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January 10, 2020

Mr. Andrew Trueblood
Director
Office of Planning
1100 4th Street SW, Suite 650 East
Washington, DC 20024

Dear Mr. Trueblood:

The District of Columbia Building Industry Association ("DCBIA"), comprising more than 450 firms working in all areas of real estate development in the District of Columbia, is pleased to submit the attached comments on the Draft Amendments to the Comprehensive Plan ("Draft Plan").

DCBIA supports the shared goals and philosophy behind the Draft Plan. We believe the Office of Planning ("OP") and the Mayor have created a fair planning document that helps all District residents, supports job growth and opportunities, and provides agencies with guidance so that important issues, such as land use, economic development, workforce development, housing, environmental protection, historic preservation, transportation, and more, are addressed in a way that is equitable and inclusive.

Over 20 DCBIA members worked in great detail on this submission, and many more individuals and companies were consulted and involved in further discussion. We categorized our detailed comments in three areas: errata/corrections, general conceptual items and comments, and specific suggested language. Our detailed review of the Draft Plan was designed to ensure that the key objectives remained intact to the best extent possible, and to reflect the economic realities of real estate development.

As you turn your attention to our detailed comments, I want to highlight several of the most significant recommendations and themes.

First, in the Land Use Element, DCBIA requests a reconsideration of the proposal to remove language giving this element greater weight over other elements. It is important that this language be restored to provide guidance to the Zoning Commission on balancing competing policies.

~more~

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In Memoriam
Albert R. "Butch" Hopkins, Jr.
(1941-2012)

Second, DCBIA has several key recommendations for the Housing Element. Recognizing that the Mayor has set a goal to create 36,000 new housing units by 2025 to address the city’s housing shortage and affordability issues, DCBIA notes that the Housing Element focuses heavily on the preservation and production of affordable housing and family-sized units, but does not match this with equal weight or detail on how to incentivize the market to meet demand. DCBIA requests that OP include supply-side incentives, such as flexibility with zoning requirements, including height, density, lot occupancy and setback, expedited entitlement review and permitting tracks, and other incentives noted in our submission. Further, DCBIA notes that the Housing Element does not explicitly prioritize mixed-income multifamily housing. Finally, the Element does not adequately grapple with the fact that the District’s regulatory regime and agency policies and performance make development more unnecessarily expensive and slow the production of units. The National Apartment Association and ULI Washington, among others, have studied and documented the difficulties of doing business in the District. The Housing Element might now be utilized to add more burdens being added without evaluating or mitigating their impact on the production of housing. To that end, since affordable housing is such an essential primary issue for the success of the District, we believe that prior to the passage or implementation of any new statute, regulation or policy, the District should consider an **“housing affordability impact statement”** assessing the effect of such change on the production of affordable housing in DC, similar how a fiscal impact statement is required for any Council legislation.

Finally, for all elements in the Draft Plan, DCBIA recommends that city leaders ensure a strong focus on the District’s economic development trajectory and competitiveness within the region. Over the last few years, the District has increased costly regulations, policies, and processes, including a new Universal Paid Leave law and increased commercial property and transfer and recordation taxes, among many others. The District also now has the most ambitious clean energy law in the country, which mandates new, costly building energy performance standards for all new residential and commercial development *and* existing buildings. At the same time, the steady growth of new residents over the last ten years is beginning to decline as more and more residents opt to live and work in our surrounding jurisdictions that enjoy the same amenities of D.C. neighborhoods, but with lower housing costs. These City-wide policies come with significant cost drivers and need to be constantly monitored and considered as we seek to remain a competitive city *while* addressing the city’s housing affordability and supply problem.

To ensure that the Draft Plan directly addresses the District’s competitiveness, DCBIA strongly recommends, for example, against raising impact fees and submitted a comment along these lines relating to the Community Services and Facilities Element. One of the competitive advantages the District has over suburban jurisdictions relates to lower development “impact fees.” We also recommend expanding on the D.C. Policy Center’s competitiveness study¹ to inform city leaders and city stakeholders of the competitiveness risks over the next decade as the city goes through this Comprehensive Plan Amendment process.

