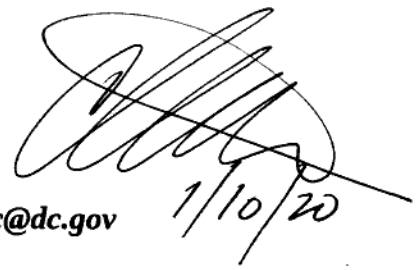


DC FOR REASONABLE DEVELOPMENT  
COMMENTS ON DC COMP PLAN, JANUARY 10, 2020  
SENT TO: [andrew.trueblood@dc.gov](mailto:andrew.trueblood@dc.gov), [heba.elgawish@dc.gov](mailto:heba.elgawish@dc.gov), [plandc@dc.gov](mailto:plandc@dc.gov)



1/10/20

THERE IS NO EFFICACY REPORT TO SUBSTANTIATE 1500-PAGES OF A REDLINE DOCUMENT PUT FORTH UNLAWFULLY AS A REWRITE OF D.C.'S CENTRAL PLANNING DOCUMENT BY THE MAYOR WITH A TIMELINE THAT IS DEPLORABLE IN ITS DISMISSAL OF THE VALUE OF REAL COMMUNITY INPUT.

SEE ATTACHED EMAILS SO FAR IGNORED ASKING FOR A EFFICACY REPORT PER THE LAW DEVELOPED BY THE OFFICE OF PLANNING TO SUBSTANTIATE ANY ADDITIONS, DELETIONS, OR AMENDMENTS TO THE EXISTING COMP PLAN POLICIES.

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**Re: Mr. Trueblood: SATURDAY'S ANC: Kicking Off DC2ME Comp Plan Values Campaign**

1 message

d.c. forrd &lt;dc4reality@gmail.com&gt;

Mon, May 20, 2019 at 9:12 PM

To: "Trueblood, Andrew (OP)" &lt;Andrew.Trueblood@dc.gov&gt;

Cc: DcGPCsteering &lt;dcgpcsteering@googlegroups.com&gt;, Alex Baca &lt;abaca@ggwash.org&gt;, David Alpert &lt;alpert@ggwash.org&gt;, Caitlin Cocilova &lt;caitlin.cocilova@legalclinic.org&gt;, David Poms &lt;davidpoms@gmail.com&gt;, William Jordan &lt;whj@melanet.com&gt;, Parisa Norouzi &lt;parisa@empowerdc.org&gt;

Andrew. Chewing on this response.

"Regarding the report you mention, I had said that I would look into it, but did not commit to completing one. The Office of Planning has neither the expertise nor the resources to conduct in-depth policy evaluation and analysis on all of the topics in the Comp Plan. Instead, we have relied on public and agency engagement to get feedback around the effectiveness of the various policy language in the Comp Plan."

Ok. If not an in depth report as you believe me to mean, maybe OP can produce something more than a red, yellow, or green signal indication such as found in the existing report (a report that at least pulls out each policy). <https://tinyurl.com/dc-op-bogus-plan-report>

Its been a year since the marathon Council hearing. How about starting with Chapter 5 on housing since thats the number one priority?? How have the housing policies stood the test of time? Are they working and to whos benefit. Equity starts with at least understanding these basics, right?

Chris O.

cc: DCGPC  
GGW

On Saturday, May 18, 2019, Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov> wrote:

Mr. Otten,

Thanks for your note and thoughts on our process (and feel free to call me Andrew). As you mentioned, our survey was released last Friday. It was shared via Mayor's Press release, various articles, OP's follow up press release, social media push, and emails to ANCs, as well as through our ongoing engagement with the community (such as community events and panels). In addition, you may be interested in the one-page element summaries we have created as part of this engagement to summarize high-level feedback: <https://plandc.dc.gov/page/dc2me-comp-plan-values>.

The survey is not intended to displace or replace the hard work that you and many other community members have put into this process through engagements and your proposals. It is meant to help restart our engagement as the Council gears up to finalize Framework element in the near future. If they do, we anticipate releasing proposed amendments to the public for a 60 day review prior to submission to Council in the fall or winter and this engagement is meant to help re-engage with our stakeholders for that.

Regarding this approach, we have run a number of typical engagement points on the Comprehensive Plan, including public meetings and the public open call for amendments, but we have heard that these methods are not necessarily accessible (in content or form) for many residents. We have heard that the Comp Plan is a dense document that requires a degree of technical understanding to engage with. Which is why we designed the Values engagement to reach as broad of a community as possible and to give community members a chance to provide feedback. The values aim to distill a great deal of technical input we have received from community stakeholders, including yourself, and District agencies into

concepts of interest and concern to the broader public.

As we work to build out a practice focused on engagement, we were intentional in trying and evaluating various approaches to engagement, including this type of survey tool. It was inspired in part by our community events last winter, in which residents told us that online platforms and surveys were among the most-preferred methods of engagement (social gatherings were the most popular). In fact, we recently received positive feedback about the process when OP staff engaged with residents at Funk Parade last Saturday.

