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Unmasking the Comprehensive Plan Rewrite

The Office of Planning Amendments Attack Neighborhoods, Invite Unchecked Development

The Committee of 100 on the Federal City (C100) has just released *Unmasking the Rewrite*: *How to Make the Comprehensive Plan Work for DC*, a 74 page report that describes how the Mayor's Office of Planning (OP) has turned the legally required amendment to the District's Comprehensive Plan (Comp Plan) into an attack on neighborhoods and an invitation to developers to pursue unconstrained development. (*Unmasking the Rewrite* is <u>HERE</u>.)

"The 1500-page OP submission is not a plan that evaluates past outcomes and offers amendments to better align planning with citywide and neighborhood goals. It is a present for developers at the expense of neighborhoods," said Kirby Vining, Chair of C100.

Unmasking the Rewrite details this Top Five list of problems in the OP draft:

- 1. The Amended Plan fails to reckon honestly with the city's inequities, displacement of long-time residents and past policy failures, laying the groundwork for repeating the same mistakes. The OP Plan is based on the discredited supply-side theory that more market-rate housing will trickle-down to lower housing costs for low income residents. The premise is that a glut of new housing can be created to magically cause a drastic drop in rents to a level that will benefit those most in need of deep affordability.
- 2. Basic data and impact studies required for decision-making are missing or out of date.

 Assumptions about population growth appear to be inflated and are at odds with those of the Chief Financial Officer. These deficiencies are crippling the ability to assess the past and plan for the future.
- 3. The Mayor's amendments disempower residents and give maximum flexibility to the Mayor and the unelected Zoning Commission to ignore community wishes in favor of developer interests.

- 4. Strong verbs that hold policy makers accountable for implementing the Plan have been replaced by insipid words, making it immune to enforcement in court. Examples include: protect (a meaningful verb) becomes <u>respect</u> (an attitude); retain becomes <u>encourage</u>; ensure becomes <u>promote</u>; must and shall become <u>should</u>; pursue becomes <u>consider</u>. The result is that the city need not follow its own policies and citizens will have no grounds to object or challenge decisions.
- 5. The Plan is weak on policies and actions to achieve affordable housing or build generational wealth through home ownership. It fails to spell out needed reforms to rent control and public housing, or lay out innovative affordable housing models that OP finds adaptable to District goals.

Unmasking the Rewrite closely examines proposed policies and actions for five major sections of the Mayor's proposed plan and offers detailed recommendations on how to make the Plan work for DC:

- Land Use Element including the Generalized Policy Map & Future Land Use Map (FLUM)
- Housing Element
- Historic Preservation Element
- Urban Design Element
- Central Washington Area Element

DC Council Chair Phil Mendelson has stated that the Committee of the Whole will consider and vote on the Mayor's proposed amendments in February 2021. All residents who are concerned about the Plan should contact their ward and at-large Council members.