¹ Building a Competitive City: Strengths, Weaknesses and Potential Paths of Growth for the District of Columbia. October 2019. D.C. Policy Center - <https://www.dcpolicycenter.org/wp-content/uploads/2019/10/Chamber-State-of-Business-Report-2019-FINAL-spreads.pdf>

DCBIA appreciates the opportunity to provide comments on the Draft Plan and looks forward to continuing to work closely with you and your team, the Executive Office of the Mayor, other key District agencies, Advisory Neighborhood Commissions, and the Council of the District of Columbia on this important planning document. We stand ready to continue to offer analysis and recommendations to address our housing supply and affordability problem and work toward a shared goal of a competitive, equitable, and livable city for all.

Sincerely,



Lisa María Mallory
Chief Executive Officer

Attachments

cc: Honorable Mayor Muriel E. Bowser
All Councilmembers

Chapter 3 - Land Use Element Comments:

Errata – Land Use Element

- 309.7 – Is the “except” at the end of this section is intended to be “particularly” or “especially”?

Proposed Edits – Housing Element

- “Supporting Growth” (New Section after Sec. 303) – Consider inserting language that map amendments need not wait until the conclusion of a small area plan or other study within the Future Analysis Areas once the Comprehensive Plan amendments and updates to the FLUM go into effect.
- 304.11 – Florida Avenue Market/Union Market should be inserted as one of the target areas.
- 307.3 – The inserted phrase “and the infill development should reflect the neighborhood” is potentially problematic and should be deleted. This phrase is counter to the other proposed amendments in this section that appropriately remove references to neighborhood scale. The concept of “reflecting the neighborhood” could increase the likelihood that neighborhoods are locked in place and might be grounds for unnecessary and baseless challenges of otherwise highly desirable projects and well considered entitlement reviews.
- 309.6 – “Great Neighborhood” – It seems wise to include something in the “definition” of a “Great Neighborhood” that would indicate the area is thriving or economically successful, along the lines of the highlighted language below. These sorts of economic concepts are included later in this section for what the predictor indicates but not up front in the “definition.”

What Makes a Great Neighborhood? 309.6

A successful neighborhood should create a sense of belonging, civic pride, thriving, and a collective sense of stewardship and responsibility for the community’s future among all residents.

- 309.12 – The text of this policy should be recast in terms of “compatibility” rather than “consistent” and discouraging additions. The rowhouse neighborhoods have substantial potential to contribute to housing goals. If the point of this policy is to address the need to take care of the District rowhouse neighborhoods, then this can be achieved by supporting compatible development in these areas. Otherwise, this section can be contrary to housing goals in addition to unnecessarily locking a neighborhood in place.

309.12 Policy LU-2.1.7: Row House Neighborhood Character

Respect the character of row house neighborhoods by requiring the height and scale of structures to be **consistent compatible** with the existing pattern. Upward and outward extension of row houses which compromise their design and scale should be discouraged. 309.12

- 309.13 – Similar to the above discussion of 309.12, we would recommend that 309.13 is drafted as the following (highlighting and deletions omitted for legibility):
 - **Unless a small area plan, District agency directive or study indicates otherwise,** rezoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through RF) for multi-family apartments (e.g., RA) where such action may result in the demolition of housing in good condition should take into consideration the relationship that new development resulting from the rezoning of an area will have with the scale, character, and pattern of nearby development. 309.13
- 309.14 – We recommend making the addition of the following highlighted language.

Policy LU-2.1.9: Alterations to Rowhouses and Apartments

Generally discourage **alterations to buildings that result in a loss of family-sized units that are being utilized by families** resulting from new floors and roof structures (with additional dwelling units) being added to the tops of existing row houses and apartment buildings, **if** such additions would be **architecturally undistinguished and** out of character with the other structures on the block. Roof structures should only be permitted if they **aim to respect the** architectural character of the building on which they would be added. 309.14

- 309.16 – The following language should be deleted. The current zoning regulations encourage reductions in parking through less stringent requirements overall, reduced requirements within proximity to transit, provision of car sharing spaces, and looser standards for parking relief.
 - “...should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. ~~Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated.~~ 309.16”
- 314.7 – Recommend that the text of this policy be revised as follows:
 - ***Policy LU-3.1.1: ~~Conservation~~-Preservation of Industrial Land*** - Recognize the importance of industrial land to the economy of the District of Columbia, specifically ~~its ability~~ to support public works functions, and accommodate production, distribution, and repair (PDR) activities. ~~Ensure that~~ **Z**oning regulations and land use decisions **should continue to preserve protect** active and viable PDR land uses **in the locations where maintaining such uses is appropriate**, while allowing compatible office and retail uses and development under standards established within ~~CM and M-~~ **PDR** zoning. Economic development programs should work to retain and permit such uses. ~~in the future.~~ 314.7

