy level for sensitive groups at 0.085-0.104 ppm. Code red days are when ozone is unhealthy for the general public at a level of 0.105-0.124 ppm, and code purple days are very unhealthy with levels of 0.125-0.374 ppm of ozone. According to the ALA, in 2003, the District had 35 orange days and 4 red days. In 2005, the

District recorded only 25 orange days, but 10 red days and 1 purple day¹. While the total number of high ozone days has decreased since 2003, the ozone intensity levels and the rate of pediatric asthma have increased.

Trends for asthma are expected to increase as long as the levels of ozone remain high. The Ozone Transport Commission is working on decreasing ozone precursors in the northeast region, and therefore decreasing the levels in the District. The District's SIP states how the area will reduce VOCs and NOx in order to decrease levels of ozone, which should impact this trend.

Indoor Air Quality Issues

Indoor air pollution is an important aspect of air quality management in the District. The NAAQS do not account for indoor air pollutants and, on the whole, they are unregulated. The sources of indoor air pollutants are materials found within the home, off-gassing from objects like carpets or pressed wood and cleaning products, radon, mold, carbon monoxide from boilers and furnaces, fibers and irritants, and smoke from cigarettes and other tobacco products. In addition to these sources, poor ventilation adds to the problem of indoor air pollution by not allowing air to circulate or by dispersing contaminants throughout the building. The health effects of poor indoor air quality can range from short-term, easily treatable effects such as dizziness, nausea, and rashes, to long-term, serious effects such as lung cancer, and heart or respiratory disease, including asthma.

Two of the most common indoor air pollutants that are present in the District are radon and mold. Radon is a naturally occurring, toxic, colorless gas that is a result of the breakdown of the radioactive radium. Radon is found naturally in soil and rock beneath homes, in well water, and is also present in building materials. While there are no immediate symptoms felt from radon exposure, it is a known carcinogen. Radon is the only regulated indoor air pollutant with an indoor action level of 4 picocuries per liter (pCi/L) set by the EPA. The average level of radon in buildings is 1.3 pCi/L while the average outdoor level of radon is 0.4 pCi/L. (EPA,2005)

The DOH-EHA's Radon Program has educated and informed the public on radon issues over the past ten years. Outreach activities include interacting with District residents across the city to provide radon information, literature, and test kits for those who desire to test their homes. Community events such as the Latino Festival, the Black Family Reunion, the Black Caucus, the Greater Southeast Hospital Health Fair, the Ward 8 Community Health Fair, the NBC4 Your Health and Fitness Expo, and Adams Morgan Day all provide opportunities to disseminate radon information. Free radon tests kits are offered by EHA so that District residents can test radon levels in their homes. When results from these test kits are available, the EHA enters them into a database that includes the name of the event where the test kit was

¹ MWCOG's Air Quality Index for 2005 shows 45 yellow days (0.-66-0.085 ppm) and 19 orange days (0.086-0.100 ppm)

disbursed, the name of the recipient, address, type of home (single family residence detached, semi-detached, row house or apartment), telephone number, test kit number, and test kit results.

Mold, a common indoor air pollutant, is produced when spores that are carried in the air land in a damp area and grow and spread. Excessive moisture results in the spread of mold in homes, especially when moisture levels are allowed to remain high for a long period of time. It is very difficult to eliminate mold from an indoor environment but it can be limited through moisture control. Inhalation of molds can cause adverse health effects in sensitive populations, including the young and elderly, such as nasal stuffiness, eye or skin irritation, or wheezing. Additionally, people severely allergic to mold may have severe reactions. Such reactions, such as fever or shortness of breath, may also occur in the workplace in a case such as an office worker working in a building where the roof, windows, or pipes are in poor repair and leaking. For people with pre-existing chronic lung illness, mold infections in the lungs are a possible health effect from mold exposure. EHA provides public information on mold issues, such as informing homeowners of actions to take after their home has been flooded to avoid mold formation. EHA also provides technical support to the Department of Consumer and Regulatory Affairs, which is responsible for enforcing housing and building codes.

In January 2006, the DC Council passed the Smoke Free Bill (16-293). This legislation applies immediately to all restaurant seating areas and would be extended to bars, nightclubs, taverns and the bar areas of restaurants in January 2007.

Summary and Trends

The District of Columbia is currently in non-attainment for ozone and $PM_{2.5}$. For ozone, the District is classified as severe non-attainment for the one-hour standard and moderate for the 8-hour standard. The District is also classified as a carbon monoxide (CO) maintenance area, having moved from non-attainment to attainment. The District is in attainment for NO_2 , SO_2 , lead, and PM_{10} . Tables III.G-5 and III.G-6 show the four highest records of exceedence of the NAAQS for ozone and $PM_{2.5}$.

MWCOG's Air Quality Trend Analysis from 1993 to 2003 details the trends per air pollutant for the District. The study includes parts of Virginia and Maryland as well as DC, and provides the overall trend for this regional resource. This report found that, in general, regional air quality is improving. The Washington metropolitan area meets the minimum federal health standards for four of the six criteria pollutants.

Overall, ozone is decreasing, with a total of three days above the one hour standard in 2003, as opposed to 8 days above the standard in 1993. Days above the standard are calculated when any monitor within the region has a reading above the 0.120 ppm level. The days above the 8 hour standard show a slight downward trend however there is no clear trend for a continued decrease. Between 1997 through 1999, the numbers for days exceeding the 8 hour standard experienced a large peak. Factors such as unusually warm weather may have contributed to this spike.

These trends indicate that ozone levels will continue decreasing, more for the one-hour standard than the 8 hour standard; however, trends are difficult to predict because of outside influences such as metrological conditions. Temperatures above 85 degrees Fahrenheit, light winds, and stationary high pressure systems contribute to the formation of ozone and are a factor that will influence future ozone levels (MWCOG, 2004).

Table III.G-5: Ozone Monitor Values, 2005

1 hour values	Monitor Location	1 st max value	2 nd max value	3 rd max value	4 th max value	Days Above Std.
	Takoma Sch. Piney Branch Rd & Dahlia St	0.105 ppm	0.101 ppm	0.097 ppm	0.094 ppm	0
	34 th & Dix St, N.E.	0.105 ppm	0.099 ppm	0.099 ppm	0.098 ppm	0
	S.E. End Mcmillian Reservoir	0.109 ppm	0.108 ppm	0.103 ppm	0.101 ppm	0
8 hour values	Takoma Sch. Piney Branch Rd & Dahlia St	0.087 ppm	0.084 ppm	0.082 ppm	0.077 ppm	1
	34 th & Dix St, N.E.	0.089 ppm	0.082 ppm	0.082 ppm	0.081 ppm	1
	S.E. Mcmillian Reservoir	0.093 ppm	0.088 ppm	0.087 ppm	0.086 ppm	5

Source: EPA, 2005

Table III.G-6: PM2.5 Monitor Values, 2005

	Monitor Location	1 st max value	2 nd Max value	3 rd Max Value	4 th Max Value	98 th percentile	Mean	Exceeded standard?
24 hour values	34 th & Dix St, N.E.	29 µg/m3	26 µg/m3	24 µg/m3	23 µg/m3	29 µg/m3	--	No
	34 th & Dix St, N.E.	35 µg/m3	35 µg/m3	34 µg/m3	33 µg/m3	34 µg/m3	--	No
	Park Services Office 1100 Ohio Dr	36 µg/m3	33 µg/m3	33 µg/m3	29 µg/m3	33 µg/m3	--	No
	S.E. End McMillan Reservoir	36 µg/m3	35 µg/m3	34 µg/m3	33 µg/m3	33 µg/m3	--	No
Annual Values	34 th & Dix St, N.E.	--	--	--	--	--	12.4	No
	34 th & Dix St, N.E.	--	--	--	--	--	16.8	Yes
	Park Services Office 1100 Ohio Dr	--	--	--	--	--	16.5	Yes
	S.E. End McMillan Reservoir	--	--	--	--	--	16.1	Yes

Source: U.S. EPA, 2005.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant impact if it violated ambient air quality standards, contributed substantially to an existing or projected air quality violation, created objectionable odors affecting a substantial number of people, or exposed sensitive receptors to substantial air pollution concentrations.

IMPACTS AND MITIGATION MEASURES

CONSTRUCTION IMPACTS

Impact G1. Development consistent with the Comprehensive Plan could result in construction-related air quality impacts. The potential for this impact is less than significant. In addition to DOE and DCRA regulations on construction, the Comp Plan's policies ensure that construction controls are enforced to reduce airborne dust.

By facilitating additional construction in the District, the Plan could create the potential for additional airborne dust and dirt, exhaust from construction vehicles and equipment, and odors from paints, solvents, and other materials used in building construction. Short-term increases in particulate matter could occur in and around construction sites. The impacts could affect sensitive receptors such as schools or nursing homes.

Policy E-4.1.3 requires new development to include "construction controls to reduce airborne dust", while other policies and actions include provisions to address construction-related air quality impacts. Relevant policies are listed below:

Policy E-4.1.3: Evaluating Development Impacts On Air Quality

Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants.

Policy E-4.1.7: Best Available Control Technology

Encourage the use of best available control technology for minor sources of air pollution such as boilers, generators, and construction and maintenance equipment.

Policy E-3.4.4: Monitoring of Operational and Construction Impacts

Strengthen District government programs that monitor and resolve air pollution, water pollution, noise, soil contamination, dust, vibration, and other environmental impacts resulting from commercial uses, industrial uses, trucking, construction activities, and other activities around the city that could potentially degrade environmental quality.

LONG-TERM AIR QUALITY IMPACTS

Impact G2. The Comp Plan permits continued development in an air basin that does not meet federal standards for a number of criteria pollutants. Future traffic generated by this development could exacerbate existing air quality problems and contribute to further exceedances of air quality standards. This could lead to additional human health problems, and further concentration of greenhouse gases in the local atmosphere. These impacts are substantially mitigated by Plan policies to reduce reliance on single passenger autos by improving non-auto travel modes and encouraging growth in areas where auto travel is not a necessity. However, these measures alone may not fully offset land use and transportation decisions that are being made in Maryland and Virginia which are exacerbating regional air quality problems.

The Draft Comp Plan includes numerous provisions to reduce Vehicle Miles Traveled (“VMT”), thereby reducing potential air quality impacts. It balances jobs and housing to a far greater degree than the existing Plan, creating a mechanism to reduce interstate commuting. It includes programs to link DC residents to local jobs, thereby reducing the need for residents to commute out of the city to suburban edge cities. It emphasizes growth Downtown, along corridors, and around transit stations—all areas with transit service—thereby minimizing the necessity of auto ownership. It emphasizes transit improvements that will help residents travel to and around the city without a car. It calls for substantial pedestrian and bicycle improvements. It encourages tree planting to absorb carbon monoxide and other air contaminants. And it promotes transportation systems management measures to reduce idling and improve the efficiency of the local road network.

Ultimately, however, the Plan would allow continued growth in a region that is in non-attainment for federal ozone and fine particulate matter standards. Given the absence of regional government and fully coordinated interstate land use and transportation decisions, the District’s environmentally progressive efforts to improve air quality may still be compromised by the decisions of suburban jurisdictions to locate jobs and housing in areas where driving is a necessity.

In addition, the transportation analysis for the Comp Plan determined that several road segments will move from “at” capacity to “over” capacity during the 20 years following Plan implementation. As traffic congestion on these segments increases, there may be localized increases in CO levels. Some of these areas are planned for housing, potentially exposing future residents to high CO levels.

The Plan includes the following policies to reduce and mitigate air quality impacts:

Policy E-4.1.1: Attaining Air Quality Standards

Continue to undertake programs and initiatives that move the region closer to attaining and maintaining federal air quality standards. Expand these programs as feasible to incorporate new technology and to reflect best practices around the country.

Policy E-4.1.4: Stationary Sources

Maintain controls on gaseous and particulate emissions from stationary sources of air pollution in the city, such as power plants and refrigeration plants. Particular attention should be given to monitoring the air quality impacts of local power plants, which are the largest stationary sources of air pollution in the District.

Action E-4.1-A: State Implementation Plan (SIP)

Cooperate with appropriate state, regional and federal agencies to carry out the federally-mandated State Implementation Plan (SIP) in order to attain federal standards for ground level ozone and fine particulate matter by 2010.

Policy E-4.1.2: Regional Planning

Recognize that air quality is a regional issue that requires multi-jurisdictional strategies and solutions. Accordingly, work with surrounding cities, counties, states, the federal government, and appropriate regional organizations to more effectively conduct air quality planning.

Action E-4.1-D: Air Quality Monitoring

Continue to operate a system of air quality monitors around the District, and take corrective actions in the event the monitors exceed federal standards.

Action E-4.1-B: Control of Bus Emissions

Collaborate with WMATA and local tour bus operators to reduce diesel bus emissions through the acquisition and use of clean fuel transit vehicles.

Action E-4.1-C: Motor Vehicle Inspection Programs

Regularly update the District's motor vehicle inspection and maintenance program to ensure that the latest emission control and monitoring technologies are being employed. Consider expanding requirements for heavy vehicle emission inspections.

Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency

Promote strategies that reduce motor vehicle emissions in the District and surrounding region. As outlined in the Land Use and Transportation Elements of this Comprehensive Plan, this includes the development of a fully integrated regional system of buses, streetcars, rail transit, bicycles, taxis, and pedestrian facilities to make it easier and more convenient to travel without an automobile. It also includes the promotion of trip reduction measures such as videoconference facilities, telecommuting, flextime, and carpooling. Strategies to reduce congestion and idling time, such as improved signal timing and reversible commute lanes also should contribute to air quality improvement.

Policy E-4.1.6: Clean Fuels

Encourage the use of clean fuel vehicles and enhance efforts to place refueling and recharging equipment at facilities accessible for public use. Where feasible, provide financial incentives for District residents and business to use clean vehicles, such as reduced motor vehicle tax and license fees.

Policy E-4.1.8: Air Quality Education

Support increased public awareness of air quality issues through "Air Quality Action Day" programs, publication of air quality data, and distribution of educational materials that outline steps residents and businesses can take to help maintain clean air.

In addition to the policies above, the Transportation Element of the Comp Plan calls for greater use of Transportation Demand Management to limit congestion and maintain acceptable service conditions on local roadways.

IIII.H LAND RESOURCES

This section of the Environmental Assessment describes the impact of the proposed Comp Plan on land resources, specifically on soil erosion and slope stability. The analysis includes a summary of existing geologic and soil conditions, a description of impacts resulting from adoption of the Plan, and measures to mitigate these impacts.

SETTING

Regulatory Framework

The Watershed Protection Division (WPD) of the Environmental Health Administration is responsible for the conservation of soil resources. Activities relating to the investigation and remediation of contaminated soils and groundwater are presently located within the Bureau of Hazardous Material and Toxic Substances, and are discussed under the section of this report on environmental hazards. WPD is divided into three branches, the Sediment and Storm Water Technical Services Branch, Inspection and Enforcement Branch, and the Non-point Source Pollution Management Branch, each with a role in developing and enacting stormwater management and sediment and erosion control regulations for construction sites. The regulations governing storm water management, erosion and sediment control, and floodplain management are outlined in Chapter 5 of Title 21 and Chapter 31 of Title 20 of the District of Columbia Municipal Regulations.

The Soil Erosion and Sedimentation Control Act (1977 as amended) calls for a program to review and approve all construction and grading plans submitted to the District of Columbia Government for compliance with regulations. In addition, DC Public Law 8-36 (the District of Columbia Environmental Policy Act of 1989) requires that all District of Columbia agencies consider the environmental impact of all proposed major actions prior to issuing any approvals. Inspections are conducted at construction sites to ensure that control devices are constructed in accordance with approved plans. The program is also responsible for investigating erosion and drainage-related complaints, and providing recommendations towards their resolution.

The Sediment and Storm Water Technical Services Branch is responsible for managing land disturbing activities to prevent the acceleration of soil erosion and sediment deposition in the Potomac and Anacostia Rivers and their tributaries. In the District of Columbia, all land disturbing activities, unless specifically exempted from the soil erosion and sedimentation control regulations, require a building permit. The Branch reviews construction and grading plans; coordinates the permit review process with the Department of Consumer and Regulatory Affairs; reviews environmental impact screening forms and environmental impact studies; reviews geotechnical reports; develops and upgrades storm water management, erosion and sediment control, and floodplain management regulations and guidance manuals; and provides technical assistance on planning issues related to its mission.

The Inspection and Enforcement Branch is responsible for developing and implementing inspection and enforcement programs in support of the regulation of land-disturbing activities. The Branch is authorized to inspect soil erosion and sediment control and storm water management facilities at construction sites for compliance; review and approve “As-Built” plans for storm water management facilities submitted to the District for compliance with design standards and specifications; investigate cases of soil erosion, water drainage, and related complaints; and conduct preventive maintenance inspections of storm water management facilities to ensure proper function.

The Non-point Source Pollution Management Branch’s chief mission is to provide support to control, prevent, and remediate non-point sources of polluted runoff through voluntary activities. The DC Soil and Water Conservation District, a separate agency, is located within and receives support from this branch. The DC Soil and Water Conservation District identifies and coordinates available technical, financial, and educational resources to sponsor demonstration projects and activities that conserve the soil and water resources of the District.

The Habitat Restoration Program participates and sponsors activities that protect and restore river, stream, and wetland habitats in the District of Columbia and the Chesapeake Bay watershed as a way to increase ecological diversity. The Education and Community Outreach Program encourages pollution prevention by providing effective public information and involvement in clean up efforts in the Anacostia River, Chesapeake Bay, and neighborhood watersheds. Some of the activities of this program include schoolyard conservation projects, environmental education camping, and the environmental education resource center.

Geologic Setting

The District of Columbia lies between two physiographic provinces – the Coastal Plain and the Piedmont. These two regions are separated by the Fall Line, a zone of geologic transition that marks the boundary between the older, resistant, metamorphic rocks of the Piedmont and younger, softer, mostly unconsolidated sediments of the Coastal Plain. Approximately two-thirds of the District is covered by the Coastal Plain Province.

The Coastal Plain Province is comprised of a wedge of sediments which increase in thickness toward the Atlantic Ocean. The lower two-thirds of the wedge, which rests on Precambrian to Mesozoic rocks, consists of clay, sand, and gravel sediments of the late Jurassic and Cretaceous age. These sediments were deposited by rivers flowing eastward from the Appalachian Mountains. The upper section of the wedge consists of Tertiary and Quaternary sand, silt, and clay sediments which are predominantly of marine origin.

The Piedmont Province is an area characterized by meta-sedimentary rocks of the Wissahickon Formation, altered mafic rocks, the Kensington Gneiss and Sykesville Formation, and later-aged granitic intrusives. The province is exposed along the Potomac River and Rock Creek and slopes in a southeasterly direction towards the Chesapeake Bay. It has a gently rolling topography, deeply weathered

bedrock, and a relative paucity of rock outcrop. The outcrops are usually restricted to stream valleys where saprolite or weathered materials have been washed away by erosion.

Soils

In 1974, the United States Natural Resources Conservation Service conducted a soil survey of the District. Since that time, no new regional soil survey has been conducted.

The majority of soil map units in the District (approximately 70%) are characterized as being either partly or completely comprised of Udorthents, or soils that have been reworked or previously cut or filled, i.e. urban soils. These soil types are found throughout the District wherever development has occurred, and due to the disturbed nature of the soils, permeability is often variable in these areas, runoff is generally medium to rapid, and erosion can be severe where the surface is left bare. The disturbed nature of soils in these areas makes onsite characterization necessary to determine uses and limitations.

The next most common soil map units account for less than 17% of the District, and are all complexes with urban soils. The Christiana soil series consists of very deep, well drained soils with slow to moderately slow permeability on uplands and sideslopes of the dissected Coastal Plain. They formed in red clays of marine origin, have a low to moderate shrink swell potential, and are found on slopes ranging from 0 to 50 percent. These soils are predominately found in the Upper Northeast.

The Manor soil series is also common in the District, and consists of very deep, well drained to somewhat excessively drained, moderately permeable soils on uplands. These soils are formed in materials weathered from micaceous schist, are typically found on slopes ranging from 0 to 65 percent, and can be highly erodible on the higher end of this slope range. The Manor series dominates the Upper Northwest, and is common along the northern portion of Rock Creek.

The last of the common soil series in the District is the Sassafras series. The Sassafras series consists of very deep, well drained soils with moderately or moderately slow permeability found on summits and sideslopes. They are derived from sandy marine and old alluvial sediments, have a slow to medium runoff potential, and have a low shrink swell potential (NRCS, 2006). These soils dominate Upper Northwest east of Rock Creek Park and are found in other parts of the Northwest and Northeast quadrants.

The soil survey for the district classified each soil into one of three major erodibility categories (NRCS, 1974). These categories were developed based on an erodibility index derived from the Universal Soil Loss Equation (USLE) and the soil's T Factor, which represents the maximum annual rate of soil erosion that could take place without causing a decline in long-term productivity. The following table (Table III.H-1) reports the number of acres found in each erodibility class in the District. The distribution of these erodability classes is presented in Figure III.H-1.

Figure III.H-1: Susceptibility to Erosion

Soil Erodibility and Steep Slope Locations in the District of Columbia

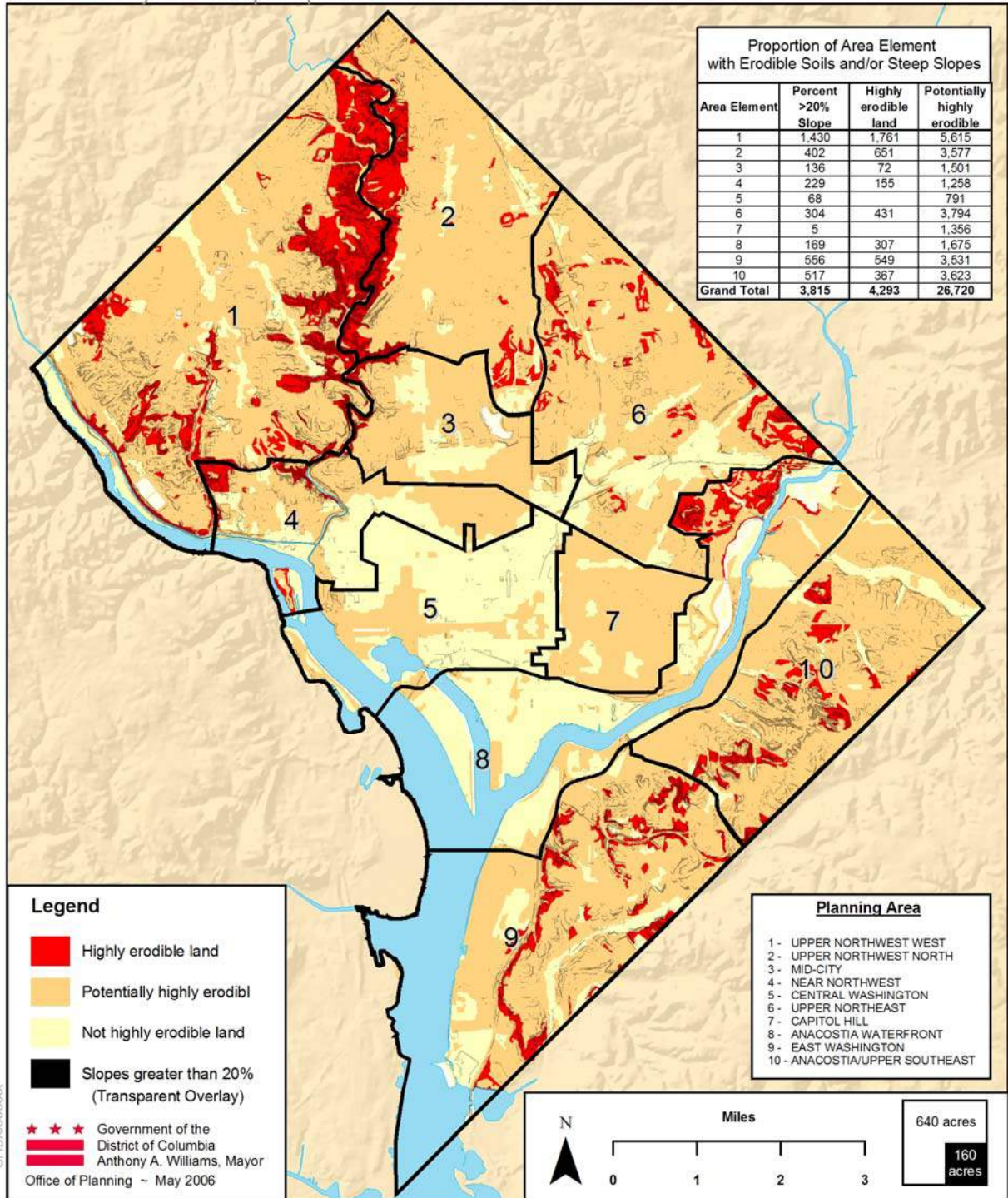


Table III.H-1: Soil Erosion Categories in the District of Columbia

Classification	Acres	Proportion of District of Columbia
Not Highly Erodible Land	8,268	18.7%
Potentially Highly Erodible	26,908	60.9%
Highly Erodible	4,330	9.8%
---	4,654	10.5%

Source: Louis Berger Group, 2006

Based on the soil erodibility map presented in **Figure III.H-1**, erodible soils are primarily concentrated within areas of topographic variability within Upper Northwest (especially along Rock Creek and within other parks) as well as within Upper Northeast near the National Arboretum. Erodible soils are also interspersed in the upland areas west of the Anacostia River. Due to the amount of paved surfaces in the Central Washington, Capitol Hill, and Anacostia Waterfront areas, soil erodibility within these areas is generally low.

Few comprehensive surveys of major upland erosional processes in the District have been conducted. One recent study conducted in 2003 evaluated the erosional processes occurring in 87 District parks (DOH, 2005). This study noted that five of these parks were considered sites with active annual erosion, which can potentially pose safety risks to citizens or potential damage to nearby property. The majority of park areas rated as having the most serious erosion ranking are located near the District Boundary. Two of these parks are located east of the River (Hillcrest Recreation Center and Watts Branch Recreation Center), two in Upper Northeast (Fort Lincoln Recreation Center and Evans Recreation Center), and one in Upper Northwest (Palisades Recreation Center) (DCR 2003).

Hydrologic Groups

The NRCS defines a hydrologic group as a group of soils that have similar runoff potential under similar storm and cover conditions. The properties that influence runoff potential are the same ones that influence the minimum rate of infiltration for a bare, non-frozen soil after prolonged wetting. Hydrologic soil groups describe the different levels of infiltration capacity for any given soil type. There are four hydrologic groups (A, B, C, D) and three dual classes (A/D, B/D, C/D). As shown in Table III.H-2, hydrologic soil group “A” designates soils that are well to excessively well drained, whereas hydrologic soil group “D” designates soils that are poorly drained. This means that soils in hydrologic group “A” allow a larger portion of the rainfall to infiltrate and become part of the ground water system.

Table III.H-2: Hydrologic Soil Groups in the District of Columbia

Hydrologic Soil Group	Description	Acres	Proportion of District of Columbia
A	High infiltration rates. Soils are deep, well drained to excessively drained sand and gravels.	3,308	7%
B	Moderate infiltration rates. Deep and moderately deep, moderately well and well-drained soils with moderately coarse textures.	17,161	39%
C	Moderate to slow infiltration rates. Soils with layers impeding downward movement of water or soils with moderately fine or fine textures.	7,764	18%
D	Very slow infiltration rates. Soils are clayey, have high water table, or shallow to an impervious cover	10,344	23%
B/D	Combination of Soil Group B and D	21	<1%
C/D	Combination of Soil Group C and D	907	2%
---	Not applicable	4,654	11%

Source: Louis Berger Group, 2006

Conversely, soils in hydrologic group “D” allow a smaller portion of the rainfall to infiltrate and become part of the ground water resulting in more rainfall conversion to surface water runoff on soils of this hydrologic group. The District is dominated by soils from Hydrologic Soil Groups B and D.

The majority of the low permeability/high runoff soils (C/D hydrologic groups) are found within in the heavily modified urban areas and corridors (Figure III.H-2), including the historic “L’Enfant city.” In contrast, areas north and west of Rock Creek Park are dominated by soils with generally higher infiltration rates. In these areas, runoff potential would be generally low in the absence of development and associated impervious cover.

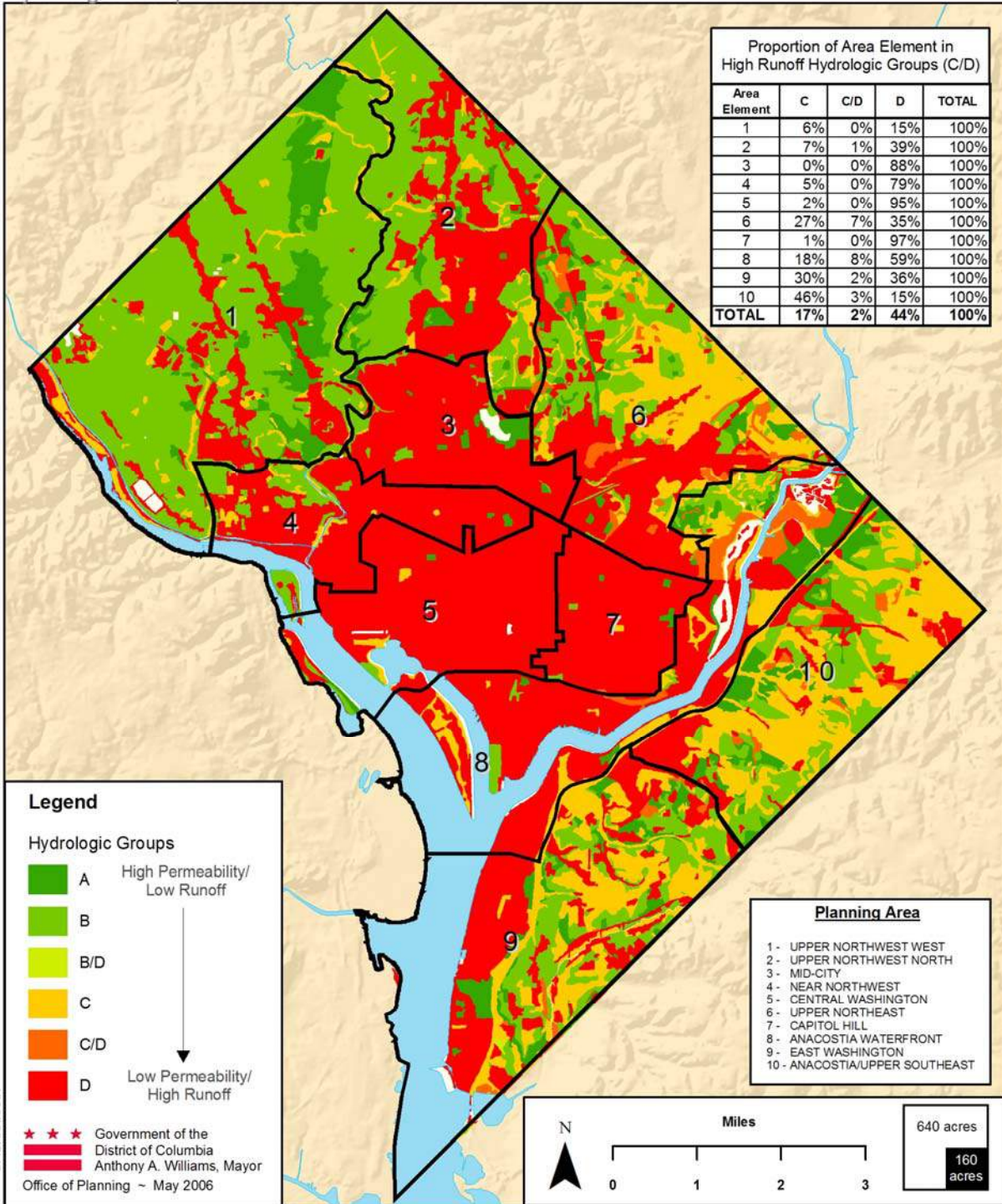
Streambank Erosion

Stream bank erosion is a result of multiple interrelated factors. The rate at which erosion occurs in stable systems is generally much slower and of a smaller scale than that which occurs in unstable systems. In the District, similar to other urban environments, large amounts of impervious surface in the contributing watershed result in unnaturally high flow volumes during storm events. This stormwater runoff generates significant stream flow volumes and velocities, which can destabilize stream channels and increase sediment production and delivery to downstream areas. Other factors that contribute to stream bank erosion are the clearing of stream bank vegetation, stream bed lowering, or development infill. Stream banks in the District range from unvegetated and highly unstable with great potential for erosion and collapse, to recovering re-vegetated stream banks, to fairly stable and fully-vegetated stream banks.

