

April 6, 2021 *[last edit]*

## **RE: THE PROPOSED AMENDMENTS TO THE DC COMPREHENSIVE PLAN and FUTURE LAND USE MAP (FLUM); RESPONSE FROM WARD 1 RESIDENTS**

*Dear Councilmember Brianne Nadeau, and our At Large Councilmembers Phil Mendelson, Elissa Silverman, Anita Bonds, Christina Henderson, and Robert White,*

The time has come for a trauma-informed approach to politics and policy.

The loss of businesses and homes through absence of tax abatements when property values skyrocket, the separation of families due to lack of family-sized units, and the aggressive economic pressure placed on all residents when the goal is to maximize private property values rather than to eliminate direct harm & maximize public benefit – all of these cause acute, direct trauma to our citizens and community.

However, the proposed amendments to the DC Comprehensive Plan will only induce more harm and trauma because of how it bypasses basic planning expected in any modern city.

The Mayor's amendments have been proposed without the legally required impact studies associated with the desired population growth. Amendments have been done without any efficacy studies or progress reports showing how the existing Comp Plan policies may be working, or not, right now in order to make the proper adjustments. And, the proposed 200 million square feet of Future Land Use map changes represent a hodge-podge approach to developer-driven spot zoning that will largely benefit speculative profit margins without serious and careful consideration for the affected families and communities.

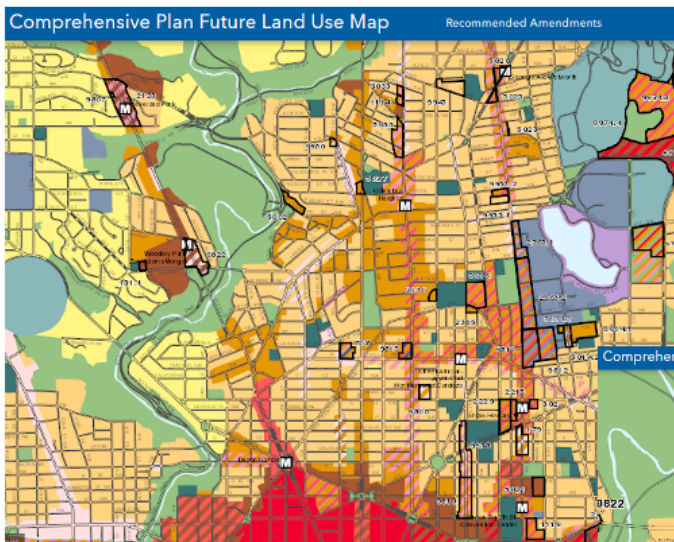
It's up to the DC City Council to get the Mayor's planning apparatus in shape and to follow the laws and basic common-sense principles of planning as we don't see it happening at the DC Office of Planning or at the DC Zoning Commission. The results of these failures and gaps over the past decade has resulted in acute and permanent harm to Black and Brown communities in DC and in Ward One. Families separated, churches in decline, homes and businesses lost, communities scattered, schools overcrowded, infrastructure overtaxed, roads clogged, public spaces privatized, and ultimately, lives shortened and lost.

**Specifically, the proposed amendments to Plan policies and Future Land Use Map affecting areas in Ward One demonstrate that the Mayor and Office of Planning:**

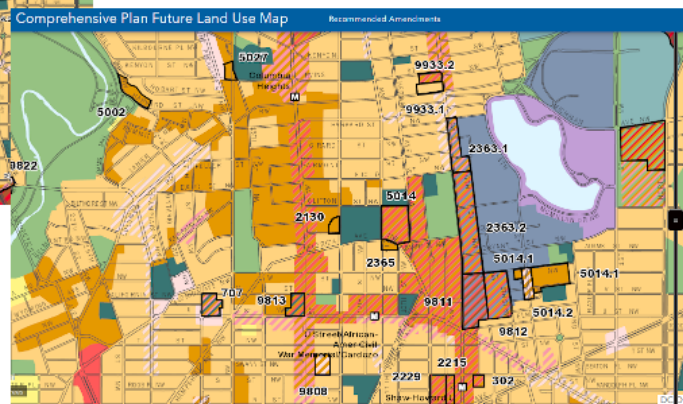
**1. Attempts to work around community input as to the future of our Ward neighborhoods.**

Changes to the FLUM eliminate community-driven planning because they make the areas that are upFLUMed able to be developed as a matter-of-right after a basic proforma map change hearing with no actual parties who can contest. Map amendments post UpFLUMing won't allow for binding community-benefits agreements and the requirements for proper impact planning are sidelined. In fact, there won't be much anyone can say or do to tie the allowed density increases to more truly affordable family sized housing or to help propel existing small business or economic opportunities for local entrepreneurs.

