

Coalition for Smarter Growth’s comments on the DC Comprehensive Plan and maps, October 2019 draft

Submitted January 10, 2020

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Land Use Element

Overall – we support refocusing on equity and affordable housing, and enhancing rather than “protect & conserve” what’s best about our neighborhoods. We believe that “protect & conserve” suggest a degree of exclusion, and that “enhance” and “respect” more appropriately address how the plan is to honor and build on what is best about our communities, while welcoming changes that achieve greater equity for all residents.

LU 300.2 – We support deleting “Promoting neighborhood conservation” as the first in the list of critical land use issues, and replacing with “Providing adequate housing, particularly affordable housing.”

Further we support revising the now 3rd bullet to: **“Conserving, creating and maintaining successful inclusive neighborhoods, accessibility, and diversity, while allowing new growth.”** We also support adding:

- **Promoting transit-accessible, sustainable development**
- **Improving resilience**

LU 302.1 – We support changes/additions to the Land Use Goal, **“stability, affordability, and equity...provide for additional housing and employment opportunities...to support a growing population...”**

LU NEW: Supporting Growth – we support this new section and especially support references to **“supporting growth through an equity lens”** and **“economic disparities cannot be ignored.”**

LU 306.4 – We support the revision beginning with **“Appropriate transitions ‘stepping down’...recognizing, however, that some major corridors are well served by transit can support higher density even farther away from the Metrorail station.”**

LU 306.9 – we support deletion of this section.

LU 306.10 – Policy LU-1.3.1: Station Areas as Neighborhood Centers

We support the proposed changes to this section. We concur with the concept that we should be looking to match levels of population and employment density to levels of transit service.

306.11 Policy LU-1.3.2: Development Around Metrorail Stations

We concur with the deletion of the first sentence which directed redevelopment away from certain Metro stations.

306.12 Policy LU-1.3.3: Housing Around Metro Stations

We concur with the improved language that changes from the more passive “recognize the opportunity” to the more active and inclusive: “recognize the need to build housing that serves a mix of incomes, households types including families”

NEW Policy LU-1.3.3a: Affordable Rental and For-Sale Multifamily Housing Near Metrorail Stations (page 28 of 72)

While we concur that we should support permanent affordability, we find this statement fails to refer to existing policies and practices to secure permanently affordable housing. We recommend updating this statement in light of several DC practices. We recommend this revision:

“Explore mechanisms to encourage Continue to expand the use of permanent affordability terms in the construction of affordable rental and for-sale multifamily housing adjacent to Metrorail stations...”

Justification: To state that the city should “explore mechanisms” is out of step with existing DC law and District government practice.

One is that permanent affordability requirements are included in the DC code section for the sale of public land, which sets aside 20-30% of units as affordable. The DC Code states:

DC Code § 10–801. Authorization; description of property; submission and approval of resolution; reacquisition rights; notice.

(b-3)(1)(C) The units dedicated as affordable housing pursuant to subparagraphs (A) and (B) of this paragraph shall remain affordable-housing units for the life of the ground lease if the land disposition is by ground lease, or shall remain affordable-housing units in perpetuity, secured by a covenant running with the land that may be extinguished at the sole discretion of the District; and

Second, the [DHCD 2019 Consolidated Request for Proposals for Affordable Housing Projects](#) process gives maximum points to applications that propose in perpetuity terms for the affordable units. DHCD's Requests for Proposals over the past several years have awarded maximum points to applications, and the majority of projects selected, with these criteria:

16. Affordability Period Restriction (maximum 5 Points) Applications documenting that the owner will maintain the low-income units in compliance for a designated period beyond the affordability period required by the requested funding source will be awarded prioritization scoring points. Maximum points will be awarded to projects that commit to affordability in perpetuity.

5 points = Applicant commits to placing a permanent, perpetual affordability covenant on the property.

2 points = Applicant commits to a 60-year affordability period or longer.

1 point = Applicant commits to a 50-year affordability period or longer.

0 points = The project will meet minimum required affordability period.

306.13 Policy LU-1.3.4: Design to Encourage Transit Use

We support the addition of “low-density housing” to the list of forms of development to discourage around Metro station areas.

306.14 Policy LU-1.3.5 Development Along Corridors

We support this revised section – “Encourage growth and development along major corridors...” And “respect character and integrity of adjacent neighborhoods while balancing against the city’s broader need for housing.” We support the deletions, since these issues of appropriate transitions are addressed elsewhere.