The District works with the Chesapeake Bay Program’s Watershed Commitments Task Force to actively plan and implement stream restoration projects that address stormwater runoff, develop partnerships between multiple land owners, and suggest specific design considerations in urbanized

Figure III.H-2: Hydrologic Groups in the District of Columbia

Hydrologic Groups in the District of Columbia



watersheds. The goal of these stream restoration initiatives is to improve degraded habitat, increase diversity and stability of supported biological communities, and reduce downstream sediment and pollutant loading impacts. The Task Force has developed Bay-wide Aquatic Health Guidelines and recommended actions to ensure the health of stream corridors (Chesapeake Bay Program, 2003).

Summary and Trends

Much of the District has been developed, and therefore “urban” soils, composed primarily of disturbed soils and fill, predominate. Once paved over or compacted, these soils are no longer fertile or productive, and are not likely to be for the foreseeable future. Additional development and construction will do little to reduce the quality or productivity of the District’s already degraded soils.

The creation of additional impervious surface may result in an increase in runoff, which could lead to increased soil loss due to bank erosion and scouring. Runoff also may contribute to the destruction of riparian buffer vegetation as banks become undermined and fail. Additionally, aquifer recharge can decline as rainfall is rapidly converted to surface runoff instead of percolating into the soil and entering the groundwater system. Some of the impacts of infill development may be mitigated through the implementation of Best Management Practices and through stream rehabilitation projects.

SIGNIFICANCE CRITERIA

A project may be seen to have a significant impact if its implementation would expose residents to geologic hazards (including landslides), damage or eliminate soil resources, or render geologic resources unusable.

IMPACTS AND MITIGATION

SOIL EROSION

Impact H1: The Comp Plan would continue to allow development on soils that have erosion potential. This could lead to additional topsoil loss and sedimentation. This is a less than significant impact due to established construction controls and standards, and policies in the Plan which require that such hazards be mitigated.

As noted on Figure III.H-1, there are a limited number of areas in the District of Columbia that are “highly” erodible soils. These are mostly contained in Rock Creek Park and other permanent open space lands. The amount of development likely to occur on these “highly” erodible soils is very small, and in fact may be less under the proposed Plan than under the current Plan due to the redesignation of land east of the Anacostia River from Moderate to Low Density Residential. The proposed Plan generally envisions less density on “highly” erodible soils than the existing (1998) Plan did.

The amount of development likely to occur on “potentially” erodible soils will not be substantially different under the proposed Plan than it is under the existing (1998) Plan. Nonetheless, the potential for erosion does exist on these soils, many of which include transit station areas and corridors. Site-specific erosion control conditions will continue to be prescribed for large construction projects that involve earth movement, as they are today.

The following policies in the Draft Plan specifically address the potential for soil erosion in the city:

Policy E-1.3.1: Preventing Erosion

Ensure that public and private construction activities do not result in soil erosion or the creation of unstable soil conditions. Support the use of retaining walls and other “best management practices” that reduce erosion hazards. Erosion requirements should be implemented through building permit and plan reviews, and enforced through the permitting and regulatory processes.

Policy E-1.3.2: Grading and Vegetation Removal

Encourage the retention of natural vegetation and topography on new development sites. Grading of hillside sites should be minimized and graded slopes should be quickly revegetated for stabilization.

Policy E-1.3.3: Reducing Sedimentation

Prevent sedimentation of rivers and streams by implementing comprehensive stormwater management measures, including regular maintenance of storm drains and catch basins and the use of sedimentation ponds where appropriate.

Policy E-1.3.4: Restoring Eroded Areas

Abate soil erosion problems in developed areas, particularly where erosion has resulted from poor site design, aging streets and alleys, or deferred maintenance.

STREAMBANK EROSION AND SEDIMENTATION

Impact H2. The Draft Plan would allow continued development in areas where streams are currently impaired by bank erosion, scouring, and sediment flow from their surrounding watersheds. The potential for increased impacts attributable to the Comp Plan is minimal, however. The impact is less than significant due to Plan policies which address this hazard and protect stream valleys. Positive impacts could result from the implementation of new policies and erosion control measures that are not included in the 1998 Comp Plan.

As noted above, the proposed Comp Plan does not envision significant density increases along stream valleys or in areas adjacent to local streams. Most of the city’s streams are contained within parks. Nonetheless, neighborhood revitalization efforts in areas such as Lincoln Heights and Deanwood (near Watts Branch), in Washington Highlands (near Oxon Run), and in similarly situated areas could lead to increased runoff rates. Moreover, policies to improve public access to streams and rivers, to connect the Fort Circle Parks through trails, to improve park useability and recreational amenities, could lead to an increased risk of streambank erosion.

The potential for such hazards is mitigated by the following policies:

Policy E-1.4.2: Management of Uplands Along Stream Valleys

Protect stream valley parks by limiting construction, requiring sensitive design, and retaining vegetation on adjacent upland properties. Development of land draining to stream valleys shall be managed as needed to protect flora, fauna, and water quality; prevent erosion and siltation of streams; minimize intrusion of views from the parks; and retain a green buffer between the built environment and these natural areas.

Policy E-1.4.3: Open Space Protection Along Stream Valleys

Preserve land adjacent to streams and ravines as densely vegetated open space. Natural drainage channels and buffer zones in these areas should be protected from the adverse effects of nearby urban uses. Particular focus should be given to areas adjacent to Rock Creek Park and to Watts Branch, Pope Branch, Oxon Run, Battery Kemble, and Glover-Archbold Parks.

Policy E-1.4.4: Channelization of Streams

Retain streams and ravines in their natural condition, rather than constructing man-made channels. Where alteration is necessary, encourage design solutions which retain or recreate natural ecological values.

Implementation of these policies would tend to have a positive environmental impact on streambank erosion, insofar as they promote open space retention and stream restoration and discourage channelization.

DEVELOPMENT ON STEEP SLOPES

Impact H3. The Comp Plan would continue to allow development on privately-owned lots where slopes exceed 20 percent. These slopes are more susceptible to erosion than flatter sites. This is a less than significant impact due to the limited amount of private land that exceeds 20 percent slope, the low densities that are permitted on these lands, the Plan’s recommendation to expand the tree and slope overlay zone, and other policies in the proposed Plan. Impacts of Plan adoption should be positive as these policies are implemented.

The District generally defines steep slopes as those exceeding 20 percent grade. Most slopes in this category are contained in Rock Creek Park, the Palisades (C&O Canal) Park, and the Fort Circle Parks east of the Anacostia River. There are a few areas west of Rock Creek and east of the Anacostia in private ownership where slopes exceed this benchmark. Most of these areas are designated for “Low Density Residential” uses on the existing (1998) Plan and are likewise designated for such uses on the proposed (2006) Plan. Some are designated for “Moderate” Density Residential uses on the 1998 Plan and as “Low” Density Residential uses or open space on the 2006 Plan.

Improper construction techniques on these slopes can exacerbate erosion problems and create the potential for landslides and slope de-stabilization. The Plan contains the following policies to minimize the potential for such impacts:

Policy E-1.4.1: Conservation of Steep Slopes

Strongly discourage development on steep slopes (i.e., greater than 25 percent), such as those found along stream valleys in Upper Northwest and Southeast DC. Planning and building regulations should ensure that any construction on such slopes is sensitively designed and includes slope stabilization measures.

Policy E-3.4.1: Mitigating Development Impacts

Take measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited.

Action E-1.4-A: Expand the Tree and Slope Protection Overlay

Work with neighborhood and community groups, homeowners and other landowners, and Advisory Neighborhood Commissions to identify additional areas where the Tree and Slope Protection (TSP) Overlay zone should be mapped. Such areas should generally abut streams or public open spaces and should have steep slopes, significant natural tree cover, and some potential for future development. Particular attention should be given to mapping the TSP Overlay on lands east of the Anacostia River.

Action E-1.4-B: Hillside Conservation Easements

Explore the use of land trusts and conservation easements as a tool for protecting steep slopes and hillside areas.

III-I ENVIRONMENTAL HAZARDS

This section of the Environmental Assessment addresses environmental hazards in the District of Columbia, including exposure to hazardous substances, flooding, noise, and electromagnetic fields. The text notes the potential for Comp Plan implementation to disturb hazardous materials, exacerbate noise and flooding conditions, and expose additional people to environmental hazards. It also identifies mitigation measures as needed to address any significant adverse impacts.

SETTING

Regulatory Framework

The District of Columbia operates the following programs to regulate and manage environmental hazards within its boundaries:

Underground Storage Tanks Management Program

In 1997, the District of Columbia was granted state program approval by the EPA to manage and monitor all underground storage tanks (UST) and leaking underground storage tanks (LUST) located within the city (EPA, December 2005d). The mission of the Underground Storage Tanks Management Division is to protect human health and the environment from the adverse effects of petroleum, petroleum-related products, and hazardous materials through:

- Prevention of releases from underground storage tanks (USTs)
- Inspection, investigation, remediation, monitoring, voluntary cleanup, and risk assessment programs to ensure compliance
- Strong enforcement of District and federal regulations

The division is divided into two programs:

- UST Program: Directs the regulatory requirements intended to prevent releases. Activities include regulation of installation, removal, abandonment, upgrades, and leak detection systems, and full compliance inspections and enforcement actions (DOH, December 2005d).
- LUST Program: Directs the regulatory requirements intended to deal with releases, i.e., contaminated sites. Activities include release reporting, initial response and abatement activities, investigations of confirmed releases, review of site assessment reports, risk-based corrective actions, and both voluntary and mandatory cleanup report review and approval (DOH, December 2005d).

The provisions of the District's underground storage regulations can be found in Title 20, Chapters 55-70 of the District of Columbia Municipal Regulations (DCMR). DC Official Code § 8-113 provides definitions and authorizations that empower the division to carry out its mission. In addition, Subtitle I of

the Resource Conservation and Recovery Act (RCRA) allows approved state programs to operate in lieu of the federal program.

Toxic Substances Division-Pesticide Regulation Program

The Toxic Substances Division regulates the sale, distribution, storage, use, and disposal of pesticides in the District of Columbia as outlined in DCMR, Title 20 Chapters 22-25 (DOH, 2005e). The term “pesticides” refers to fungicides, insecticides, rodenticides, herbicides, and antimicrobials. DC Code § 8-401 to 8-419 provides the legislative framework that authorizes the division to carry out its mission, which is to ensure protection of human health and the environment from risks resulting from pesticides, while recognizing the benefits that pesticides offer to society.

The Pesticide Program also seeks to prevent pollution; protect human health, land, air, water, and both plant and animal non-target species; and show positive human health or environmental results within the community (DOH, 2005). This is done through a certification and testing program that ensures that governmental and commercial applicators of pesticides within the District of Columbia know how to properly apply pesticides. In addition, the Division also maintains a registration of all pesticides sold to governmental and commercial applicators throughout the District of Columbia, and monitors for compliance by conducting spot checks and investigations of pesticide application (DOH, 2005e). This program also provides public outreach and education relating to the safe use of pesticides, as well as Integrated Pest Management techniques, such as the use of the least toxic pesticidal products appropriate to the application.

Lead-Based Paint Management Program

The District of Columbia Government conducts lead poisoning prevention activities through a number of agencies, including the Department of Health, with its Childhood Lead Poisoning Prevention, Screening, and Education Program; Medicaid Managed Care Program; and Childcare and Residential Facilities Licensing and Regulation Program. In addition, the Environmental Health Administration has a Lead-Based Paint Management Program, described below, which regulates the training and certification of lead abatement professionals and workers and establishes safe work practices.

The Lead-Based Paint Management Program is an authorized EPA state program funded by the Lead-Based Paint Compliance and Enforcement Grant (DOH, 2005g), program revenues, intra-district transfers, and local dollars. The mission of this program is to protect human health and the environment from the adverse effects of lead-based paint through implementation of a District-wide strategy to build the infrastructure necessary to reduce the hazards of lead-based paint poisoning.

Activities aimed at reducing exposure to lead hazards include:

- Accrediting training providers and courses;
- Certifying abatement contractors, professionals, and workers;
- Establishing work practice standards for abatement;

- Permitting abatement projects;
- Inspections and enforcement of the accreditation, certification, permitting, and work practice standards;
- Public outreach and education;
- Providing inspection services and technical assistance to other District agencies, including the Childhood Lead Poisoning Prevention, Education, and Screening Program; the Child and Family Services Agency; the Department of Housing and Community Development; and the Department of Consumer and Regulatory Affairs.

The Department of Consumer and Regulatory Affairs is responsible for enforcement of the District's Housing Regulations, which require that all housing where children under the age of eight reside or could reasonably be expected to reside or visit on a regular basis, be maintained free of lead-based paint hazards, including paint hazards, dust hazards, and soil hazards. The Department of Housing and Community Development provides grants to homeowners and owners of multi-family dwellings for lead hazard control. The District of Columbia Housing Authority is tasked with lead hazard control for public housing. In addition, the Child and Family Services Agency requires that all foster and adoptive homes be certified as lead safe.

The District of Columbia Water and Sewer Authority has embarked upon an ambitious lead pipe replacement program to eliminate the risks associated with lead in drinking water. Over the years, concerned government officials and children's health advocates have established a number of task forces and advisory groups to address various lead issues. The Mayor's Office is presently working on re-convening a multi-agency task force to ensure coordination of the various lead programs and activities.

Hazardous Waste Division Programs

The Hazardous Waste Division was formed as a result of the District's reorganization of the Department of Consumer and Regulatory Affairs. After 1996, all environmental programs were reassigned to the Department of Health and hazardous waste management was assigned to the Hazardous Waste Division (EPA, September 2001).

The Division performs two separate activities. The first involves the regulation of hazardous waste pursuant to Subtitle C of the federal Resource Conservation and Recovery Act. The second provides regulatory oversight and technical review for contaminated site investigation and remediation at active and formerly used defense sites. The Subtitle C program regulates hazardous waste from "cradle-to-grave", and also includes a used oil program. In addition to inspections and enforcement, staff collect data relating to the generation, handling, and disposal of hazardous waste and used oil; and engage in activities to encourage toxic chemical source reduction and hazardous waste minimization.

The contaminated site program receives funding from the Army, Navy, and Air Force to provide technical review of their various site investigation and remediation activities. Staff closely monitor the cleanup of arsenic-contaminated soils and chemical and other munitions in Spring Valley, as well as the groundwater

study that is presently underway. Staff are also engaged with the review of cleanup activities at the Washington Navy Yard, the District's only Superfund Site, and Bolling Air Force Base.

Radiation Protection Program

The purpose of the Radiation Protection Division is to protect the public from the hazards associated with radiation. With the exception of source, special nuclear, and byproduct material, the regulation of which is preempted by the Federal Government, the Radiation Protection Division regulates all other sources of radiation, including X-Ray machines, particle accelerators, radioactive material created by accelerators, lasers, cell phone towers, and low-level radioactive waste. The Division is also responsible for conducting various emergency planning, preparedness, and response activities under the District's Bioterrorism Grant related to radiation, hazardous substances, and infectious agents.

The Division:

- Develops and implements regulations, standards, and guidance relating to radiation protection;
- Issues biennial registration certificates to over 2000 users of sources of radiation;
- Reviews and determines the adequacy of health physics shielding plans for facilities housing radiation producing materials and devices;
- Conducts routine compliance inspections of all facilities that use radioactive material, x-ray producing equipment, and lasers, including hospitals, clinics, private practitioners' offices, and cell phone towers;
- Conducts special inspections of mammography facilities pursuant to an agreement with the United States Food and Drug Administration;
- Conducts radiation surveys of all Radio-Frequency (RF) producing structures;
- Maintains surveillance over all shipments of low-level radioactive waste in and through the District;
- Participates in multi-media environmental review of matters involving contaminated sites where radioactive materials are a contaminant of concern, as well as matters subject to the District's Environmental Policy Act and similar environmental review processes, where radiation is a matter of concern;
- Performs surveillance and monitoring activities to determine radiation contamination;
- Investigates radiation incidents;
- Responds, in coordination with the Department of Fire and Emergency Medical Services, to radiation emergencies;
- Conducts emergency planning, preparedness, and support for incidents involving radiation, hazardous substances, and infectious agents; and
- Conducts public outreach and education relating to radiation safety, mammography, and nuclear medicine.

Voluntary Clean-Up Program

One of the goals of the Environmental Health Administration is to protect and preserve the ecological system of the District, protect and increase green spaces, and promote the safe use or development of lands that are contaminated or perceived to be contaminated by hazardous substances. To achieve this goal, the Environmental Health Administration established the Voluntary Cleanup Program. This Program oversees owner or developer initiated voluntary remediation of contaminated lands and buildings that return actual or potentially contaminated properties to productive uses.

The Voluntary Cleanup Program's mission is to:

- improve human health and the environment
- promote urban redevelopment
- stimulate economic growth by encouraging and supporting the reuse of contaminated lands and buildings through voluntary, private cleanup.

The District of Columbia has several sites currently involved the Voluntary Cleanup Program (EPA, February 2005). These include:

- Camp Simms Residential & Commercial, Alabama Avenue and 15th Street, SE- This site was formerly the Camp Simms National Guard facility used as a target range facility, ammunitions dump, and defensive battery. The site is currently owned by the District of Columbia Department of Housing and Community Services and will be redeveloped for commercial and residential use. Presently, polycyclic aromatic hydrocarbons and semi-volatile compounds are found on the site.
- 1755-1759 Columbia Rd. NW- Currently the site of retail & restaurant establishments, this site was purchased by Combined Properties, Inc. in 2004 and is scheduled to be converted into mixed use development. Total petroleum hydrocarbon (tph), polycyclic aromatic hydrocarbon (pcah), chlorinated and non-chlorinated hydrocarbons are found on the site.
- 100 I St SE- An 82,000-sq-ft old trash transfer lot where volatile compounds and chlorinated solvent compounds in soil and groundwater have been found.
- 27th Block C St SE / American Pharmaceutical Society Annex- volatile compounds and chlorinated solvent compounds in soil and groundwater
- Fort Totten Park Apartments Near Ft. Totten metro- volatile organic compounds, metals, arsenic, & lead exceeding District regulatory guidance

The EPA has played a significant role in helping the District establish the Voluntary Cleanup Program. In 1999, the Department of Health entered into an agreement with the EPA, Region III to establish a Clean Lands Program in the District of Columbia (DOH, 2005i). The purpose of the Clean Lands Program is to ensure that any potential or known contaminated land in the city is carefully and efficiently assessed, cleaned to the city's groundwater and soil standards, and then reused for development or other productive uses.

On June 15, 2001, the Brownfield Revitalization Amendment Act of 2000 (DC Official Code § 8-631) established the Voluntary Cleanup Program for contaminated property. The Act authorized tax and other

incentives for clean up and development of contaminated properties, and amended provisions of other acts to incorporate and support the cleanup and redevelopment of contaminated sites.

In 1998, the EPA had selected the District of Columbia to be a Brownfields Assessment Demonstration Pilot under its Brownfields Economic Redevelopment Initiative and gave a grant of \$200,000 to the city to be used to assist in cleanup and redevelopment (EPA, July 1998). In 2001, the EPA granted supplemental assistance in the form of \$100,000 to the District of Columbia to continue the work of identifying, evaluating, prioritizing, and assessing brownfields (EPA, April 2001).

Characterization

Brownfields

DC Code § 8-633.02 defines a brownfield as an “abandoned, idled property or industrial property where expansion or redevelopment is complicated by actual or perceived environmental contamination.” The District currently has several brownfield sites participating in the Voluntary Cleanup Program (see above).

From the EPA’s Brownfields Management System (BMS), seven properties have been identified as brownfields (EPA, December 2005). The BMS is the EPA’s database for the Brownfields Program. The database assists the EPA in collecting, tracking, and updating information, as well as reporting on the major activities and accomplishments of the various Brownfields grant programs. Further details about the site, such as the type of contaminant and dates, were unavailable at the time of access. Table III.I-1 shows the property and status of the site accessed from the BMS.

Table III.I-1: Brownfield Sites in the District of Columbia (from the BMS data base)

Property Name	Address	Total Acres	Status of Site	Media Affected
5th and K Streets	Washington DC	3.2	Assessed	-
Brentwood Road	1100 Brentwood Road, NE	14.5	Ready for Reuse	Soils
Georgia at Upshur St. (Square 2910)	Washington DC	1.6	Assessed	Soils
Kingman Island	Washington DC	45	-	Soils, Groundwater
Pepco Pumphouse	Washington DC	1	Ready for Reuse	-
Square 710	119 New York and 151 O Street, NE	7	-	Soils, Groundwater
Washington Gas	12th and M Streets, SE	11	Ready for Reuse	-

Source: Louis Berger Group, 2006

Table III.I-2: Underground Storage Tanks in the District of Columbia

Planning Area Name	LUST	UST	AST
Rock Creek West	159	149	54
Rock Creek East	110	101	4
Mid-City	141	117	11
Near Northwest	184	153	16
Central Washington	261	154	93
Upper Northeast	229	194	15
Capitol Hill	49	46	7
Lower Waterfront	125	98	36
Far SE/SW	153	71	28
Far NE/SE	121	93	2
Total	1532	1176	266

Source: Louis Berger Group, 2006

UST/LUST

According to the Office of Underground Storage Tanks (OUST) of the EPA, as of September 30, 2004, there were 720 active underground storage tanks in the District of Columbia (OUST, 2004). There were 788 confirmed releases and 545 cleanups completed. The backlog of cleanups to complete was 243 sites.

For comparison, states such as Massachusetts have 11,368 active USTs, 6,103 confirmed releases and 5,026 cleanups completed. New York has 29,925 active USTs, 20,422 confirmed releases, and 18,442 cleanups completed. New York City has at least 1,600 underground storage tanks in at least 400 locations throughout the New York City metropolitan area. The District is most comparable to Delaware, with 598 active USTs, 2,284 confirmed releases, and 2,010 cleanups completed (EPA, September 2005). Table III.I-2 provides a summary of GIS data provided by the Office of the Chief Technology Officer (OCTO) concerning the number of USTs, LUSTs, and ASTs in the District of Columbia by planning area.

CERCLIS Sites

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment (EPA, December 2005).

The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) is a compilation of records from a nationwide database created to maintain and regulate those facilities or sites that the EPA has investigated or will investigate for suspected or uncontrolled releases of hazardous substances, contaminants, or pollutants as reported by states, municipalities, private companies,

and private citizens under CERCLA (or the Superfund Program) (EPA, December 2005). Once a site is placed on the CERCLIS list, it may be subjected to additional levels of evaluation to determine the severity of the contamination, from discovery and preliminary assessment to site inspection, and possibly the application of the Hazard Ranking System (HRS).

Such a determination could ultimately place the site under consideration for inclusion on the National Priorities List (NPL). The NPL is a federal listing of uncontrolled or abandoned hazardous waste sites that pose a potential risk to human health or the environment (EPA, December 2005f). The list is created from the CERCLIS database and is primarily based upon a score that each site or facility receives from the HRS. After a site or facility has been identified as a CERCLIS site, the EPA conducts an assessment of the property. The HRS score associated with the degree of environmental risk is one of the determinations made as to whether the site is placed on the NPL. These sites are then prioritized for possible long-term remedial action and referred to the state for further action under state programs.

The CERCLIS data base lists 32 sites in Washington, D.C (December, 2005). When a hazardous site is found, information is entered into CERCLIS. Sites listed in CERCLIS are investigated to determine what further actions are necessary to protect human health and the environment. Inclusion on the CERCLIS list does not confirm the presence of an environmental problem or a public health threat. The Washington Navy Yard was the only site to be listed on the National Priorities List (NPL). It should be noted that when a site is put into CERCLIS, it will remain in the data base even after all actions have been taken. Therefore, many of the sites listed have no ongoing activities.

Of the 32 sites listed in the CERCLIS data base, 13 are federal facilities. Table III.I-3 and Figure III.I-1 show the information concerning the substances and media contaminated for 4 of the 32 sites: the Washington Navy Yard, the Washington Gas site, the Washington DC Mercury Incident, and the USAF Bolling Air Force Base. Information concerning the contamination and media affected was not obtained from the CERCLIS database for the other 28 other sites.

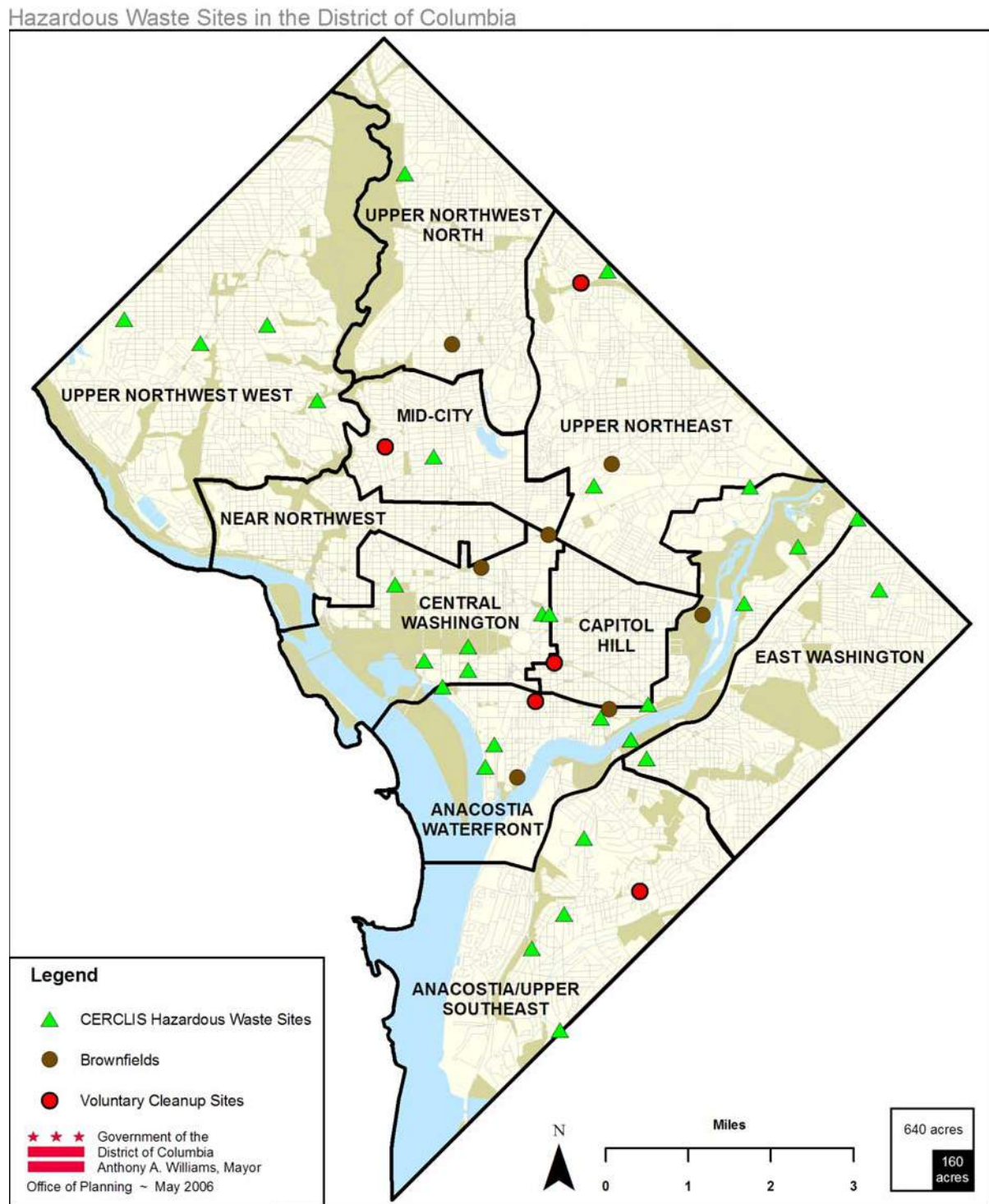
Table III.I-3: CERCLIS Sites and Contaminants

EPA ID	Site Name	Fed Fac.	NPL	Non NPL Status	Media	Contaminants
DCN000306144	2005 Inaugural Pre-Deployment	N	N	R		not listed
DCSFN0305431	50th And Hayes	N	N	NF		not listed
DCN000305703	Capitol Hill Anthrax Site	N	N	R		not listed
DCN000306094	Capitol Hill Ricin Site	N	N	R		not listed
DCN000306151	Cardozo High School Mercury	N	N	R		not listed
DCN000305870	Custis & Brown Barge Spill	N	N	R		not listed
DCN000305659	DC Deicer Spill	N	N	NF		not listed
DCN000305729	Department Of Commerce Mail	Y	N	R		not listed

EPA ID	Site Name	Fed Fac.	NPL	Non NPL Status	Media	Contaminants
DCN000305704	Diamond Ordnance Fuze Lab	N	N	OF		not listed
DCN000305710	EPA Mail Rooms	Y	N	R		not listed
DC9470090003	Fort Lincoln Barrel Site	Y	R	unknown		not listed
DC8210021004	Fort McNair	Y	N	OF		not listed
DCN000305916	General Services Administration	Y	N	OF		not listed
DCSFN0305524	Glover Bridge Site	N	N	PA		not listed
DCN000305625	Hud Pcb Spill	N	N	PA		not listed
DCSFN0305462	Kenilworth Park Landfill Site	N	N	OF		not listed
DCD003254273	NPS - Anacostia Park Sections E	Y	N	OF		not listed
DCD983967951	Pepco Benning Road Facility	N	N	SI		not listed
DCN000305662	Poplar Point Nursery	N	N	OF		not listed
DC0001401637	Seafarers Yacht Club Er	N	N	NF		not listed
DC8470090004	Southeast Federal Center (Gsa)	Y	N	HRS		not listed
DC9751305997	St Elizabeth's Hospital	N	N	OP		not listed
DCN000305732	US Postal Service - Brentwood	N	N	R		not listed
DC5570024443	USAF Bolling Air Force Base	Y	N	OF	Soils	Aroclor 1260, Benzo [A] Pyrene
DC7120507432	USDA National Arboretum	Y	N	NF		not listed
DC1170023476	USN Naval Security Station	Y	N	OF		not listed
DCN000305585	Vermiculite Vpcl	N	N	NF		not listed
DC4210021156	Walter Reed Army Medical	Y	N	OF		not listed
DCD983971136	Washington D.C. Chemical	Y	N	OF		not listed
DCN000306000	Washington DC Mercury	N	N	R	Soils	Mercury
DCD077797793	Washington Gas Light Site	N	N	OP	Liquid	Arsenic, Benzene , Benzo (B)
DC9170024310	Washington Navy Yard	Y	F	SI	Soils	Metals, PCB, VOCs
NPL Code- Status on the Superfund's National F= Currently on the Final NPL N= Not on the NPL R= Removed from Proposed NPL						
Non NPL Status R= Removal Only Site (No Site Assessment Work Needed)- These sites have been removed from NF- No Further Remedial Action Proposed OF= Other Cleanup Activity: Federal Facility-Lead Cleanup OP= Other Cleanup Activity: Private Party-Lead Cleanup PA= Preliminary assessment is still being performed to gather information about the site and its SI= Site investigation is still being conducted HRS= Site is still being evaluated on the Hazard Ranking System						

Source: Louis Berger Group, 2006

Figure III-I-1: CERCLIS Sites in the District of Columbia



Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was enacted by Congress in 1976. The primary goals of RCRA are to protect human health and the environment from the potential hazards of waste disposal, to conserve energy and natural resources, to reduce the amount of waste generated, and to ensure that wastes are managed in an environmentally sound manner (EPA, 2003). RCRA regulates the management of solid waste, hazardous waste, and underground storage tanks holding petroleum products or certain chemicals. Congress, through RCRA 3002(a)(6), requires the EPA to develop a program for hazardous waste generators to report the nature, quantities, and disposition of hazardous waste generated. The Biennial Report compiles data collected from large quantity generators about the generation, management, and final disposition of RCRA hazardous waste in the United States (EPA, 2003).