As we understand the limitations of online tools, we are providing hard copies of the survey to Advisory Neighborhood Commissions, including at the training today (which is covering a broad array of the Office of Planning's work, not just Comp Plan). We are also attending community events in May and June to roll out short activities related to the key values, in order to gather residents' opinions in a light and fun way. Our general approach is to utilize a suite of engagement techniques and then to compare across methods and share these results, along with known limitations.

Regarding the report you mention, I had said that I would look into it, but did not commit to *completing* one. The Office of Planning has neither the expertise nor the resources to conduct in-depth policy evaluation and analysis on all of the topics in the Comp Plan. Instead, we have relied on public and agency engagement to get feedback around the effectiveness of the various policy language in the Comp Plan.

Thanks again for your thoughts,  
Andrew



**Andrew Trueblood** • Director  
DC Office of Planning  
1100 4th Street SW, Suite E650 • Washington, DC 20024  
202.442.7636  
Andrew.Trueblood@dc.gov  
planning.dc.gov

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**From:** d.c. forrd <dc4reality@gmail.com>  
**Sent:** Friday, May 17, 2019 12:56 AM  
**To:** Trueblood, Andrew (OP) <Andrew.Trueblood@dc.gov>  
**Cc:** Dcgp steering <dcgpsteering@googlegroups.com>  
**Subject:** Mr. Trueblood: SATURDAY'S ANC: Kicking Off DC2ME Comp Plan Values Campaign

**CAUTION:** This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to [phishing@dc.gov](mailto:phishing@dc.gov) for additional analysis by OCTO Security Operations Center (SOC).

Dear Mr. Trueblood (Andrew):

Hope all is well. It was good seeing you a couple of weeks ago. You said you'd be announcing more info on the Comp Plan soon. ***The message below shows you have an ANC-only meeting THIS Saturday. OK.***

Members of my ANC have asked me specifically what this is about given my involvement in the Comp Plan and in seeking to protect communities from luxury overdevelopment that displaces longtime District residents.

It's hard for me to respond to my ANC Commissioner friends about what the DC2ME campaign is about given how basic this outreach reset is appearing to be. Sadly, the DC2ME survey in your email below is almost at a 5th grade level. Nothing personal, but this simplistic approach seems it will result in far less informational feedback than that already on the record.

I hope you not erasing the time already spent getting feedback from real people of DC over the past 24 months or so. For example, it has been more than one year since the 13-hour marathon hearing on the Comp Plan that provided hundreds of people's feedback about the plan and the changes proposed by OP. Yet, none of that feedback has been synthesized and put up anywhere to review by OP staff. Why?

**More importantly, we still are wondering WHERE IS THE EFFICACY REPORT on the Plan policies that exist now, you know of the policies you are asking us to change.**

The people of DC, including ANC's are being asked to amend a 1,000 page central planning document (DC Comp Plan:: [tinyurl.com/comp-plan-dc](http://tinyurl.com/comp-plan-dc)) that contains hundreds of policies that guide the collective future of our city and that of its individual neighborhoods. YET TO DATE... despite the year since the 13-hour Council hearing and despite almost 2 years before that kicking off this amendment cycle... WE STILL DON'T HAVE AN EFFICACY REPORT.

What is a true efficacy report? An efficacy report is a report that shows each policy and the actual real time results of any given policy as reported by the agencies that are to perform that policy. This link here is not an efficacy report (report put out by OP two years ago) >> <https://tinyurl.com/dc-op-bogus-plan-report>

Since we are being asked to amend the plan policies, we need a report that shows each policy in the plan and how its being used and whether its been successful or not and why. We are more than 12-years into using these policies, as the Comp Plan was passed in 2006 and amended in 2011.

Clearly, the anti-displacement and inclusive successful neighborhood Comp Plan policies have fallen on deaf ears within the Executive agencies making the decision to "plan" out the city. The census numbers show DC has lost tens of thousands of black families, a complete and utter failure of accountability to hold city officials to the intent and purpose of existing plan policies. Accountability comes by way of data, data in how these plan policies are working or not. We want an efficacy report, for real.

As I recall, when this issue of a real efficacy report was raised to you, you said OP was working on it. Its been so long now... and time is ticking... and the ANC's I know would surely appreciate some real data about important planning policies before being asked to eliminate, add to, or amend them.

Further, what of ANC's living in communities with a mix of ethnicities that require translation and interpretation?

Please advise.

Thanks,  
Chris Otten  
DC for Reasonable Development

cc: DC Grassroots Planning Coalition  
[fb.me/DCGrassrootsPlan/](https://fb.me/DCGrassrootsPlan/)

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**From:** Barber, Jennifer (OP) on behalf of Trueblood, Andrew (OP)  
**Sent:** Friday, May 10, 2019 4:33 PM  
**To:** Trueblood, Andrew (OP)  
**Cc:** Scriven, Malaika (OP); plandc  
**Subject:** Kicking Off DC2ME Comp Plan Values Campaign

Dear Advisory Neighborhood Commissioner,

For the past three years, the DC Office of Planning (OP) has been engaged in a Comprehensive Plan amendment process we call [PlanDC] and for which more information can be found [here](#). We have engaged stakeholders, collected proposed amendments and conducted an in-depth analysis of DC's current Comprehensive (Comp) Plan, which is our legislatively-adopted, 20-year roadmap to ensure that growth is inclusive for all of DC residents. I have attached a handout we have used to help explain the Comp Plan and this amendment process. As Commissioners, you are key partners in the District's Comp Plan amendment process, as you represent the people and places that make up our great city.