306.15 Policy LU-1.3.6 Parking Near Metro Stations

While we support the proposed changes, focusing on pricing, and discouraging 1-1 replacement, we recommend eliminating motor vehicle parking requirements altogether and assessing the potential for placing parking supply limits on new developments. It is especially important to eliminate parking minimums near Metro, but we support eliminating parking requirements entirely.

NEW Page 29 of 72: Policy LU-1.3.9: Co-Location of Private and Public Facilities

We support this new policy, especially as a benefit to affordable housing, along with other community needs.

306.18 Action LU-1.3.4

We support adding “transportation demand” and recommend stronger policies for transportation demand management to reduce traffic and increase the use of more sustainable travel modes.

306.19 Action LU-1.3.B: Zoning Around Transit

We support the proposed revisions affirming the importance and meaning of transit-oriented development. We do however, recommend stating that parking requirements should be eliminated in the zoning.

NEW page 30 or 72: Action LU-1.3.C: Metro Station and Inclusionary Zoning

We support the direction of this new policy but request clarification. Stating “Consider requiring the maximum percent of affordable housing required...” Since the IZ requirement is not a sliding scale but a specific number, it’s unclear what is being maximized. We support expanding IZ requirements and benefits to other land use decisions to build more affordable housing with appropriate increased bonus density and height.

NEW page 30 of 72: Action LU-1.3.D: Co-location Opportunity Evaluation

We support this action as long overdue, given the many missed opportunities to date (e.g. Tenley-Friendship Library, Benning Library, Southwest Library). We are hopeful about the next generation of co-location opportunities in transit nodes and corridors.

307.3

We support the revised language to affirm the importance of infill development in its neighborhood context.

NEW page 32 of 72: “Accessory dwelling units are another form of infill development...”

We support this statement.

307.7 We support the deletion of this statement. The issue of compatibility is addressed in the other part of this section.

308 LU-2 Creating and maintaining ~~successful~~ Inclusive neighborhoods

We support the shift in language to from “successful” to “inclusive” and from “protecting” to “enhancing”. These shifts build a more inclusive, and less defensive, approach to managing growth and change.

309.1 LU-2.1

We support the inclusive language, which emphasizes diversity and how land use policies can contribute to “shar[ing] in economic mobility.”

NEW page 34 of 72: “Continued growth, competing demands for land, and the desire to manage policy priorities across Washington, DC requires renewed attention to all areas of the city.”

We concur.

309.4 “greater equity” “economic mobility” “~~protected~~ **respected**”

We concur with this new approach.

309.5 Policy LU-2.1.1: Variety of Neighborhood Types

We support the amendments, especially identifying appropriate sites to help accommodate population growth and advance affordability and opportunity.

309.6

We concur with changes, especially “a neighborhood’s success must be measured by more than the income of its residents or the size of its homes.”

New section on page 35 or 72 – we concur with the section beginning with: “The understanding of what makes a great neighborhood as evolved, particularly in terms of addressing social equity, advancing sustainability and building community resilience...”

309.7 Policy LU-2.1.2: Neighborhood Revitalization

We support the revised language away from “stabilization” and addition of “projects that advance equity and opportunity for disadvantaged persons.”

309.8 Policy LU-2.1.3

We support change from “protect” to “respect” neighborhood character. And adding that “all neighborhoods have a role in helping meet broader District-wide needs such as affordable housing...”

309.10 Policy LU-2.1.5 ~~Conservation of Single Family~~ Neighborhoods **Support**

We agree with the shift towards affirming DC’s established neighborhoods and managing change, including inclusion of more housing, and more affordable housing and civic space.

309.11 Policy LU-2.1.6: Teardowns **and Mansionization**

We agree with this policy revision.

309.12 Policy LU-2.1.7 ~~Conservation of Row House~~ Neighborhoods **Character**

We agree with the amendments to this section.

309.13 Policy LU-2.1.8

We agree with the changes proposed to this section.

309.14 Policy LU-2.1.9: Alterations to Rowhouses and Apartments.

We agree with these changes. However, the concept of “loss of family-sized units” needs better definition because young families have found 3- and 4-bedroom houses to be far outside their price range, while 2 or more units in a flat have served as starter homes for many families.

309.16 Policy LU-2.1.11: Residential Parking Requirements

We recommend this section be replaced with: “Residential parking requirements should be eliminated and the establishment of parking maximums as a policy tool should be assessed for their benefits.”