Based on the National Biennial Hazardous Waste Report (2003), the District of Columbia has 21 hazardous waste generators producing about 1,124 tons of waste. Of the 56 states and territories in the report, the District of Columbia ranked 54th in the quantity of hazardous waste produced and 49th in the number of generators. The District, however, also has about 600 small quantity and conditionally exempt small quantity generators. These generators combined produce more hazardous waste on a biennial basis than the large quantity generators combined. The District's Hazardous Waste Division therefore has initiated a self-certification and return-to-compliance program for small quantity and conditionally-exempt small quantity generators, to collect data from the regulated community regarding waste management practices and to provide information and assistance in toxic chemical source reduction, waste minimization, and emergency planning and preparedness.

Table III.I-4 shows the 21 generators ranked by the amount of hazardous waste produced. All 21 were reported to be large quantity generators (LQGs) (EPA, 2003). A generator is defined as a LQG if it generated 1,000 kg (2,200 pounds) or more of RCRA hazardous waste in any single month; or accumulated 1 kg (2.2 pounds) of RCRA acute hazardous waste at any time; or accumulated more than 100 kg (220 pounds) of spill cleanup material contaminated with RCRA acute hazardous waste at any time.

The EPA uses the North American Industry Classification System (NAICS) to categorize the activities associated with the generators. Table III.I-5 shows the top activities associated with hazardous waste generation. Most of the waste generated were associated with electric power generation, transmission, and distribution; printing and related support activities; and colleges, universities, and professional schools.

Table III.I-4: RCRA Hazardous Waste Generators in the District of Columbia

Rank	EPA ID	Site Name	Total Generated (Tons)
1	DCD00819516	PEPCO Benning Road Generating Station	373
2	DC2200907812	US Bureau of Engraving and Printing	320
3	DCD980204879	Catholic University of America	260
4	DC470090010	Smithsonian Institution - AA/PG BLDG	31
5	DCD077797793	Washington Gas East Station	27
6	DC8170024311	Naval Research Laboratory	20
7	DCD049515844	Georgetown University	14
8	DCD003259439	Gallaudet University	14
9	DC9570090036	Bolling Air Force Base	14
10	DC4210021156	Walter Reed Army Medical Center	13
11	DC4170000901	HQ NDW Naval Station Anacostia	7
12	DC7470090005	Smithsonian Inst - Natural History BLDG	5
13	DCR000500199	MEDSTAR Georgetown Medical Center	4
14	DC9170024310	HQ Naval District Washington	4
15	DCD000819508	PEPCO Buzzard Point Generating Station	4
16	DCD077795060	American University	4
17	DCD98190083	George Washington University	3
18	DC8470000086	Food and Drug Administration FB 8	3
19	DC4470090008	Smithsonian Institution - Mus of American History	2
20	DC7360010402	Dept of Veterans Affairs Medical Center	2
21	DCD074845504	Children's National Medical Center	1
Total			1,124

Table III.I-5: Top 10 Quantities of Waste Generated in 2003, by NAICS Code

Rank	NAICS	Description	Tons Generated
1	2211	Electric Power Generation, Transmission and Distribution	377
2	3231	Printing and Related Support Activities	320
3	6113	Colleges, Universities, and Professional Schools	295
4	7121	Museums, Historical Sites, Similar Institutions	39
5	2212	Natural Gas Distribution	27
6	9281	National Security and International Affairs	20
7	6221	General Medical and Surgical Hospitals	20
8	5417	Scientific Research and Development Services	20
9	9211	Executive, Legislative, and Other General Government Support	4
10	9221	Justice, Public Order, and Safety Activities	3
Total			1,124

Source for Tables III.I-4 and III.I-5: Louis Berger Group, 2006

Toxic Release Facilities Inventory

The Toxic Release Inventory (TRI) is an EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities (EPA, December 2005c). The purpose of the TRI is to provide information to the public about toxic chemicals in their communities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990. Section 313 of EPCRA required the EPA and the States to annually collect data on releases and transfers of certain chemicals from industrial facilities and also make this data available for public access. The Pollution Prevention Act required that additional data on waste management and source reduction activities be reported in the TRI.

A facility must report to the TRI if:

- its Standard Industrial Classification (SIC) code is between 20 to 39 or corresponds to a specific industrial sector as dictated by the EPA; and
- it employs 10 or more full-time employees; and
- it manufactures or processes more than 25,000 pounds or uses more than 10,000 pounds of any listed chemical during the calendar year

There are a total of nine facilities in the District of Columbia that reported to the TRI releases of toxic chemicals in 2003 (EPA, December 2005b). Table III.I-6 shows the total amounts of on-site and off-site disposal or releases. These nine TRI facilities reported total releases in 2003 of 13,788 pounds of toxic chemicals. Out of 13,482 pounds of on-site disposal or other releases, 3,338 pounds were fugitive air emissions, 1 pound was point source air emission, 8,062 pounds were surface water discharges, and 2,082 pounds were other surface impoundments.

Table III.I-7 shows the chemicals and the facilities which released them. Of the 306 pounds of off-site disposal or other releases, 207 pounds were sent to RCRA Subtitle C Landfills, 93 pounds (metals only) were solidification/stabilization, 3 pounds (metals only) were transferred to Publicly Owned Treatment Works (POTWs), and 2 pounds were transferred to a waste broker for disposal.

It was reported that these facilities managed a total 102,527 pounds of production-related waste. Most of this waste (87,687 pounds) had been sent off-site to be recycled, while 1,003 pounds had been sent to POTWs for treatment.

Table III.I-6: TRI Facilities and Total Releases

Facility	TRIF ID	Total On-site Disposal or Other Releases (Ibs)	Total Off-site Disposal or Other Releases (Ibs)	Total On- and Off-site Disposal or Other Releases (Ibs)
Benning Generating Station	20019BNNG3400B	1	2	3
Buzzard Point Generating Station	20024BZZRD1STVS	0	0	0
Fort Totten Ready-Mix Concrete	20011FRTTT5001F	NA	NA	NA
Superior Concrete Materials (1st and Maryland Ave SE)	20004SPRRC1STAN	0	-	0
Superior Concrete Materials (South Capitol Street SW)	20024SPRRC1601S	0	0	0
USACE Dalecarlia WTP	20315SCDLC5900	8,303	0	8,303
USACE McMillan WTP Aqueduct	20001SCMCM2500F	5,179	2	5,181
US Dept of the Treasury Bureau of Engraving and Printing	20228BRFNG14THC	0	52	52
US Dept of Justice – ATF HQ	20226SDJBR650MA	0	249	249
Total		13,482	306	13,788

Table III.I-7: TRI Facilities and Chemicals Released

Chemical	Facility	Total Amount Released (Ibs)
Ammonia	Army Corps of Engineers - Dalecarlia WTP	240
	Army Corps of Engineers - McMillan WTP	
Benzo (G,H,I) Perylene	None	0
Chlorine	Army Corps of Engineers - Dalecarlia WTP	3100
	Army Corps of Engineers - McMillan WTP	
Copper Compounds	Army Corps of Engineers - McMillan WTP	1899
Lead	US Dept of Treasury, Bureau of Engraving and Framing	290
	US DOJ Bureau of Alcohol Tobacco Firearms and Explosives	
Manganese Compounds	Army Corps of Engineers - Dalecarlia WTP	8244
	Army Corps of Engineers - McMillan WTP	
Mercury Compounds	Benning Generation Station	1
Nickel Compounds	US Dept of Treasury, Bureau of Engraving and Framing	11
Nitrate Compounds (Listed 1995)	None	0
Polycyclic Aromatic Compounds (Listed 1995)	Buzzard Point Generating Station	2
Total		13788

Source for Tables III.I-6 and III.I-7 : Louis Berger Group, 2006

Summary and Trends

Future development in the District will necessitate excavation on sites previously used in ways that produced contaminants. As a result, new contaminated sites may be identified for cleanup and restoration. Cleanup and monitoring programs will continue, providing general improvement of hazardous resources across the District.

Remediation is expected to continue in specific locations, including the Spring Valley neighborhood. The area was used during World War I by the US Army for chemical warfare research and testing. In the past 90 years, the majority of volatile materials have degraded and are no longer found in soil but some arsenic contamination remains. The Agency for Toxic Substances and Disease Registry (ATSDR) is currently evaluating the health implications of the contaminated soils while the remediation and clean up is being conducted by the U.S. Army Corps of Engineers (USACE). The remaining pathways of concern are soil ingestion, dust inhalation, and vegetable gardening. The results have thus far concluded that low levels of volatile and semi volatile substances in indoor air pose no apparent public health hazard to adult or child occupants.

SIGNIFICANCE CRITERIA

A project could be deemed as having a significant impact on the environment if it would create a public health hazard or involve the use, production, or disposal of materials that pose a hazard to people, animals, or plant populations in the affected area. This includes the exposure of the public to high levels of noise, including substantial increases in ambient noise levels. Impacts could also be significant if they would interfere with emergency response or evacuation plans. In many cases, federal standards or guidelines are used to determine the acceptable levels and/or public health risks associated with exposure.

IMPACTS AND MITIGATION

EXPOSURE TO RESIDUAL HAZARDOUS MATERIALS

Impact I-1. The Comprehensive Plan supports additional residential and mixed use development on underutilized commercial and industrial sites. Major areas of change include the Fort Totten and Brookland Metro station areas, land along Blair Road, Ivy City/Northeast Gateway, the Bladensburg Road corridor, and several sites on the Anacostia River. Some of these sites are still in active industrial or heavy commercial use; others are vacant but could contain residual hazardous materials from former land uses. Introducing residential uses in such areas could increase the potential for exposure to hazardous materials unless proper precautionary measures are taken. This impact will be mitigated to a less than significant level by policies and actions in the Comprehensive Plan, particularly in the Environmental Protection Element, and by following establish District and federal procedures for hazardous materials remediation.

As noted in the Project Description of this Environmental Assessment, the Comprehensive Plan directs much of the city's future housing growth to property that was once used for commercial, military, or industrial activity. Some of these sites are now vacant, and others still support heavy commercial activities. These uses are especially prevalent in the Northeast quadrant of the city, an area where extensive redevelopment is expected (including the conversion of industrial land to housing) during the next 20 years. Hazardous materials have historically been used on many of these sites; in addition, some contain underground storage tanks.

Construction on former commercial and industrial sites could disturb soil and groundwater containing hazardous materials. Grading and excavation activities could expose workers and the public to hazardous materials if the site has not been completely remediated. Toxic materials on such sites may not pose a threat if they are left in place, but they could become hazardous if they become airborne or are released during construction.

New development on such sites could also result in the exposure of future residents to toxic substances through contact with contaminated soils, building materials, dust, water, fumes, or vapor. For example, eating vegetables grown in contaminated soils, accidentally ingesting such soils, or inhaling dust associated with residual toxic substances in the ground all represent potential hazards. Such of the residual materials on former commercial and industrial sites may be carcinogenic. Substances like lead, which is found in the soil on some sites, can lead to developmental problems in children.

The earlier sections of this chapter describe the local and federal regulations that mitigate exposure to such hazards. The need for site investigations is determined on a case-by-case basis by the appropriate regulatory agency. Such investigations identify the nature and extent of hazardous materials present and whether or not the materials occur at levels requiring remediation. The investigations also identify health and safety precautions and special handling or disposal procedures. If threshold levels for particular contaminants are exceeded, appropriate remediation measures are required. Sites are typically cleaned to levels considered to be protective of human health and the environment given existing and planned land uses.

The following policies and programs are included in the Environmental Protection Element to address the potential exposure of aquatic life, wildlife, and the human population in the District to hazardous materials resulting from development on contaminated sites:

Policy E-4.4.5: Clean-Up of Contaminated Sites

Ensure that the necessary steps are taken to remediate soil and groundwater contamination in the city, both in areas where future development is likely and in areas that are already fully developed. In addition, require soil and groundwater evaluations for any development that is proposed on a site where contamination may be possible due to past activities. If contamination is found to be above acceptable levels, require remediation and, where necessary, long term monitoring and institutional controls.

Policy E-4.4.6: Hazardous Substances and Land Use

Ensure that land use planning and development decisions minimize the exposure of residents and workers to hazardous substances. New residences, schools, and similarly sensitive uses should not be sited in areas where significant quantities of hazardous substances are handled, stored, or disposed. Likewise, new municipal or industrial facilities that produce hazardous waste and toxic materials should not be sited in residential or environmentally sensitive areas.

Policy E-5.3.1: Brownfield Remediation

Clean up and redevelop contaminated “brownfield” sites, providing new business and job opportunities and expanding land resources for economic development, open space, and other purposes.

Action E-4.4-D: Underground Storage Tank Management

Maintain and implement regulations to monitor underground storage tanks (UST) that store gasoline, petroleum products, and hazardous substances. Prevent future releases from USTs to soil and groundwater; abate leaking tanks and other hazardous conditions, remediate contaminated sites; and provide public education on UST hazards.

Action E-5.3-A: Voluntary Clean-Up Program

Continue the District’s voluntary clean-up program. The program is designed to remediate contamination on any site that is not on the EPA’s National Priority List and that is not the subject of a current clean-up effort

Implementation of these policies and actions, coupled with the continued implementation and enforcement of District and federal hazardous substance regulations, will reduce the potential for adverse effects to a less than significant level. The potential exists for positive environmental impacts as contaminated soils are remediated, and brownfield sites are put back into productive use.

PROXIMITY OF NEW HOUSING TO INDUSTRIAL AND COMMERCIAL USES

Impact I-2. Housing development in transitioning industrial and heavy commercial areas could result in the exposure of additional residents to health hazards associated with the day-to-day operations of established businesses on nearby sites. Similarly, new “mixed use” development (with housing over ground floor commercial uses) along commercial corridors and in neighborhood centers could potentially expose new residents to hazardous materials such as dry cleaning solvents, petroleum products, and other chemicals used by ground floor businesses. This is a less than significant impact due to established programs which regulate the handling of hazardous materials, zoning and building code requirements, health regulations, and the policies set forth in the Comprehensive Plan.

The land use policies in the proposed Comp Plan could result in the increased mixing of land uses that were once regarded as incompatible. For example, live-work lofts are encouraged in quasi-industrial areas like NoMA, and housing is specifically encouraged above retail uses in almost every neighborhood of the city. Many businesses in these areas use hazardous materials (for instance, dry cleaners use perchloroethylene). These materials are well regulated and do not pose a public health concern under proper operating conditions. The District has a number of programs ensuring the safe handling of these materials, maintains records of where they are used and in what quantities, and has emergency response procedures in the event of an accident. Building codes and zoning standards provide further assurance that compatibility between uses will be maintained.

The Land Use Element of the Plan addresses this issue directly. It calls for performance standards and changes to the Zone Regulations to more effectively buffer incompatible uses, and ensure the compatibility of different uses within mixed use projects. In addition, the Plan contains the following policies and actions to further reduce the potential for hazardous materials impacts associated with adjoining land uses. The policies call for continued enforcement of local and federal hazardous materials handling regulations, as well as improved emergency response and preparedness:

Policy E-4.4.1: Hazardous Substances Management

Develop and implement programs to manage the use, handling, transportation, storage and disposal of harmful chemical, biological, and radioactive materials including expanded enforcement of local regulations and the establishment of training programs on hazardous materials and emergency planning.

Policy E-4.4.3: Accidental Spills and Releases

Ensure compliance with District laws relating to the notification and reporting of accidental spills and releases of hazardous materials. Improve public education and awareness of these requirements as part of a broader effort to improve emergency preparedness and planning in the city.

Policy E-4.4.7: Design Considerations

For uses where hazardous substances are handled, require design and construction practices that minimize the possibility of hazardous spills, accidents, leaks, or security breaches—and encourage other measures as necessary to prevent injury and disease, and protect property and natural resources.

Action E-4.4-B: Compliance with Hazardous Substance Regulations

Maintain regulatory and inspection programs to ensure that all businesses that store, distribute, or dispose of hazardous materials comply with all applicable health, safety, and environmental requirements. These requirements range from used oil collection facilities at automotive repair shops to emergency contingency plans for the PEPCO power plant to disposal of medical waste from area hospitals and clinics.

Implementation of these policies, coupled with continued enforcement of District and federal regulations, will reduce this impact to a less than significant level.

EXPOSURE TO HAZARDOUS BUILDING MATERIALS

Impact I-3. The Comprehensive Plan strongly supports the renovation of older buildings, some of which may contain hazardous building materials such as asbestos and lead. In addition, the Plan targets a number of areas for redevelopment and “land use change.” This could result in the demolition of older buildings, which likewise may contain hazardous building materials. This is a less than significant impact due to policies and actions in the Draft Plan and existing regulations for hazardous building materials.

The Comprehensive Plan explicitly supports restoration of vacant and abandoned structures, and additional population and employment growth. Thus, its implementation could result in demolition or renovation of structures containing hazardous building materials. Continued implementation of the existing (1998) Plan would have similar impacts.

If a building contains friable or non-friable asbestos, there is a potential for release of airborne fibers when the structure is demolished, moved, or altered, unless proper precautions are taken. A release could expose the public and construction workers to airborne asbestos. Similarly, if lead-based paint is present and has delaminated or chipped from building surfaces, the potential exists for the release of airborne lead particles. If PCBs are present, any leakage could potentially expose workers to unacceptable levels. Removal of fluorescent light tubes could result in exposure to mercury vapors if the lights are broken.

Structures with asbestos or lead-containing materials require abatement to prevent worker and public exposure. All structures are inspected prior to alteration or demolition to determine the presence of such materials. Abatement practices such as containment and/ or removal are required prior to permit approval.

To further reduce the potential for hazardous material impacts, the proposed Comp Plan includes the following policies and actions:

Policy E-4.4.2: Hazardous Building Materials

Protect public health and safety by testing for and, where appropriate, removing lead, radon gas, asbestos, and other hazardous substances from the built environment. When these hazards are abated, require full compliance with all applicable licensing and inspection standards.

Action E-4.4-C: Reducing Exposure to Hazardous Building Materials

Implement programs to reduce exposure to hazardous building materials, including the existing radon gas testing program and the lead-based paint management program. The latter is designed to reduce public exposure to lead hazards and eliminate childhood lead poisoning citywide by 2010.

Implementation of these policies, along with established city programs and regulations to abate and regulate hazardous building materials, will mitigate the impacts of the Comprehensive Plan to a less than significant level.

INCREASES IN HOUSEHOLD HAZARDOUS WASTE

Impact I-4. The proposed Comp Plan envisions the addition of 57,100 households by the year 2025. The addition of these households would likely increase the volume of household hazardous waste that would be generated, the amount of used motor oil that would be produced, and the amount of pesticides and herbicides that are applied and released into the air and water. These wastes could adversely affect human health if they are not appropriately handled, stored, and disposed. Compliance with existing laws and regulations, accompanied by implementation of Comp Plan policies, will reduce this impact to a less than significant level.

Some of the day to day activities that contribute to pollution include car washing, oil changing, radiator flushing, washing down driveways, lawn fertilizing, and dumping of yard waste in gutters. Rain can carry contaminants from these activities to creeks or storm drains which then drain to the Potomac and Anacostia Rivers. These untreated wastes can harm fish and wildlife.

Other potential impacts that can result from improper handling or disposal of household chemicals include:

- Children can be seriously harmed by eating, drinking, touching, or breathing toxic chemicals.
- Refuse haulers, transfer station workers, and utility workers can be injured by exploding aerosol cans, splashing chemicals, or poisonous fumes created by mixing chemicals
- Firefighters can be injured by these chemicals when responding to a fire
- Hazardous chemicals can pass through treatment processes and get discharged to the Potomac River
- Groundwater can be contaminated as pesticides and herbicides filter into the soil
- Wastewater treatment bacteria needed to break down wastewater solids can be killed by household chemicals

As noted earlier, the District maintains regulations and programs to promote the safe handling and disposal of household hazardous wastes. Public education is one of the most important components of these programs and is essential to reduce the potential for adverse effects. The District also enforces dumping laws, and promotes integrated pest management practices to avoid reliance on toxic pesticides in lawn and garden care. The following Comp Plan policies further address this issue:

Policy E-4.4.4: Toxic Chemical Source Reduction and Disposal

Encourage the substitution of non-toxic or less toxic chemicals and products for toxic chemicals and products in all businesses and households. Provide options for the disposal of hazardous waste generated by households and small businesses to minimize illegal and harmful dumping. Maintain penalties and fines for the illegal dumping of materials such as used oil and batteries.

Policy E-4.6.3: Discouraging Illegal Dumping

Develop and maintain effective public education and enforcement tools to curb littering and illegal dumping, and to promote the safe disposal of solid waste (including hazardous waste, medical waste, construction debris, used oil, and scrap tires) and bulky items.

Action E-4.4-A: Household Hazardous Waste Disposal

Expand the District's education and outreach programs on the dangers of household hazardous wastes and continue to sponsor and publicize household hazardous waste collection events. Provide additional sites and regularly scheduled events for the safe collection and disposal of such wastes. Explore options for addressing the collection and disposal of hazardous waste from businesses that are classified as conditionally exempt small quantity generators.

Action E-4.4-E: Reductions in Pesticide Use

Maintain a pesticide management program that complies with the District's Municipal Regulations for pesticide registration, certification, and use. Implement new programs to promote integrated pest management by the private sector and discourage the use of harmful pesticides and herbicides by District residents and employers.

HAZARDOUS MATERIALS TRANSPORT

Impact I-5. The addition of 125,000 jobs and 57,100 households by 2025 would result in additional truck and rail traffic, probably including the increased transport of hazardous materials on local roadways and rail lines. The risk of an incident associated with terrorism or an accidental spill could grow as the volume of goods and deliveries increases. At the same time, emergency response

capacity could be diminished as traffic congestion increases. This is a potentially significant impact that is mitigated by implementation of the District's emergency management and response plans.

Adoption of the Comprehensive Plan will not have a direct, material impact on the transportation of hazardous materials through the city. However, the Plan does anticipate increased commerce, economic diversification, substantial population growth, increases in tourism, and increased levels of congestion. The combination of these factors could mean that additional hazardous cargo is transported to (and through) the District, moving at a slower pace and in greater proximity to residential uses. The risk of an accident—or the potential for a terrorist-related incident—could increase as this occurs.

DDOT's Motor Carrier Threat Assessment Study assessed the level of threat associated with hazardous materials transport and recommended a number of programs and policies to reduce hazards. In April 2005, DDOT published the Terrorism Prevention in Hazardous Materials Transportation Emergency Act of 2005. The Act requires carriers transporting certain ultra-hazardous materials within 2.2 miles of the US Capitol to obtain a permit. The emergency rulemaking will apply only to rail carriers starting April 11, 2005; it will apply to motor vehicle carriers when legal issues are resolved. This legislation originated from concerns over potential terrorist attacks on the US Capitol Building and complex due to the large shipments of ultra-hazardous materials transported by motor vehicle or rail car in the vicinity.

The Comprehensive Plan addresses hazardous materials transportation in both the Transportation and Environmental Protection Elements:

Policy T-3.3.1: Balancing Goods Delivery Needs

Balance the need for goods delivery with concerns about roadway safety, hazardous materials exposure, quality of life, and security.

Policy T-3.3.2: Freight Safety

Continue to work with the federal government and the rail owners and operators to protect the city's residents and workforce by working to eliminate the rail shipment of hazardous materials through the District of Columbia.

Policy E-4.4.8: Hazardous Materials Transport

Regulate and guide the transport of hazardous materials through the District to minimize the possible exposure of residents to untenable health risks

Action T-4.1-C: Emergency Evacuation Plan

Continue to refine an emergency evacuation plan that describes not only evacuation procedures and routes, but that also defines the modes of transportation in case certain modes, such as the Metrorail system, become unavailable.

These policies must be carried out in tandem with the much more detailed and prescriptive policies and regulatory programs developed by DDOT, the federal government (e.g., the Department of Homeland Security and others), and the DC Emergency Management Agency to effectively mitigate hazardous transportation risks.

INCREASED NOISE EXPOSURE

Impact I-6. The additional development envisioned by the Comp Plan—particularly new housing along arterial streets, near elevated Metrorail stations (e.g., Fort Totten, Brookland, Rhode Island Ave, New York Ave), and close to freeways (Poplar Point, Kenilworth-Parkside, Near Southeast), could result in a larger number of residents living in areas with noise levels that exceed federal guidelines. At the same time, the introduction of streetcars, rapid buses, and other transit modes—coupled with additional traffic—along certain streets could raise ambient noise levels. Existing sensitive receptors such as housing, schools, libraries, and hospitals could be exposed to higher noise levels in a limited number of locations. Increases in construction activity associated with plan-related development also could create noise. These are potentially significant impacts but they are mitigated to less than significant levels by policies and actions in the Draft Plan.

As noted in the Transportation section of this Environmental Assessment, traffic volumes are expected to increase on most District arterials during the next 20 years. Many of these streets are lined with housing, ranging from single family detached homes (for example, along Pennsylvania Avenue SE east of the Anacostia River) to large apartment buildings (for example, along Connecticut Avenue and Lower 16th Street). While the District does not have a large number of freeways, the freeways that do exist are abutted by housing in many locations (particularly along I-295 between Anacostia and Deanwood, and in Capitol Hill adjacent to the Southeast/Southwest Freeway).

In some cases, noise levels along the freeways and arterials already exceed HUD guidelines for residential land uses (65 dB). Increased traffic levels could expand the edges of the 65 dB noise contour even further, with the distances varying based on such factors as traffic volume, topography, and vegetation. Without new sound walls or landscape buffers, a larger number of homes could be subject to high noise levels. Other land uses along these corridors, such as schools, hospitals, nursing homes, and libraries could also be exposed to higher noise levels.

At the same time, the Comp Plan proposes new development in areas with relatively high ambient noise levels. These areas include Poplar Point, Near Southeast, and Kenilworth/ Parkside. Residential development is also contemplated along New York Avenue, and around elevated Metro stations at New York Avenue, Rhode Island Avenue, Brookland, Fort Totten, Takoma, Minnesota Avenue, and Deanwood. New housing in these locations would need to be designed to comply with DCMR Chapter 27 standards for noise, with insulation, double-paned windows, and other measures to reduce interior noise to acceptable levels.

Finally, the mixed use development pattern envisioned by the Comp Plan could also lead to new residential uses being constructed close to noise-generating commercial uses such as restaurants and night clubs. Noise associated with mechanical equipment (in commercial buildings), delivery trucks, refrigeration units, garbage collection, and similar activities could affect the peace and quiet of adjoining new residential development.

The following policies and programs are included in the Environmental Protection Element in order to reduce noise pollution levels within the District:

Policy E-4.3.1: Interior Noise Standards

Ensure that interior noise levels in new buildings and major renovation projects comply with federal noise standards and guidelines. Support the retrofitting of existing structures to meet noise standards where they are currently exceeded.

Policy E-4.3.2: Reduction of Vehicle Noise

Provide regulatory, mitigation, and monitoring measures to minimize exposure to noise from vehicular traffic, including buses, trucks, autos, and trains. Encourage the use of landscaping and sound barriers to reduce exposure to noise along freeways, rail lines, and other transportation corridors.

Policy E-4.3.3: Household Noise Control

Strengthen enforcement of local ordinances and regulations that limit sources of household noise in the city, including noise originating from car alarms, construction activities, mechanical equipment and machinery, and similar sources.

Policy E-4.3.5: Noise and Land Use Compatibility

Avoid locating new land uses that generate excessive noise adjacent to sensitive uses such as housing, hospitals, and schools. Conversely, avoid locating new noise-sensitive uses within areas where noise levels exceed federal and District guidelines for those uses.

Action E-4.3-A: Evaluation of Noise Control Measures

Evaluate the District's noise control measures to identify possible regulatory and programmatic improvements, including increased education and outreach on noise standards and requirements.

Action E-4.3-B: Enforcement of Noise Regulations

Pursuant to the DC Municipal Regulations, continue to enforce laws governing maximum day and nighttime levels for commercial, industrial and residential land uses, motor vehicle operation, solid waste collection and hauling equipment, and the operation of construction equipment and other noise-generating activities.

Action E-4.3-E: Measuring Noise Impacts

Require evaluations of noise impacts and noise exposure when large-scale development is proposed, and when capital improvements and transportation facility changes are proposed.

Action E-4.3-F: I-295 Freeway Noise Buffering

Consistent with DDOT's noise abatement policy, continue to pursue the development of sound barriers and landscaping to shield neighborhoods abutting the I-295 (Anacostia) Freeway, Kenilworth Avenue, and I-395 (SE/SW Freeway) from noise levels that exceed acceptable standards.

Policy E-3.4.4: Monitoring of Operational and Construction Impacts

Strengthen District government programs that monitor and resolve air pollution, water pollution, noise, soil contamination, dust, vibration, and other environmental impacts resulting from commercial uses, industrial uses, trucking, construction activities, and other activities around the city that could potentially degrade environmental quality.

In addition to these policies, the Environmental Protection Element encourages the planting of trees to absorb sound and reduce noise impacts and the Land Use Element recommends performance standards to ensure that noise levels remain acceptable as new development is approved. Implementation of these measures, coupled with administration of building code requirements for insulation and noise reduction, will reduce impacts to less than significant levels.

FLOODING

Impact I-7. The Comprehensive Plan envisions redevelopment along the Anacostia River, and new parks and trails along the waterfront. This could increase the potential for flooding unless precautions are taken to locate habitable structures above the 100-year flood elevation. This is a less than significant impact due to site planning practices which take flood hazards into consideration, and the enforcement of building codes and other regulations that limit development in the flood plain.