Last Spring, OP introduced the Framework Element Bill to Council for review. The Framework Element is the foundational chapter (out of a total of 25 chapters and two maps) of the Comp Plan and provides the context for the rest of the Comprehensive Plan, including demographic data, forecasts, guiding principles, and land use guidance and definitions. While a hearing was held in March 2018, we are still awaiting Council's action and have encouraged the Chairman to move the bill forward prior to summer recess in order to ensure the process is not further delayed. Once the Framework Bill is approved, OP will review to determine whether any changes are required to the remaining elements, then release them for a 60-day public review period prior to submitting a final proposal to Council. If the Council passes the Framework Bill soon, we expect public review to be in that late Fall or early Winter. We intend to work with ANCs to support their review during that time, so we will be sure to update you when we have firm timelines.

While the Framework Bill awaits Council action, the Bowser Administration and OP are committed to engaging residents. We are interested in reporting out what we have heard and gathering feedback through an exciting new DC2ME campaign. It features 8 proposed Comp Plan Values—Accessibility, Diversity, Equity, Livability, Opportunity, Prosperity, Resilience and Safety—which

distill major themes we heard during the amendment process and through various engagements. Through the DC2ME campaign, we are asking residents if these proposed values align with their thinking about the future of our growing city. We will use the value statements as guides for the remainder of the Comp Plan amendment process, and will likely incorporate into appropriate areas of the Comp Plan.

We created an online community survey will be available through June 30<sup>th</sup> and can be accessed <https://www.dc2me.com/survey>. We also have paper copies that we can provide upon request, just send an email to [plandc@dc.gov](mailto:plandc@dc.gov). We appreciate your efforts in helping us spread the word to your constituents.

If you would like to discuss the Values Campaign or the broader Comp Plan amendment process in more depth, please contact the Comp Plan Project Team at [plandc@dc.gov](mailto:plandc@dc.gov). We would be happy to set up a time to talk with you. Also, ANC Chairs (or their designees) have been invited to a workshop on May 18, where OP staff will share information on the status of the Comp Plan.

Thank you for your continued engagement and leadership. We look forward to working with you to produce a strong plan for the future of our city.

Sincerely,

Andrew



**Andrew Trueblood** • Director

DC Office of Planning

1100 4th Street SW, Suite E650 • Washington, DC 20024

202.442.7636

[Andrew.Trueblood@dc.gov](mailto:Andrew.Trueblood@dc.gov)

[planning.dc.gov](http://planning.dc.gov)

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**Fwd: Will OP Respond ? ? ? Re: DC Comprehensive Plan Amendment Cycle**

1 message

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d.c. forrd <dc4reality@gmail.com>  
To: Dcggpcsteering <dcggpcsteering@googlegroups.com>

Mon, Mar 4, 2019 at 4:3



FLASHBACK TO SHAW!

-- no efficiacy in the planning process or amendment cycle --

OP asking the city to amend the plan but won't update us on how the plan policies are already working, or not, and why or why not. How are w to amend a plan without a real efficiacy report!!!

Trueblood should do this long before any CITYWIDE SUMMIT as being bantered about >>  
<https://dc.curbed.com/2019/2/28/18243758/dc-development-office-of-planning-comprehensive-plan>

Chris

----- Forwarded message -----

From: **Shaw, Eric (OP)** <Eric.Shaw@dc.gov>  
Date: Wed, Jun 7, 2017 at 1:18 PM  
Subject: RE: Will OP Respond ? ? ? Re: DC Comprehensive Plan Amendment Cycle  
To: d.c. forrd <dc4reality@gmail.com>, Stern, Tanya (OP) <tanya.stern@dc.gov>  
Cc: Phillips, Shinada (EOM) <shinada.phillips@dc.gov>, Jeong, Kelly (EOM) <kelly.jeong@dc.gov>, Yarnall, Bruce (OP) <bruce.yarnall@dc.gov>, Ozberk, Erkin (OP) <erkin.ozberk@dc.gov>, Willger, Colleen (OP) <colleen.willger@dc.gov>, Bird, Melissa (OP) <melissa.bird@dc.gov>, Gabr Tracy (OP) <Tracy.Gabriel@dc.gov>, Delfs, Christopher (OP) <christopher.delfs@dc.gov>, Crain, Deborah (OP) <deborahcrain.kemp@dc.gov>, east\_of\_the\_river@yahoogroups.com <east\_of\_the\_river@yahoogroups.com>, Ward 5 Yahoo Group <ward5@yahoogroups.com>, DupontForum@yahoogroups.com <DupontForum@yahoogroups.com>, tenleytown@yahoogroups.com <tenleytown@yahoogroups.com>, shepherdpark@yahoogroups.com <shepherdpark@yahoogroups.com>, bloomingdale@yahoogroups.com <bloomingdale@yahoogroups.com>, bloomingdale@yahoogroups.com <bloomingdale@yahoogroups.com>, Ward7@yahoogroups.com <Ward7@yahoogroups.com>, wardonedc@yahoogroups.com <wardonedc@yahoogroups.com>, historicwashington@yahoogroups.com <historicwashington@yahoogroups.com>, Mendelson, Phil (COUNCIL) <PMENDELSON@dccouncil.us>, Silverman, Ellssa (Council) <esilverman@dccouncil.us>, David Grosso <dgrosso@dccouncil.us>, rwhite@dccouncil.us <rwhite@dccouncil.us>, Anita Bonds <abonds@dccouncil.us>