- ~314.17 (new Section “Policy LU-3.1.11: Infrastructure Adequacy”) – Clarify that the installation of additional infrastructure (above and beyond what the project would use or that could be utilized by other parcels not owned by the developer/owner) can be a benefit of a project as part of a PUD.
- 315.8 – Insert “and/or mitigations” at the end of this section so that it is not only benefits that are considered in a project’s effect on adjacent residential areas.

Thematic Comments – Housing Element

- 300.3 – The language that the Land Use Element is to be given greater weight than the other elements has been deleted. We request a reconsideration of this deletion. It is important that the language regarding the Land Use Element having greater weight when balancing competing policies is important.
- Action LU-1.3.C – Metro Stations and IZ – Consider tying this “maximum” requirement to the approval of a Zoning Map amendment. In addition, the first use of “maximum” here could lead to confusion – could the term “increased minimum” or similar be used instead?

DCBIA Comments on Proposed Transportation Element (Chapter 4)

A. Comment Focus: Technical Errors, Omissions, Corrections

- Technology and Innovation sections (page 3 and 64) seems like not enough focus has been placed on the emerging influence of tech and innovation. For being one of the leading high -tech regions in the country, I would think that DDOT would be advancing more smart technologies and transit amenities.

B. Comment Focus: Generalized Issues / Themes

- 400.2 – Add additional critical issues/themes - 1. Linking Land Use and Transportation; 2. Regional Coordination; 3. Technology and Innovation
- Enforcement/Compliance Strategies for new DDOT Initiatives. Some new initiative examples include High-Capacity Transit Corridors (407.23) /Curbside Management and Parking (415) / Autonomous Vehicles. The enforcement is mentioned in places like 415.7 but no enough emphasis in the Action Items.

C. Comment Focus: Specific Issues and Proposed Text Revisions

- 407.29 – Water Taxis – Will there also be publicly funded water taxis in the future? In my opinion, there's not enough focus/emphasis placed on this mode compared to the other modes
- 408.10 – Further explore and identify other potential locations for the intermodal hubs within the District. For instance, in Ward 8, the intersection of I-295 / Green Line Stop / South Capitol / Suitland Parkway / Potential Street Car / Potential HyperLoop would be a potential. I would suggest that DDOT develops selection criteria for site selection options for these hubs.

DCBIA COMP PLAN COMMENT SUBMISSION FORM

Chapter 5 – Housing Element

Proposer: DCBIA

Errata – Housing Element

Chapter / Element:

Housing Element

Subsection 501.1

Existing Text: “360,000” units (typo)

Proposed Text: Replace with “36,000” units

General/Thematic Comments – Housing Element

- **Supply Side Incentives:** The chapter focuses heavily on the preservation and production of affordable housing and family-sized units. This emphasis is not matched with equal weight or detail regarding how to appropriately incentivize the market to meet demand. The chapter should emphasize that agencies and the Zoning Commission have flexibility and discretion, coupled with a range of tools, to incentivize the production of housing that can offset the cost burden of building affordable and family-sized units. Examples of these tools should be enumerated in detail and integrated throughout the chapter. (Tools might include: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.)
- **Mixed Income Housing:** The chapter focuses on the preservation and production of affordable housing but does little to explicitly prioritize mixed-income multifamily housing. Mixed-income housing is a superior social and economic model for multifamily development. The chapter should be adjusted to reflect this priority throughout.
- **Cost Drivers and Housing Affordability Impact Statement:** The chapter does not adequately grapple with the fact that the District’s regulatory regime and agency performance make development unnecessarily more expensive and slow the production of units. The National Apartment Association and ULI Washington, among others, have studied and documented the difficulties of doing business in the District. The Housing Chapter adds more burdens without evaluating or mitigating their impact. To that end, since affordable housing is such an essential primary issue for the success of the District, we believe that prior to the passage or implementation of any new statute, regulation or policy, the District should consider an “**housing affordability impact statement**” assessing the effect of such change on the production of affordable housing in DC, similar how a fiscal impact statement is required for any Council legislation.
- The “Neighborhood Conservation Area” concept should take into account the concept that older buildings need to be updated or completely redeveloped. Preservation of old, affordable units does not account for livability. Older buildings may not be capable of

practical renovation to provide better housing for residents. Innovation and technology will overtake older buildings and will leave buildings and residents behind. Allowing dense redevelopment with a set-aside percentage of affordable units is a better option in many, if not most, cases. Preserving older housing for the sake of preserving “naturally-occurring affordable” units is not a sustainable long-term solution.