The Comp Plan envisions redevelopment of several hundred acres of waterfront tracts in the next 20 years, including the 50-acre Southwest Waterfront, the 67-acre Reservation 13 site, the 100-acre Poplar Point site, land in the Kenilworth-Parkside neighborhood, the Southeast Federal Center, and other waterfront properties along the west bank of the Lower Anacostia River. The Plan also integrates the Anacostia Waterfront Initiative Framework Plan proposals for a riverwalk and expanded park along the Anacostia shoreline (including pedestrian and bicycle bridges, nature centers, trails, meadows, restored wetlands, boathouses, and active recreational areas). It also endorses completion of the proposed Georgetown Waterfront Park.

Some of these areas are within the federally-designated 100-year flood plain or are in areas subject to coastal flooding during hurricanes and coastal storms. The phenomenon of global warming, coupled with rising sea level and the increased incidence of severe storms, could result in a greater land area being subject to flooding in the future.

The impacts of the Comprehensive Plan on flood hazards, however, are minimal. Areas within the 100-year flood plain are generally designated for park and open space. The more detailed site planning that has occurred (or that will occur) on waterfront development sites has designated (or will designate) flood prone areas as open space. The Comp Plan itself includes the following policy to recognize and mitigate flood hazards:

Policy E-4.7.4: Flood Plains

Restrict development within FEMA-designated flood plain areas. Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within these areas that could pose public health or safety hazards in the event of a flood.

Continued implementation of this policy, coupled with ongoing enforcement of the DCMR and FEMA regulations, will ensure that the risk of flooding is not increased by the Comp Plan.

ELECTROMAGNETIC FIELD (EMF) EXPOSURE

Impact I-8. The Comp Plan supports residential and commercial growth in the city. Increased population and employment could lead to the need for additional telecommunication towers and electric power transmission and distribution facilities, which could in turn lead to additional electromagnetic fields. Housing development near existing communication towers or electric facilities could also result in a large number of residents being exposed to EMF. This is a less than significant impact due to policies in the Comp Plan which promote prudent avoidance of EMF hazards in site planning and land use decisions.

In the District, the federal and local governments, commercial industry, and general public rely heavily on radiofrequency services, facilities, and devices. In recent years, this demand has necessitated the location of new antennae on both public and private land. District residents are exposed to the electromagnetic fields (EMF) produced by the local build-up of electric charges generated from such telecommunications towers. The spectrum of electromagnetic radiation includes radio waves and microwaves, collectively referred to as radiofrequency, emitted by transmitting antennas.

The World Health Organization reports that the levels of radiofrequency to which people are normally exposed are much lower than those which produce significant impacts. Cellular installations, especially with tower-mounted antennas, have shown ground-level power densities that are thousands of times less than the Federal Communications Commission limits for safe exposure (WHO 2003). While WHO has found no adverse health effects from low-level long-term exposure to radiofrequency emission, the American Medical Association has recommended a policy of “prudent avoidance”, suggesting that manufacturers and employers begin reducing the exposure of workers and the public to EMF radiation.

The Zoning Commission for the District of Columbia has established development standards for antenna towers and the NCPC has written guidelines for antenna location on federal property in the National Capital Region. Both sets of guidelines govern the appropriate location of radiofrequency facilities and devices for functional and aesthetic reasons, protecting the operational needs of federal installations and parkland, and preserving important viewsheds.

The following policies and programs are included in the Comp Plan Environmental Protection Element to address electromagnetic field reduction in the District:

Policy E-4.7.1: Prudent Avoidance of Electromagnetic Field Impacts

Incorporate prudent avoidance in decisions regarding the approval, location or routing, and intensity of facilities that generate electromagnetic fields, such as power lines and communication antennas. Such facilities should be located only when and where necessary based on local service needs, and should be designed using methods to mitigate involuntary public exposure to potential adverse effects.

Policy E-4.7.2: Co-Location of Antennas

Consider the joint use and co-location of communication antennas to reduce the number of towers necessary, thereby reducing aesthetic impacts and limiting the area of radiofrequency exposure.

Similar policies are contained in the NCPC Federal Elements Comprehensive Plan. Implementation of the District and federal policies will ensure that EMF impacts associated with the Comp Plan are less than significant.

III.J COMMUNITY SERVICES

This section of the Environmental Assessment describes the impact of the proposed Comprehensive Plan on community services in the city, including schools, libraries, police, fire/EMS, health care facilities, child care facilities, and parks. The analysis includes a summary of the District's existing community services, a description of impacts resulting from the adoption of the Plan, and measures to mitigate any significant impacts. The impacts assessed here are based on a combination of anticipated development and redevelopment activity that will occur in the next 20 years as well as the implications of the many policies advocated in the Plan.

SETTING

Schools

The District of Columbia Public Schools (DCPS) provide the city's public K-12 educational services. Enrollment has been declining for the last four decades and was approximately 60,000 students in 2005. While declining enrollment was largely a result of shrinking population and household size during the 1970s, 80s, and 90s, it has more recently been attributable to increasing enrollment in charter schools.

The District government does not directly oversee DCPS. However, the city does provide the schools with their annual and capital operating funds. After receiving city approval, the annual budget is further approved by Congress. There is currently an effort to develop a more collaborative capital facilities process involving both the city and DCPS.

The DCPS-run public schools are supplemented by one of the nation's largest charter school systems, with over 15,000 students in 2005. The increasing charter school enrollment has offset declines in the numbers of DCPS students, stabilizing the combined enrollment of both systems at around 75,000 students.

Libraries

The DC Public Library (DCPL) system has 27 facilities. Despite having a ratio of facilities to residents that compares favorably with other cities of similar size, many of its facilities are outdated and are in need of either renovation or replacement. The average age of the branch libraries is 46 years old, with no new libraries opened since 1988. In particular need of improvement is the Martin Luther King Central Library. Starting in 2004, DCPL embarked on a 10-year plan for renovating the branch libraries. The process of selecting a new site for the Central Library and evaluating options for the future of the current Central Library property is underway.

DCPL reported an 11 percent decrease in library circulation between 2001 and 2004. The current utilization rate of DCPL facilities places the system 15th out of 67 large US cities. Improvement of

facility condition, location, technology, events and focusing the content of materials at the various branches could potentially improve circulation levels. The design and programming for the new Central Library is especially important. This library should serve as the administrative hub of the DCPL system, provide facilities for all the programming DCPL offers, and be designed in a manner that anticipates the evolving needs of the city's library patrons.

Police Facilities

The Metropolitan Police Department (MPD) is the primary law enforcement agency for the District. The MPD has seven Police Districts and 46 Police Service Areas within the City. In federally-controlled areas, the US Park Police, the US Capitol Police and the United States Secret Service are the primary law enforcement agencies. In and around WMATA transit stations (and on the trains), the Metro Transit Police provide law enforcement and public safety services.

MPD's facilities are generally dated and obsolete, with a pronounced need for modernization and renovation at all buildings. Operations headquarters and command centers are especially in need of updating.

Fire/EMS Facilities

The Fire and Emergency Medical Services (FEMS) Department provides fire protection and emergency medical service within the boundaries of the District. FEMS has 13 fire stations, including 33 engine companies, 16 ladder companies, three heavy-duty rescue squads, one HAZMAT unit, and one fireboat company. Emergency medical units include 13 advanced life support ambulances, 21 basic life support ambulances and two rapid response units.

Response times are generally adequate, with 91 percent of fire-related calls being responded to within four minutes and 73 percent of critical medical calls responded to within eight minutes. FEMS desires 90 of each of these call types to be responded to within the indicated time range. FEMS has identified several major capital improvement needs, such as a new headquarters building, a fleet maintenance yard, and renovations to stations and the training center.

Health Care Facilities

The district has 14 hospitals to serve residents, workers, visitors and others who need specialized medical and health care services. These hospitals are largely concentrated in Northwest DC, with only one full-service hospital located east of the Anacostia River. There are primary care facilities and clinics throughout the city, although as with hospitals, the eastern quadrants of the city tend to be underserved.

Access to affordable health care is a serious issue in the District. In 2003, 13 percent of District residents were uninsured. Of insured residents, only 53 percent were covered through employer or individual

insurance programs. To assist the uninsured, the DC HealthCare Alliance enrolls over 20,000 people. The primary target of this program is low-income people who do not qualify for Medicaid.

The most obvious trend affecting the provision of healthcare, both in the District and the rest of the nation, is the aging of the population as the large “Baby Boom” cohort passes the age of 60. This trend will greatly change the mix of services health care institutions will need to provide.

Child Care and Senior Care Facilities

The district has an estimated 31,500 children eligible for subsidized childcare. As of 2002 there were 20,889 children enrolled in its child care programs. This reflects a deficit of nearly 10,000 slots due at least in part to insufficient capacity. The District has made great strides in recent years, however, with the number of accredited child care centers more than doubling between 1999 and 2002.

At the other end of the age spectrum, seniors are expected to be the fastest growing segment of the District’s population during the next 20 years. Although the District’s Office of Aging and several affiliated organizations already provide a comprehensive system of services for the elderly, the growing demand for senior services will greatly tax the city’s current offerings. Current statistics show that 45 percent of seniors live alone, 43 percent have no personal vehicle and 42 percent have a physical disability. This general profile of senior residents will likely remain similar in the future. However, with the increasing senior population, the need for transportation, disability services, housing and other services will grow.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant effect on the environment if it substantially increased the demand for governmental services or required alteration of these services without provisions to meet or respond to the increased or changed needs. Thus, the Comp Plan’s impact would be significant if it required major alterations to community services but did not include policies or actions addressing how these needs would be met.

IMPACTS AND MITIGATION MEASURES

New public facilities will be needed to accommodate growth in the city’s population and workforce as well as changes in demographics. The City will need to act with foresight to make certain that facility needs are met. The need for coordinated collaborative public facility planning is acknowledged throughout the Comp Plan. The benefits and efficiencies of co-locating multiple services in combined facilities also is recognized.

The Plan includes the following “global” policies to ensure that public facilities are planned for and expanded concurrently with growth:

Policy CSF-1.1.1: Adequate Facilities

Construct, rehabilitate, and maintain the facilities necessary for the efficient delivery of public services to current and future District residents.

Policy CSF-1.1.2: Adequate Land

Ensure that the District government owns a sufficient amount of land in appropriately distributed locations to accommodate needed public facilities and meet the long-term operational needs of the government.

Policy CSF-1.1.3 Retention of Publicly-Owned Land

Retain District-owned property for community facility uses. Wherever feasible, the District should use short- or long-term leases for lands not currently needed so as to preserve the District's long-term supply of land for public use.

Policy CSF-1.1.8: Co-Location

Encourage the co-location of multiple community services in the same facility, provided that the uses are functionally compatible with each other and are also compatible with land uses and activities on surrounding properties.

Policy CSF-1.2.1: Capital Improvement Programming

Use the capital improvement program process to coordinate the phasing, prioritizing, and funding of public facilities.

Policy CSF-1.2.2: Linking the Comp Plan and Capital Improvement Program

Use the District's Comprehensive Plan, particularly its analysis of growth needs and service adequacy, to establish priorities for the funding of capital improvement projects. Public facility planning should be done systematically and comprehensively and should be based on analytical data about community needs, service levels, and projections—in addition to facility condition assessments.

Policy CSF-1.2.4: Alternative Financing Strategies

Develop and apply alternative capital financing and public facility construction techniques, including joint development, creative leasing arrangements, and financing instruments that reduce long-term debt accumulation.

In addition, the Plan indicates that one of the highest Comp Plan implementation priorities is preparation of a public facilities master plan. This is articulated by the following action:

Action CSF-1.1-A: Master Public Facilities Plan

Develop a Master Public Facilities Plan to ensure adequate community facilities and to provide guidance for the long-term Capital Improvements Program and the 6-year capital budget. The Master Public Facilities Plan should include an assessment of all District-owned or maintained community facilities and should identify what improvements are needed to correct deficiencies and address planned growth and change in the District. The facilities plan should be updated regularly.

The policies and actions referenced above help to mitigate impacts on schools, libraries, police and fire stations, health care facilities, child care facilities, and parks. More specific policies and actions to mitigate impacts on these services are itemized below.

SCHOOL IMPACTS

Impact J1: Residential growth and changing demographics may cause an increase in the number of students and the need for new or expanded school facilities in some parts of the city. Although

the city has excess school capacity on a cumulative, citywide basis, and is actually closing schools in some areas, schools in some neighborhoods are over capacity. Such facilities could be further impacted by future residential growth. Residential growth would also increase the demand for charter schools, which already face the challenge of finding suitable space with limited choices and resources. This is a potentially significant impact but is mitigated to a less than significant level by policies and actions in the Comp Plan.

As a result of DCPS schools' declining enrollment, a number of facilities have been closed over the past two decades. Further closings are needed to ensure that the remaining schools are of sufficient size to offer the full range of programs that produce well-educated graduates. The closing and consolidation of existing facilities provides an opportunity to ensure that the institutions that remain are the best located and most compatible facilities the city can offer. DCPS is forecasting continued declining enrollment, with 52,000 students expected in the DCPS system during the 2012-13 school year. Consequently, there may be yet more school closings in the next five to six years, despite significant residential development in the city.

Longer term-prospects may be different. The Comprehensive Plan contains initiatives to add a significant amount of residential development, including family housing. If this development is even partially accomplished, a significant increase in the number of school children could result. Improvements to educational quality could also attract students from private and charter schools back to the DCPS system, or convince young families who might otherwise leave the city to remain in DC as their children reach school age.

The Comp Plan notes that even if only 10 percent of the projected new housing units contain one school-aged child, that equates to 5,700 potential new students. Consequently, DCPS must be careful to avoid excessive disposition of school properties in the coming years. It is conceivable that at some point new school facilities may be needed to serve new neighborhoods along the Anacostia River and elsewhere. At the very least, the District's school choice policies (which allow out of boundary enrollment) mean that there will be a need to modernize and expand schools in some parts of the city.

The Comp Plan anticipates and responds to long-term school facility needs in a number of ways. It recommends that excess space be leased rather than sold, to retain the flexibility of reclaiming it when it is needed in the future. It recommends that school services be co-located with other public facilities to make the most of limited public assets and to improve operating efficiency. The Plan also supports new approaches to financing school improvements, including impact fees and proffers.

In addition to the overarching public facility planning policies cited on Page III.J-4, the Comp Plan includes the following specific policies relating to school facility planning and development:

Policy EDU-1.1.1: Updated Facilities

Provide updated and modern school facilities throughout the District based on the DCPS Facilities Master Plan.

Policy EDU-1.1.2: Facility Master Planning

Strongly support DCPS efforts to prepare long-range master facility plans so that the school modernization program is based on comprehensive system-wide assessments of facility condition, enrollment trends, long-term needs, and the District's land use plans.

Policy EDU-1.1.3: Administrative and Maintenance Facilities

Ensure that educational facility planning accommodates the administrative, maintenance, and transportation needs of DCPS.

Policy EDU-1.1.4: Public-Private-Partnerships

Consider public-private partnerships and proffers to improve schools as residential development is approved. Strongly discourage the practice of giving up actively used school recreational areas and/or open spaces to accommodate private development in exchange for school reconstruction.

Action EDU-1.1-A: DCPS' Facility Master Plan Process

Actively participate in the DCPS Facilities Master Plan Update process to ensure that facility plans are coordinated with the District's neighborhood conservation and community revitalization plans.

Policy EDU-2.1.1: Collaborative Arrangements with Community Service Providers

Create partnerships between DCPS, District government, non-profits, and other institutions to promote schools as the central focus of community activities.

Policy EDU-2.1.2: Wrap-Around Services

Where space is available, accommodate wrap-around health and human service programs within local schools to address the non-academic needs of students and families. Include affordable child care services wherever feasible.

Action EDU-2.1-A: Shared Maintenance Facilities

Identify opportunities to share DCPS and District government operations, transportation, and maintenance facilities to reduce land and facility costs for both entities.

Policy EDU-1.2.1: Planning For Public Charter Schools

Incorporate the needs of the Public Charter Schools in public school facility planning.

Policy EDU-2.2.1: Intergovernmental Coordination

Coordinate DCPS facility planning efforts with District agencies to ensure that school modernization produces better education facilities for District children while also improving the neighborhood.

Policy EDU-2.2.2: Educational Facilities in Local Plans

Involve the District of Columbia Public Schools in District government land use and transportation planning activities. Local principals, faculty, students, and parents should be invited and encouraged to participate in decisions that impact school facilities and their surroundings.

Policy EDU-2.2.3: Community Participation

Promote an open, public process when making school facility decisions, including decisions on school renovations, additions, and replacements; new schools; school closings and consolidation; the disposition of surplus schools and/or property; site selection; and school design.

Implementation of the policies and actions listed above will result in environmental impacts that are less than significant.

LIBRARY IMPACTS

Impact J2. New residential development, which the Comprehensive Plan encourages, could create demand for new or expanded libraries. This is a potentially significant impact but it will be mitigated to a less than significant level by policies in the Plan calling for library expansion and modernization.

A citywide increase in population and employment could cause an increase in staffing needs, programs, floor space, and materials at the Main Library and at the branch libraries. The increase in demand would probably be greatest in the areas where the largest number of new housing units is planned, particularly Downtown, along corridors east of 16th Street, and along the Anacostia River. Increased demand in these areas would be exacerbated by the fact that most of the existing facilities are too small or are in dire need of modernization.

The Comp Plan notes that the location of new or modernized libraries should be determined in a manner that anticipates sources of population growth and the demand for services. Forecasted demographic trends, such as the aging of the city's population, changes in the number of non-English speaking residents, and the anticipated location of development and redevelopment should be combined with DCPL profiles of user activity and program need. Changing patterns of funding sources for public libraries should also be noted, with an increasing portion of non-governmental funding, such as foundations, "friends of" groups and corporate partners being utilized to maximize the quality of physical resources and program offerings.

In addition to the overarching policies cited on Page IIIJ-4, the Comp Plan provides the following policies to mitigate library impacts:

Policy CSF-3.2.1: Location of Branch Libraries

Locate branch libraries in a systematic way to maximize access for the greatest number of District residents, including future residents who will reside in planned new neighborhoods. This approach may result in the closure of libraries that are close to one another, and the development of new facilities in growing population centers within the city. [Note: this policy was subsequently edited in response to public comments].

Policy CSF-3.2.2: Public-Private Partnerships for Libraries

Explore public-private partnerships to fund the construction of new libraries, including the development of new and remodeled libraries within mixed-use projects on existing library sites. In such cases, any redevelopment should conform to the other provisions of this Comprehensive Plan, including the protection of useable neighborhood open space.

LAW ENFORCEMENT SERVICES

Impact J3: Future residential and commercial growth will generate a need for expanded or relocated police facilities. This is a potentially significant impact but it will be mitigated to a less than significant level by policies and actions in the proposed Comprehensive Plan.

The addition of 57,100 households and 125,000 jobs over 20 years would result in the demand for additional police services. Additional sworn officers and civilian staff would be required, additional equipment would be needed, and police stations and correctional facilities would need to be expanded and modernized. Changes to Police Service Area boundaries could become necessary as growth patterns reshape the city and affect crime patterns. Even without growth, a new (or modernized) administrative headquarters is needed, along with new special operations and evidence warehouses.

Homeland security and emergency/natural disaster management have increasingly been added to the duties of local law enforcement agencies. In some instances, these expanded responsibilities have competed with local police departments' primary responsibility of fighting crime. This has placed an additional burden on law enforcement agencies, particularly in the District of Columbia where the threat of terrorism is very real.

Anticipating such impacts and trends, the Comprehensive Plan includes Policy CSF-4.1.1 to "Provide updated and modern police facilities to meet the public safety needs of current and future District residents, businesses, workers, and visitors." This policy is to be implemented in tandem with the broader policies cited on Page IIIJ-4 of the Environmental Assessment to reduce impacts to a less than significant level.

FIRE AND EMERGENCY MEDICAL SERVICES

Impact J4: Anticipated residential and commercial development is like to create the demand for expanded fire and emergency services. Additionally, anticipated changes in traffic patterns could result in longer response times in some locations—creating the need for additional or relocated stations. This is a potentially significant impact but it will be mitigated to a less than significant level by policies and actions in the Comp Plan.

The additional population and employment accommodated by the Comp Plan will generate the need for additional Fire/EMS personnel and equipment. Expanded and/or modernized facilities will be required, and entirely new facilities could be needed in high growth areas of the District such as the waterfront. The Fire Department is already planning for such facilities, primarily to address gaps in existing response time in the northern part of the city.

Demographic shifts and shifts in economic activity also will impact future Fire and EMS needs. For instance, the aging of the population means that a larger number of emergency medical calls could occur in the future. Similarly, the conversion of older manufacturing sites to newer uses such as offices could change the nature of fire/EMS calls in areas like New York Avenue and NoMA.

By 2025, increased traffic on some District streets could slow down emergency vehicles and increase response time. As noted in the Transportation section of this Environmental Assessment, a number of

streets will be over capacity by that time causing the rush hour to “spread” so that congested conditions are experienced a greater number of hours each day.

The Comp Plan contains the following policies and actions to anticipate and respond to these impacts:

Policy CSF-4.2.1: Adequate Fire Stations

Provide an adequate number of properly equipped fire stations to ensure the health and safety of residents of the District of Columbia. The adequacy of existing facilities should be evaluated in part on the ability to maintain a response time of four minutes at least 90 percent of the time for emergency fire calls and eight minutes at least 90 percent of the time for emergency medical calls. Where response times exceed acceptable limits, equipment and facilities should be relocated or provided to close these gaps.

Policy CSF-4.2.2: Fleet Maintenance and Administrative Office Space

Accommodate the administrative, maintenance, and transportation needs of the city’s fire and emergency medical services, including space for training and fleet maintenance and storage.

Policy CSF-4.2.3: Responsiveness to Demographic Change

Ensure that fire and emergency medical services and facility assessments are responsive to the changing social and economic composition of the population, including workers and visitors as well as residents.

Action CSF-4.2-A: Level of Service Monitoring

Prepare an annual evaluation of the response times for fire and emergency medical calls in order to evaluate the need for additional facilities, equipment, and personnel and identify specific geographic areas where services require improvement. This should include a review of the distribution of fire hydrants and water flow capabilities.

Action CSF-4.2-B: Implement The District Response Plan

Continue to implement the policies and recommendations of the District Response Plan (DRP). Periodically update the plan in response to changing circumstances and resources.

Action CSF-4.2-C: Regional Emergency Coordination Plan

Work with the Metropolitan Washington Council of Governments and its member jurisdictions to help implement the Regional Emergency Coordination Plan.

Implementation of these policies, and adherence to the Level of Service standard for response time in Policy CSF-4.2.1 (through the development of new facilities and acquisition of additional equipment), will mitigate impacts to a less than significant level.

HEALTH CARE FACILITIES

Impact J5: Anticipated residential development, combined with the aging of the population, will increase the demand for health care facilities. The need for such facilities could be exacerbated by the imbalanced distribution of hospitals and primary care facilities around the city today, and by the changing structure of the health care industry. This is a potentially significant impact, mitigated to a less than significant level by policies and actions in the Draft Plan.

The projected addition of new residents combined with the “graying” of the existing population will create demand for new hospitals and primary care facilities. Since many of the large sites projected for future development are in areas that are currently underserved by health care facilities, the need for new

facilities will be even more acute. In addition to future needs, it will also be necessary to modernize existing facilities and add capacity to the overall system to accommodate an increase in the aged population.

The Plan includes the following policies and actions to anticipate and respond to these needs:

Policy CSF-2.1.1: Primary and Emergency Care

Ensure that high quality, affordable, community primary health centers are available and accessible to all District residents. Develop new or rehabilitated centers in medically underserved and/or high poverty neighborhoods, and in areas with high populations of senior citizens, the physically disabled, the homeless, and others with unmet health care needs.

Policy CSF-2.1.2: Public-Private Partnerships

Develop public-private partnerships to build and operate a strong, cohesive network of community health centers in areas with few providers or health programs.

Policy CSF-2.1.3: Coordination to Better Serve Special Needs Residents

Design and coordinate health and human services to ensure the maximum degree of independence for senior citizens, the disabled, and the physically and mentally handicapped.

Policy CSF-2.1.4: Drug and Alcohol Treatment Facilities

Develop an adequate number of equitably distributed and conveniently located drug and alcohol treatment facilities to provide easily accessible, high quality services to those District residents in need of such services.

Policy CSF-2.1.5: Mental Health Facilities

Provide easily accessible, and equitably distributed high quality mental health treatment facilities for District residents in need of such services.

Policy CSF-2.1.6: Health Care Planning

Improve the coordination of health care facility planning with planning for other community services and facilities, and with broader land use and transportation planning efforts in the city. Coordinate city population and demographic forecasts with health care providers to ensure that their plans are responsive to anticipated growth and socio-economic changes.

Policy CSF-2.1.7: Hospices and Long-Term Care Facilities

Support the development of hospices and other long-term care facilities for persons with advanced HIV/AIDS, cancer, and other disabling illnesses.

Action CSF-2.1-A: Implement Medical Homes DC

Work with DCPCA and other partners to implement the recommendations of the Medical Homes DC initiative, including the modernization of primary care facilities and development of new facilities in under-served areas. 1106.20

Policy CSF-2.3.1: Senior Care Facilities

Establish new senior centers in areas that have large elderly populations, particularly neighborhoods in Upper Northwest and Far Northeast. These centers could be co-located in community health facilities or near other public facilities such as libraries or elementary schools to increase the interaction and learning between senior citizens, youth, and others.

Successful implementation of these policies, particularly continued planning for better geographic distribution of emergency medical facilities and primary care facilities, will reduce impacts to a less than significant level.

CHILD CARE FACILITIES

Impact J6. New residential and commercial development, as well as a strong policy emphasis on linking District residents (including single parents) to jobs and attracting families to the city will create the need for additional child care services. This demand will be added to the existing unmet demand for child care facilities, creating a heightened need for additional facilities and services. These impacts are less than significant due to policies and programs in the Draft Plan which respond to expected needs.

The District has seen a recent increase in the number of residents from 0-4, and is experiencing continued strong demand for child care and early childhood development centers. The addition of 57,100 households will result in an increased number of children requiring such services. Moreover the addition of 125,000 jobs—coupled with employment programs designed to link these jobs to District residents—will mean that additional child care services will be needed for working parents. Non-resident workers also will generate demand for child care facilities and services within the District. Providing high-performance childcare services can help reclaim the city as a place to raise children, especially for households in which no parent is available to watch the children during daytime hours.

The Comprehensive Plan has several policies addressing this area of concern:

Policy CSF-2.2.1: Adequate Child Care Facilities

Allow new and expanded child care facilities in all residential, commercial, and mixed-use areas and in community facilities in an effort to provide adequate affordable childcare facilities throughout the District. Locations should be accessible to public transit.

Policy CSF-2.2.2: Child Care Incentives

Provide incentives for new and rehabilitated residential and commercial developments to set aside on-site space for child care facilities.

Policy CSF-2.2.3: Child Development Centers

Recognize the importance of early childhood education and related programs to the well being of the District's youth, and support the development of appropriate facilities for these programs.

Action CSF-2.2-A: Review And Address Zoning Issues

Review and assess the zoning regulations to identify barriers to the development of childcare centers in the District. The assessment should consider ways of reducing any barriers that are identified, provided that child safety and neighborhood quality of life issues can be adequately addressed.

Implementation of these policies will effectively address the impacts of the Plan on child care services, and should result in a net positive impact.

PARK AND RECREATIONAL FACILITIES

Impact J7. Development consistent with the proposed Comprehensive Plan would increase the demand for parkland and recreational facilities, particularly in inner-city multi-family neighborhoods targeted for infill housing and redevelopment. The additional population could

exacerbate existing shortages of parkland in areas like Columbia Heights, Mount Pleasant, Shaw, Ivy City, and Eckington. These impacts will be outweighed by the positive impacts of adopting a Parks, Recreation, and Open Space Element in the District Elements for the first time. The city will enact pro-active policies to provide new parks and improve its existing parks through adoption of the Comprehensive Plan, ensuring that existing conditions are improved as growth takes place.

The addition of 121,000 residents as envisioned by the Comp Plan will require that the city's existing park system is expanded and upgraded. The Comp Plan itself estimates that 200 acres of additional parkland would be needed to sustain the existing acreage per resident ratio. Existing parks will accommodate more users, particularly in higher-density neighborhoods. Many of these neighborhoods are already experiencing a shortage of usable parkland. Given the built out character of the city, finding additional parks will be expensive and difficult.

Whereas the existing (1998) Comprehensive Plan also allows large-scale residential development, it did not address this issue head on. Only a handful of park-related policies are provided (most in the Ward Plans) and there is no overall framework for how the city will meet its park needs. The new Plan recognized this policy void and provided such a vision. The addition of a new Plan Element focused on improvements to the city's park system will have a positive impact on the city's ability to meet future park needs.

The following specific Draft Plan policies speak to this impact:

Policy PROS-1.4.1: Park Acquisition

Acquire and improve additional parkland to meet the recreational needs of existing and future residents. This should occur both through the expansion of existing parks, and the development of new parks.

Policy PROS-1.4.2: Acquisition Methods

Use a variety of methods to acquire and improve parkland, including easements, donations, land purchases, and park set-asides on new development sites. Recognize the impacts of new development on the need for additional park and recreational facilities, and mitigate impacts through dedication of parkland or in-lieu payments.

Policy PROS-1.4.3: Parks on Large Sites

Include new neighborhood and/or community parks on large sites that are redeveloped for housing and other uses that generate a demand for recreational services. The potential for such parks to enhance the connectivity of parks and open spaces throughout the city should be an important planning and design consideration, particularly where multiple large adjacent sites are being redeveloped.

Policy PROS-1.4.4: Parks on Surplus Land

Acquire and convert abandoned or tax delinquent land, surplus rail or road rights of way, and other land not in productive use into recreational use where feasible and appropriate, particularly in parts of the city that lack adequate access to parkland.

Policy PROS-1.4.5: Park Amenities on NPS Land

Where consistent with other policies in the Comprehensive Plan and NPS plans, and where supported by nearby neighborhoods and needs assessments, encourage federal government projects that would provide new recreational amenities such as soccer fields, picnic areas, and trails serving District residents on national parkland.

Policy PROS-1.4.6: Parks in Employment Growth Areas

Provide new parks and open spaces in areas of expected employment growth. Small pocket parks, plazas, and other open spaces should be created in the vicinity of the New York Avenue Metro Station, the Southeast Federal Center, the east end of Downtown, and the South Capitol Street Corridor to provide visual relief and space for outdoor seating and passive recreation.

Action PROS-1.4-A: Park Impact Fee

Study the feasibility (including potential fiscal and economic effects) of adopting a park impact fee that would require residential developers to help cover the cost of parkland acquisition and improvement. Such a fee would be based on a standard amount per dwelling unit or square foot, with the proceeds used to acquire or improve nearby parkland.

Action PROS-1.4-B: Mixed-Use Zones

As part of the review of the city's zoning regulations, revise the provisions for mixed-use zones to consider requirements for useable recreation space or payments in-lieu to meet recreational needs.

Policy PROS-1.3.3: Protecting the Triangle Parks

Maintain the District's open space triangles as neighborhood amenities supporting a range of activities. These activities should vary based on the setting of each triangle, and should range from planted "islands" to more active spaces. The triangles should be designed in a way that mitigates stormwater runoff and air pollution from adjacent corridors.