Mr Otten,

Thank you for your email.

I am reforwarding the response of Ms. Crain-Kemp that directs you to the progress report and status report on implementation:

" OP maintains a database of all 600+ implementation actions and publishes the status report on our website for public access here.

In 2013, OP produced an in-depth progress report specifically to address how the Comp Plan policies are being used and whether they are working. This document has a wealth of data, photos, maps, and examples presented in a reader friendly format; it can be found here. "

The District Elements of the Comprehensive Plan is comprised of high level policy goals on how the District will respond to population and job growth within the context of the dynamic nature of the nature of the city.

Agencies use these polices as guidance in the drafting of systems plans (MoveDC, SustainableDC, Consolidated Plan) that provide greater detail and set more specific actions and targets. The Office of Planning does this at a place based level, using these policies as guidance in the drafting of small area plans.

The open call process is the opportunity for residents and stakeholders to provide new, and revise existing, policies to ensure that they are providing the appropriate guidance. The Office of Planning is working with agencies to draft amendments that incorporate strategy and best practices within their fields that advance the five core themes of the Comprehensive Plan: Managing Growth and Change, Creating Successful Neighborhoods, Increasing Access to Education and Employment, Connecting the City, Building Green and Healthy Communities.

My staff have been working closely with community groups, neighborhood organizations and stakeholder to support them in their efforts to draft amendments. I am aware that a number of these groups have hosted their own working sessions. Many have already submitted proposed amendments.

The Office of Planning has briefed the Mayor's Office of Community Affairs and is working closely with their *affiliated offices* to receive and respond to questions from their respective constituencies. In addition the office has many of its outreach materials in Spanish. For languages other than Spanish we are in consultation with translation services to provide responses as requested.

We amend the Comprehensive Plan under the context that the District continues to be a dynamic city. Its population has grown faster than initially projected in 2006 and 2011 estimates. There have been changes in how people work and learn. There have been changes in technology that impact on how people travel throughout the District, that impact the delivery of public services, and that impact day-to-day activities like shopping for goods and groceries. There is a renewed and strengthened commitment to sustainability. There is a new expectation that the District be resilient to natural forces, like climate change. There is a renewed commitment to strong urban design and a quality built environment. And there are continued and strengthened efforts to affirm the District as a city of neighborhoods and not just the home to the federal government. Working within these new contexts we are amending the plan to ensure that polices remain relevant and responsive, supporting inclusive and equitable growth.

The [plandc.dc.gov](http://plandc.dc.gov) includes a number of resources to support those interested in learning about the amendment process, what is already in the Plan, and demographic information. As reminder, proposed amendments must be submitted by June 23<sup>rd</sup> on the [plandc.dc.gov](http://plandc.dc.gov) website. Paper amendment forms are available at all of the District libraries and must be delivered to the OP office or postmarked by June 23<sup>rd</sup>.

Eric Shaw



**Eric D. Shaw** • Director

DC Office of Planning

1100 4th Street, SW, Suite E650 • Washington, DC 20024

202.442.7636

[eric.shaw@dc.gov](mailto:eric.shaw@dc.gov)

[planning.dc.gov](http://planning.dc.gov)



**From:** d.c. forrd [mailto:dc4reality@gmail.com]

**Sent:** Wednesday, June 07, 2017 1:20 AM

**To:** Shaw, Eric (OP); Stern, Tanya (OP)

**Cc:** Phillips, Shinada (EOM); Jeong, Kelly (EOM); Yamall, Bruce (OP); Ozberk, Erkin (OP); Willger, Colleen (OP); Bird, Melissa (OP); Gabriel, Tracy (OP); Delfs, Christopher (OP); Crain, Deborah (OP); east\_of\_the\_river@yahoogroups.com; Ward 5 Yahoo Group; DupontForum@yahoogroups.com; tenleytown@yahoogroups.com; shepherdpark@yahoogroups.com; bloomingdale@yahoogroups.com; bloomingdatedc@yahoogroups.com; Ward7@yahoogroups.com; wardonedc@yahoogroups.com; historicwashington@yahoogroups.com; Mendelson, Phil (COUNCIL); Silverman, Elissa (Council); David Grosso; rwhite@dccouncil. Anita Bonds

**Subject:** Re: Will OP Respond ? ? ? Re: DC Comprehensive Plan Amendment Cycle

Can you at least confirm you received this email for pete's sake.

