

January 10, 2020

Director Andrew Trueblood
DC Office of Planning
1100 4th Street, SW, Suite 650 East, Washington, DC 20024
Via: plandc@dc.gov

RE: Coalition for Smarter Growth Comments on DC Comp Plan October 2019 Draft

ENCL: Detailed CSG comments on the Comprehensive Plan October 2019 draft

Dear Director Trueblood:

Please accept these comments on behalf of the Coalition for Smarter Growth, the leading organization in the Washington, DC region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

Summary statement: We wish to express our support for the Comprehensive Plan amendments, including the map amendments. We believe that these changes are a major step forward for the District, as it seeks to fulfill its new mandate from the Framework Element to build a more inclusive, equitable, and sustainable city.

We strongly support the housing goals to increase housing opportunities throughout the city and provide more affordable homes, especially in parts of the city where there are few today. We commend the refocusing of defensive language to “enhancing” and “respecting” neighborhoods while ensuring they help address our housing needs. We also support the continued focus on transit-oriented development. We recommend going further in rethinking the role of vehicle parking in our future as parking requirements are a government anachronism in a rapidly changing transportation and environmental context. We recommend eliminating government regulations for minimum parking requirements and focusing on improving multimodal access and transportation demand management.

A mix of housing types with access to better transit will build a stronger city and better neighborhoods for all. It is also a legal obligation under the Fair Housing Act to affirmatively further fair housing. We applaud the District’s specific production goals to create 36,000 homes, with 12,000 of them affordable by 2025, and we support the allocation of these production goals by planning area. We agree that this is a helpful approach to building a truly equitable city and directly addressing the need to undo a legacy of racial discrimination and segregation.

We support the Future Land Use Map (FLUM) changes in general. A highlight are FLUM changes for new housing capacity in Rock Creek West, the area with the smallest share of affordable housing, at just one percent today. The next two areas lagging in affordable housing opportunities are Capitol Hill and Near Northwest. We urge the District to designate more housing capacity in these areas to achieve the

minimum 15 percent affordable homes in each planning area. We value quality affordable homes to meet the needs of DC households in all planning areas, but we especially urge the city to use land use policy to help lagging areas catch up to their affordable housing production goals of 15 percent.

DC's many compact, walkable, transit-served neighborhoods make it the most sustainable place to live in the region. We should make it easier for more people, of all incomes to live in the city, which offers lower transportation costs, and helps reduce regional vehicle miles traveled and greenhouse gas emissions. The Comprehensive Plan and the District's increased housing production goals play a major role in facilitating our region's increased sustainability and social equity. The District faces many challenges, but our most pressing need as we manage the benefits of rising prosperity is to ensure that our low-income residents, especially people of color, have access to safe and affordable housing and transportation, along with quality nearby schools and services. Therefore, we commend the District's efforts to ensure equitable access to quality housing and neighborhoods across the city.

We have enclosed our detailed comments on the Comprehensive Plan and maps. These comments are supplemented by our [joint statement](#) with affordable housing groups submitted on December 16, 2019. In addition, we want to associate ourselves with the comments of Ward 3 Vision and the 21st Century School Fund.

Thank you for the good work of the Office of Planning and sister agencies in putting together this excellent draft. We look forward to supporting the quick adoption of the new plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort
Policy Director