Policy PROS-1.3.4: Conversion of Parkland / Open Space

Protect the basic function of District parks as public open spaces and prevent parkland conversion to other uses. In the event that there is no other viable alternative to conversion, require that an equivalent or greater area of parkland is acquired and improved in the vicinity of the impacted site.

Policy PROS-1.2.1: Closing the Gaps

Achieve a better distribution of parks in all neighborhoods of the city. This will require a priority on improving or expanding parks in: (a) more densely populated neighborhoods with limited open space; (b) areas that are more than ½ mile from a neighborhood or community park (or a federal park that serves an equivalent function); (c) areas where substantial new housing growth is expected, based on the forecasts of the Comprehensive Plan; and (d) areas where the existing recreation centers and parks are in poor condition.

Policy PROS-1.2.2: Improving Access

Improve access to the major park and open space areas within the city through pedestrian safety and street crossing improvements, bike lanes and storage areas, and adjustments to bus routes.

Policy PROS-1.2.3: Responding To Community Change

Update and improve existing parks in response to changing demographics, cultural norms, and community needs and preferences. Parks should reflect the identity and needs of the communities they serve.

Action PROS-1.3-A: Open Space Zone

Establish an Open Space zone district to cover District-owned parks, community gardens, and other lands where long-term open space preservation is desired. Develop limits on lot coverage and impervious surface coverage in this zone that recognize and protect the basic value of parkland as open space. The zoning provisions should ensure that any future construction within parks is limited to park-related uses and facilities.

III.K CULTURAL AND HISTORIC RESOURCES

This section describes the impact of the proposed Comprehensive Plan on cultural and historic resources in the District. The analysis includes a summary of the city's historical resources, a description of potential impacts resulting from adoption of the Plan, and measures to mitigate any potentially significant impacts.

SETTING

Washington is unique not only because it is the Nation's Capital, but also because it is the great planned city of the United States. Pierre L'Enfant's 1791 plan for the city as well as the 1901 McMillan Plan have largely been followed, creating a street grid and system of boulevards and circles that is unique within the United States. The Height Act of 1910 gave the city a physical scale that is unparalleled in the nation, while allowing historic structures to successfully co-exist with newer buildings. The desire to preserve the legacy of DC's historic planning legacy is noted throughout the Comprehensive Plan, and is the subject of the Plan's Historic Preservation Element.

Beginning in the 1950's, a heightened appreciation for the District's built heritage began to emerge. As a result of the attention paid to preserving the city's historic resources, there are now over 600 historic landmarks and more than 40 historic districts, half of which are local neighborhoods. In all, nearly 25,000 properties are protected by a historic designation. The Comprehensive Plan should be consulted for maps and descriptions of these landmarks and districts.

The current historic preservation program has the Historic Landmark and Historic District Preservation Act of 1978 as its foundation. This law established the Mayor's Agent, the Historic Preservation Review Board and the Historic Preservation Office (See Comprehensive Plan for the text of the act). These bodies are responsible for the review of preservation projects and construction projects in historic districts as well as other related programs. They are also responsible for identifying additional historic properties and areas before they are lost to demolition or alteration.

Historic preservation issues extend beyond the boundaries of the city's historic districts. Approximately two-thirds of the city's residential buildings were constructed before 1950—most are outside of historic districts. Many of the city's parks and open spaces have historic merit, and the open space around older buildings contributes to their historic character and integrity. In addition, the city has a rich archaeological heritage that includes not only the remnants of early European and American settlers, but evidence of earlier Native American cultures going back to 2000 B.C.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant environmental impact if it disrupted or adversely affected a prehistoric or historic archaeological site or property of historic or cultural significance. The historic integrity of a resource includes all the visual qualities that establish its link to its historic associations, including architectural style and the historic uses of the land, structures, and setting. An impact would be considered significant if it caused substantial adverse effects to the character-defining elements of a historic structure without mitigation.

IMPACTS AND MITIGATION MEASURES

ARCHAEOLOGICAL IMPACTS

Impact K1: Excavation of development sites identified in the Comprehensive Plan could unearth or disturb archaeological resources. This is a potentially significant impact that will be mitigated to a less than significant level by existing development requirements coupled with policies in the Draft Plan's Historic Preservation Element. The addition of archaeological policies to the Historic Preservation Element would have a positive impact.

Because the District of Columbia was inhabited by Native Americans for centuries before European settlers arrived, the potential for uncovering archaeological resources exists throughout the city. This is particularly true near the Anacostia River, where evidence of past Native American settlement has already been uncovered. The Plan accommodates development on numerous sites near the river, leading to the potential for further discoveries.

In addition, the Comp Plan encourages continued Downtown infill development, along with the reuse of large sites and the revitalization of areas on the eastern fringes of Central Washington. Many of these sites have been in continuous use with development since the 1700s and early 1800s. The lack of well-defined procedures to protect archaeological resources on private property could result in the loss of these resources as redevelopment takes place. Activities such as vegetation removal, grading, excavation, soil compaction, and landscaping could compromise archaeological artifacts.

The Comp Plan points out that care should be taken to protect archaeological resources when large sites that are located in areas known to be the site of historic or prehistoric activity are proposed for development or redevelopment. It contains several policies designed to protect the city's archaeological resources, listed below:

Policy HP-2.6.1: Protection of Archeological Sites

Retain archeological resources in place where feasible, taking appropriate steps to protect sites from unauthorized disturbance. If sites must be excavated, follow established standards and guidelines for the treatment of

archaeological resources, whether in documentation and recordation, or in the collection, storage and protection of artifacts.

Policy HP-2.6.2: Curation of Data and Artifacts

Treat archaeological artifacts as significant civic property. Ensure that all data and artifacts recovered from archaeological excavations are appropriately inventoried, conserved, and stored in a facility with proper environmental controls.

Policy HP-2.6.3: Public Awareness of Archaeological Resources

Make archaeological artifacts and data visible to the public. Maintain public access to collections, use artifacts and information as educational tools, and treat artifacts as objects of cultural interest.

Action HP-2.6-A: Archaeological Curation Facility

Establish as a high priority a facility for the proper conservation, curation, storage, and study of artifacts, archaeological materials, and related historic documents owned by the District of Columbia. Ensure public access to these materials and promote research using the collections and records.

Action HP-2.6-B: Archaeological Surveys and Inventories

Increase surveys, inventories, and other efforts to identify and protect significant archeological resources.

Action HP-2.6-C: Archaeological Site Reports

Require prompt completion of site reports that document archaeological findings after investigations are undertaken. Maintain a central archive of these reports and increase efforts to disseminate their findings and conclusions.

These policies are absent from the existing (1998) Comp Plan and their addition would have a positive impact on the protection of archaeological resources in the city.

IMPACTS TO HISTORIC CITY PLANS

Impact K2. Infill development and related street and alley closures could compromise the integrity of the historic L'Enfant and McMillan Plans. This is a potentially significant impact, but it is precluded by policies in the Comprehensive Plan.

The Comp Plan supports infill development within the boundaries of the historic L'Enfant city. In the past, such development has not always been sympathetic to the historic system of diagonal avenues, right-angled streets, and alleys that characterize the old city. A number of important elements of the 1791 Plan have been lost over the years due to street closures or realignments and development on open space "reservations". Without proper guidance and regulation, further losses could conceivably occur.

Similarly, the Comp Plan recognizes the possibility of land use changes on the Armed Forces Retirement Home, the McMillan Sand Filtration site, and other sites associated with the McMillan Plan of 1901. It notes the probability of residential and mixed use development on these sites, and recognizes that such development could jeopardize important open space resources that were part of the McMillan vision.

The Comp Plan includes extensive policy and action language to preclude impacts on the city's historic plans. Implementation of these policies, coupled with existing procedures for development review by the District, the NCPC, and the Commission on Fine Arts will reduce impacts of the Comprehensive Plan to

less than significant levels. More detailed environmental assessments (and environmental impact statements) may be needed for individual developments to assess their specific impacts on historic city plans.

The following policies and actions are included in the Comp Plan to avoid these impacts:

Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans

Respect and reinforce the L'Enfant and McMillan Plans to maintain the District's unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L'Enfant Plan reservations (green spaces), limits on street and alley closings (see Figure 9.3), and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds.

Policy UD-1.1.4: Height Act of 1910

Protect the civic and historical character of the city, particularly the "horizontal" urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910. Basic principles of the Height Act are shown in Figure 9.4 below.

Policy UD-1.4.1: Avenues/Boulevards and Urban Form

Use Washington's major avenues/boulevards as a way to reinforce the form and identity of the city, connect its neighborhoods, and improve its aesthetic and visual character. Focus improvement efforts on avenues/boulevards in emerging neighborhoods, particularly those that provide important gateways or view corridors within the city.

Action HP-1.3-D: The Historic Plan of Washington

Complete the documentation and designation of the historic Plan of the City of Washington as a National Historic Landmark.

Implementation of these policies will reduce impacts to less than significant levels.

POTENTIAL LOSS OF HISTORIC STRUCTURES

Impact K3: Some of the development envisioned by the Comprehensive Plan will take place on land that may contain historic structures, or older structures that are eligible for historic designation. As the city redevelops, there could be increased pressure to demolish such structures rather to renovate them. This is a potentially significant impact that is mitigated to a less than significant level by policies and actions in the Draft Plan, and by existing historic preservation practices and procedures in the District of Columbia.

The loss of historic structures due to demolition or "demolition by neglect" is not a new issue in the District. As new infill development occurs, and as corridors, waterfront sites, large sites, and Metro station areas are more fully developed, the risk of demolition to existing historic or potentially historic structures will continue to be present. Many of the most significant sites in the city contain historic landmarks, including the St. Elizabeths Hospital Campus, the McMillan Sand Filtration Site, the Armed Forces Retirement Home, and many of the Anacostia Waterfront lands. The city will face a number of choices as these sites are redeveloped, including whether or not to retain historic structures and preserve historic open spaces.

The structures at greatest risk may be those outside historic districts, and those not currently designated as landmarks. There are hundreds of buildings like these in the District. Some are in poor condition and are vacant or abandoned, further heightening the risk of demolition. Buildings in older commercial and industrial areas are particularly at risk, as many of these areas may transition to new higher-value mixed land uses in the future.

This issue is addressed at length by the Historic Preservation Element. But it is also a topic of critical importance in the Land Use Element, the Housing Element, and the Urban Design Element. The Plan pays particular attention to the preservation of row house neighborhoods. But it also emphasizes preserving the fine-grained character of neighborhood commercial districts, preserving smaller buildings and encouraging adaptive reuse rather than demolition.

The following policies are contained in the Plan to specifically encourage preservation and avoid demolition:

Policy HP-1.3.1: Designation of Historic Properties

Recognize and protect significant historic properties through official designation as historic landmarks and districts under both District and federal law, maintaining consistency between District and federal listings wherever possible.

Policy HP-1.2.1: Historic Resource Surveys

Identify properties meriting designation as historic landmarks and districts through a comprehensive program of thematic and area surveys that document every aspect of the prehistory and history of the District of Columbia. Support these surveys with scholarly research and analytical tools to aid evaluation.

Policy HP-1.2.5: Protecting Historic Building Integrity

Protect historic buildings from demolition whenever possible, and protect the integrity of whole buildings. Discourage treatments like facadism or relocation of historic buildings, allowing them only when there is no feasible alternative for preservation, and only after a finding that the treatment is necessary in the public interest.

Policy HP-2.1.1: Protection of District-Owned Properties

Sustain exemplary standards of stewardship for historic properties under District ownership or control. Use historic properties to the maximum extent feasible when adding new space for government activities, promote innovative new design, and ensure that rehabilitation adheres to the highest preservation standards. Properly maintain both designated and eligible historic properties and protect them from deterioration and inappropriate alteration.

Policy UD-2.3.5: Incorporating Existing Assets in Large Site Design

Incorporate existing assets such as historic buildings, significant natural landscapes, and panoramic vistas in 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.

Policy LU-2.1.4: Rehabilitation Before Demolition

In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition.

Implementation of these policies, coupled with the extensive education, surveying, and outreach programs proposed by the Comp Plan, will reduce this impact to a less than significant level.

LOSS OF HISTORIC CHARACTER

Impact K4. Infill development and redevelopment on large sites could disturb the context and integrity of historic resources. Even if preserved and refurbished, the integrity of historic buildings could be compromised as larger or more modern structures are developed on adjacent properties. Alterations to historic buildings also have the potential to compromise historic context. These are potentially significant impacts but they will be mitigated to less than significant levels by following the policies and actions in the Comprehensive Plan.

The historic preservation policies and actions in the Comprehensive Plan should effectively protect historic buildings from demolition. However, alteration of historic buildings remains an issue. Additionally, the construction of new buildings adjacent to historic buildings has the potential to compromise their historic value by changing their context. Larger or taller buildings also can cast shadows on historic buildings and change the scale of the street environment, the rhythm of a block, and the integrity of the historic district.

Protecting historic character by promoting context sensitive design is a major theme of the Comprehensive Plan. The Land Use Element include extensive policy language on this topic, with several policies addressing the scale transitions between higher and lower density development, and the alteration of historic structures. Policies address both small infill sites and large sites where development could affect the historic context on the site and on adjacent sites.

Section LU-1.4 of the Comp Plan includes numerous policies on the compatibility of infill development with established neighborhood character, while Section LU-2.1 of the Plan speaks to the importance of preserving the context and scale of older neighborhoods. Special attention is given to the preservation of single family homes (LU-2.1.6) and row houses (LU-2.1.7), the appropriateness of zoning in low and moderate density neighborhoods (LU-2.1.8), and the addition of floors to existing residential buildings (LU-2.1.9).

In addition, the following policies and actions in the Urban Design and Historic Preservation Elements are aimed at reducing the potential impacts of future development on historic context:

Policy HP-2.4.1: Rehabilitation of Historic Structures

Promote appropriate preservation of historic buildings through an effective design review process. Apply design guidelines without stifling creativity and strive for an appropriate balance between restoration and adaptation as suitable for the particular historic environment.

Policy HP-2.4.3: Compatible Development

Preserve the important historic features of the District while permitting compatible new infill development. Ensure that new construction, repair, maintenance, and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail.

Policy HP-2.4.4: Suitability to the Historic Context

Apply design standards in a manner that accounts for different levels of historic significance and different types of historic environments. Encourage restoration of historic landmarks while allowing enhancements of equivalent design quality. In historic districts, allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more dramatic new design.

Action HP-2.4-B: Design Standards and Guidelines

Expand the development of design standards and guidelines for the treatment and alteration of historic properties, and for the design of new buildings subject to preservation design review. Ensure that these tools address appropriate treatment of characteristics specific to particular historic districts. Disseminate these tools widely and make them available on the Internet.

Action HP-2.4-C: Preservation Standards for Zoning Review

Work jointly with planning and zoning officials to ensure consistency between zoning regulations and design standards for historic properties. Zoning for each historic district should be consistent with the predominant height and density of contributing buildings in that district. Where needed, develop specialized standards or regulations to help preserve the characteristic building patterns of historic districts and minimize design conflicts between preservation and zoning controls.

Policy UD-2.2.1: Neighborhood Character and Identity

Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context.

Policy UD-2.2.6: Maintaining Façade Lines

Generally maintain the established façade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic façade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing façades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm.

Policy UD-2.2.7: Infill Development

Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs.

Policy UD-2.2.8: Large Site Development

Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are 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.

Action UD-2.2-C: Conservation Districts

Explore the use of "Conservation Districts" to protect neighborhood character in older communities which may not meet the criteria for historic districts but which nonetheless have important character-defining architectural features.

IMPACTS ON HISTORIC LANDSCAPES

Impact K5: New development accommodated by the Comprehensive Plan could impact historic landscapes and open spaces, including the landscaped setbacks along city streets, the open spaces around historic homes and estates, and significant open spaces that are not formally designated as parks. This is a less than significant impact because it is addressed by multiple policies and actions in the Plan and is further mitigated by the District and federal preservation programs, and by zoning rules establishing setbacks and lot coverage requirements to conserve open space.

Equal in importance to the District's archaeological heritage and the historic built environment are the historic open spaces that have served to established Washington's unique identity. These spaces enhance the monumentality of major buildings, provide dramatic vistas, and provide natural elements to complement man-made structures. Historically significant open spaces in the city include the National Mall, the Fort Circle Parks, the L'Enfant City park reservations, and the grounds of historic homes and estates. In addition, the front yard setbacks in many historic neighborhoods (such as Capitol Hill) or along historic streets (such as Lower 16th Street) help to define the character of these areas.

Potential impacts on historic open spaces are mitigated by a series of policies in the Urban Design, Historic Preservation, and Park, Recreation, and Open Space Elements of the Comprehensive Plan. Key among these policies are:

Policy UD-1.2.2: Protecting the Topographic "Bowl"

Consistent with the Federal Elements of the Comprehensive Plan, maintain the prominence of the topographic bowl formed by lowland and rim features of the L'Enfant city. This should include preserving the green setting of the Anacostia hills and maintaining the visual prominence of the Florida Avenue escarpment.

Policy UD-1.2.4: View Protection

Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods.

Policy HP-2.5.1: The Natural Setting of Washington

Preserve the historic natural setting of Washington and the views it provides. Preserve and enhance the beauty of the Potomac and Anacostia riverfronts and the system of stream valley parks. Protect the topographic bowl around central Washington and preserve the wooded skyline along its ring of escarpments. Prevent intrusions into the views to and from these escarpments and other major heights throughout the city.

Policy HP-2.5.2: Historic Landscapes

Preserve the distinguishing qualities of the District's historic landscapes, both natural and designed. Protect public building and monument grounds, parks and parkway systems, government and institutional campuses, gardens, cemeteries, and other historic landscapes from deterioration and incompatible development.

Policy HP-2.5.4: Landscaped Yards in Public Space

Preserve the continuous and open green quality of landscaped front and side yards in public space. Take special care at historic landmarks and in historic districts to protect this public environment from intrusions, whether from excess paving, vehicular access and parking, high walls and fencing, or undue disruption of the natural contours or bermed terraces.

Policy HP-2.5.5: Public Campuses

Recognize campuses in federal ownership as both historic landscape settings for important government facilities and as open green space for the entire city. Preserve the communal value of these campuses by protecting them from overdevelopment. Balance any new development against the public interest in retaining open green space.

Policy HP-2.5.6: Historic Open Space

Retain landscaped yards, gardens, estate grounds, and other significant areas of green space associated with historic landmarks whenever possible. If development is permitted, retain sufficient open space to protect the setting of the historic landmark and the integrity of the historic property. In historic districts, strive to maintain shared open space in the interior of blocks while balancing the need to accommodate reasonable expansion of residential buildings.

Action HP-2.5-A: Protecting Historic Landscapes

Promote the protection of historic landscapes through documentation, specific recognition in official designations, and public education materials. Work cooperatively with federal and city agencies and private landowners to promote the preservation of historic landscapes as integral components of historic landmarks and districts, and to ensure that new construction is compatible with the setting of historic properties.

Successful and continuous implementation of the policies and actions cited above, accompanied by more detailed environmental assessments and prescriptive mitigation measures for future individual projects, should reduce impacts to a less than significant level.

III.L VISUAL RESOURCES

This section of the Environmental Assessment describes the impact of the proposed Comprehensive Plan on visual and aesthetic conditions in the District. The analysis includes a summary of the District's existing visual and aesthetic setting, a description of impacts resulting from the adoption of the Plan, and measures to mitigate any potentially significant impacts.

SETTING

Neighborhood Character and Design

Washington is made up of over 130 neighborhoods, each defined by unique visual characteristics that provide a sense of "place" for residents and visitors. The sense of place is the result of a complex layering of neighborhood history, architectural character, spatial definition, land use, open space and various other design features.

The District's "inner ring neighborhoods" include those areas that were developed largely before 1900. These neighborhoods, such as Georgetown, Dupont Circle, Shaw, Near Northeast, Capitol Hill, and others, are concentrated near the core of the city, largely within the topographic "bowl" defined by the Potomac and Anacostia Rivers, and primarily within the boundaries of the 1791 L'Enfant Plan. While these areas include a variety of housing types and densities, their most memorable visual feature is row house architecture. Rowhouse neighborhoods make up more than one-fourth of Washington's housing.

Variations in the rowhouse type can provide for distinct neighborhood identity, ranging from the Wardman-style porch-front rowhouses, to the bay-front rowhouses characteristic of the Capitol Hill neighborhoods. With development pressures increasing, the need to protect the character of traditional inner ring rowhouse neighborhoods has become increasingly important.

"Outer ring neighborhoods" include those areas that developed largely after 1900 as the city grew rapidly outwards. By 1930, streets had been mapped across the entire 67 square miles of the District, and neighborhoods and population were growing in every area, from Bellevue to Brookland, and Takoma to Friendship Heights. The outer ring neighborhoods are located on the city's higher ground, on the hills and ridges that surround the topographic bowl. The outer ring is generally less dense than the inner ring, and is characterized by an eclectic mix of single family detached housing, semi-detached housing, flats, and garden apartments. Some of these neighborhoods also include high-density apartment buildings. The outer ring neighborhoods are generally more auto-oriented than those in the inner-ring, although they often contain pedestrian-scale neighborhood centers located along old streetcar lines or at Metro stations.

The District's neighborhoods face a range of aesthetic challenges—in some cases improving the visual quality of the existing environment, and in other cases preserving visual integrity in the face of intense development pressure. Neighborhoods such as Shaw and Columbia Heights are dealing with the visual

compatibility of large and small scale infill development. At the same time, these neighborhoods are still confronting visual blight issues related to abandonment or neglected properties. Other neighborhoods are dealing with the visual compatibility of large-scale development on their edges, or along corridor streets. This is particularly true in the historic neighborhoods that ring the edges of Downtown such as Eckington and Capitol Hill.

Streets and Public Spaces

Street layout and design is an important part of neighborhood identity and visual quality. Because of the District's relatively small size and period of initial development (pre-1930), it has a traditional urban street pattern characterized by small rectangular blocks laid out on a grid, with a hierarchical network of major and minor streets and alleys. Buildings relate strongly to streets and sidewalks. Overall the city has a compact form that is easily navigated, the exceptions being large military bases or institutional campuses, large open spaces like Rock Creek Park and the National Mall, and some of the areas east of the Anacostia River developed in the Post-World War II era.

The aesthetic appearance of the city's streets and public spaces depends on a number of design considerations. These include street scale and quality, street tree planting and landscaping, street furniture, and building quality. Many areas in the District—for instance M Street in Georgetown or 18th Street in Adams Morgan—exhibit these qualities, resulting in strong spatial definition. Other areas, such as Benning Road NE lack this sense of definition and do not function as well aesthetically. Here, the pedestrian experience is diminished, and streets tend to be dominated by automobiles.

Streetwalls contribute to active streets and walkability by increasing the level of visual interest and pleasure experienced by the pedestrian and other users. Qualities like variety, facade articulation, and transparency, while subjective in nature, contribute to the pedestrian experience. Currently, Washington exhibits a range of block and building types, with certain streetwall qualities more prominent in some neighborhoods than others. For instance, the narrow, repetitive-but-varied building forms of row houses creates a rich, varied visual texture at the street level. Variations in ground floor use, building materials, and architectural detail provide heightened visual interest. By contrast, the city's downtown office core typically provides less visual interest. The K Street corridor, for example, is characterized by very large buildings, with a horizontal expression of both architecture and urban form.

The District's height limit creates conditions that both add and potentially detract from the aesthetic and functional quality of streets—particularly in the Central Business District. With a restricted height, there is a natural tendency in the densest areas to maximize the number of floors within the allowable building envelope. In order to achieve the 13 or 14 floors possible within the height limit, ground floor heights are typically minimized. The resulting floor-to-floor height is often less than 12 feet, and ground floor entrances are sometimes sunken below sidewalk-grade by several feet. A smooth transition between sidewalk and commercial interior is thus not possible. Examples of successful retail streets usually place ground-floor retail within a range of zero to 2 feet above the adjacent sidewalk elevation. The sunken-entrance sidewalk condition that occurs in the District has the added disadvantage of breaking the

sidewalk space into 2 or more distinct levels, since the change in grade is usually more than can be accommodated by a single, gradual and accessible slope. These level changes create challenges for pedestrian flows, accessible ramping, street furniture placement, and the accumulation of trash.

Public space, including formal squares and plazas as well as sidewalks, also affects the aesthetic appearance and functionality of streets. The District has many successful public spaces, such as the popular gathering spot of Dupont Circle and the lively streets of Adams Morgan where activity between the inside and outside is well connected. It also has public spaces that fall short of their full potential, including Mount Vernon Square, Franklin Square and Freedom Plaza. Part of the challenge here is that the spaces are not adequately programmed for public activity or lack surrounding uses that contribute to activity. Many streets, even those in the traditional retail core of downtown DC, lack the ground floor uses needed to create an active relationship between interior and exterior spaces.

Pedestrian-friendly, neighborhood streets are critical to creating strong neighborhood identity. The most successful neighborhood-oriented streets attempt to balance the needs of the pedestrian, bicycles, automobiles, public transit, and service vehicles. However, the legacy of mid-20th century urban renewal in the District mirrors that of many other U.S. cities. The emphasis for the last 50 years has been on accommodating the automobile, combined with a desire to eliminate blight through redevelopment. Inner city freeways are the most extreme example, completely changing neighborhood scale and visual quality. In some areas, it may take years to re-establish a vibrant, connected, pedestrian-oriented environment.

At this point, it is unlikely that there will be a return to the era of large-scale highway projects. However, DC neighborhoods remain at risk of a loss of neighborhood identity through the widening of streets and elimination of on-street parking to facilitate traffic flow. With the District's high volume of commuter traffic, it is especially important to consider the potential dangers of a gradual erosion of neighborhood street quality.

Civic Identity

The District's civic identity is shaped by many factors, including its physical landscape and topography, its views and vistas, and its juxtaposition of open space and buildings. Monuments and monumental buildings in particular help a visitor to the city understand its symbolic importance and its status as the nation's capital.

The L'Enfant Plan has been the source of civic identity since the earliest phases of the city's growth. The 1791 Plan featured ceremonial spaces and grand radial avenues, respecting natural contours of the land. The result was a system of intersecting diagonal avenues superimposed over a grid system. L'Enfant's geometries set the stage for urban design conditions that define almost every new development in the historic city center today. L'Enfant's avenues were to be grand, tree-lined boulevards, situated in a manner that would visually connect topographical features throughout the city. Large open spaces, known as 'reservations,' were created at the intersections of these avenues. Each reservation would feature statues and memorials to honor worthy citizens.

A century later, the McMillan Plan's focus on the monumental core and the transformation of the Mall added a new layer of complexity. The McMillan Commission called for re-landscaping the ceremonial core, consisting of the Capitol Grounds and Mall, including new extensions west and south of the Washington Monument; consolidating city railways and alleviating at-grade crossings; clearing slums; designing a coordinated municipal office complex in the triangle formed by Pennsylvania Avenue, 15th Street, and the Mall, and establishing a comprehensive recreation and park system that would preserve the ring of Civil War fortifications around the city.

Another factor greatly affecting DC's civic identity is the 1910 Height of Buildings Act, which established maximum building height limits throughout the District. The limit determined a unique path for the nation's capital in allowing for truly monumental public buildings and monuments to define its skyline. The net effect of the Height Act combined with wide, radial boulevards, is that of a 'horizontal city', where vertical street 'canyons' are avoided, and views of the sky and vistas of open space are defining characteristics.

A resulting series of urban "tensions" continues to define Washington today. Few other American cities contain as high a proportion of irregular building sites—a direct result of the radial arrangement of streets and public spaces. The diversity of block shapes and angles is tempered by height limits and resulting uniformity of building massing. L'Enfant's radial street pattern creates many axial focal points and a hierarchy of block and lot types that allows for numerous stand-out buildings. Both the L'Enfant and McMillan plans, with their wide boulevards and radial patterns have managed, with varying degrees of success, to accommodate the arrival of trains, streetcars, subways, and more importantly, the automobile. In each case, elements of the city of been altered and even transformed, but not at the expense of the civic identity imbued by their original planning.

In much of Downtown, the combination of L'Enfant's Plan and the Height Act create a dynamic particular to DC. The desire to maximize the build-out of a structure limited in height often results in buildings with very little sculptural form or design features. Most office and residential development consists of buildings with fairly consistent street walls and massing. On the other hand, museums and monuments—which do not place the same premium on maximizing buildable floor area, generally display more freedom in their architectural expression and site placement.

The monumental core of Washington has been the subject of serious study, investment and improvement since the city's origin. The District has been careful to regulate and plan for its important assets with oversight in the form of organizations like NCPC and CFA, who continue to advocate for the highest standards in architecture, urban design, and planning for areas related to the federal interest. The emphasis on the core, has in some ways occurred at the expense of the neighborhoods beyond.

Outside the L'Enfant boundaries in particular, there is a significant change in the physical character and form of the city. It is less formal, with a more fragmented pattern of development and more complex topography. The pattern is the result of a patchwork of historic subdivision and neighborhood plans,

many of which are traditional neighborhoods with house-form architecture spanning various periods. There are small shopping districts in historic centers, as well as occasional auto-oriented commercial strips and shopping centers along corridors. Extensions of many of the principal avenues (some as former streetcar lines) still strongly define corridors in a radial pattern. Industrial areas along railroad and transportation corridors (highways in particular) often act as major barriers.

View Corridors and Vistas

View corridors and vistas play an integral part in the city's image. The city's layout emphasizes long, axial views and creates a hierarchy of "background" and "foreground" buildings. One of the city's most distinctive visual features is the pervasive image of a monument or monumental building at the end of a view corridor along a grand boulevard. The most important civic monuments frame the vistas of what one would assume to be the most important boulevards and streets—streets like Pennsylvania Avenue, 16th Street, and North Capitol Street.

The city's topography lends itself to radial boulevards terminating at monuments on high and low vantage points. Such geometric road patterns would have been less effective on rolling hills. In outlying areas, where the topography is more varied, important landmarks are often closely related to features of the natural setting. The National Cathedral, for example, is sited on one of the highest ridgelines in the District, affording great visibility to the structure from many points in the city and beyond.

View corridors and vistas in the city exist with varying degrees of success. In many cases, the effect is dramatic and memorable, with high quality architecture framing the street or providing a compelling distant focal point. In other cases, the axial view is apparent, but the streetscape does not reinforce the view corridor to the fullest extent. Portions of North and South Capitol Streets, for instance, do not live up to the full potential of their symbolic orientation. With direct views of the Capitol Building, parts of North Capitol Street have poor streetwall definition, inconsistent landscaping, inactive ground floors, poor architectural quality, and a general lack of the grandiosity one would expect from such an alignment.

City gateways provide particularly important opportunities for view or vista opportunities. Gateways into the District include the Roosevelt and Memorial bridges; here, approaches to Washington provide a sense of transition through views and vistas of the monumental core. These views shape how visitors, residents, and workers experience the capital. Underdeveloped gateways, such as New York Avenue, NE and South Capitol Street, do not yet provide an appropriately dignified view or transition to the monumental core from the Baltimore-Washington Parkway and Suitland Parkway, respectively.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant effect on visual resources if it produced substantial, demonstrable negative aesthetic effects. These effects could include dramatic alteration of desirable views and vistas, creation of light and glare, or changes which diminish the important and defining visual characteristics of the national capital.

IMPACTS AND MITIGATION MEASURES

NEIGHBORHOOD VISUAL CHARACTER

Impact L1: New development accommodated by Comprehensive Plan could impact neighborhood character and design. This impact is potentially significant but will be mitigated to a less than significant level by policies and actions in the Plan.