Is this the responsive transparent government the Mayor is always touting?

#wow

On Tue, May 30, 2017 at 4:36 PM, d.c. forrd <dc4reality@gmail.com> wrote:

**Mr. Shaw,**

You have directed your staff at the DC Office of Planning (OP) to extend the deadline for Comprehensive Plan Amendments until **June 23, 2017**. Thank you. The **Comprehensive Plan** is more than 500+ pages long.

Despite the extra time, the public **still** has no real reporting on how OP has implemented the Comp Plan policies and how well these policies have worked (or not) over the past decade. Thus, DC residents, communities, families, and everyone affected by the Comprehensive Plan has absolutely no context for how to engage this policy amendment cycle. **How are we to amend a plan without knowing how its working?**

I've sent three emails on this issue now dating back at least 2 months.

Why no response at least to say, you are right Mr. Otten, there is no proper context for this amendment cycle put forth by the Office of Planning

That is, OP has chosen to just throw the doors open to the developer-community and their lawyers seemingly in an effort to weaken good Comprehensive Plan policies that we know actually work to protect our neighborhoods, our elderly, children, and families, and simultaneously increase the allowable development densities around the city to further the massive overdevelopment and displacement underway as well continue the assault on our environment, air, and water.

Please at least acknowledge our concerns about the process.

Did you get these emails.

Chris Otten, co-facilitator

DC for Reasonable Development  
202 810 2768

On Tue, May 2, 2017 at 2:42 AM, d.c. forrd <dc4reality@gmail.com> wrote:

**Dear Mr. Shaw, Mrs. Stern,**

It would seem that Mrs. Crain can not provide any more response to our brief back and forth about the 2017-2018 Comprehensive Plan Amendment cycle. We are hoping you can.

To review in short, the Office of Planning is asking the public to amend the Comprehensive Plan. The Comprehensive Plan affects the whole city and contains hundreds of policies. We are halfway thru the 20-year planning cycle, but there is no real evaluation of the efficacy of existing plan policies.

- How is the public to provide comments and suggested amendments without a real evaluation of whether the existing plan policies are working or not, and why, or why not?
- And, how are those residents who may have limited english proficiency but who are directly impacted by the Comp Plan being engaged in this amendment cycle?

Please advise.

Thank you.

**Chris Otten**

<http://www.facebook.com/dc4reality>  
202 810 2768

On Tue, Apr 18, 2017 at 3:26 PM, d.c. forrd <dc4reality@gmail.com> wrote:

**Dear Mrs. Crain, Mrs. Stern, and Mr. Shaw, among others in the DC planning offices,**

Thank you for the information you have provided to DC for Reasonable Development regarding the DC Comprehensive Plan "Open Call" for amendments.

We've reviewed the links you have provided regarding the 20-year DC Comprehensive Plan (<https://planning.dc.gov/page/2006-comprehensive-plan>) and still find ourselves scratching our heads and wondering what to tell our participating members about this amendment process. Perhaps you can share more light on this situation. First, let's review.

**So we know that:**

1. We are halfway through the 20-year DC Comprehensive Plan (passed into law in 2006; Supposed to guide DC planning decisions until 2026)
2. That the Comprehensive Plan is DC Law, passed by the Council, and approved by the Mayor
3. The plan is DC's central planning document by which other city plans are to be based, and contains hundreds of policies and hundreds of action ideas that are to be implemented by the planning officials and agency heads here in the District
4. The Office of Planning has only recently opened the door wide to changing the 20-year Comprehensive Plan -- asking the public to suggest amendments and allowing about 7 weeks for the public to do this

**The questions that remain despite your email are as follows:**

- 1) How will Office of Planning (OP) discern the needs of actual DC residents who are living, working, and playing in DC now, versus the profit-driven motives of DC's developer-class who see our city as an investment vehicle for real estate speculation?
- 2) How will the Office of Planning contend with the expectation that the developer-class will want to increase the anticipated development density of the Future Land Use Map and local neighborhood policies specific to properties and parcels they want or expect to develop in the near future?
- 3) How will OP assess the developer's requests for increased density amendments against the very real backdrop of a Metro system that is having serious financial and physical maintenance troubles, or the increasingly poor air and water quality in and around DC, or the rising housing prices brought on with each new luxury development?
- 4) How will OP weigh the amendments of the developer-class against those from civic groups, ANC's, and local residents who are truly concerned about the long term planning of their neighborhoods and aren't in it for profit motives?

## Efficacy reporting

Mrs. Crain, you pointed me to these reports here and here. I've reviewed these links to the 2013 reports you say depict some sort of evaluation of the current policies in the plan now that we are halfway through the plan's 20 year cycle. One would figure ten years into the plan, we'd have lot more information about how the plan is working. We don't by your reports.

Mrs. Crain the above linked reports depict an analysis of our Comp Plan, DC's central planning document in a most pedantic way, showing a traffic light with a red light, yellow light, and green light representing little to no information of how or why the implementation of the policies are working or not working.