309.17 We support changes to this section.

319.18a We support the changes proposed, especially adding benefits including “housing, affordable housing, and affordable commercial space.”

NEW page 39 of 72: Action LU02.1.E: Study of Neighborhood Indicators

We support this study, especially to assess fair housing.

310.8 Policy LU-2.2.7: Alley Use

We recommend reconsideration of the discouragement of residential uses for alley lots, and how to include residential uses as a part of the overall desired uses of alleys.

311.4 Policy LU-2.3.2 – we support inclusion of “transportation demand management.”

312.7 Policy LU-2.4.3: Regional Centers

We support the addition of “accommodating population growth and increasing affordable housing” “promote equitable access to regional shopping.”

312.8 Policy LU-2.4.4: Heights and Densities in Regional Centers

We support proposed changes to this section.

312.10 Policy LU-2.4.6: Scale and Design

We support adding “a growing, densifying city”.

315.6 Policy LU-3.2.1

We support “transportation demand management measures” and recommend adding “and plans.”

Housing Element

Overall, we support the changes to the Housing Element and especially commend the emphasis on equitable access throughout the city. While furthering fair housing is mentioned, we recommend that this principle be cited more often as a legal obligation.

500.2 – we support the changes but suggest adding “preventing displacement of vulnerable residents from their homes and communities.”

NEW – Page 17: Table 5.4 Total Residential and Affordable Unit Goals: 2018-2050 – we support these goals and commend the increase in percentage of affordable units over time from 16.7% in 2020 to 21% in 2050.

503.2: Policy H-1.1.1: Private Sector

We support new requirements for affordable housing.

503.3 Policy H-1.1.2 Production Incentives

We support adding the proposed “relaxation of heights and density limits near transit.”

503. 10 Action H-1.1.B: Annual Housing Reports & Monitoring Efforts

We support this action and the amendments to track evaluating progress toward measurable goals. This is a helpful accountability tool.

NEW – Page 22: Action H.1.1.D: Research New Ways to Expand Housing.

We support.

504.7 Policy H-1.2.2: Production Targets

We support.

504.8 Policy H-1.2.2: Mixed income housing

We support the amendments, especially adding addressing fair housing requirements.

504.14 Policy H-1.2.7: Density bonuses for affordable housing

We support the revisions to this policy, and seek to develop tools to implement the goal of building more affordable housing.

NEW page 28: Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas

We commend the administration for proposing this approach and support it, specifically to achieve a 15% minimum of affordable units in each planning area. We support providing protected classes with “a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods.”

New page 29: Policy H-1.2.11 Inclusive Mixed Income Neighborhoods

We support this policy, especially emphasizing long term affordability.

New page 33: Action H-1.2.I: Leveraging Inclusionary Zoning

We support and look forward to helping develop specific tools for implementation.

New page 33: Action H-1.2.J: Establish Affordability Goals by Area Element

We support this action, with a minimum share of affordable housing of 15% for each planning area. We support noting the need to address fair housing requirements, particularly in high housing cost areas.

506.10 Policy H-1.4.4: Public Housing Renovation

We support this revision and emphasis on preventing displacement and resident moves, 1-1 replacement, and build first principles.

506.16 Action H-1.4D: Tax Abatement

While we support consideration of tax abatements, DC decision-makers have often provided subsidies like tax abatement that were unnecessary, did not secure long term affordability, did not secure affordability at lower income levels, and did not consider using similar tax expenditures to support mission-driven affordable housing producers. Use of tax abatements to subsidize conversion of existing office buildings to residential should only be considered where the affordable housing benefits are greater than other use of the forgone tax revenues. Meeting an office building owners' high expectation of property sales value is not a justification to subsidize the conversion of commercial to housing use. Substantial affordable housing benefit would need to be secured, a depth and set aside of affordability that would not be achieved another way with a similar expenditure. All such subsidies should also include a covenant of permanent affordability, as is already required under the affordable housing through public land dispositions law and prioritized in DCHD funding allocations.

506.17 Action H-1.4.E: Additional Public Housing

We support, but ask that the governance of the Housing Authority be reexamined to ensure the most efficient use of public resources, and the best outcomes for residents.

NEW Page 42: Action H-1.4.F: Non-housing investment in areas of concentrated poverty.

We support.

NEW Action H-1.4.G: Co-location of housing with public facilities

We support this and have long advocated for this, see [Public Land for Public Good](#).