Without a strong policy framework for land use and urban design, neighborhood character and design could be adversely impacted as new development takes place. This could occur through the development of buildings of excessive scale, mass, or density; or the use of inappropriate building alignments, materials and architectural details. This is particularly relevant for neighborhoods of high historic or architectural character, particularly where such areas are contained within (or are adjacent to) planned large-scale development activity. Examples of such areas would be Shaw, Logan Circle, the U Street corridor, the northeast part of Capitol Hill, Bloomingdale, Eckington, Columbia Heights, Petworth, and the Near Southeast. While larger-scale development in such areas can provide an important catalyst for revitalization, it can also overwhelm the existing neighborhood.

The potential for adverse impacts on neighborhood character and design is mitigated by policies in the Urban Design Element. The Plan recommends a heightened focus on architectural quality in both well-established and emerging neighborhoods, with greater emphasis on higher design standards, design compatibility, and appropriate scale. The Plan promotes maintaining the existing fabric of row house neighborhoods through zoning and additional historic district designations. It promotes protection of single family detached and moderate density neighborhoods through the use of “conservation districts” and other tools designed to ensure scale and design compatibility. The Plan also recommends extensive use of design guidelines and an expanded design review program. Illustrations are included in the Urban Design Element to demonstrate basic principles of good design.

The basic premise of the Comp Plan is that significant changes in character should be directed to large sites, corridors, downtown, and the waterfront, thereby avoiding visual and aesthetic impacts on the city’s neighborhoods. The Policy Map designates most of the city’s neighborhoods as “Conservation Areas,” mitigating the potential for major changes in scale and character.

The following specific policies and actions on neighborhood character are included in the Comprehensive Plan to address neighborhood visual character impacts:

Policy UD-2.2.1: Neighborhood Character and Identity

Strengthen the defining visual qualities of Washington’s neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context.

Policy UD-2.1.3: Downtown Edges

Establish and maintain scale and density transitions between Downtown and adjacent lower density neighborhoods. Use variations in height, massing, and architectural quality to ensure that the fine-grained pattern of adjacent neighborhoods is protected.

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 within such areas does not need to replicate prevailing architectural styles exactly but should be complementary in form, height, and bulk.

Policy UD-2.2.4: Transitions in Building Intensity

Establish gradual transitions between large-scale 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 when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood.

Policy UD-2.2.6: Maintaining Façade Lines

Generally maintain the established façade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic façade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing façades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm.

Policy UD-2.2.7: Infill Development

Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs.

Policy UD-2.2.8: Large Site Development

Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are 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.

Policy UD-2.2.9: Protection of Neighborhood Open Space

Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas.

Action UD-2.2-A: Scale Transition Study

Complete a “Scale Transition Study” which evaluates options for improving design compatibility between more dense and less dense areas.

Action UD-2.2-C: Conservation Districts

Explore the use of “Conservation Districts” to protect neighborhood character in older communities which may not meet the criteria for historic districts but which nonetheless have important character-defining architectural features.

STREET AND PUBLIC SPACE VISUAL CHARACTER

Impact L2: Proposed increases in pedestrian, transit and bicycle use could impact the aesthetic appearance and functionality of sidewalks, streets and public spaces. This impact is less significant because it is specifically addressed by policies and action in the Plan. Positive impacts are likely as the proposed Plan provides more explicit direction on public realm improvements than the 1998 Plan.

The Comprehensive Plan promotes a well-balanced and multi-modal transportation system, with increased pedestrian, transit and bicycle activity. For many neighborhoods, this may represent an intensification of existing conditions—for other neighborhoods (i.e., the Anacostia Waterfront), this represents a significant change. The increased activity will generally have a positive visual impact, creating more animated and attractive places and encouraging the use of streets and public spaces in a way that increases aesthetic appeal and identity. A basic premise of the Plan is that increased mobility and transportation choice should be provided in a way that makes the District's streets and public spaces more attractive.

The Plan includes provisions for improving streetscape design, streetwalls and street function, as well as managing sidewalk space in a way that enhances visual character. It also recommends the provision of public space and the programming of outdoor space in ways that stimulate street life and community activities.

The following policies and actions in the Plan effectively mitigate potential impacts on the aesthetics and functionality of sidewalks, streets and public spaces:

Policy UD-3.1.1: Improving Streetscape Design

Improve the appearance and identity of the District's streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street "furniture", and adjacent building façades.

Policy UD-3.1.2: Management of Sidewalk Space

Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic.

Policy UD-3.1.3: Streetscape Design and Street Function

Use variations in lighting and landscaping to highlight and clarify the function of different streets. The design features of streets should make the city's circulation system easier to navigate and understand for residents and visitors.

Policy UD-3.1.5: Streetscape and Mobility

Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Bus shelters, benches, bicycle parking, safe pedestrian connections, and clear wayfinding signage should be provided to facilitate multi-modal travel.

Policy UD-3.1.6: Enhanced Streetwalls

Promote a higher standard of storefront design and architectural detail along the District's commercial streets. Along walkable shopping streets, create street walls with relatively continuous facades built to the front lot line in order to provide a sense of enclosure and improve pedestrian comfort.

Policy UD-3.1.7: Improving the Street Environment

Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall.

Policy UD-3.1.8: Neighborhood Public Space

Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the "activation" of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas.

Policy UD-3.1.9: Street Closures

Strongly discourage the closure of streets for private ownership or use. Any request for street closure should be reviewed in terms of the resulting impacts on vehicular and pedestrian circulation, access to private property, emergency access and fire protection, view obstruction, loss of open space, building scale, and other factors.

Policy UD-3.1.12: Programming of Outdoor Space

Encourage the programming of outdoor space with events and activities (such as performances, arts, and farmers markets) that stimulate streetlife and active use.

Action UD-3.1-A: DDOT Design and Engineering Manual

Update the DDOT Design and Engineering Manual (the "Red Book") to ensure that it more effectively promotes the goal of creating a safe, attractive, and pedestrian-friendly street environment.

Action UD-3.1-B: Streetscape Improvement Programs

Maintain capital funding to upgrade the visual quality of District streets through programs such as Restore DC (Main Streets), Great Streets, and the DDOT Urban Forestry program.

CHANGES IN CIVIC IDENTITY

Impact L3: New development could impact the civic identity of the District. This impact is less than significant because it is addressed by policies and actions in the Plan, as well as the Future Land Use Map and Policies Map. Significant impacts on civic identity are also avoided by well-established procedures requiring federal review of potentially significant changes in the monumental core of the city and its environs. Positive impacts are likely as neglected and blighted areas of the city are improved.

New development has the potential to impact the civic identity of the District. Without proper guidance and oversight, the identity defined by the city's low scale buildings, radial and rectangular streets, grand public spaces, prominent buildings and monument sites, and horizontal skyline could be disturbed by the addition of poorly designed housing and commercial development. Conversely, with a strong design policy framework, infill development and the reuse of large sites has the potential to extend the underlying principles of the historic plans beyond the monumental core. Design decisions applied to corridors, transit station areas, and infill sites as well as undervalued public spaces and streets, could

enhance the District's civic identity beyond the center and have an enormous positive impact on the identity of the city.

Although the Comprehensive Plan supports substantial new development, it mitigates the potential for adverse impacts on civic identity through a variety of provisions. These include policies and actions that respect and reinforce the L'Enfant and McMillan Plans and protect the horizontal urban quality of Central Washington. The Plan also promotes view protection and view enhancement (through the siting of new monuments and memorials and the design of streets and buildings). It places particular emphasis on the strengthening of key avenues and boulevards. The Plan's urban design policies and actions are structured to reinforce urban form and identity in neighborhoods beyond the central area, particularly in areas that have been neglected or that suffer from poor aesthetic qualities today. This reinforcement could better connect city neighborhoods and reduce the perception of Washington as a divided city.

The following policies and actions in the Plan serve to mitigate potential impacts of future development on the civic identity of the District:

Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans

Respect and reinforce the L'Enfant and McMillan Plans to maintain the District's unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L'Enfant Plan reservations (green spaces), limits on street and alley closings, and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds.

Policy UD-1.1.3: Siting of Museums, Monuments, and Memorials

Coordinate with federal entities such as the National Capital Planning Commission (NCPC) and the Commission of Fine Arts (CFA) in the planning and siting of major landmarks, including museums, monuments, and memorials, and in the development of plans for federal reservations and other federally-owned civic spaces.

Policy UD-1.1.4: Height Act of 1910

Protect the civic and historical character of the city, particularly the "horizontal" urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910.

Policy UD-1.2.2: Protecting the Topographic "Bowl"

Consistent with the Federal Elements of the Comprehensive Plan, maintain the prominence of the topographic bowl formed by lowland and rim features of the L'Enfant city. This should include preserving the green setting of the Anacostia hills and maintaining the visual prominence of the Florida Avenue escarpment.

Policy UD-1.4.1: Avenues/Boulevards and Urban Form

Use Washington's major avenues/boulevards as a way to reinforce the form and identity of the city, connect its neighborhoods, and improve its aesthetic and visual character. Focus improvement efforts on avenues/boulevards in emerging neighborhoods, particularly those that provide important gateways or view corridors within the city.

Policy UD-1.4.5: Priority Avenues/Boulevards

Focus the city's avenue/boulevard design improvements on historically important or symbolic streets that suffer from poor aesthetic conditions. Examples include North and South Capitol Streets, Pennsylvania Avenue SE, and Georgia Avenue and the avenues designated by the "Great Streets" program.

VIEWS AND VISTAS

Impact L4: New development accommodated by the Comprehensive Plan could impact views and vistas. This impact is less than significant because it is addressed by policies and actions in the Plan.

Development accommodated by the Comprehensive Plan has the potential to impact views and vistas in the District. Iconic vistas of the US Capitol, the Washington Monument, the Tidal Basin and Jefferson Memorial, the Lincoln Memorial, and other important local landmarks carry strong symbolism and convey the city's function as the capitol of the United States. These views must not be impaired or obstructed.

While the city's most renowned visual landmarks are located on federal lands and are outside the city's direct control, development beyond the federal city but within District boundaries has the potential to alter views of these landmarks from different vantage points around the city. This is particularly true for projects on the fringes of the monumental core, along the Anacostia River, on ridgelines and knolls, and along major boulevards and avenues. Infill development in such areas could potentially obstruct views and vistas due to inappropriate massing, scale, density and building form. However, development also offers the potential to reinforce, protect, and highlight views and vistas through building and landscape design.

The Plan recommends policies and actions that protect major views and vistas in the city, including those along avenues/boulevards, at the waterfront, and at important city gateways. The Plan places particular emphasis on developing zoning regulations and special design controls that would ensure the protection and enhancement of views and vistas, including a proposed view plane ordinance.

The following policies and actions in the Plan also serve to mitigate potential impacts on views and vistas:

Policy UD-1.2.4: View Protection

Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods.

Action UD-1.2-B: Creating View Plane Regulations

Conduct a review of desirable views, creating view plane diagrams, affording analysis of desired possibilities, and developing zoning regulations accordingly.

Policy UD-1.3.5: River Views

Protect and enhance river views in the design of buildings, bridges, and pedestrian walkways on or near waterfront sites. The scale, density and building form along the city's waterfronts should define the character of these areas as human-scale, pedestrian-oriented neighborhoods and should protect views from important sites.

Policy UD-1.4.2: City Gateways

Create more distinctive and memorable gateways at points of entry to the city, and points of entry to individual neighborhoods and neighborhood centers. Gateways should provide a sense of transition and arrival, and should be designed to make a strong and positive visual impact.

Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors

Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place.

Action UD-1.4-A: Zoning and Views

As part of the revision of the District's zoning regulations, determine the feasibility of overlays or special design controls that would apply to major boulevards and gateway streets. The purpose of such overlays would be to ensure the protection and enhancement of important views and to upgrade the aesthetic quality of key boulevards.

Action UD-1.4-B: Boundary Streets and Entrances

Explore the feasibility of enhancing points of arrival into the District at the major Maryland/DC gateways through signage, public art, landscaping, restoration of historic boundary markers, road design and pavement changes, special treatment of boundary streets (Southern, Eastern, and Western Avenues), and similar improvements.

IIIM ECONOMIC IMPACTS

This section of the Environmental Assessment describes the impact of the proposed Comprehensive Plan on the economy of the District of Columbia. The intent is not to provide a detailed fiscal impact assessment of the Plan, but rather to broadly assess the potential effects of the Plan's policies and map designations on the city's economic base, business attraction and retention strategies, job training and employment initiatives, and other economic development matters. This section includes a summary of existing economic conditions in the District, a description of potential impacts resulting from the adoption of the Plan, and measures to mitigate any potentially significant impacts.

SETTING

In recent decades, the District has faced chronic economic challenges that have limited its ability to meet the needs of many residents. These include population loss, job decline, high unemployment and poverty rates, fiscal insolvency, and the loss of spending power to the suburbs. Economic indicators also point to growing geographic disparities. Fortunately, some of the negative trends of the past are showing signs of reversal. These include significant private-sector employment growth, a recent housing boom and increase in property values, reinvestment in neighborhood shopping districts, and a rebounding of the tourist industry.

Indicators and Trends

Key economic indicators and trends in the District include:

- **A diminishing share of region's jobs.** In 1950, the District had 83 percent of its jobs. By 2000, it had just 25 percent of its jobs.
- **Growing geographic disparity.** The District currently has the largest concentration of poverty in the region and a sharper divide between rich and poor than most large American cities.
- **Structural Fiscal Imbalance.** A municipal fiscal imbalance has resulted from the District's hosting of the federal government and other tax-exempt entities; and a commuter population of non-residents (who do not pay District income taxes) that is nearly the size of the entire resident population.
- **Leaking of Retail Spending.** The District continues to leak a significant amount of retail spending to the surrounding suburbs, because its overall retail mix and the quality of its offerings lags suburban shopping areas.
- **An Imbalanced Economy.** The District's economy is heavily tied to the actions of the Federal Government, without taking full advantage of the opportunities that come from being the nation's capital. While the recent job trends have been positive, that the District was adversely affected by

federal downsizing during the early to mid-1990s. While it has benefited from increased federal contracting, the suburbs have benefited more.

- **Chronic Underutilization of the District's Labor Force.** A substantial share of District residents live below the poverty line and are chronically unemployed. The problem stems from inadequate education, training and skills on the one hand; and an economy that is primarily producing jobs for educated professionals on the other.
- **The "Skills Gap".** Future job growth is expected to be concentrated in the services sector, including the business, legal, engineering, management, educational and social service fields. It is essential to close the skills gap by improving education and job training so that more District residents can fill jobs in these professions. By improving the District's educational system and job readiness programs, more residents will participate in the workforce, and the benefits of a stronger and more diverse economy will be more widely realized.
- **Land Capacity.** The District is hemmed in by adjacent cities and states and cannot grow through annexation. Key opportunities for growth include military bases and federal installations, underused commercial and industrial sites, and vacant buildings. Other sites, including failed housing projects and ailing business districts, also present opportunities. There are also hundreds of small "infill" sites scattered throughout the city, especially in the northeast and southeast quadrants.
- **Congestion.** The 2005 Urban Mobility Report found that Washington was the third most congested region in the country, behind Los Angeles and San Francisco. Funding to maintain the existing transportation system, let alone expand the system to meet increased demand, is severely constrained. Looking forward, increased investment in bus and rail transit, pedestrian and bicycle facilities, and other modes of travel, will be needed to sustain economic growth.
- **Mobility.** Many of those who need transit the most, including the poor and those with special needs, face mobility problems. Transit often does not connect District residents to jobs in the suburbs, and it may be expensive or difficult to access.
- **Regulatory.** Since 1899, building height has been strictly regulated, giving the District a low visual profile and preventing the construction of buildings over about 14 stories tall. In addition, much of the city consists of historic districts with limited capacity for growth. Even many of the areas that are not "officially" historic are fully developed and have little potential for change.

Comprehensive Plan Objectives

The Comprehensive Plan establishes a number of important economic objectives:

- **Increasing Employment for District Residents.** Over the next twenty years, the District is projected to add 125,000 jobs. The single greatest economic development challenge facing the city will be to link more of these jobs to District residents. This will not only create wealth and opportunity within the city, it will help offset commuter traffic, reduce social service expenses, and improve the quality of life for thousands of households. The Comprehensive Plan offers a multi-pronged strategy to aid in improvement of the District’s educational system, vocational training, workforce preparedness, and regional transportation network to support job access.
- **Sustaining “Core” Industries.** The District economy is underpinned by a handful of “core” industries, including government, education, professional services, administrative support, membership associations, tourism, and health care. These seven sectors account for three-quarters of the jobs in the city and distinguish the District’s economy from the more diverse economies of the surrounding region and nation. Economic development strategies in the Comprehensive Plan explore ways to sustain these industries while leveraging them to attract new businesses and jobs.
- **Diversifying the Local Economy.** To increase its competitiveness within the regional economy, the Comprehensive Plan calls on the District to further diversify its economy in sectors that have growth potential and/or are underperforming. Expanding knowledge-based industries can position the District to capture a larger share of federal “spin-off” benefits, particularly given its already strong competitive edge in the technology sectors. Fast growing sectors include computer systems design, legal services, retail, and restaurants. Based on regional and national economic data and indicators, opportunities also exist to more aggressively market the District as a corporate headquarters location, grow the building trade and construction industries, and expand information-based industries such as broadcast media. There are also untapped opportunities in “supply” industries, such as the laundry and catering firms that serve the city’s hotels, and “supplied” industries, such as the technology firms that benefit from local university research.
- **Bolstering Neighborhood Shopping Areas.** From an economic development standpoint, the District’s neighborhood shopping areas generate property and sales taxes, provide entry-level jobs, and meet local needs for goods and services. The economic health of these areas varies widely across the city. In shopping districts that are thriving, the city intends to promote continued patronage, variety, and quality, while addressing issues such as parking and aesthetics. In shopping districts that are struggling, more strategic decisions will be made, taking into account the long-term viability of each area. A range of solutions—including phasing out obsolete commercial areas in favor of new uses like housing—will address chronic challenges such as boarded up storefronts, concerns about public safety, and a lack of access to financing.
- **Accommodating Economic Growth.** The addition of 125,000 jobs during the next 20 years will create the demand for office, retail, hospitality, institutional, and industrial space. Estimates of floor space needs for the 20-year period vary from around 35 million to 65 million square feet, depending on the mix of jobs and space utilization trends. Several hundred acres of land will be required to

sustain this development, in a variety of settings with a variety of building types. Through significant land use policies and actions, the Comprehensive Plan will help the District creatively and effectively accommodate growth.

SIGNIFICANCE CRITERIA

A project would be considered to have a significant adverse economic impact if it resulted in substantial job loss and economic hardship, a reduction in the tax base, the displacement of businesses, adverse fiscal conditions, increases in unemployment and under-employment, adverse effects on the real estate market and decreases in property values, or the reduction of shopping choices and retail services. A significant impact would also occur if a project exacerbated the jobs-housing balance by providing an excess of job opportunities without provisions to house prospective workers.

IMPACTS AND MITIGATION MEASURES

DISPLACEMENT OF SMALL, LOCAL BUSINESSES

Impact M1. Revitalization of older commercial centers, coupled with rising rents and land costs, could make it more difficult for small and locally-based businesses to remain in place. There is a risk that national chains will displace small businesses, affecting both the economic livelihood of proprietors and employees, but also changing the character of neighborhood shopping. The potential for this impact is mitigated to a less than significant level by a series of anti-displacement strategies in the Economic Development Element, and by policies and actions in the Area Elements which emphasize the importance of neighborhood businesses.

The Comprehensive Plan acknowledges that the redevelopment and revitalization of older neighborhoods, particularly neighborhood business districts, will create the risk of displacement for small locally-owned businesses. The changing economics of the national retail market, coupled with rising land costs and operating costs, can make it harder for small businesses to stay viable as national chains move in and redevelopment occurs. The character of business districts can change dramatically as a result, impacting shopping choices for residents, hurting local storeowners or tenants, and changing the eclectic mix of shops that distinguishes urban neighborhood shopping from the more “generic” shopping centers in the suburbs. This has already happened in places like U Street and Georgetown; in the future, small retailers in places like Brookland (12th Street NE), Historic Anacostia, Minnesota-Benning, and Petworth (Georgia Av) could be similarly impacted.

The District already has a number of programs in place to protect and assist small businesses, including the Main Street (ReStore DC) program. The Comprehensive Plan proposes to augment such efforts with new programs, and to mitigate the risk of displacement through proactive policies. Foremost among these is a national “best practices” study (Action ED-3.2-A) to develop new approaches to protect small

businesses. The District is also embarking on a “Retail Action Agenda” that will assess how to attract additional retailers to the city, while retaining small neighborhood businesses. The following Plan policies specifically address this issue:

Policy ED-2.2.5: Business Mix

Reinforce existing and encourage new retail districts by attracting a mix of nationally recognized chains as well as locally-based chains and smaller specialty stores to the city’s shopping districts.

Action ED-3.2-A: Anti-Displacement Strategies

Complete an analysis of alternative regulatory and financial measures to mitigate the impacts of “commercial gentrification” on small and local businesses. Measures to be assessed should include but not be limited to income and property tax incentives, historic tax credits, direct financial assistance, commercial land trusts, relocation assistance programs, and zoning strategies such as maximum floor area allowances for particular commercial activities.

Action ED-3.2-C: Shopsteading Program

Investigate the feasibility of a shopsteading program that would enable entrepreneurs and small businesses to open shop in currently vacant or abandoned commercial space at greatly reduced costs.

Action ED-3.2-D: Small Business Needs Assessment

Conduct an assessment of small and minority business needs and existing small business programs in the District. The study should include recommendations to improve existing small business programs and to develop new programs as needed.

Action ED-3.2-E: Best Practices Analysis

Analyze what other cities have done to encourage and foster their small business sectors, including the development of business parks and incubators. Use this best practice information to inform District policy.

Action ED-2.2-A: Retail Action Agenda

Prepare and implement a citywide Retail Action Agenda. The Agenda should include an evaluation of the current and projected amount of market-supportable retail, strategies for overcoming retail development barriers, neighborhood-specific evaluations, and recommendations for new retail development and assistance programs.

Successful implementation of these policies and actions would reduce small business displacement impacts to a less than significant level.

IMPACTS ON INDUSTRIAL JOBS

Impact M2. Comprehensive Plan-related land use changes could create economic hardships for industrial and heavy commercial businesses. Changing real estate economics and development pressures could make it more difficult for such businesses to stay in the District. This could potentially lead to job loss, increased business expenses for the companies these vendors supply, and a drop in the supply of relatively good-paying jobs in careers that do not require a college degree. The potential for such impacts is mitigated by policies and actions to retain industrial land uses, and to maintain a range of job training and placement policies for District residents.

As noted in the “Land Use” section of this Environmental Assessment, the Comp Plan anticipates a decline in industrial acreage over the next 20 years. In some cases, industrial lands on the Comp Plan

Map are being redesignated for other uses (such as housing and commercial). The Industrial Land Use Study commissioned by the Office of Planning in 2006 noted that businesses in the production, distribution and repair economy are particularly vulnerable to rising real estate costs. The study also recommended that a critical mass of these uses be protected and retained within the District.

The following Comprehensive Plan policies and actions seek to address and mitigate this impact:

Policy ED-2.5.1: Industrial Land Retention

Retain an adequate supply of industrially zoned land in order to accommodate the production, warehousing, distribution, light industrial, and research and development activities which sustain the local economy, support municipal services, and provide good employment opportunities for District residents.

Action ED-2.5-A: Industrial Business Improvement Districts

Consider the formation of an Industrial Business Improvement District (BID) along the New York Avenue corridor to coordinate development activity, promote industrial tenant attraction and retention, and improve the functionality of the corridor as a viable industrial area.

Policy ED-2.5.2: Retaining Heavy Industry

Ensure that basic manufacturing (M-zoned) land is retained within the District to support the heavy industries that are essential to the local economy, such as concrete and asphalt batching plants and waste transfer facilities.

Policy LU-3.1.1: Conservation of Industrial Land

Recognize the importance of industrial land to the economy of the District of Columbia, specifically its ability to support public works functions, and accommodate production, distribution, and repair (PDR) activities. Ensure that zoning regulations and land use decisions protect active and viable PDR land uses, and that economic development programs work to retain such uses in the future.

Policy LU-3.1.3: Location of PDR Areas

Accommodate Production, Distribution, and Repair (PDR) uses—including municipal public works facilities—in areas that are well buffered from residential uses (and other sensitive uses such as schools), easily accessed from major highways and railroads, and characterized by existing concentrations of PDR and industrial uses. Such areas are generally designated as “PDR” on the Comprehensive Plan’s Future Land Use Map.

Policy LU-3.1.4: Rezoning of Industrial Areas

Allow the rezoning of industrial land for non-industrial purposes only when the land can no longer viably support industrial or PDR activities or is located such that industry cannot co-exist adequately with adjacent existing uses. Examples include land in the immediate vicinity of Metrorail stations, sites within historic districts, and small sites in the midst of stable residential neighborhoods. In the event such rezoning results in the displacement of active uses, assist these uses in relocating to designated PDR areas.

Policy LU-3.1.7: Cottage Industries

Support low-impact “cottage industries” and “home-grown businesses” in neighborhood commercial districts and on appropriate industrial lands. Maintain zoning regulations that strictly regulate such uses in residential areas, in order to avoid land use conflicts and business-related impacts.

As noted in the discussion of Impact A.6 (Land Use), the Plan also proposes industrial zoning changes to protect industrial jobs and industrial land uses. Successful implementation of these policies will reduce impacts to a less than significant level.

OFFICE MARKET IMPACTS

Impact M3. Implementation of the Comprehensive Plan would encourage the development of office space beyond the traditional Downtown-Golden Triangle area, expanding the central business district into NoMA and the Near Southeast/South Capitol area. The Plan also suggests local-serving office development in neighborhood centers and on some of the large sites around the city. The Plan's impacts on the office market would generally be positive, providing additional space for the jobs that drive the District's economy, helping the District maintain its economic position within the region, and creating more opportunities for District residents to find local jobs.

The Comprehensive Plan recognizes that the traditional office centers of the city—Downtown and Golden Triangle/West End—are effectively built out. It identifies the potential for over 35 million square feet of additional office space in the NoMA and Near Southeast areas, and the potential for additional space on large sites such as St. Elizabeths and Reservation 13. The Plan notes that office development in these areas will be necessary to help sustain the District's role within the regional economy. It also encourages housing within these areas, to create a more diverse and attractive street environment than is present in the city's traditional office centers.

The District's office market faces a number of challenges to its continued high performance. While absorption has been brisk (about 1.75 million square feet per year in recent years), approximately half of the space due to come online in the coming years is speculative. At the same time, some of the existing space in Central Washington has reached the end of its economic life and is in need of renovation or replacement. Different sectors of the office economy will generate the demand for different types of space. Accommodating this growth will pose a challenge for the District, given that it is a mature city with fixed boundaries. Going forward, there will also be a need for strategies to retain existing office tenants, some of whom may be attracted to cheaper space in the suburbs or to space closer to the suburban workforce.

With a few exceptions, the Comprehensive Plan discourages region-serving and large-scale office development outside of the Central Employment Area. Its Transit-Oriented Development (TOD) areas are targeted for housing, with complementary retail and service uses. Some neighborhood-serving office (real estate offices, insurance offices, small businesses, etc.) may locate in these areas, but corporate headquarters and large floor-plate office buildings are explicitly discouraged in some instances. These policies should not adversely affect the city's office market, as there are ample sites being made available in the Central Employment Area.

Some sectors of the economy, such as technology, research and development, and biomedical companies, need office space, but not necessarily the same type of "Class A" CBD office space that law firms and corporate headquarters require. The Comp Plan suggests that outlying "large sites" be considered for such uses, and that industrial lands such as those along Kenilworth Avenue, Blair Road, Bladensburg Road, and New York Avenue likewise be considered.

The following policies and actions from the Economic Development Element of the Comprehensive Plan are intended to accommodate the long-term growth and sustenance of the city's office economy:

Policy ED-1.1.5: Use of Large Sites

Plan strategically for the District's remaining large development sites to ensure that their economic development potential is fully realized. These sites should be viewed as assets that can be used to revitalize neighborhoods and diversify the District economy over the long term. Sites with Metrorail access, planned light rail access, and highway access should be viewed as opportunities for new jobs and not exclusively as housing sites.

Policy ED 1.3.4 Technology Infrastructure

Focus technology attraction efforts on sites and corridors where technology infrastructure (such as fiber optics cable) is already in place. Proximity to such infrastructure provides an advantage for firms that rely on the movement of large amounts of data. The capacity and need for such infrastructure should be considered when planning for the redevelopment of strategic corridors, such as New York Avenue.

Policy ED 2.1.1: Office Growth

Plan for an office sector that will continue to accommodate growth in government, government contractors, legal services, international business, trade associations, and other service-sector office industries. The primary location for this growth should be in Central Washington and in the emerging office centers along South Capitol Street, the Anacostia Waterfront.

Policy ED 2.1.5 Infill and Renovation

Support the continued growth of the office sector through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space.

Action ED-2.1-C: Back-Office Construction Incentives.

Explore the feasibility of financial and/or regulatory incentives to encourage the development of lower-cost office space and office space for small and/or non-profit businesses in underinvested areas and in commercial districts outside Downtown.

Policy LU-1.1.1: Sustaining a Strong City Center

Provide for the continued vitality of Central Washington as a thriving business, government, retail, financial, hospitality, cultural, and residential center. Promote continued reinvestment in central city buildings, infrastructure, and public spaces; continued preservation and restoration of historic resources; and continued efforts to create safe, attractive, and pedestrian-friendly environments.

Policy IN-4.1.1: Development of Communications Infrastructure

Plan and oversee development and maintenance of communications infrastructure including cable networks, fiber optic networks, and wireless communications facilities to help support economic development, security, and quality of life goals.

Policy IN-4.1.2: Digital Infrastructure Accessibility

Promote digital infrastructure that provides affordable broadband data communications anywhere, anytime to the residents of the District. Implement programs to help residents, businesses, schools, and community organizations make effective use of this technology.

Successful implementation of these policies will avoid adverse economic impacts.

RETAILING AND TOURISM MARKET IMPACTS

Impact M4. The Comprehensive Plan aims to increase the District's share of the regional retail market, and increase its capture of regional tourist spending by accommodating additional hotels,

restaurants, entertainment venues, and attractions. These changes should have positive economic impacts by creating additional entry level jobs, generating sales tax revenue, and providing additional local shopping opportunities for District residents.

Efforts are underway to expand retail choices and strengthen existing retail businesses, both in Central Washington and in District neighborhoods. If the full market potential of retail is tapped, as much as seven to ten million square feet of floor space may be accommodated in the next 20 years. Future growth is also expected in both the tourism and convention sectors, with strong job gains projected during the next five years. The opening of new attractions such as the renovated National Portrait Gallery/ Smithsonian Museum of American Art and the US Capitol Visitors Center will attract new visitors and also bring repeat visitors back to the capital. The new ballpark, scheduled to open in 2008, will have a particularly strong impact on the local economy.

There are actions that can be taken to improve the fiscal impacts of new retail development. For example, retail development may be good, but a retail development coupled with a job training and placement program for DC residents is better. Such pairings can help move unemployed residents into work, decreasing their demand for social services while creating new taxable income. The Comprehensive Plan strongly supports such synergies.