Specific Edits to Proposed Text – Housing Element

Chapter / Element:

Housing Element

Subsection 502.4

Existing Text: A multi-pronged strategy is needed to facilitate production, address regulatory and administrative constraints, and ensure that a substantial number of the new units added are affordable to District residents. **New units should also be visitable to residents who are living with disabilities and enable residents to age in community. Visitability refers to apartments and single family housing that can be lived in or visited by persons who have trouble with steps or who use wheelchairs or walkers.** Many of the basic tenets of this strategy were established by the 2006 Comprehensive Housing Strategy and are reiterated discussed in the text box on the following page.

Proposed Text: A multi-pronged strategy is needed to facilitate production, address regulatory and administrative constraints, and ensure that a substantial number of the new units added are affordable to District residents. Many of the basic tenets of this strategy were established by the 2006 Comprehensive Housing Strategy and are reiterated discussed in the text box on the following page.

Recommendation: The text added should be removed.

Explanation: The Fair Housing Act and the Americans with Disabilities Act along with federal Uniform Federal Accessibility Standards provide extensive guidance to ensure that those with physical disabilities who are visiting others in new housing are able to do so. The existing regime is quite comprehensive and adding additional requirements would likely not improve new buildings. The modified text that was proposed seems to include an intent related to “aging in place.” If this is the policy goal it seems to be adequately addressed through Action Item H-4.3D Aging in Place. Therefore, if the intent is to facilitate conversion of existing buildings to allow for visitability (to align with Action item H-4.3D), it is recommended that a new separate policy statement be drafted. It is not clear how the new sentences relate to the other’s in the existing policy section.

Chapter / Element:

Housing Element

Subsection 503.3

Existing Text: *Policy H-1.1.2: Production Incentives*

Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing **and relaxation of height and density limits near transit.**

Proposed Text: Provide suitable regulatory, tax, and financing incentives to meet housing

production goals. The following and other incentives may be appropriate to facilitate development: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools. ~~These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing and relaxation of height and density limits near transit.~~

Recommendation: Remove the strikethrough text, insert the underlined text.

Explanation: Housing production should be incentivized to overcome the barriers to housing production. DC is one of the most expensive and bureaucratically difficult jurisdictions in which to develop real estate. We should encourage the use of a broad array of tools to make development more efficient to meet housing production goals.

Chapter / Element:

Housing Element

NEW Policy H-1.1.8 Production of Housing in High Cost Areas

Existing Text: Encourage development of both market rate and affordable housing in high cost areas of the city making these areas more inclusive. Develop new innovative tools and techniques that support affordable housing in these areas. Doing so increase costs per unit but provides greater benefits in terms of access to opportunity and outcomes.

Proposed Text: Encourage development of both market rate and affordable housing in high cost areas of the city making these areas more inclusive. Doing so increase costs per unit but provides greater benefits in terms of access to opportunity and outcomes. Develop new innovative tools and techniques that support affordable housing in these areas. The following and other incentives may be appropriate to facilitate development in high cost areas: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.

Recommendation: Insert additional text.

Explanation: The original text stated a policy goal pf developing affordable housing and acknowledged that the goal increases development costs. However, the original text was too vague regarding how to appropriately incentivize the market to meet the policy goal. The recommended text provides substance on incentives to help the private sector meet the policy goal and gives agencies an array of tools to facilitate housing production.

Chapter / Element:

Housing Element

NEW Action H.1.1.D

Existing Text: NEW Action H.1.1.D: Research New Ways to Expand Housing

Continue research to expand market rate and affordable housing opportunities in Washington, DC such as expanding existing zoning tools and requirements. Consider a broad range of options to address housing constraints which could include updating the Height Act of 1910, a federal law, outside of the monumental core if it can promote housing production.