509.9 Policy H-2.1.5: Long-term affordability restrictions

We recommend revising this change to better reflect current policy, law and practice – the term for inclusionary zoning is life of the development, and “in perpetuity” for affordable units in public land dispositions, and prioritized for DHCD funding. This section could also mention shared equity approaches for homeownership.

NEW Page 56: Action H-2.1.J: Tracking Displacement

We support. This will be helpful information for targeting policies and interventions.

New Page 64: We welcome the mention of Affirmatively Furthering Fair Housing. We ask that more focus be given to AFFH in the Comp Plan. We appreciate the analysis of affordable units by planning area.

NEW Page 66: Action H-3.2.D: Overcoming Impediments to Fair Housing

We support.

Transportation Element

We support the added emphasis on:

- equity,
- dedicated transit lanes

- added focus on pedestrian/bicycle access and safety,
- person carrying capacity as the capacity standard,
- recognition of the importance of limited stop bus service and dedicate transit lanes.

We recommend even stronger emphasis on improving bus service to meet more travel needs and better coordination with the growth at housing and commercial development nodes (such as Walter Reed). Dedicated bus lanes in particular need to be better integrated into plans to improve bicycling facilities and walk access and safety.

414 T-3.1 Transportation Demand Management

414.11 Action T-3.1.A: TDM Strategies

We recommend that Transportation Management Associations (TMA) not be abandoned entirely. While we support the piloting of DC Government and DCPS TDM programs, major institutions and clusters like the North Capitol Crossroads area with four hospitals, urgently need a coordinated transportation strategy. Our recommendation for 22156.13 Action RCE-2.5.B: North Capitol Crossroads Planning, should also be incorporated here: create a strong TDM plan and organization, such as a Transportation Management Association, or Anchor District, to address the common institutional needs of this area. This city needs to establish a requirement for participation in the TMA, potentially through a combination of development review and legislation. The emergence of McMillan Sand Filtration project and the potential for a BID to provide the function of a TMA should be extended to the rest of this area. Other opportunities in the city should also be assessed.

415.8 Action T-3.2.D: Unbundle Parking Cost

We support this revision.

*NEW Action T-3.2.E: **Manage Off-Street Parking Supply***

Continue to waive or reduce parking requirements in the vicinity of Metrorail stations and along major transit corridors, as implemented during the recent revision of the Zoning Regulations. Explore further reductions in requirements as the demand for parking is reduced by changes in market preferences, technological innovation, and the provision of alternatives to car ownership. Update the Mayor’s Parking Task Force Report with more recent parking data, and monitor parking supply on an ongoing basis.

We support this action but propose the following addition: “Revise the zoning regulations to eliminate parking minimums, and assess the establishment of parking supply maximums beyond the current 2016 regulations.”

Environmental Protection Element

We support the changes to this element, but urge the District to recognize the inherent environmental benefit of more of the region’s households living in the city, especially near major transit services, rather than in the suburbs. A typical DC household emits roughly half the transportation CO2 emissions compared to the average household in the region. DC households own fewer cars, are more likely to be carless, ride transit more, and walk and bicycle more than any other city in the country. In fact, 64% of DC residents ride transit, walk or bicycle to work, which is more than twice the rate of their suburban

counterparts.¹ As we strive to do more, we should recognize that enabling more of the people in this region to live in the city is an important contribution to sustainability and reducing pollution and greenhouse gas emissions.

Economic Development Element

NEW Action ED-2.3.D: Economic Development Financing Tools Review the potential of expanding commercial revitalization programs, such as tax increment financing, to include adjoining underutilized and historically disadvantaged commercial districts with an emphasis on areas on the east side of the Anacostia River.

We support, but recommend an addition at the end:

However, TIFs should not be used for subsidizing vehicle parking in general, but only in specific cases where DDOT and OP have conducted an evaluation that demonstrates such a subsidy is necessary and beneficial, and only if the Chief Financial Officer’s evaluation deems the subsidy warranted.

Urban Design

We want to express our support for the new section: “UD 2.4: The Equitable City.” This section is important to address concerns community design character while ensuring that we can create the homes we need to keep up with demand to live in the city, providing housing that enhances the neighborhood and is family- and child-friendly, age-friendly, and intergenerational.