These reports provide no information on why policies may not be working at all, especially the housing inclusivity policies.

These reports provide no examples of the policies that are working and in what real world ways they are working in DC's communities. The second report is flowery language that does not contend discretely with Comp Plan policies at all.

So the question is following from your linked reports, **how can OP expect the public at large to understand how to participate in the "Open Call" to amend the 20-year Comp Plan without any real analysis and evaluation of the policies that are in the plan now and whether they are truly working or not, and why or why not.** A traffic light rendition of our central planning document is a joke, right?

## Conclusion

If the public has no context for what policies are working or not working over the past 10 years (yes we are a decade into these policies) then the process is clearly not for existing residents, civic groups, and ANC's.

This process is thus ripe for abuse by the developer-class who have the lawyers and motives to increase the density and weaken the protection of the policies that are currently stand under-evaluated by OP.

Please help explain to me otherwise.

Thank you,

**Chris Otten, co-facilitator**

DC for Reasonable Development  
202 810 2768

On Tue, Apr 11, 2017 at 9:36 AM, Crain, Deborah (OP) <deborah@dc.gov> wrote:

Dear Mr. Otten,

Thank you for contacting the Office of Planning (OP) about the Comprehensive Plan Amendment cycle.

Almost all of the work OP does is related to the District's Comprehensive Plan. In March 2016, we held a *Preserving for Planning and Progress* event, which explored the balance between historic and cultural preservation and new development. Since that time, OP has used a blend of traditional and innovative techniques—ranging from creative place-making activities to the [PLAN]DC town hall meetings—to better understand resident priorities and challenges facing the District.

You ask two main questions in your email, paraphrased here:

**1. Why do we amend the Comp Plan (and why an Open Call)?**

First, the Comp Plan, itself, calls for a regular update to the plan, to keep it fresh and relevant. More specifically, the Implementation Element recommends that the Plan be amended every four years and a major revision / update occur every 12 years [p. 25-13, *IM-3.2 The Amendment Timeline*]. Following the Plan's initial adoption by the DC Council in 2006, the first amendment cycle began in 2009 as final amendments were approved in 2011. OP launched the second Comprehensive Plan amendment cycle in 2016, five years after the Plan was last amended and eleven years after its adoption.

Second, OP recognizes a great deal has changed since 2006 (and 2011, the date of the last amendment). New challenges have arisen including faster population growth than expected, the need to better serve families, rising housing costs, new telecommute patterns, climate change and other threats to city resilience, among others. The amendment process allows the District to update data and other factual information, clarify language, integrate new thinking and planning such as adopted Small Area Plans and SustainableDC, which have been informed and shaped by public input.

We are now holding an "Open Call" so any and all people have an opportunity to propose amendments to strengthen the Comp Plan and ensure it advances its Vision for an Inclusive City. OP also used an open call during the 2009-2010 amendment cycle and found it a fast and useful approach.

**2. How / where does the Office of Planning track and assess Comp Plan progress?**

Compared to other jurisdictions around the country, the Office of Planning is extraordinary in its record of tracking Comp Plan implementation and evaluating the progress of Comp Plan policies. OP maintains a database of all 600+ implementation actions and publishes the status report on our website for public access here.

In 2013, OP produced an in-depth progress report specifically to address how the Comp Plan policies are being used and whether they are working. This document has a wealth of data, photos, maps, and examples presented in a reader friendly format; it can be found here.

OP staff members are available to provide further assistance at [planDC@dc.gov](mailto:planDC@dc.gov) or (202) 442-7600. You may also find an array of background information and support materials on [plandc.dc.gov](http://plandc.dc.gov).



[Plan] DC Project Team

DC Office of Planning

1100 4th Street SW, Suite E650 • Washington, DC 20024

202.442.7600

[plandc@dc.gov](mailto:plandc@dc.gov)

[planning.dc.gov](http://planning.dc.gov)

MAYOR BOWSER PUT  
OUT A CALL FOR 36,000  
NEW HOUSING UNITS  
WITHOUT ANY ANALYSIS  
OF THE ACTUAL NEED,  
PARTICULARLY AS IT  
RELATES TO THE  
AFFORDABLE HOUSING  
NEEDS WE HAVE NOW  
AND ENVIRONMENTAL  
IMPACTS THAT SUCH A  
CALL WILL BRING ONTO  
DC RESIDENTS AND ALL  
DC COMMUNITIES.