Proposed Text: NEW Action H.1.1.D: Research New Ways to Expand Housing

Continue research to expand market rate and affordable housing opportunities in Washington, DC such as expanding existing zoning tools and requirements. Consider a broad range of options to address housing constraints which could include updating the Height Act of 1910, a federal law, outside of the monumental core if it can promote housing production. Encourage agencies to utilize a variety of tools to make projects feasible, including: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.

Recommendation: Insert the underlined text.

Explanation: The chapter should emphasize that agencies and the Zoning Commission have flexibility and discretion, coupled with a range of tools, to incentivize the production of housing that can offset the cost burden of building affordable and family-sized units.

Chapter / Element:

Housing Element

Subsection 504.14

Existing Text: 504.14 Policy H-1.2.7: Density Bonuses for Affordable Housing

Provide zoning incentives, such as through the Planned Unit Development process, to developers proposing to build ~~low and moderate income~~ a substantial amount of affordable housing. Affordable housing above and beyond any underlying requirement. The affordable housing proffered shall be considered a top-priority public benefit for the purposes of granting density bonuses when new development is proposed, especially when the proposal expands the inclusiveness of high cost area by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood. ~~Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood.~~

Proposed Text: 504.14 Policy H-1.2.7: Density Bonuses and Flexibility for Affordable Housing
Provide zoning incentives and entitlement and regulatory relief, such as through the Planned Unit Development process, to developers proposing a substantial amount of affordable housing ~~above and beyond any underlying requirement.~~ The affordable housing proffered shall be considered an important ~~a top-priority~~ public benefit for the purposes of granting regulatory flexibility, including density bonuses, when new development is proposed, ~~especially when the proposal expands the inclusiveness of high cost area by adding affordable housing.~~ When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood maximize housing production and project viability.

Recommendation: Remove the strikethrough text, insert the underlined text.

Explanation: Existing regulatory and legal requirements that require the production of affordable units already stress the development environment in the District. This, coupled with land and construction costs, permitting delays, labor and environmental requirements, and appeal uncertainty, have slowed-down in housing production. Use this opportunity to match affordable unit production with zoning incentives and easing of regulatory burdens that add cost and slow production. Replace “top priority” public benefit with “an important” public benefit to allow the Zoning Commission and agencies the necessary discretion and flexibility to approve projects while balancing a variety of competing priorities and factors unique to each development project.

Chapter / Element:

Housing Element

NEW Policy H-1.2.10

Existing Text: Redevelopment of Existing Subsidized and “Naturally Occurring” Affordable Housing

Encourage and incentivize build-first and one-for-one, on-site in-kind replacement of affordable units, including larger family sized units as appropriate, and relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial assistance to ensure long-term affordability when projects meet these criteria.

Proposed Text: Strike this subsection.

Backup Proposed Text: Encourage and incentivize build-first and one-for-one, on-site in-kind replacement of affordable units, including larger family sized units as appropriate, and relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial assistance to ensure long-term affordability when projects meet these criteria. Zoning incentives and entitlement and regulatory relief are appropriate to maximize housing production and project viability under these circumstances. Relief might include: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.

Explanation: These standards are not economically viable for private parties. Imposition of these standards is likely to economically injure private owners who are held to a far higher standard than owners of sites that do not happen to include “naturally occurring” affordable housing.

Chapter / Element:

Housing Element

Subsection 508.1

Existing Text: Preservation of housing in the District-especially affordable housing-is perhaps an even higher priority than increasing housing supply. This section focuses on two aspects of housing conservation: (1) retaining affordable housing units specifically and (2) retaining existing housing stock generally.

Proposed Text: ~~Preservation of housing in the District-especially affordable housing-is perhaps an even higher priority than increasing housing supply.~~ This section focuses on two aspects of housing conservation: (1) retaining affordable housing units specifically and (2) retaining existing housing stock generally.

Recommendation: Strike text as indicated.

Explanation: Production of many more new, efficient units should be the highest priority.

Chapter / Element:

Housing Element

NEW Callout Box: Principles for the Redevelopment of Existing Affordable Housing

Existing Text: NEW Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that not only are the affordability controls expiring, but the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. In addition, the neighborhoods, the surrounding land uses, and the needs of the city have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies critical to Washington, DC's growth as an inclusive city, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;
- Advance mixed income neighborhoods with both market rate and affordable housing;
- One-for-one replacement of affordable units;
- Provide family-sized housing, including multi-generation families;
- Build affordable units first to minimize displacement and maximize the return of residents to their community;
- Include tenants' rights of return and comprehensive relocation plans for tenants prior to the redevelopment.

