

# The Committee of 100

on the Federal City



April 28, 2021

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Subject: Bill 24-0001 Comprehensive Plan Amendment Act of 2020 – Committee Print

Dear Council Members:

While the Committee Print of Bill 24-0001 makes some important changes to the Mayor’s Office of Planning (OP) legislation that strengthens language and expresses support for viewing policy through a “racial equity lens,” the bill will still perpetuate and accelerate failed policies that have led to gross racial inequities and citizen disempowerment. We do not believe the Council can sufficiently amend the bill to correct policies that will expand racial inequities in land use planning and implementation. For this reason, C100 recommends the Council table the bill.

The Council Office of Racial Equity’s (CORE) *Racial Equity Impact Assessment (REIA)* found that, even with the changes, the bill ...*fails to disrupt the status quo of deep racial inequities in the District of Columbia...Despite the Plan’s commitment to eliminating racial inequities, the document before us perpetuates the status quo.*”

**The REIA underscores the legislation’s negative impacts, including that it:**

- Lacks honest historical narrative and gives a selective view of the present, thus normalizing structural racism and laying a faulty foundation for policymaking;
- Reinforces structural racism by reporting aggregate data that conceals racial inequities and the fact that Black and White DC residents live in separate economies;
- Fails to encourage a transparent and accessible planning process that fully and substantively includes Black residents and other communities of color in decision making;
- Fails to translate racial equity into forceful policies and actions within the Plan that hold people accountable; and
- Fails to deal with the devastating impact of the COVID-19 public health emergency on top of the public health crisis of racism.

**We support CORE’s conclusions.** *Unmasking the Rewrite: How to Make the Comprehensive Plan Work for DC*, C100’s December 2020 74-page analysis of five elements stated: [https://committeeof100.net/download/planning/comprehensive\\_plan/2020-12-Unmasking-the-Rewrite-Assessment-of-Selected-Elements-in-CP.pdf](https://committeeof100.net/download/planning/comprehensive_plan/2020-12-Unmasking-the-Rewrite-Assessment-of-Selected-Elements-in-CP.pdf)

**The Plan fails to reckon honestly with the city's inequities and past failures, laying the groundwork for repeating the same mistakes in the future.**

- Current land use policies have permitted the worst gentrification in the nation with the accompanying displacement of tens of thousands of Black residents, many among the District's most vulnerable people.

**Faulty data, missing data and discredited theories underlie the policies and actions promoted in the Plan.**

- Unsubstantiated rapid population growth figures justify policies that prioritize dense development.
- The most basic data and impact studies required for competent decision making are missing.
- Discredited supply side theories assume that abundant market rate housing will trickle-down in lower rents and help solve the affordability crisis.

**The amendments will further disempower residents and undercut the Council by transferring power over land use decisions to the Executive and the Zoning Commission.**

- Major changes in density could add as much as 200 million sq. ft. of built-out space in DC. Most of the proposed changes to the Future Land Use Map have been made largely without community involvement—the damning answer to “who has a seat at the table?”.
- The amendments are a developer's dream ...and a nightmare for neighborhoods.

**The Plan is astonishingly weak on policies and actions to achieve affordable housing or build generational wealth.**

- The assault on single-family zones will negatively impact Black family homeownership and the capacity for generational wealth-building without resulting in affordable housing or more diverse neighborhoods.
- The dire crisis in public housing is ignored.
- Necessary reforms in rent control are not considered.
- Badly needed reform of the loophole-riddled Inclusionary Zoning program is never mentioned.

**The Plan is not a plan at all but a pastiche of problematic prescriptions. Conceived through a chaotic process, it is not based on a foundation of good data, community visioning, evaluation of alternatives or building consensus.**

- In sum, *the amendments represent an attack on neighborhoods, position the Office of Planning [and the Zoning Commission] to determine land use decisions absent any dissent, and encourage developers to build large-scale development without regard to current residents.*

As a whole, the Committee Print will further damage, not heal the brokenness of our city. We urge you to vote NO and to begin immediately to lay the foundation for a radically different planning process to produce a radically different Plan in 2026. We join CORE in calling for a plan based on disaggregated data and community-driven planning to address entrenched problems and guide us to a more equitable and prosperous future for all. To adopt the amended plan, even with its veneer of equity, would be a great disservice to the residents of this city.

Sincerely,



Kirby Vining, Chair