Educational Facilities Element

Decisions about educational facilities involve many factors, including land use, transportation, and equity considerations. However, these three factors often do not receive sufficient evaluation. We recommend the District work with the 21st Century School Fund, and accept their proposed revisions to the Comp Plan (submitted separately). Their expertise can reconcile the city’s efforts to address residential segregation, school segregation, Ward 3 school overcrowding, and the factors that cause students to travel significant distances to attend Ward 3 schools rather than schools closer to home.

We endorse the following revisions proposed by the 21st Century School Fund:

NEW Policy EDU-1.2.5: Facility Expansion

Where additional DCPS school capacity is needed to satisfy enrollment demand and to avoid overcrowding, DCPS **should first explore adjustments in attendance boundaries, feeder patterns, the number of grades offered, and student transportation, before deciding on capital and land intensive options such as building additions,** site acquisition, and new school development. **When new schools are needed due to in-boundary crowding, DCPS should have first priority and access to public land and buildings.**

We support proposed new policy EDU-1.2.6:

¹ 2019 State of the Commute Survey Report from the Metropolitan Washington Report (Draft), National Capital Region Transportation Planning Board. September 17, 2019. Table 7, Table 7 Primary Mode by State of Residence and State of Employment.

NEW Policy EDU-1.2.6: Transportation Demand Management Programs for DCPS Facilities
Improve parking management at DCPS facilities by pairing reduction in surface parking availability with a transportation management plan for school staff.

However, we recommend adding: “All DCPS facilities shall be required to have a TDM plan reviewed by DDOT, which maximizes access for staff and students, while minimizing parking and vehicle traffic. Free parking will not be provided to staff, and free transit and walk/bike incentives will be provided to the extent practicable, at least equivalent to the value of any vehicle parking benefit offered by a DCPS facility.”

Area Elements

Rock Creek East Area Element

2211 RCE-2.1 Takoma Central District

2211.4 We support proposed changes to reflect a more efficient multi-family residential layout at the Metro station.

2211.8 Policy RCE-2.1.3: Takoma Central District Housing Strategy

We support proposed changes.

2212.5 Policy RCE-2.2.1: Development Character

We support the change adding “medium” density character, and designing of transitions between larger-scale and small-scale development.

2213.8 Policy RCE-2.3.2: Pedestrian and Transit Improvements to Upper Georgia Ave.

We support these changes, but recommend stronger commitment to increased transit service for this area that will rely on better bus service to provide the only mass transit for this rapidly growing area.

2215.7 Policy RCE-2.5.1: AFRH Redevelopment

We support these changes, but recommend that transportation-demand management (TDM) be a stronger focus, along with bringing the hospital area and AFRH into a new TDM district.

NEW Policy RCE-2.5X: Reintegrating AFRH into the District

We support this policy. Not only does the area need to be reconnected to the public street network, the highly inefficient cloverleaf on/off ramps should be redeveloped.

22156.13 Action RCE-2.5.B: North Capitol Crossroads Planning

We support these changes but add that a Transportation Management Association or Anchor District be created to coordinate transportation, TDM programs and plans, and other common needs of the four hospitals and related uses in this area.

NEW Action RCE-2.7.A: Land Use Change

We support.

New Action RCE-2.8D: Transportation Demand Management

We support, but also recommend it for the North Capitol Crossroads planning area.

Rock Creek West Area Element

We endorse Ward 3 Vision's comments. In addition, regarding edits to 2309.9 Policy RCW-1.2.8:

2309.9 Policy RCW-1.2.8: Schools and Libraries Place a very high priority on the expansion, renovation and improvement of schools and libraries. The fact that a majority of the schools in this Planning Area are operating at or above capacity should be considered in DCPS facility planning, and in the approval of any residential development that could further exacerbate school overcrowding. Changes to school service boundaries, and the expansion of existing school facilities, and/or development of additional school facilities should be aggressively pursued to ensure that school overcrowding is proactively addressed. 2309.9

We support this change, but recommend adding that demand for Ward 3 schools should not be treated in isolation to the rest of the city given the large number of out of boundary students, and students who travel long distances. To address high demand and overcrowding in Ward 3 schools, the District should develop and implement growth and investment strategies in school programs and/or support services, in an effort to align capacity and demand and ensure convenient and excellent matter-of-right options in every community.

Further, we note (and support) new policy EDU-1.25 (see comments on Educational Facilities) which supports this RCW policy as well.

Upper Northeast Element

2408 UNE-1.1 GUIDING GROWTH AND NEIGHBORHOOD CONSERVATION

2408.2 Policy UNE-1.1.1: Neighborhood Conservation

We support the addition of "allowing new housing opportunities for all incomes" to this policy.