The Comprehensive Plan should positively impact the retail market in other ways. In addition to providing a strong policy foundation for retail growth, it addresses the issue of retail ceiling heights in the Central Employment Area. The Plan seeks ways to address the present situation resulting in low ceilings or partially below grade retail stores (due to the height limit and desire to maximize leasable floor space). The Plan also promotes “nodal” retail development patterns rather than auto-oriented strips. This would most likely be achieved through zoning and development standards addressing the placement and quantity of parking, setbacks, etc. While there could be some adverse economic impacts (on “drive-through” uses such as fast food, gas stations, car dealerships, etc.), they are likely to be outweighed by the benefits of more intimately-scaled—and ultimately more successful and attractive—shopping districts.

Growing the tourism market implies growing capacity to house these tourists. Most hotels are now concentrated in downtown and the West End, where they cater to business travelers. Waterfront sites that offer highway and Metro access are also of interest, and include the Navy Yard, Poplar Point, and Southwest Waterfront. Beyond this, the Comprehensive Plan encourages other lodging types, including smaller inns and hotels in neighborhood commercial districts. The Plan includes provisions to accommodate bed and breakfast hotels, along with more affordable and diverse hotel choices.

The following policies, derived from the Economic Development, Land Use, and Arts and Culture Elements of the Comprehensive Plan seek to address the balance between retail and hospitality growth and other priorities:

Policy ED-2.2.2: Downtown Shopping

Strengthen Downtown Washington as a regional retail destination in order to capitalize on its status as a transit hub and its historic role as the cross-roads and central marketplace for the Washington metropolitan area. Downtown should be developed and promoted as a regional retail destination of choice, with multiple traditional and non-traditional retail anchors, a well-programmed variety of consumer goods retailers, specialty shops, retailers unique to the Washington region, and a wide variety of restaurants and entertainment venues.

Policy ED-2.2.3: Neighborhood Shopping

Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites.

Policy ED-2.2.7: Planning For Retail

Coordinate neighborhood planning efforts with the District's economic development planning and implementation programs in order to improve retail offerings in local commercial centers.

Policy ED-2.3.6: Entertainment Districts

Support the continued concentration of entertainment uses in the Gallery Place/ Convention Center area to create a stronger and more visible destination for visitors, workers, and residents, and to avoid the over-concentration of these uses in neighborhoods where they might have adverse impacts. Improve streetscape and transportation connections between this area and the National Mall to foster its continued success.

Policy ED-3.1.1: Neighborhood Commercial Vitality

Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents.

Policy ED-3.1.2: Targeting Commercial Revitalization

Continue to target government economic development programs to areas of greatest need, including older business areas and commercial centers that inadequately serve surrounding areas. Focus on those areas where the critical mass needed to sustain a viable neighborhood commercial center can be achieved.

Policy LU-1.3.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide.

Policy LU-2.4.1: Promotion of Commercial Centers

Promote the vitality of the District's commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, and sustain the city's role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and ease of access for nearby residents.

Policy LU-2.4.5: Encouraging Nodal Development

Discourage auto-oriented commercial "strip" development and instead encourage pedestrian-oriented "nodes" of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height and scale of development within nodes respects the integrity and character of surrounding areas.

Policy AC-1.2.1: Arts District

Sustain the Downtown Arts District as the preeminent location in the city for region-serving arts venues, including theaters, galleries, and museums and encourage the development of additional arts districts throughout the city.

Policy AC-1.2-2: Designate Arts Districts

Identify, recognize, and support existing clusters of arts establishments and encourage the designation of such areas as Arts Districts.

Successful implementation of these policies will avoid adverse economic impacts.

GROWTH OF NON-TAXABLE LAND USES

Impact M5. The Comprehensive Plan recognizes the growth needs of the District’s institutions—including colleges, universities, hospitals, and large non-profits. It also recognizes the potential adverse effects of unregulated expansion of these uses, including the removal of land from the tax rolls. Implementation of the Plan will generally have positive economic impacts by striking a balance between institutional growth needs and neighborhood conservation needs. Further positive economic impacts should result as non-taxable federal land is transferred to the District for development, thereby generating property taxes where none are generated today.

As noted in the Land Use section of this Environmental Assessment, the growth of colleges and universities has generated concerns about traffic, parking, noise, and neighborhood character. The loss of taxable land has also been raised as a concern—although this economic loss is significantly offset by the positive economic impacts of universities on business development, technology, and culture. The Comprehensive Plan seeks to minimize the loss of additional taxable land to non-profits in a number of ways, including considering the concept of universities growing “up” (through additional density) rather than “out” (through acquisition of additional land). The Plan also encourages the development of satellite campuses on federal or District-owned (e.g., tax-exempt) land.

As noted above, the Comp Plan supports partnerships between universities, hospitals, and the private sector to generate jobs and other economic benefits for District residents. Such partnerships can not only create internships, apprenticeship, and job opportunities, they can also improve educational quality and contribute to efforts to improve District schools.

Also as noted above, the Comprehensive Plan will help enable the future public-private development of certain tracts that are currently non-taxable. Such sites include Reservation 13, St. Elizabeths, McMillan Sand Filtration Site, Poplar Point (and in the future, possibly the Armed Forces Retirement Home and Walter Reed Army Medical Center). To some extent, the “new communities” sites (which are currently owned by the Housing Authority) could also be in this category. Moving this land from non-taxable to taxable status would provide positive economic benefits.

The following policies are geared towards balancing the needs of institutions with the need to sustain taxable land. The Land Use section of this Environmental Assessment should be consulted for a discussion of the land use impacts associated with institutional expansion.

Policy EDU-3.3.1: Satellite Campuses

Promote the development of satellite campuses to accommodate university growth, relieve growth pressure on neighborhoods adjacent to existing campuses, spur economic development and revitalization in neighborhoods lagging in market activity, and create additional lifelong learning opportunities for DC residents.

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District's character, culture, economy, and is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas.

Policy ED-4.1.2: Career-Oriented Curriculum

Encourage the DC Public Schools and Public Charter Schools to continue to provide career magnet campuses, such as McKinley Technology High School and Marriott Hospitality Charter School. District government will advocate on behalf of its residents for expanded vocational training within its public schools.

IV. CONSISTENCY WITH ADOPTED PLANS AND PROGRAMS

This section of the Environmental Assessment examines the relationship of the proposed Comprehensive Plan to the adopted plans and programs of potentially impacted federal, regional, and District agencies.

FEDERAL PLANS AND PROGRAMS

Federal Elements of the Comprehensive Plan

The Comprehensive Plan for the National Capital: Federal Elements was adopted August 5, 2004. This Plan, produced by the National Capital Planning Commission, is seen formally as a companion to the “District Elements,” which is the project evaluated in this Environmental Assessment. The Federal Elements serve as “a statement of principles, goals and planning policies for the growth of the national capital for the next 20 years.” The Federal Elements cover federal lands within the District, federal installations outside the city, and “federal interests” which include an array of issues influencing the ability of federal agencies to carry out their respective missions. The Elements address a number of issues of particular importance to the District, including embassy and chancery locations and the impact of federal facilities on the surrounding community. Additionally, the Federal Elements cover regional transportation, tourism, open space/parkland, and housing issues. These topics are multi-jurisdictional, and should be compatible with local policies.

Because the areas covered in the Federal Elements are adjacent to and surrounded by the territory covered in the District Comprehensive Plan, there are several geographic and topical areas that are covered by both plans. The District Elements have been drafted with the deliberate intent of achieving internal consistency on these topic areas. The chief difference between the two plans is not one of policy but one of perspective. The District Elements (and the Area Elements in particular) tend to be more detailed, prescriptive, and place-specific. They must balance a broad array of interests including those of private property owners, residents, businesses, and the government. The Federal Elements are primarily tied to the well-being of the federal government, recognizing the inter-relationship between federal activities and those of the surrounding localities. When the two plans broach the same topics, they are in agreement with one another.

The land use recommendations in the Federal Elements principally relate to federal areas such as the National Mall and Rock Creek Park. Land use recommendations also pertain to the siting of chanceries of foreign governments. The Federal Elements make recommendations for possible locations for chanceries away from the most heavily-used areas near Sheridan-Kalorama and 16th Street. The Federal Elements specifically recommend locating a new chancery center on the grounds of the Armed Forces Retirement Home. The South Capitol Street corridor and the areas east of 16th Street, NW are also recommended as areas appropriate for chanceries. The District Elements reiterate the choice of these locations for future chancery sites and are consistent with federal policy on the siting of foreign missions.

Both the District and Federal Elements address the siting of future monuments and memorials. The Federal Elements call for new commemorative facilities to be located along the Potomac and Anacostia waterfronts and along several “Monumental Corridors,” with 16th Street NW, Massachusetts Avenue, New Hampshire Avenue, and Constitution Avenue being the most prominent. The District Elements are consistent with this directive and support federal initiatives to site monuments in these locations.

The Federal Elements complement the District Elements by providing thematic linkages between the District and the areas surrounding Washington. This is particularly true for topics that cross jurisdictional boundaries, including transportation, housing, and environmental quality issues, and the planning of parks and trails. The Federal Elements supplement the District Elements by placing the city within its regional context in a manner that the District Elements cannot do.

Legacy Plan

Extending the Legacy: Planning America’s Capital for the 21st Century (commonly referred to as “the Legacy Plan”) was produced by NCPC and approved in 1997. This plan focuses on expanding the reach of the monumental core of the District outwards from the city center, particularly along the North, East and South Capitol Street corridors. This document also calls for the reclamation of several of the Avenues that have been interrupted, especially in the Near Southwest. The Legacy Plan also calls for the elimination of the Southeast-Southwest Freeway and the railroad tracks that currently cut through the Southwest Federal Center. This plan also strongly advocates for higher urban design standards, and higher neighborhood design and historic preservation ideals. In both its principles and its specific provisions, the District Elements are consistent with the Legacy Plan.

Memorials and Museums Master Plan

NCPC’s *Memorials and Museums Master Plan* was produced in 2002, in conjunction with the National Capital Memorial Commission and the Commission of Fine Arts. The Memorials and Museums Master Plan divides the City into two geographic categories for the purpose of siting future memorials: Area I, which is located between the Capitol and Arlington National Cemetery, extending southwards to the Potomac River south of the Jefferson Memorial; and Area II, encompassing the District outside of Area I. The Memorials Plan states a concern shared by the participating agencies that Area I has become somewhat crowded with memorials while certain areas of the District (such as Wards 5, 7, and 8) have no memorials and few museums.

This Plan seeks to locate new memorials and museums throughout the non-monumental parts of the city, while ensuring that existing neighborhoods are not disturbed. The Memorials plan also desires to use memorials and museums to activate the District’s underutilized waterfront areas. The Draft District Elements of the Comp Plan are fully consistent with these objectives, and in fact advance the goals of the Memorials and Museums Master Plan by speaking more specifically to those locations where new museums and memorials should be encouraged.

National Capital Urban Design and Security Plan

The National Capital Urban Design and Security Plan was approved in 2002, with an addendum released in 2005. This document focuses on the upgrading of security features in areas with strong concentrations of federal facilities based on the heightened threat of terrorism after the attacks of September 11, 2001. This document is also highly focused on making the security improvements as aesthetically positive as possible. The Plan explicitly decries the extensive use of temporary guard structures and “jersey” barriers that became common around federal buildings after the 2001 terrorist attacks.

The Urban Design and Security Plan describes in detail the types of security enhancements that can be used to protect the perimeter of a federal facility and how the enhancements can be deployed to cause a minimal disruption of the pedestrian environment. The Urban Design and Security Plan identifies five specific districts and outlines security design standards for the districts, in many cases demonstrating the preferred streetscape treatment for specific locations. These locations are: Downtown, the West End, the Federal Triangle, the National Mall and the Southwest Federal Center. The NCPC plan is consistent with the policies that are detailed in the Urban Design Element of the District Elements. The District Elements address the NCPC’s efforts to create security enhancements that do not detract from the public realm.

Federal Capital Improvements Program

The Federal Capital Improvements Plan is designed to guide the federal government’s capital spending in the Washington region. This document provides guidelines to federal agencies regarding the submission of projects to be included in the five-year capital budget. The document states that Comprehensive Plan for the National Capital (both the Federal and District elements) is the primary policy guide for use in the selection of proposed projects. The submission recommendations state that proposed development projects should be analyzed for compliance with federal, state, and local environmental and historic preservation requirements.

The District is emphasized as the core of regional federal employment. Further promoting the District, the CIP guidelines state that underutilized federal buildings and sites should be utilized before new space is leased or additional lands are purchased for the construction of new buildings. The District Elements of the Comprehensive Plan do not demonstrate any conflicting policies relative to the Federal Capital Improvement Plan, and in many cases share common goals for maintaining the preeminence of the District and its historic federal facilities.

National Park Service General Management Plans

The National Parks Service produces General Management Plans for each of its parks, both in the District as well as the rest of the nation. The most prominent locations in the District include Rock Creek Park, the Fort Circle Parks (Civil War Defenses of Washington) and the Potomac and Anacostia Parklands. Together, the NPS properties account for 85 percent of the parkland in the District. The Parks, Recreation and Open Space Element and the Environmental Protection Element of the District Elements were written

with the General Management Plans in mind. The recently completed GMPs for Rock Creek Park and the Fort Circle, in particular (and the accompanying environmental documents) were reviewed to ensure that their principles were carried forward into the District Elements as appropriate.

REGIONAL PLANS AND PROGRAMS

MWCOG Constrained Long Range Plan 2005 Update

The Constrained Long-range Plan (CLRP) identifies the Metropolitan Washington Council of Government's preferred strategy for improving transportation conditions in the Greater Washington Region. Funding priorities for transportation enhancements and other transportation capital projects are reflected in the Transportation Improvement Program, which is the implementing document of the Constrained Long-Range Plan. The reason the plan is referred to as "constrained" is that it is limited to projects for which funding is anticipated to be available, as opposed to the "wish lists" that other types of long-range plans can present. With this guideline in mind, this regional plan is updated every three years.

The Constrained Long-Range Plan is divided into sections covering region-wide or multi-jurisdictional initiatives, followed by separate sections for the District, Maryland and Virginia. The list of projects in the District is essentially the same as the projects recommended in the District Elements of the Comprehensive Plan, although the CLRP includes a few more small scale projects.

Regionwide, the makers of this plan work under an agreement that 60 percent of all funding that is not used for maintenance of the existing transportation system is allocated for new public transit projects. In addition to physical transportation projects, the CLRP also has items designed to increase transportation planning in the area as well the funding of studies required before major transportation projects are undertaken. The District of Columbia Government is a core component of the decision-making process behind the production of the CLRP. The contents of the District Elements of the Comprehensive Plan—particularly the Transportation Element—are consistent with the CLRP and help carry its provisions forward at the local level.

MWCOG Air Quality Conformity Program

The MWCOG Air Quality Conformity Program is a Component of the Constrained Long Range Plan and the five-year Transportation Improvement Program. The Air Quality Program is designed to mitigate the Washington Region's status as an ozone non-attainment area as measured by the EPA, under terms defined in the Clean Air Act of 1990. The region was relegated to 'severe' non-attainment status in the 1990s, resulting in a pressing need to take action to reduce pollution levels in the area.

The Air Quality Conformity Program lists projects that are believed to diminish the amount of pollutants emitted, primarily by reducing congestion and excessive vehicle idling. The Transportation Element of

the District Elements is designed to contribute to regional air quality goals through maximizing transit ridership and other forms of non-single occupancy vehicle travel. Several of the key projects listed in the Transportation Element are component parts of the Air Quality Conformity Program. As such, the District Elements are in conformity with the MWCOG document.

Chesapeake Bay Agreement (Chesapeake 2000)

Chesapeake 2000 was a voluntary agreement between the District, Maryland, Virginia, Pennsylvania, the U.S. Government and the Chesapeake Bay Commission. This agreement extended over two decades of regional cooperation to protect the Chesapeake Bay. The agreement has several goals with dates by which desired practices should be implemented. The goals included in the plan are in the following areas: Living Resource Protection and Restoration, Vital Habitat Protection and Restoration, Water Quality Protection and Restoration, Sound Land Use, and Stewardship and Community Engagement.

The goals in this agreement are generally regional in nature, but each participating governmental entity is expected to contribute to regional outcomes through local implementation of specific actions or practices. The District Elements of the Comprehensive Plan, especially the Environmental Protection Element, is in accordance with the Chesapeake Bay Agreement. The Environmental Protection Element advocates both local strategies and participation with regional entities to mitigate the potential impacts of development activity on the health of the Bay.

COG Round 7.0 Cooperative Forecasts

The Council of Governments periodically prepares population, household, and employment forecasts for the Metropolitan Area to the year 2030. The most recent forecasts—Round 7.0—were developed through a collaborative process involving each jurisdiction in the COG region. The forecasts used in the Comprehensive Plan are not only consistent with the COG forecasts, but were actually used as the inputs for the District of Columbia in the COG's traffic modeling and air quality conformity analysis.

DISTRICT PLANS AND PROGRAMS

District of Columbia Transportation Vision Plan

The District Department of Transportation (DDOT) is currently in the process of updating the DDOT Vision Plan. The most recent version of the Vision Plan was completed in 1997. DDOT began working on an updated Vision Plan in 2003 and has produced several documents detailing the policies likely to be included. The main goals of the forthcoming DDOT Vision Plan are to create a more transit-oriented and walkable city, improved mobility for all, to foster new development that capitalizes on investments in the Metrorail system, using the transportation system to foster other city goals, increasing regional transportation partnerships, and linking transportation improvements to other investment and reinvestment programs within the city. The plan also details possibilities for adding new modes of public transportation and improving public space.

The Transportation Element of the District Comprehensive Plan was written with input solicited from DDOT and incorporates all of the key points of the Transportation Vision. The two documents are entirely consistent and complementary.

District of Columbia Parks Master Plan

The Department of Parks and Recreation (DPR) is producing a comprehensive 5-year agency master plan. The DPR plan has analyzed recreation needs by Ward to determine the future actions needed to address those needs. This plan has involved extensive public engagement and made recommendations based on an analysis of demographic trends, program analysis, property analysis, financial analysis and best practices in formulating policy recommendations. A working draft of the DPR Plan was used as the foundation for the Parks, Recreation, and Open Space Element of the Comprehensive Plan, thereby assuring internal consistency between the two documents. Additionally, the DPR plan is designed to work in coordination with other related efforts such as the Great Streets initiative, the Bicycle Master Plan, and the Anacostia Waterfront Initiative.

District of Columbia Comprehensive Housing Strategy

The Comprehensive Housing Strategy Task Force released *Homes for an Inclusive City* in April of 2006. The Mayor and Council convened the Task Force to address ongoing problems with housing affordability that had accompanied the higher sales prices of existing residences and the production of numerous higher-priced new housing units since 2000. The strategy is focused on increasing the city's home ownership rate, retaining existing federally-funded low income housing units, doubling the District's expenditures on affordable housing production, and using a variety of tax enhancements to create revenue sources for housing production. Additionally, the recommendations call for streamlining the process of gaining approval for affordable projects, as well as providing direct subsidies to very low-income renters.

The strategies outlined in the Comprehensive Housing Strategy are consistent with the housing goals in the District Elements of the Comprehensive Plan as well as the overall theme of inclusiveness that has been at the core of the District Elements. While the Housing Strategy does have some recommendations that are more specific than those that are in the District Elements, there are no policies that are inconsistent.

District of Columbia Emergency Management Agency District Response Plan

The *District Response Plan* is the DC Emergency Management Agency's (DCEMA) official plan for providing a framework for District agencies to respond to public emergencies in the District and the Greater Washington region. Public emergencies are defined as incidents such as enemy attacks, severe resource shortages, major fires, natural disasters, civil disorders, power failures or environmental contaminations. The Plan establishes a process for the efficient and coordinated delivery of government services in the event of such emergencies. The Response Plan also delegates areas in which responsible District agencies are to contribute to emergency efforts.

After the "Base Plan," which details the overall framework for the expected response, the plan has 16 chapters detailing the response structure, broken down into functional areas known as Emergency Response Functions. The Emergency Response functions include transportation, communications, public works and many other topics. Appendices to the plan detail the mutual aid agreements that DCEMA has made with agencies outside the District government to assist in the event of a public emergency. Overall, the District Elements and District Response Plan complement one another without any conflicts being created.

District of Columbia Public Schools Master Facilities Plan

The District of Columbia Public Schools Master Facilities Plan was released on September 14, 2006. The Facilities Plan has as its focus the use of schools to serve the curriculum needs of the District. The DCPS Plan states that in the past the focus had been the other way around, with curricular offerings being driven by the availability of appropriate facilities. The school system also is facing the reality of declining enrollment, which has created excess school facilities. The main strategies that will be taken to improve the appropriateness of the city's schools will be to select a number of schools to be modernized, select the location for new facilities, and to decide which facilities to close. If implemented, the schools master plan will result in the construction of 23 schools, the modernization of 101 schools and the closing of 60 facilities. The philosophies that will be utilized in the selection of buildings to modernize and the location of new buildings will be the aforementioned desire to have buildings that complement the curricula to be offered as well as the ability to create "campus" centers where multiple programs can be offered in one location.

The Educational Facilities chapter of the District Elements carries forward the same philosophy for the District's schools as the DCPS Master Plan. It demonstrates both the need for a reduction in the number of schools and the pronounced need for modernization of the facilities that will be retained. The District

Elements also agree with the DCPS Master Plan's aim to co-locate schools and city services. Lastly, both plans agree that schools should be seen as centers of their communities.

District of Columbia Strategic Plan/ Strategic Neighborhood Action Plans

One City, One Future: The District of Columbia Strategic Plan accompanied the budget for the 2003-2004 fiscal year. The plan was designed to show the core aims of Mayor Anthony Williams' government and how the aims would be achieved. The Strategic Plan stated five principles that would guide the administration: Strengthening Children, Youth, Families and Elders; Building Sustainable Neighborhoods; Promoting Economic Development; Making Government Work; and Enhancing Unity of Purpose and Democracy. The Strategic Plan details budget items designed to implement these visions. Many of the items are service-oriented tasks and upgrades of performance monitoring, rather than the land use actions which the District Elements cover. However, many of the goals in the Strategic Plan—especially those related to sustainable neighborhoods and economic development—are related to the long-term goals of the District Elements. In that sense, the District Elements are consistent with the District Strategic Plan, representing long-term strategies to achieve the same conditions covered in the District Strategic Plan.

At the neighborhood level, the Citywide Strategic Plan was translated into 39 Strategic Neighborhood Action Plans (SNAPs) in 2002. Each SNAP reflects budget priorities for a neighborhood cluster based on a citizen-driven, bottom up planning process. As part of the drafting of the Comprehensive Plan Area Elements, each SNAP was reviewed and consulted. Relevant policies, actions, and priorities were excerpted and carried forward, thereby assuring internal consistency.

V. ALTERNATIVES TO THE PROPOSED PROJECT

INTRODUCTION

This section of the Environmental Assessment evaluates alternatives to the proposed project. The merits of each alternative are assessed, and an explanation as to why each was rejected is provided. Among the alternatives assessed are a “No Project” alternative, which presumes the existing Comprehensive Plan would remain in effect, and a “No Development” alternative. Other alternatives are also outlined, based on the process that was used to revise the Comprehensive Plan.

APPROACH

Throughout the Comprehensive Plan Update, various alternatives to the District’s future – and to the organization and content of the Comprehensive Plan itself – were considered.

Physical development alternatives included different Land Use Map designations on the various corridors, Transit-Oriented Development Areas, and large sites in the city; different Policy Map designations (noting different areas of the city where change would occur); and different transportation system alternatives. Defining the Area Element boundaries also required that a wide range of alternatives be developed and vetted.

Policy alternatives explored different approaches and responses to issues such as affordable housing, environmental quality, gentrification, and traffic congestion. Public input on policy choices was solicited through workshops in 2005; the public was invited to “vote” on these choices by completing survey forms. More than 2,000 surveys were completed. Typical policy choices included decisions about the city’s industrial land supply (preserve it, or allow its redevelopment), inclusionary zoning (mandatory vs voluntary), the height limit (retain it or explore changes outside the view plane of the monumental core), and implementation issues such as the need for a District Planning Commission.

Land Use Category alternatives also were considered. For example, the Comprehensive Plan Task Force debated the merits of having five commercial designations on the map (versus four). The Task Force also considered alternative definitions for land use categories, one of which included density ranges (housing units per acre) for the residential land use categories. The Task Force also debated the merits of the categories shown on the Policy Map, which was initially prepared to depict “Growth Management Areas” and “Revitalization Areas.”

A variety of growth options were considered through the Comp Plan process, both on a cumulative, citywide level (e.g., should the city promote more growth west of Rock Creek Park? should the city rely less on “large sites” and focus more development around transit stations?) and on a small-scale level

(should the Georgia Avenue corridor be designated for Moderate Density or Medium Density Mixed Use? should DC Village be preserved for municipal uses or designated for industrial and commercial development?) These types of options were debated by residents, Task Force members, ANCs, and other stakeholders throughout the process.

Different alternatives for the format and content of the Comprehensive Plan were evaluated over a four-year period, starting with the Plan Assessment in 2002. Initially, the Plan was to be a relatively short, “theme-based” document that did not include Ward Plans. Alternative tables of contents were presented to the Comp Plan Task Force (and the community) for discussion. The format that was ultimately chosen was determined to be more responsive to the community needs, and more likely to produce a useable and implementable plan.

An amalgam of these options and alternatives has been taken to develop several options to the preferred approach, laid out below.

ALTERNATIVES FOR CONSIDERATION IN THIS ENVIRONMENTAL ASSESSMENT

For the purposes of this Environmental Assessment, the following alternatives are offered:

Proposed Plan

This is the “preferred” alternative. The environmental impacts of the proposed Plan are the subject of this Assessment and have been reviewed and summarized throughout this document. The Plan has been designed to guide land use and development decisions in the District of Columbia through the year 2025. It promotes smart growth at the local and regional level, resulting in cumulative environmental benefits for the Washington Metropolitan Area and contributing to the well-being of the National Capital.

The Plan would accommodate a larger share of the region’s growth than the existing Comprehensive Plan and endorses a vision for the region’s future that is more compact, less dependent on fossil fuels, and ultimately more sustainable. The Plan does this without designating parkland or other permanent open spaces for development, and without compromising the integrity of the District’s natural resources and environmental quality. It reduces the potential for adverse impacts to transportation by promoting a multi-modal system that increases transportation choices and mobility. Air quality impacts are minimized by promoting transit, bicycling, walking, and transportation demand management. Water quality impacts are minimized by implementing low impact development practices, separating sanitary and storm sewers, and enforcing stormwater regulations and urban runoff controls. Cultural and visual resources will be protected through historic preservation and urban design programs recommended by the Plan.

Option A: The No Project Alternative

The “No Project” Alternative presumes that the existing 1998 Comprehensive Plan would remain in effect. The current Land Use Map and Policies Map would remain in place, and the text of the existing Plan would not be changed. The eight Ward Plans would remain as they are today, and the Plan would continue to be an unformatted document without graphics.

Quantifying the difference in development potential under this alternative (versus the proposed plan) is not possible, since density ranges are not assigned to the Plan’s land use categories. While the proposed plan does show increased density in a number of locations, it shows decreased density in other locations. Moreover, some of the increases that are contemplated would probably occur even if the Comp Plan was not updated. In many cases, they reflect ongoing City initiatives that have proceeded in the absence of an updated Comprehensive Plan, rendering the existing document less useful and obsolete in many ways. Examples of such initiatives are Great Streets, New Communities, and the Anacostia Waterfront Initiative. Given the way the Comp Plan is used (or not used), the “No Project” alternative would be unlikely to cause these initiatives to terminate.

What is clear is that the “No Project” alternative would cause the existing Comprehensive Plan to become even more arcane and less effective. The guidance it provides on certain topics (regulation of institutional uses, land use compatibility, buffering, etc.) would be further eroded as the data in the document became more outdated and its relevance to current conditions and events continued to diminish. The Plan’s effectiveness in advocating for environmental quality and improvement would also diminish as the document became less relevant.

While the No Project Alternative would not necessarily result in more “negative” environmental impacts, it would result in fewer “positive” environmental impacts. It lacks the strong policy framework for environmental quality and sustainability that the proposed Plan offers. Its format makes it difficult to access, and it is rarely cited as a “road map” guiding city decisions. The preferred alternative is more accessible, easier to read, contains current data and maps, and would likely be consulted more frequently as environmental policy choices are made. It also strongly advocates for environmental quality improvements in a way the existing Plan does not.

The No Project Alternative is also less desirable because it does not conform to the requirements of the Home Rule Act which state that the Plan be amended at least once every four years in response to changing conditions. Conditions and issues in the city have changed greatly since the Plan was last amended (1998) so retention of the existing Plan “as is” would be inconsistent with the Act. Retention of the Plan “as is” could also be viewed as conflicting with federal interests, since it is in the best interest of the federal government that the District Elements are kept up-to-date and compatible with the Federal Elements.

Option B: No Development Alternative

A second alternative to the proposed project would be to retain the project's physical setting—with no substantive changes to the District's physical environment between now and the project's horizon year of 2025. Existing structures and infrastructure would be maintained under this scenario, and vacant and abandoned structures would be restored but vacant land would remain "as is".

While this alternative could be considered "environmentally superior" at the local level, in that it would allow no development-related degradation of the natural environment, the environmental effects would be profoundly negative at the regional level. The demand for land in the District would be displaced to suburban counties, and additional urban sprawl would result. This would cause additional congestion, air and water quality impacts, and infrastructure impacts, as well as the loss of agricultural land and degradation of visual resources in the metropolitan area. The economic impacts would be severe, as the city's economic position within the region slipped and residents were forced to commute longer distances to suburban job centers. Sales and property tax revenues would be stifled. The Vision for Growing an Inclusive City would not be achieved, as the constrained land supply would exacerbate the housing shortage and cause home prices to rise further out of reach.

Ultimately, a no development alternative was rejected for these reasons.

Option C: Incremental Update of the 1998 Plan

A third alternative would be to update the 1998 Plan to reflect current data and make the Plan more attractive and readable, but without the shifts in policy contemplated by the proposed 2006 Plan. This alternative is somewhat like the "No Project" alternative, but it would at least partially respond to the need for a more current and useable Plan. Under this alternative, the Plan would continue to contain "General Provisions", ten citywide elements (including Human Services), and the eight Ward Plans. It would not contain an Implementation Element, the Framework Element, or the other topical elements added to the proposed Plan.

In terms of content, this approach would be similar to the update performed in 1998. Minor changes and additions to the text would be considered, but the core of the Plan would remain the same. All of the policies in the existing (1998) Plan, except those that are clearly outdated, would be carried forward. Data references that are clearly obsolete (for instance, where 1990 Census data is cited as current conditions) would be updated. Maps and tables could be added to the document and it could be formatted using graphic design to make it more useful.

The impacts of this alternative would not be quite as negative as the "No Project" Alternative in that the Plan would continue to have some utility and relevance. More attractive formatting and updated data would at least keep the Plan current and result in its continued use by the public, the Council, and decision-makers. However, simply carrying the existing content forward would not expand the Plan's coverage to the topics which will result in a more sustainable and healthy environment. Key issues such

as environmental justice and the remediation of hazardous sites would go unaddressed. Important initiatives such as green building, recycling, stream restoration, and water quality education would not be included. A “Parks” element would still be missing, and policy guidance on infrastructure issues would still be lacking. Large well-established low-density areas East of the Anacostia River would still be designated for Moderate Density development, while valuable land around transit stations in parts of Northeast DC and elsewhere would continue to be designated for industry.