NEW Many of these strategies will be difficult to achieve, and some may not be appropriate for an individual redevelopment, but the redevelopment of existing affordable housing should strive to employ as many of these strategies as possible. Critical to achieving the goal of inclusivity and the strategies above are the availability and certainty of the land use and financial incentives necessary to make the projects feasible.

Proposed Text:

NEW Many of Washington, DC's affordable housing developments are aging past their functional lives. This means that not only are the affordability controls expiring, but the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. In addition, the neighborhoods, the surrounding land uses, and the needs of the city have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring publicly owned affordable housing should use several strategies critical to Washington, DC's growth as an inclusive city, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;
- Advance mixed income neighborhoods with both market rate and affordable housing;
- ~~One-for-one~~ Prioritize replacement of affordable units in proportions applied to other projects;
- ~~Provide~~ Where feasible, include family-sized housing, including multi-generation families;
- Where feasible, build affordable units first to minimize displacement and maximize the return of residents to their community;
- Where feasible, include tenants' ~~rights of opportunity~~ rights of opportunity to return and comprehensive relocation plans for tenants prior to the redevelopment.

NEW Many of these strategies will be difficult to achieve, and some may not be appropriate for an individual redevelopment, but the redevelopment of existing affordable housing should strive to employ as many of these strategies as possible. Critical to achieving the goal of inclusivity and the strategies above are the availability and certainty of the land use and financial incentives necessary to make the projects feasible.

Recommendation: Remove the strikethrough text, insert the underlined text.

Explanation: When an affordability covenant expires on private property, the owner should be permitted to redevelop the property in a manner consistent with all other privately held sites (IZ, etc.), regardless of whether there was affordable housing on the site prior to redevelopment. A

privately held site that was utilized for 30 or 40 years as affordable housing cannot be expected to be permanently affordable. Indeed, many owners/investors were induced to enter affordability covenants expressly with the long-term redevelopment opportunity in mind as a return on the original investment. In fact, owners/investors of affordable projects often forgo market returns and distributions over the life of the affordability covenant. Overly burdening privately-held sites with onerous restrictions, will render them undevelopable and may subject the District to litigation.

Chapter / Element:

Housing Element

Subsection 509.14

Existing Text: 509.14 *Action H-2.1.C: Purchase of Expiring ~~Section 8~~ Projects Subsidized Housing and 'Naturally Occurring' Affordable Housing*

~~Consider legislation that would give the District the right to purchase assisted, multi-family properties (and to maintain operating subsidies) where contracts are being terminated by HUD or where owners are choosing to opt out of contracts. Implement and use DOPA (District Opportunity to Purchase Act) to acquire, preserve and dedicate new affordable housing through a process of transferring ownership to pre-qualified developers that will maintain the properties with long term affordability requirements.~~

Proposed Text: Study the market effects of using ~~Implement and use~~ DOPA (District Opportunity to Purchase Act) to acquire, preserve and dedicate new affordable housing through a process of transferring ownership to pre-qualified developers that will maintain the properties with long term affordability requirements.

Recommendation: Remove the strikethrough text, insert the underlined text.

Explanation: Interfering with private transfer rights is another way in which the District makes itself uncompetitive. The impact of this policy should be further considered. The focus should be on the production of a significant amount of new housing and incentivizing the market to meet demand.

Chapter 7 - Economic Development Comments:

Potential Errata – Economic Development Element

- Policy ED 2.5.3 – Is “consolidate” missing before “municipal operations” in the first sentence?

Proposed Edits – Economic Development Element

- 708.1 – There are several locally-based businesses that are considered to be chains (CAVA, Sweetgreen, Matchbox, Clydes, etc.). Therefore, we would recommend excluding companies that are locally-owned or locally-based.
- 711.5 – The word “transform” is in the title but missing from the narrative. Consider adding the word to the provision or removing it from the title.

Thematic Comments – Economic Development Element

None.