2408.4 Policy UNE-1.1.3: Metro Station Development

We support adding, "Locating higher-density housing near Metro minimizes the impact of cars and traffic that would be expected if the residents lived farther from high capacity transit."

2411.9 Action UNE-2.1.A: Florida Avenue Market

Lack of attention to including affordable housing in the redevelopment of the Florida Avenue Market area and in the small area plan was an oversight. Increased levels of affordable housing should be stated as a goal as part of mixed residential/commercial redevelopment plans.

2416.3 Policy UNE-2.6.1: "Brookland/CUA Metro Station Area Encourage moderate and medium-density mixed use development." We support this change.

Future Land Use Map (FLUM)

Overall, we support the amendments to the Future Land Use Map and note that it is becoming more of a

future, forward-looking land use map rather than an existing land use map as it has been in the past. While we support the amendments as a whole, we recommend more housing capacity be designated near transit. In addition, we wish to highlight a number of changes that we support.

Rock Creek West

We support the proposals by Ward 3 Vision regarding Ward 3 FLUM amendments.

Rock Creek East

At the DC/Silver Spring Line:

1360: We support change from moderate to medium density.

84: We support change from moderate to medium

At the Takoma Metro station:

1708.1 & 1708.2: We support change to Low Density Commercial/Medium Density Residential for entire site, Local Public Facilities for a portion

Upper Northeast

2170: We support the proposed change to Mixed-use Institutional/Moderate Density Residential.

Brookland Metro station:

2061.5 & 1906: We support to change to mixed use residential/commercial

9803: We support change to Medium Density Commercial, Medium Density Residential

9997: We support change to medium density commercial/residential

2463: We support change to moderate density commercial & moderate density residential.

1866: (901 Monroe St NE) We support change to Mixed-Use Moderate Density Commercial / Medium Density Residential

Rhode Island Ave. Metro”

1973 & 1739: We support the proposed change to Mixed-Use Medium Density Commercial and High Density Residential

Mid City

Bruce Monroe & Georgia Avenue:

9933.2: We support proposed change from Institutional to Moderate Density Commercial, Medium Density Residential

2363.1 & 2363.2: We support these changes.

1691: (McMillan Sand Filtration site) We support the proposed change.

707: (U Street Police Station) We support change to Striped / Local Public Facilities / Moderate Density Commercial / Medium Density Residential

Far Northeast & Southeast

Deanwood Metro:

1679: We support change to Low Density Commercial/Medium Density Residential/Local Public Facilities

1996.1 & 1996.2: we support the change to Mixed Use Low Density Commercial / Medium Density Residential

Minnesota Ave. Metro:

2035: We support the proposed change to Mixed-Use Medium Density Commercial / Medium Density Residential

2021: (Nannie Helen Burroughs) We support the change to Mixed-use Medium Density Commercial / Medium Density Residential.

Benning Road Metro:

1542: We support the change to: Medium Density Residential/Medium Density Commercial/Local Public Facilities

1984: We support the change to: Mixed-use Medium Density Commercial / Medium Density Residential

9816: We support the change to: Moderate Density Commercial, Medium Density Residential

9979: (Fletcher Johnson) We support the change to Moderate Density Commercial, Moderate Density Residential

Capitol Heights Metro:

9918: We support the change to: Moderate Density Commercial, Medium Density Residential

Capitol Hill

9983: Support change from Low Density Commercial, Moderate Density Residential to Moderate Density Commercial, Medium Density Residential

2088: Support change to Medium Density Residential/Medium Density Commercial

Lower Anacostia Waterfront & Near SW

We support amendments that support implementation of the Southwest Neighborhood Plan, including 9924, 9923, 9921, 9922, 9930, 9929, 9931, 9928, 9927, and 2101.

We also support the changes to make L'Enfant mixed use: 9914, 9913, and 2373.

Generalized Policy Map

We support the proposed future planning analysis areas. We recommend moving forward with a planning effort for the Friendship Heights-Tenleytown-Wisconsin Avenue designated area in the near future, because this area offers access to high levels of transit service and many opportunities to increase housing to achieve the Comprehensive Plan's housing production goals.

We recommend additional planning efforts to develop an approach to achieve the 15 percent of affordable homes for Capitol Hill and Near Northwest planning areas, which show little new capacity to provide their minimum production goals in the draft Comp Plan and maps. D