This is the exact opposite direction we want planning to go in our city as the status quo results have been substantial in the large overcrowding effects on existing levels of community services and the simultaneous displacement of working-class families and neighbors.



The proposed FLUM changes are highlighted on the maps



Ward 1

**2. Attempts to work around [American Institute of Certified Planners protocols](#) & legal directives for the city to actually plan for the impacts that come with any desire for more population growth.**

The proposal to increase the FLUM with the swipe of a pen is not planning, it's a work around of the Whole Neighborhood Approach to planning (Comp Plan Policy Policy H-1.4.6), let alone basic common sense planning that we all expect living and working here in DC. When the city encourages new buildings and population growth, such as the magnitude suggested by the Mayor's proposed upFLUMing, accompanying this desire must be consideration of community needs for new schools, expansion of parks, new clinics, libraries, better transportation, better emergency response time, and utility & transportation upgrades and the capital costs associated with them. And, identified impacts must be taken into account when approving upzoning so to commit developers to paying their fair share towards capital improvements the financial burden doesn't fall entirely on DC taxpayers.

*Planning is supposed to be based on data*, so we expect the Council to require analysis of real housing needs (existing low-income housing needs vs perceived future Class A needs), reporting of current and projected vacancy rates, discerning discrepancies in population growth projections, understanding real displacement impacts & numbers, and effects on health & environmental considerations. The proposed changes have not included written evaluations about the above data in any discernible way meaning the proposed changes are largely capricious and will likely continue the harm against vulnerable residents and communities.

**3. Weakens the Plan language and thus reduces or eliminates the community's ability to mitigate impacts and hurts our preparations for growth.**

The Mayor weakens language in the Comprehensive Plan -- for example where directives that 'ensure that' or 'must' have been turned to 'should.' This is the exact opposite direction planning and accountability needs to go in this city. Moreover, we want to see language that reflects the Housing Justice Priorities of the DC Grassroots Planning Coalition - including preserving and improving public housing, expanding rent control and housing subsidies, providing housing for the homeless, and promoting community-led equitable development. The full Housing Justice Priorities document is on the record can be found here: <http://www.dcgrassrootsplanning.org/priorities>

## WHAT DO WE WANT WITH REGARDS TO THE DC COMPREHENSIVE PLAN

- **We want the law followed regarding any changes to the Plan**

Developers and city officials are simply not above the law. We are all owed *equal* protection of the law. The proposed changes to the DC Comprehensive Plan must be accompanied with actual planning per the law:

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.”

- **We want Racial equity to be more than words and limited-English speaking residents are supposed to be part of planning in the city**

The DC Comprehensive Plan affects all DC communities and neighbors. Ward One represents part of the city with more than 3% of the population speaking languages other than English. Our neighbors who don't speak English have been left completely out of this process as OP never provided translation of the outreach materials or any publications that explain the Comprehensive Plan and the changes proposed. OP's lack of engagement with these communities breaks with the Language Access Act and Human Rights laws.

And, to bring justice into this amendment process, the recent Racial Equity law ('REACH Act') must be applied to the Comp Plan. The average black family in the city has one-tenth the net worth of the average white family largely because developer-led planning policy choices make home ownership unattainable for so many. It is time for DC's families to attain. To do that, we must build that not just into the rhetoric, but into the actual land use map and directives of the Plan. If there are racial equity deficiencies in the Comp Plan policies as we expect, we want the Comp Plan vote deferred until the DC Office of Planning acknowledges these planning issues and properly addresses them in narrative and policy.

- **We ask Councilmember Brianne Nadeau to rescind her last minute changes to the Plan maps**

In the last weeks leading up to the Comp Plan markup at the Council, Ward One Councilmember Brianne Nadeau is proposing late-changes to Plan maps that will permanently alter many Ward One communities affecting tens of thousands of Ward One residents and families. These proposed changes are a complete surprise in their late announcement and are not accompanied by any efficacy reporting or planning impact studies. Most of the affected communities aren't aware of her suggestions, and the changes are substantial in that they push the density of major corridors up and significantly so.

We want any proposed upFLUMing (aka upzoning) to have a much deeper dive through "contested case" review in evaluating how these proposed changes may affect our entire Ward before they become legally binding.

We especially want to see and participate in updated small area planning to examine any harms the additional population growth may have on existing neighborhood services like our schools, libraries, clinics, our existing transportation systems, the environment, and to see how we can eliminate, or at least mitigate, the obvious displacement pressures that come with development.