## Known DEMAND for HOUSING

DC currently has surpassed 700,000 residents.<sup>1</sup> Of those people:

- 19%, of people in the District live in poverty.<sup>2</sup>
- 6,521 persons in the District as homeless (3,862 single adults, 13 unaccompanied minors, and 815 families containing 2,646 family members.)<sup>3</sup>
- 163,874 of households in DC, or 59%, are renters.<sup>4</sup> About 1/3 of those – 57,656 – have extremely low incomes (0-30% AMI, i.e. up to \$33,100 for family of 4 in 2017).<sup>5</sup>
- 111,000 people in DC make minimum wage (\$14/hour), composing 12%.<sup>6</sup> If working full time, annual pre-tax income is \$27,560/year. Affordable rent is \$689 (30% of income).
- SSI/SSDI/Disability benefits are the primary source of income for 34.4 percent of homeless single adults.<sup>7</sup> \$771 monthly SSI amount<sup>8</sup> is the only source of income available to disabled adults; \$370/month Interim Disability Assistance (IDA).
- 48% of homeless families in D.C receive TANF benefits as their primary source of income.<sup>9</sup>
- 1,647 families sought shelter or housing services at the central point of intake for families experiencing a housing crisis (3% increase from the 2018 Hypothermia season). Only 815 families were in the shelter system when the Point-in-Time was done.<sup>10</sup>
- 6,183 single persons used the shelter system from Nov. 1, 2017 to March 31, 2018.<sup>11</sup>
- 32,000 D.C. children (26%) were living in poverty, and 49,000 children (39%) were living in households with a high housing cost burden in 2018.<sup>12</sup>
- 1,602 homeless children compose homeless population in D.C., but at least 5,593 D.C. school children were experiencing homelessness when they started the 2018-2019 academic year.<sup>13</sup>
- 40,000 households are on DCHA's voucher waitlist; 26,000 households are on the public housing waitlist.<sup>14</sup>
- 47% of D.C.'s population is Black, while 45% is white<sup>15</sup>; 87% of African Americans compose the homeless population.<sup>16</sup> Median household income for Black residents is \$42,000 vs. \$134,000 for white residents.<sup>17</sup>

<sup>1</sup> United States Census Bureau Quick Facts (2018), District of Columbia, <https://www.census.gov/quickfacts/fact/table/dc/PST045217>.

<sup>2</sup> United States Census Bureau Quick Facts (2018), District of Columbia, <https://www.census.gov/quickfacts/fact/table/dc/PST045217>. Note that poverty status cannot be determined for people not in shelters and without conventional housing. See <https://www.census.gov/topics/income-poverty/poverty/guidance/poverty-measures.html>.

<sup>3</sup> The Community Partnership for the Prevention of Homelessness. TCP Fact Sheet – Point in Time 2019. <http://www.community-partnership.org/facts-and-figures>.

<sup>4</sup> 2018 Out of Reach Report, National Low Income Housing Coalition. <http://nlihc.org/oor/district-columbia>.

<sup>5</sup> National Low-Income Housing Coalition. 2018 District of Columbia Housing Profile. Updated June 26, 2018. Accessed August 23, 2018.

[http://nlihc.org/sites/default/files/SHP\\_DC.pdf](http://nlihc.org/sites/default/files/SHP_DC.pdf).

<sup>6</sup> Bureau of Labor Statistics Report, April 2017, Table 3. <https://www.bls.gov/opub/reports/minimum-wage/2016/home.htm>.

<sup>7</sup> The Community Partnership for the Prevention of Homelessness. Facts & Figures: District of Columbia CoC FY2019 Point in Time

<sup>8</sup> United States Social Security Administration, SSI Federal Payment Amounts For 2019. Accessed February 21, 2019. <https://www.ssa.gov/oact/cola/SSI.html>

<sup>9</sup> The Community Partnership for the Prevention of Homelessness. Hypothermia FY19 Debrief – Families, Prepared for the District of Columbia Interagency Council on Homelessness. May 2019.

<sup>10</sup> The Community Partnership for the Prevention of Homelessness. Hypothermia FY19 Debrief – Families, Prepared for the District of Columbia Interagency Council on Homelessness. May 2019.

<sup>11</sup> The Community Partnership for the Prevention of Homelessness. Hypothermia FY18 Debrief – Unaccompanied Persons, Prepared for the District of Columbia Interagency Council on Homelessness. April 2018.

<sup>12</sup> The Annie E. Casey Foundation. 2019 Kids Count Data Book – State Trends in Child Well-Being. Accessed August 6, 2019.

<https://www.aecf.org/mv/resourcedoc/aecf-2019kidscountdatabook-2019.pdf>

<sup>13</sup> Government of the District of Columbia Office of the State Superintendent of Education Responses to Fiscal Year 2018 Performance Oversight Questions. P. 859.

<sup>14</sup> DC Housing Authority 2018 Oversight and Performance Hearing, Committee on Housing and Neighborhood Revitalization, Responses to Pre-Hearing Questions, Question 87 at p. 43. [http://dccouncil.us/files/user\\_uploads/budget\\_responses?dcha.pdf](http://dccouncil.us/files/user_uploads/budget_responses?dcha.pdf).

<sup>15</sup> Census QuickFacts for District of Columbia in 2017. <https://www.census.gov/quickfacts/fact/table/dc/PST045217>.

<sup>16</sup> The Community Partnership for the Prevention of Homelessness. TCP Fact Sheet – Point in Time 2019. <http://www.community-partnership.org/facts-and-figures>

<sup>17</sup> US Census Bureau, 2017 American Community Survey 1-Year Estimates, 2017, Chart S1903.

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>. Note on chart incomes for other races/ethnicities.