It would be possible to address some of these shortcomings through the editing of the 1998 Plan. However, the growth-oriented philosophy that underpins the preferred alternative would provide more environmental benefits in the long-run. If the District does not work harder to balance jobs and housing (by producing more housing), provide more affordable units (through increased density), and focus its growth in areas that are not auto-reliant (around transit stations and along corridor), cumulative adverse regional environmental and economic impacts are likely to follow. For this reason, this alternative was not selected.

Option D: Adoption of a “Theme Based” Plan Without Ward Plans

A fourth alternative would be the adoption of a shorter and more general theme-based plan, built on the Vision for Growing an Inclusive City. This was the alternative initially considered at the beginning of the Comprehensive Plan Revision. The Plan was to contain four elements:

- Creating Successful Neighborhoods
- Increasing Access to Education and Employment
- Connecting the City
- Building Green and Healthy Communities

An Implementation Element also would be included. The Ward Plans would be eliminated, and the overall focus of the Plan would be broader and more general. This Plan would bear little resemblance to the 1998 Plan, and would carry forward very few of its policies. It would be structured to “tell the story” of the District’s future by focusing on important citywide issues.

The environmental impacts of this alternative would probably be similar to the proposed Plan. However, it is possible that the emphasis on “global” level policies and the absence of Area Elements (which set place-specific policies) could result in a document that was less useful in guiding day-to-day decisions. The advantage of the preferred alternative (the 2006 Plan) is that it provides very clear guidance on how to zone different areas of the city, and handle future development requests in each of the 56 Policy Focus Areas. A theme-based Plan could offer some environmental benefits (making the environment one of the four themes could elevate its relative importance) but this could be outweighed by the more general nature of the document.

This alternative was not selected for this reason.

Option E: Adoption of a More Growth-Oriented Plan

Although the Comprehensive Plan envisions a substantial amount of growth in the city, it falls short of the ambitious targets originally set by the Mayor in 2003 (100,000 new residents by 2013) and it does not implement Transit Oriented Development (TOD) to the extent that being advocated in many other cities around the country. Moreover, the Plan presumes continued enforcement of the Height Act, and the retention of important open spaces which could conceivably be developed under a more growth-oriented plan.

The proposed alternative clearly treats each Metro station area differently, acknowledging that single family neighborhoods near stations should be conserved and buffered, and that densities should be limited in historic districts and in other areas where change could disrupt neighborhood fabric. It directs additional density to commercial and industrial land and underutilized sites rather than to residential areas. An alternative approach would have been to designate single family areas near Metro for additional density, laying the groundwork for “upzoning” and the replacement of these areas with apartments and other housing types that accommodated more residents. Such an approach was rejected in the Comp Plan revision, as it would have had unavoidable adverse effects on neighborhood character, infrastructure, and community services. It would also adversely affect the city’s neighborhood conservation and historic preservation goals.

VI. CONCLUSIONS

This section of the Environmental Assessment includes a summary of the changes made to the project during the City Council review, a summary of growth-inducing and cumulative impacts, and a final summary of the environmental impacts evaluated in Section III of this report.

Major Changes Made During Council Review

As noted in the Introduction and Project Description of this Assessment, the District Elements were submitted by the Mayor of the District of Columbia to the City Council on July 14, 2006. The document assessed in this report is the Draft as it appeared at that time.

More than 1,000 pages of comments on the Mayor's Draft were submitted between July 14 and October 31, the closing date for public comment. Comments received by September 6 were considered in a "first addendum" published on September 19. Comments received by October 13 were considered in a "second addendum" published on October 19. Both the first and second addenda contained excerpted sentences and text passages and indicated additional text (noted in underlined font) and deleted text (noted in striked out font). On November 15, a third addendum was produced (the Council Mark-Up). The third addendum included the text of the entire document, with graphics and formatting removed. It incorporated the changes noted in Addendas 1 and 2, plus additional changes based on comments received between October 13 and October 31. The Mark-Up also included changes in response to testimony received at Council hearings on September 26 and October 24.

Major changes in the mark-up are summarized below:

- The Planning Area boundaries were changed in response to public input. The most significant change is that the Anacostia Waterfront Planning Area was truncated into a "Lower Waterfront / Near Southwest" Planning Area; the upper reaches of the river were re-assigned to Capitol Hill, Far NE/ SE, and Upper Northeast accordingly. All demographic data, land use data, and projections data presented at the sub-area level was recalibrated.
- A number of changes were made to the Future Land Use Map. These changes resulted in increased density on a small number of sites, decreased density on a small number of sites, and map corrections or clarifications on a small number of sites. Several areas shown as "Mixed Use" were changed to "Commercial" (only), and at least one site was changed from an industrial/commercial designation to a commercial/residential designation. Relative to the city as a whole and the 802 map amendments contained in the July Plan, the changes were minor.
- Interpretation of the Land use categories (regarding PUDs and "mixed use" areas) was clarified
- A discussion of regional activity centers was added
- A summary of key issues was included in the introduction to each element
- Several land use policies (regarding transit oriented development, neighborhood conservation, institutions) were added or edited, generally to emphasize neighborhood conservation

- Additional provisions for transportation demand management, parking management, truck traffic, and regional transportation planning were added
- Small edits to Housing Element and Economic Development Element policies were made; including policies/actions on commercial gentrification and the distribution of special needs housing
- Some of the text, policies, and actions on hazardous materials management were clarified
- A discussion of the Mid-City/Rock Creek East open space network associated with the Armed Forces Retirement Home and McMillan Reservoir area was added
- Policies on impact fees and proffers were added to the discussions of infrastructure, schools, and community facilities
- Text regarding the compatibility of zoning in historic districts was strengthened
- Policies on co-location of public facilities and coordinated public facilities planning were strengthened; and a policy on libraries was clarified to delete references to library closure
- Minor text edits were made to the Infrastructure and Arts/Culture Elements
- Small text edits were made throughout the Area Elements, particularly in the discussions of “Planning and Development Priorities” and in the policy/action statements for “Policy Focus Areas”
- The Implementation Element was edited to clarify certain policies and actions, and to call for the completion of the Planning Commission feasibility study within 180 days of Plan adoption
- Some of the implementation priorities were shifted.

As part of the Environmental Assessment process, the changes in the Mark-Up were evaluated to determine if they would change the findings of the Assessment. The most substantial impacts are associated with Map changes, since such changes could alter the distribution of population and jobs around the city. This in turn could affect the transportation analysis, and other technical studies that underpin the analyses used in this EA. On a citywide scale, the impact of these changes is relatively minor. The outcome of the evaluation remains the same, and a net positive effect will still occur as a result of Plan adoption. Subsequent environmental assessments will be required as future development occurs within these areas to consider effects on traffic, infrastructure, community services and other variables.

Summary of Growth-Inducing Impacts

As noted throughout this Environmental Assessment, adoption of the revised Comprehensive Plan is expected to result in higher levels of household and employment growth than were anticipated by the previous Comprehensive Plan. The Plan would facilitate infill development on underutilized sites, particularly those that are commercially or industrially zoned. The areas expected to absorb most of this growth are in Central Washington, along the waterfront, on about a dozen “large sites”, along major corridor streets, and around Metrorail stations. By 2025, higher densities than exist today could be expected in these areas as development takes place. Very little change is anticipated elsewhere in the city, although infill development consistent with existing neighborhood character and densities would continue.

“Smart growth” is one of the objectives of the Comp Plan, so many of its policies would have growth-inducing effects. These effects are generally desirable and would have positive environmental impacts.

For instance, expanded application of “mixed use” designations, density bonuses, and development incentives could induce additional housing and commercial development in the city. Adoption of policies to improve infrastructure, rebuild schools and libraries, create new parks, and improve water quality would make the city a more attractive place to live and could likewise attract residents and induce growth. Adoption of policies to attract retail to the city, capture a larger share of tourist spending, and provide more shopping choices could also be growth-inducing. Adoption of policies to grow the “knowledge economy” could induce the growth of technology, hospitals, universities, think-tanks, and research industries. This growth would create economic benefits for the District, provide jobs for DC residents, and positively affect city services by increasing the tax base.

At the regional level, the growth inducing impacts are positive. The Plan would help sustain the District as the core of the region. It would encourage densities that are high enough to make transit viable, without damaging the fabric of the city’s neighborhoods. It would help alleviate a severe jobs/housing imbalance in the region by housing a greater share of the regional workforce in the city. This could alleviate traffic congestion and air quality problems, and slow the pace of farmland and woodland conversion on the periphery of the region.

Summary of Cumulative Impacts

Cumulative impacts are those which would result from the project when considered in conjunction with other projects that are already occurring or that are planned in the vicinity. Since the Comprehensive Plan is a policy document, the relevant “projects” for consideration would include the Comprehensive Plans in the suburban cities and counties on the District’s perimeter. This would principally include Montgomery and Prince Georges Counties and the city of Takoma Park in Maryland, and Fairfax County, Arlington, and Alexandria in Virginia. To a lesser extent it would include plans for the exurban counties beyond the core, such as Howard, Frederick, Prince William, and Loudoun, as well as the suburban cities. Comprehensive Plans for these jurisdictions were consulted over the course of the Comp Plan revision to determine relevant impacts and planning considerations.

As individual projects in the District are proposed, the city must remain cognizant of their impacts on adjacent cities and counties. Likewise as development is proposed on the perimeter of the city, the District must stay apprised of the potential for impacts on its own environment. This is particularly evident in Friendship Heights, Silver Spring, and Takoma, but it is also true in places like Capitol Heights, Naylor Road, National Harbor, and Rosslyn. The District already works with neighboring communities on long-range planning, particularly related to transportation. The COG cooperative forecasting process provides a means for staff and elected officials from these communities to discuss the cumulative impacts of growth and develop measures to address regionally significant issues such as the jobs/housing balance and air quality conformity.

Projected growth in the suburban cities and counties was factored into the transportation analysis conducted as part of the Comprehensive Plan. Each of the suburban jurisdictions went through a process similar to the District in this regard, determining their projected share of regional growth and allocating it to subareas based on land capacity, local policies, infrastructure capacity, proposed development, and other factors. The transportation analysis conducted as part of the Comp Plan is already a cumulative impact assessment, in that it accounts for the expected trip growth in the perimeter cities and counties. Similarly, the infrastructure analysis conducted through the Comp Plan considered water demand, wastewater generation, and stormwater runoff from suburban communities as well as the District of Columbia.

On a regional level, many of the cumulative impacts of the Comprehensive Plan would be positive. For example, by encouraging a more transit-oriented, compact development pattern and by focusing development on underutilized sites, the Plan is supportive of regional efforts to conserve open space. The stronger visual identity resulting from revitalized neighborhoods, pedestrian-scale streets, and new communities within the city would create a more positive image of the District in the region.

A number of cumulative impacts could be negative. For example, development in the District and surrounding cities and counties could contribute to a cumulative loss of vegetation and wildlife habitat in the Washington region. Development could also contribute to air emissions and could impede the attainment (or maintenance) of air quality standards. Runoff from suburban counties would impact water quality in the District, possibly reducing the effectiveness of the planned improvements along the Anacostia River. Increased air traffic at the region's airports (required to respond to population and economic growth) could add to the noise impacts that are projected by the Plan. Regional coordination can address some of these issues, but given the multi-state configuration of the region, some degradation of current environmental conditions will be likely under any scenario that contemplates more growth within the region as a whole.

Summary of Environmental Impacts

The final section of this Environmental Assessment presents a summary table of the expected impacts of the Comp Plan. The table uses a "checklist" format. Each impact described in Section III of this assessment is characterized using the following system:

1. Adoption of the revised Comprehensive Plan would have a net positive impact
2. Adoption of the revised Comprehensive Plan would have no impact or a neutral impact
3. Adoption of certain aspects of the revised Comprehensive Plan could have adverse impacts, but these impacts are fully mitigated by Plan policies and actions
4. Adoption of certain aspects of the revised Comprehensive Plan could have adverse impacts, but these impacts are partially mitigated by Plan policies and actions
5. Adoption of the revised Comprehensive Plan would have significant, adverse impacts.

Table VI-4: Summary of Impacts

ID	Impact	Net Positive Impact	Neutral/No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
LAND USE						
A1	Land Use Impacts could result from elimination of the “Medium-High Density Commercial” Land Use Category.		X			
A2	Increased density could occur around Metro Stations, along corridors, in Central Washington, and along the Anacostia River.			X		
A3	Potential land use conflicts could arise around 11 “large sites,” some of which are located close to residential areas and open space.			X		
A4	Land use conflicts could result from the mixing of housing and residential uses within mixed use areas.			X		
A5	Heavy commercial, municipal, and industrial uses could be displaced due to re-designation of certain properties for residential or commercial land uses.				X	
A6	Potential for encroachment of institutions into residential areas and accompanying traffic, parking, noise, and related uses.			X		
POPULATION, HOUSING, AND EMPLOYMENT						
B1	Policy and Map changes are expected to enable the District to accommodate 57,100 households over the next 20 years – 10 percent of the region’s growth.	X				

ID	Impact	Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
POPULATION, HOUSING, EMPLOYMENT (continued)						
B2	Plan policies could result in the attraction of additional families, raising household size and the demand for larger housing units.		X			
B3	Increased development pressure could increase the risk of displacement, particularly for lower income households.			X		
B4	A better balance between jobs and housing would be provided, with the jobs/housing ratio reduced to 2.79 (from 2.87).	X				
TRANSPORTATION						
C1	Traffic congestion would increase, and additional road segments would reach or surpass their capacity.				X	
C2	Demand for public transit would increase, particularly in Central Washington, along the Anacostia River, and on the Great Streets corridors.			X		
C3	The Plan would increase demand for (and use of) pedestrian and bicycle facilities, including sidewalks and bike trails.	X				
C4	Development would result in increased parking demand.			X		
INFRASTRUCTURE						
D1	Potable water demand would increase with population and employment growth.			X		

ID	Impact	Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
INFRASTRUCTURE (continued)						
D2	Sanitary sewer flows would increase as development occurred, and combined sewer overflows could increase. However, CSO improvements also would be made.	X				
D3	Additional energy facilities such gas and electric transmission lines could be needed to serve future growth.			X		
D4	Additional telecommunication antenna and towers could be needed to serve future growth.			X		
D5	Solid waste disposal and transfer needs could increase, but most of the increase would be offset by new recycling programs.	X				
BIOTIC RESOURCES						
E1	Development could reduce tree cover. However, extensive tree planting and urban reforestation programs are proposed.	X				
E2	Non-native and invasive plant species could increase.		X			
E3	Community hygiene and sanitation issues could arise as population increased and mixed use projects became more common.		X			
E4	Increased urban runoff could harm aquatic species. However, concurrent efforts and Plan actions would improve water quality.	X				

ID	Impact	Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
BIOTIC RESOURCES (continued)						
E5	The habitat of threatened, endangered, and special status species could be impacted.		X			
E6	Direct loss of habitat could occur through development but would be less likely under the proposed Plan than the current Plan due to map changes and new policies.	X				
E7	Human-wildlife interactions could increase.		X			
WATER RESOURCES						
F1	New development and land use changes could affect drinking water quality.		X			
F2	New development and land use changes could degrade groundwater quality		X			
F3	Runoff volumes could increase as development occurs. This will be offset by low impact development practices and pervious surface standards absent in the 1998 Plan.	X				
F4	Non-point source pollution could be exacerbated by increasing the population of the District's watersheds. This will be offset by water quality programs and pollution education initiatives.	X				
F5	Additional point sources of pollution could be created.		X			

ID	Impact	Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
AIR RESOURCES						
G1	Construction-related air quality impacts could arise.	X				
G2	Traffic could exacerbate air quality problems and affect the District’s air quality standard attainment status.				X	
LAND RESOURCES						
H1	Additional erosion could result as development occurs.		X			
H2	Additional sedimentation and bank failure could result along area streams. However stream restoration programs that are not referenced in the 1998 Plan would be initiated.	X				
H3	Development would continue to be allowed on a limited number of steep slopes. However, the Land Use Map designations on some of the areas with slopes over 20 percent would be reduced to less dense designations.	X				
ENVIRONMENTAL HAZARDS						
I-1	Development could occur on former industrial and commercial sites where hazardous materials were once handled—some of these sites may contain contaminants.			X		
I-2	New housing may be permitted in areas proximate to industrial uses or commercial uses where hazardous materials are handled.			X		
I-3	The renovation of older buildings could lead to exposure to hazardous building materials.		X			

		Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
ID	Impact					
ENVIRONMENTAL HAZARDS (continued)						
I-4	Increases in population could lead to increases in household hazardous waste generation and improper disposal.			X		
I-5	An increased number of residents and workers could be exposed to hazardous cargo as congestion increases and the volumes of hazardous materials shipped through the District increases.			X		
I-6	An increased number of residents could be exposed to high noise levels, and an increased number of sensitive receptors such as schools and hospitals could be impacted by noise.			X		
I-7	Flood hazards could increase if development is located within the 100-year flood plain.		X			
I-8	An increased number of residents could be exposed to electromagnetic fields if additional telecommunication equipment and electric equipment is sited in the city.	X				
COMMUNITY SERVICES						
J1	Residential growth and changing demographics may cause an increase in the number of students and create the need for new school facilities.			X		
J2	New residential development could create demand for new and expanded libraries.			X		
J3	Future residential and commercial growth will generate a need for expanded or relocated police facilities.			X		

		Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
ID	Impact					
COMMUNITY SERVICES (continued)						
J4	Anticipated residential and commercial development is likely to create the demand for more fire and EMS services, while changes in traffic patterns and congestion could affect response times.			X		
J5	Anticipated residential development, combined with the aging of the population, could increase the demand for health care facilities.			X		
J6	New residential and commercial development could exacerbate the shortage of child care facilities and create the demand for new facilities.			X		
J7	New development could exacerbate parkland shortages and create the demand for new parks. However, the overall impact would be positive due to the addition of pro-active policies on parks and open space to the Comprehensive Plan.	X				
CULTURAL RESOURCES						
K1	Excavation of development sites could unearth or disturb archaeological resources. The overall impact would be positive due to the addition of new policies on this topic to the Plan.	X				
K2	Historic City plans could be altered by infill and redevelopment activities, including street and alley closures.			X		
K3	As the city redevelops, there could be pressure to demolish historic structures—or other older buildings that are not yet designated as historic.			X		

		Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
ID	Impact					
CULTURAL RESOURCES (continued)						
K4	Infill development adjacent to historic sites, and alterations to historic buildings, could disturb the context and integrity of historic structures.			X		
K5	Historic landscapes and open spaces could be impacted by development.		X			
VISUAL RESOURCES						
L1	New development accommodated by the Comp Plan could impact neighborhood character and design.			X		
L2	Increases in pedestrian, bicycle, and transit use could alter the aesthetic and visual character of streets and public spaces.			X		
L3	New development could alter the civic identity of the District. The net effect would be positive, as blighted areas are restored and abandoned buildings are refurbished.	X				
L4	Important views and vistas could be obstructed by development.		X			
ECONOMIC IMPACT						
M1	Revitalization of older commercial centers could displace small, local businesses			X		
M2	Displacement of industry could result in the loss of good-paying jobs that do not require a college degree and increased expenses for local businesses.			X		

		Net Positive Impact	Neutral/ No Impact	Possible Adverse Impacts Fully Mitigated through Plan Policies and Actions	Possible Adverse Impacts Partially Mitigated through Plan Policies and Actions	Significant Adverse Impacts
ID	Impact					
ECONOMIC IMPACTS (continued)						
M3	Office space would be encouraged outside the traditional core of the city, particularly in NoMA, the Near Southeast, and on several large sites—providing room for the expansion of the city’s office economy.	X				
M4	The District’s share of the regional retail and tourist market could increase, producing positive revenue impacts.	X				
M5	There could be a net gain in taxable acreage as certain federal sites are returned to the tax rolls and institutions are encouraged to grow “up” rather than “out”	X				

EXHIBIT D

2011

ENVIRONMENTAL

ASSESSMENT FOR

REVISION OF THE

COMP PLAN

Comp Plan Environmental Assessment
Economic Development Element

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
(42) 703.13a	A new section 703.13a is added to read as follows: <u>“Policy ED-1.1.6 International Assets “Draw on international business and institutional assets to develop international centers for learning, knowledge sharing, and trade. Expand cultural opportunities to residents and visitors, and create links between Washington, DC and foreign cities, industries, retail, institutions, and markets.”.</u>	The change will increase cultural opportunities to residents, strengthen the city as an international center, and create direct and indirect employment opportunities.	0	0	3	Minor Positive Impact 3

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
(43) 703.13b	A new section 703.13b is added to read as follow: <u>“Policy ED-1.1.7 Global Financial Center “Enhance the District’s status as an international financial center by supporting the enactment of pending federal legislation to ensure that insurance reserves are held and invested in the U.S., rather than offshore in foreign jurisdictions, to cover losses from natural and man-made catastrophes. By making the District a special tax jurisdiction where billions of dollars of catastrophic insurance reserves</u>	Amendment proposal reflects new policy.	2	0	3	Significant Positive Impact 5

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	<p><u>and their investment income would be exempt from federal taxes, substantial new professional and service-support jobs would be generated for District residents, along with substantial new local tax revenues.”</u></p>					
(44) 703.16	<p>A new section 703.16 is added to read as follows: <u>“Action ED-1.1.C: Business Support Structures</u> <u>“Streamline processes and create a more centralized system to assist businesses to meet regulatory requirements</u></p>	<p>Issue not addressed in the 2006 Plan, but is significant to supporting businesses and employers of all sizes to be competitive in the District. Increases opportunities for businesses to open,</p>	2	2	3	Major Positive Impact 7

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	<u>quickly and efficiently, with a particular focus on serving small businesses. Centralize information and assistance to small and local businesses about starting a new business, business permitting processes, zoning, fees and regulations, incentives, financing, unique programs, and opportunities. Create a fast-track permits and approvals system for businesses interested in opening or expanding in priority, underserved neighborhoods.”.</u>	expand and remain in Washington, DC.				

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
(45) 705.13	A new section 705.13 is added to read as follows: <i>“Action ED-1.3.D: Link Federal Research and Enterprises</i> <i>“Create partnerships to better link federal agencies that conduct research with local businesses to foster the commercialization and production of new technology, enterprise development, and generation of patents in the District.”</i>	Issue not addressed in the 2006 Plan, but is significant to supporting federal agencies and local businesses, as well as contributing to economic base of the District. Expands employment opportunities and solidifies competitiveness.	0	0	3	Minor Positive Impact 3
(46) 708.11	Section 708.11 is amended to read as follow: <i>“Policy ED-2.2.7: Planning For Retail</i>	Addresses balance of existing and upcoming retail opportunities with demand.	2	2	3	Major Positive Impact 7

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	<p>“Coordinate neighborhood planning efforts with the District’s economic development planning and implementation programs in order to improve retail offerings in local commercial centers. <u>Consolidate retail according to existing and forecasted demand, and consider converting retail to other uses where an increased consumer base is required.</u>”.</p>	Will help guide initiatives and policies that influence retail location and requirements.				
(47) 708.11a	A new section 708.11a is added to read as follows: <u>“Policy ED-2.2.8: Innovative Retail</u>	Addresses new opportunities to meet demand in underserved or	2	2	3	Major Positive Impact 7

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	<p><u>“Identify and implement new strategies to recapture retail sales leakage. This could include mobile retail units in neighborhoods in which there might not be enough market demand to support an entire store and for helping new businesses establish themselves, or pop-up stores to introduce new products and concepts, provide seasonal merchandise and services, and fill commercial buildings during short-term vacancies.”.</u></p>	transitioning neighborhoods.				
(48) 708.11b	A new section 708.11b is added	Seeks to create a critical mass of	3	1	3	Major Positive Impact 7

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	to read as follows: <u>“Policy ED-2.2.9: Clustered Retail at Transit</u> <u>“Cluster retail around areas of high foot-traffic, including Metrorail exits, bike trails, future streetcar stops and other multi-modal meeting points. Create strong nodes of character to effectively link retail and transit.”.</u>	retail at transit areas, to increase walkability and services to residents; supports businesses.				
(49) 713.11a	A new section 713.11a is added to read as follows: <u>“Policy ED-3.1.8: Neighborhood Retail District Identity and Promotion</u> <u>“Brand the distinct character of retail districts through signature promotional</u>	Will build on existing neighborhood assets and increase visitors and a sense of community.	1	1	3	Significant Positive Impact 5

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating
			Environmental	Historic Preservation	Fiscal	
	<u>events, signage, streetscape, district gateways, as well as building unique clusters where appropriate.</u> ”.					

Comp Plan Environmental Assessment
Parks, Recreation, and Open Space Element

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating	
			Environmental	Historic Preservation	Fiscal		
(50) 804.10a	A new section 804.10a is added to read as follows: <u>“Policy PROS- 1.1.4: Mini-Parks</u> <u>“Develop a coherent identity for mini-parks through a coordinated approach to management among the various government agencies that can define the role of mini-parks in the larger park system, help the agencies manage them more efficiently, and promote system-wide investment of resources.”.</u>	Recent work completed as part of CapitalSpace has specifically looked at challenges and opportunities that small parks have. Nothing in the Parks and Recreation Element of the Comprehensive Plan specifically addresses small parks. Small parks throughout the District fall under the jurisdiction of three different agencies: the National Park Service, the DC Department of Parks and Recreation, and the DC Department of Transportation. The proposed change recommends developing a coordinated strategy for managing these	2	2	2	6	Amendment promotes more efficient administration of two District agencies responsible for maintaining green space that is part of the city’s historic plan.

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating	
			Environmental	Historic Preservation	Fiscal		
		small parks, something that is currently not being done. The proposed change will provide direction for two District agencies responsible for managing small parks, and will give guidance for how the two agencies should work with one federal agency with similar responsibilities.					
(51) 810.20	A new section 810.20 is added to read as follows: <u>“Action PROS- 2.2.F: Integration of Federal and District Athletic Fields “Better integrate federal and District athletic fields under the jurisdictions of NPS, DPR, and DCPS.”</u>	There is currently nothing in the Comprehensive Plan about permitting systems for athletic fields. Currently, fields are permitted through one of three agencies: the National Park Service, the Department of Parks and Recreation, or through DC Public Schools. Each agency has its own method of tracking and managing field	0	0	1	1	Amendment will lead to greater efficiencies for administering city programs.

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating	
			Environmental	Historic Preservation	Fiscal		
		reservations, a situation that causes confusion for residents. Current field reservation processes and fees vary depending on which agency has jurisdiction over a field. An online permitting process that is seamless to the public – where ownership, fees, and reservation requirements are managed behind the scenes - simplifies the public interaction with government agencies through new technology that has previously been unavailable.					
(52) 814.6a	A new section 814.6a is added to read as follows: <u>“Policy PROS- 3.3.3: Small Park and Mini-Park Cluster Improvements Prioritize</u>	There is currently nothing in the Comprehensive Plan about making enhancements to small parks. Recent work completed as part of CapitalSpace has specifically	2	2	2	6	Amendment seeks to take full advantage of small parks in a way that increases their environmental benefit, enhances elements of the city’s historic plan, and

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating	
			Environmental	Historic Preservation	Fiscal		
	<u>improvements of small park and mini-park clusters in areas with limited access to parks and open space and a growing population. Apply common themes such as sustainability, place-making, or connectivity to plan, enhance, and maintain the small parks as a system.</u>	looked at challenges and opportunities for small parks, including how to best manage this previously unrecognized network of park space. The proposed change will provide direction for two District and one federal agency in regards to implementing improvements plans for small parks. This action is one of several steps needed to achieve larger planning goals for small parks within the park and open space system.					
(53) 814.8	A new section 814.8 is added to read as follows: <u>“Action PROS-3.3.B: Small Parks Database</u> <u>“Develop a shared</u>	Currently there is no one place where data on all small parks is located. This makes planning for small parks difficult at best, impossible at worst.	2	2	2	6	Amendment seeks to take full advantage of small parks in a way that increases their environmental benefit, enhances

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Score/Rating	
			Environmental	Historic Preservation	Fiscal		
	<u>database of small parks, as defined by the CapitalSpace Plan, to inform coordination efforts between agencies and with the public, including data on: ownership, size, location, function, level of use, historic or cultural value, commemorative elements, programs, and condition. Assess existing agency jurisdiction for certain small parks to ensure that each parcel is managed effectively to meet District and/or federal objectives, and clarify responsibilities of the managing agencies.”.</u>	Residents or government agencies seeking information on any single small parks have no way of knowing what agency has jurisdiction over a small park, and consequently its intended use of function. The proposed amendment provides guidance for how a small park database would be created and the relevant information it would include.					elements of the city’s historic plan, and

Comp Plan Environmental Assessment

Urban Design Element

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Rating/Score	
			Environmental	Historic Preservation	Fiscal		
(54) 906.10	Section 906.10 is amended to read as follows: <i>“Policy UD-1.4.4: Multi-Modal Avenue/Boulevard Design</i> “Discourage the use of the city’s major avenues/boulevards as “auto-only” roadways. Instead, encourage their use as multi-modal corridors, supporting bus <u>transit</u> lanes, bicycle lanes, and wide sidewalks, as well as conventional vehicle lanes.”.	This issue is a correction to reflect current policy.	3	1	2	6	Multi-modal transit systems encourage walkability, retain a pedestrian scale along historic avenues, and can increase the value of adjacent property.
(55) 913.12	Section 913.12 is amended to read as follows:	This issue is a correction to reflect current policy.	3	1	2	6	Multi-modal transit systems encourage walkability, retain a

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Rating/Score	
			Environmental	Historic Preservation	Fiscal		
	<p><i>“Policy UD-3.1.5: Streetscape and Mobility”</i> Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Bus Transit shelters, benches, bicycle parking, safe pedestrian connections, and clear wayfinding signage should be provided to facilitate multi-modal travel.”.</p>						pedestrian scale along historic avenues, and can increase the value of adjacent property.
(56) 915.5	<p>Section 915.5 is amended to read as follows: <i>“Policy UD-3.3.3: Design of New Public Transit”</i> “Treat the design</p>	<p>This issue is a correction to reflect current policy.</p>	3	1	2	6	Multi-modal transit systems encourage walkability, retain a pedestrian scale along historic avenues, and can increase the value

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Rating/Score	
			Environmental	Historic Preservation	Fiscal		
	of mass transit systems, including the proposed streetcar and bus rapid transit systems , as an important form of public architecture. Bus Transit shelters, waiting platforms, signage, <u>off-board fare collection</u> , on-street bicycle facilities, pedestrian connections, and other improvements should contribute to citywide urban design goals.”.						of adjacent property.
(57) 915.6	Section 915.6 is amended to read as follows: “ <i>Policy UD-3.3.4: Metro Station Entrances</i> “Promote design improvements and	This issue is a correction to reflect current policy.	2	1	2	5	Multi-modal transit systems encourage walkability, retain a pedestrian scale along historic avenues, and can increase the value

Citation	Amendment	Evaluation	Assessment/Impact Rating			Overall Rating/Score	
			Environmental	Historic Preservation	Fiscal		
	public art at Metro transit station entrances and transit stops, providing a stronger sense of arrival and orientation for travelers.”.						of adjacent property.