Every single change in to upFLUM the Future Land Use Map has the potential for deeply inequitable and possibly traumatic impacts on nearby residents, homeowners, and businesses, along with benefitting landowners who may not care for the best interests of our city beyond speculation and profit.

*We must do our homework before we put our people and communities through such a test.*

## **CONCLUSION**

Councilmembers, upon consideration of the foregoing reasons and the law, we, the undersigned Ward One residents ask you to reject the Mayor's proposed Comprehensive Plan changes as they are proposed and without impact study.

Above all, we must ensure no harm is done in the attempt to bring about good. The concept that any of our children or neighbors' well-being should be sacrificed as collateral damage to a growth-at-all-costs mindset represents a total

failure to ensure politics and policy actually work for this city.

Thus, we ask that you require the DC Office of Planning to provide impact studies accompanying the changes to allow for transparent public evaluation before any amendments are enacted. This will ensure real planning is happening in the city so “growth” doesn’t further harm our neighbors and neighborhoods and benefits all of us appropriately not just the developer-class exorbitantly.

Please contend especially with the missing impact studies per DC Code 1-306.4(d) and 10A DCMR 2515.2, .3, a central planning issue also put on the record by some Ward One ANC’s and never responded to as of yet.

***Respectfully Signed,***

- Zachari Curtis Columbia Heights
- Jessica Neagle Adams Morgan
- William H Jordan Columbia Heights
- Lyndi Borne Columbia Heights
- George Ripley Columbia Heights
- Ms. Shonta' High Parkview Community
- Cosette Audi Columbia Heights
- Tara Vassefi Kalorama Triangle
- Vick Baker Park View
- Geoff Gilbert Columbia Heights
- Alex Vidales Mount Pleasant
- Peter Stebbins Mount Pleasant
- Megan Waziri Columbia Heights
- Chuck Moran Park View
- Amanda Kleinman Mount Pleasant
- Samantha Lee Park View
- Abigail Stahl Adams Morgan
- Tyler Benjamin Mt. Pleasant
- Beverly Stroud Petworth
- Zach Schaffler Adams Morgan
- Elizabeth Lovinger Park View
- Katy Lang Columbia Heights
- Eric Blodnikar Adam Morgan
- Armand Cuevas Columbia Heights
- Linda Golden Mount Pleasant

**Cont RE: COMPREHENSIVE PLAN and FUTURE LAND USE MAP (FLUM)  
AMENDMENTS WARD 1 RESPONSE**

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- Glenda Richmond U Street
- Vikram Surya Chiruvolu, Adams Morgan
- Bob Schlehuber Columbia Heights
- Abigail Stahl Adams Morgan
- Tiana Trutna Ward 1
- Amanda Liaw Columbia Heights
- Ann Hoffman Columbia Heights
- Leonardo Flores Columbia Heights
- Scotty Brown Park View
- Nida Chaudhary Columbia Heights/Park View
- Ryan Cummins Columbia Heights/Park View
- Marc Poe Columbia Heights/Park View
- Bob Schlehuber Columbia Heights
- Emmelia Talarico Bloomingdale
- Vikram Chiruvolu Adams Morgan
- Cesar Maxit Adams Morgan
- Jair Carrasco Columbus heights
- Sarah Cox Mount Pleasant
- Tereguebode Goungou Columbia Heights
- Shani Shih Adams Morgan
- Chris Otten Adams Morgan
- Marvin Sloan Ward 1
- Gary Zottoli Park View
- Rev. Inryū Bobbi Ponce-Barger Ward 1
- Scott Thompson Kalorama Triangle
- Sierra Ramirez Mt Pleasant/Columbia Heights
- Sandra Reischel Adams Morgan
- Amelia Gannon Adams Morgan
- Anjan Chaudhry Lanier Heights
- Laura Gubisch Kalorama triangle
- Camryn Peterson Park View
- Natalie Leach Park View
- Margaret Staines Lanier Heights
- Joshua Schmidt Columbia Heights
- Jazmin Rumbaut Columbia Heights
- David Poms Columbia Heights
- Erin Riordan Mt Pleasant
- Amanda Kleinman Mount Pleasant

**Cont RE: COMPREHENSIVE PLAN and FUTURE LAND USE MAP (FLUM)  
AMENDMENTS WARD 1 RESPONSE**

- Rob Leardo (TENAC) Mt. Pleasant
- Nick Van Duse Park View
- Betzabe Rosad Adams Morgan
- Caroline Bovair Park View
- Kimberly Krhounek Meridian Park
- Laura Narayani Gubisch Kalorama Triangle
- Myra Woods Adams Morgan