OP'S COMP PLAN REWRITE &  
CHANGES MAKE NO RELATIONSHIP  
BETWEEN THE TERMS  
GENTRIFICATION AND  
DISPLACEMENT OF BLACK FAMILIES,  
RESIDENTS, AND BUSINESSES FROM  
THE DISTRICT.

OP & THE MAYOR DO NOT  
EMPHASIZE PUBLIC HOUSING AS THE  
LAST REFUGE AND SAFETY NET  
BEFORE HOMELESSNESS.

OP & THE MAYOR NARY MAKE ANY  
MENTION OF HOMELESSNESS LET  
ALONE SUGGEST POLICIES OR  
ACTIONS TO CONTEND WITH THE  
RISING HOMELESS POPULATION IN  
THE DISTRICT. INSTEAD THE ACTION  
IS DESTROYING HOMELESS  
ENCAMPMENTS AND DISPLACING  
THE DISPLACED IN A MOST  
DISGUSTING WAY!

THE OFFICE OF PLANNING'S CHANGES TO THE COMP PLAN ARE LARGELY PREFACED ON THE MAYOR'S ARBITRARY CALL FOR 36,000 NEW HOUSING UNITS ACROSS THE CITY WITHOUT ANY UNDERSTANDING OF THE VACANCIES IN THE NEW DEVELOPMENTS OVER THE PAST 5 YEARS.

**36,000 NEW UNITS EQUALS 6X UNION MARKETS :: AKA 6,000 NEW EXCLUSIVE SEGREGATED LUXURY STUDIOS AND 1000 HOTEL ROOMS, PLUS 10 AFF FAMILY SIZED UNITS**

The vacancy information below is based on the American Housing Survey (AHS) conducted biennially by the U.S. Census. The survey asks landlords about vacancy status in terms of the categories below:

	<b>Washington city, District of Columbia</b>	
	<b>Estimate</b>	<b>Margin of Error</b>
<b>Total:</b>	<b>30,176</b>	<b>+/-1,315</b>
<b>For rent</b>	<b>10,294</b>	<b>+/-854</b>
<b>Rented, not occupied</b>	<b>1,985</b>	<b>+/-407</b>
<b>For sale only</b>	<b>1,875</b>	<b>+/-346</b>
<b>Sold, not occupied</b>	<b>1,706</b>	<b>+/-345</b>
<b>For seasonal, recreational, or occasional use</b>	<b>3,662</b>	<b>+/-529</b>
<b>For migrant workers</b>	<b>0</b>	<b>+/-29</b>
<b>Other vacant</b>	<b>10,654</b>	<b>+/-778</b>



# MAYOR BOWSER AND THE DC OFFICE OF PLANNING'S REWRITE OF THE DC COMPREHENSIVE PLAN CONTRAVENES:

- D.C. CODE § 1-306.01, et. seq.
- D.C. CODE § 2-1401.01, et. seq.
- 10A D.C.M.R § 2500, et. seq.
- AMONG OTHER LAWS & REGS

## AS WELL AS THE AMERICAN INSTITUTE OF CERTIFIED PLANNERS CODE OF CONDUCT AND ETHICS

- THE OFFICE OF PLANNING IS REWRITING THE COMP PLAN, NOT AMENDING IT, UNLAWFULLY.
- THE OFFICE OF PLANNING HAS PROVIDE NO APPROPRIATENESS STUDIES OR OTHER STUDIES ALONGSIDE THEIR REWRITE OF THE PLAN, UNLAWFULLY.
- THE OFFICE OF PLANNING HAS NOT CONDUCTED THE PUBLIC ENGAGEMENT IN A WAY THAT ALLOWS RESIDENTS OF ALL PROTECTED LANGUAGES AND CLASSES TO PARTICIPATE, UNLAWFULLY.
- PUTTING THE BURDEN TO REVIEW 1500-PAGES OF CHANGES TO DC'S CENTRAL PLANNING DOCUMENT & MAPS ON ANC'S THAT DON'T HAVE EQUAL RESOURCES AS VOLUNTEERS ACROSS THE CITY IS NOT ONLY UNFAIR, ITS PREJUDICIAL.

Pursuant to D.C. Official Code § 12-309 consider this notice to the Mayor and DC Office of Planning of your unlawful behavior.

Claimant: DC FOR REASONABLE DEVELOPMENT AND OUR INDIVIDUAL PARTICIPANTS, MEMBERS, AND CO-FACILITATORS, AND ANY AND ALL DISTRICT RESIDENTS THAT SEEK REMEDY WITH US.

Incident: ONGOING NEGLIGENCE

Location: Washington, DC

Circumstances: As laid out in the prior pages, plus incorporating any and all comments to the Mayor and DC Office of Planning with concerns about the process and discriminatory and deleterious results of unethical and unlawful planning and zoning in the District of Columbia pursuant to the DC Code, DC Human Rights Law, DC Municipal Regulations, AICP Code of Ethics, and any other relevant Domestic and International laws relating to these issues.

SUBMITTED: January 10, 2020

By: Chris Otten, co-facilitator  
DC for Reasonable Development

Signed: 