DCBIA Comments on Parks, Rec and Open Space Element (Chapter 8)

A. Comment Focus: Technical Errors, Omissions, Corrections

- Omissions
 - 817 – Max Access Through Partnerships – No mention of EventsDC with their work at RFK
 - The enhancement of existing federally owned golf courses – Langston is the only golf course mentioned

B. Comment Focus: Generalized Issues / Themes

- 800 – Add additional critical issues/themes related to NPS Land – Park Amenities on NPS Land (807.8); Park Land Transfers (812.20);
 - Leverage the use of DC and NPS owned natural resources for recreation purposes. More emphasis on programming around assets like the Potomac and Anacostia River for adult and child programs
 - Emphasis on an enhanced maintenance, management and improvement strategy for parks, recreation and open space component. With the growth of DC population, the park system has experienced overuse of facilities and conflict of park users.
- Conduct a study of other public funding mechanisms besides direct developer impact fees for parkland acquisition and capital improvements. These could include things like DC-wide sales tax revenue.

C. Comment Focus: Specific Issues and Proposed Text Revisions

- 807.10 - Continue to ensure that new development pays a proportionate share of the capital costs – meaning costs related to the relevant project or development – needed to build or expand public facilities to serve that development through the current PUD Community Benefit process.

DC BIA Comments on Proposed Urban Design Element (Chapter 9)

[*DCBIA proposed additions*](#)

[*DCBIA ~~proposed deletions~~*](#)

[**DCOP proposed additions**](#)

[**DCOP ~~proposed deletions~~**](#)

A. Comment Focus: Technical Errors, Omissions, Editorial Corrections

- N/A

B. Comment Focus: Generalized Issues / Comments / Themes

- Discussion of District's recent population growth – Unlike the District's drop in population from 1950 – 2000, the region grew from 1,464,000 in 1950 to 4,923,000 in 2000 to 6,200,00 in 2017! The idea of the District growing beyond its peak of 802,000 as the center of the region seems reasonable in some timeframe over the next several decades. The Comprehensive Plan should shape and focus this and not over dramatize the recent population boom.
- Section 910.3 – This section should incorporate some of the same notes that are included in the Historic Preservation Element regarding population growth in order to temper the notion that the District may be getting to dense.
- The Urban Design Element should include additional language to address the following:
 - Planning for buildings that will last 100+ years through high-quality design and construction - this would speak to the importance of high-quality building, and also relate to objectives stated in the Environmental Protection Element. In addition to the PUD process, which incentivizes high-quality design through, among other things, additional density, perhaps tax abatement and other incentives could also be considered to achieve high-quality, long-lasting design.
 - Ability to reconfigure apartment buildings – a policy should be added to encourage designing multi-family buildings that are divided internally into smaller units such that they can be economically reconfigured to accommodate families.
 - Additional height through new zones that require upper-level setbacks – Similar to zoning along Massachusetts Avenue, an action should be added that recommends the creation of additional zones, or amendment of existing zones, to allow greater height with upper-level setback requirements.
- Action UD-2.2.D: Regulation of High Quality Affordable Housing – As drafted, this action is very unclear as to the problem it is trying to address and what it is trying to achieve. Affordable housing is not a “type,” but rather is housing that is affordable. The latter part of this action deals with compatibility of new “dwelling units” can be better

integrated into neighborhood. Is this supposed to be referring to new “buildings?” Finally, this action seems to be based upon a premise that existing zoning and building codes are creating barriers to affordable housing. Rather than matter of right zoning regulations and building codes, it may be more likely that barriers are being created by rent-seeking behavior of existing landholders, financing constraints, and discretionary review procedures/requirements. Overall, this action is not really clear what it is trying to address.

C. Comment Focus: Specific Issues

- Policy UD-1.1.7: Community Life in Alleys –The District’s alleyway system has great potential to provide for additional housing and support for other community/utilitarian needs. However, this policy should be revised to include a statement regarding the need to take a holistic approach to using alleys in these ways so that utility and infrastructure needs are taken into consideration early in the planning process. Perhaps a new action could be added that calls for a planning/infrastructure study that looks at the development potential in the existing alleyway system, infrastructure capacity, and areas where additional capacity is needed to support alley development. (Note: related text should be included somewhere in the Infrastructure Element).
- Policy UD-2.2.7: Infill Development – This policy should recognize where there are differences between the existing development patterns and what can be developed [as a matter-of-right] under existing zoning. As drafted, this policy could be read to suggest that an infill development needs to be compatible with a three story surrounding development pattern even though the existing zoning would allow five stories. Recognition could also be given to the Future Land Use Map (“FLUM”) where existing zoning doesn’t necessarily take advantage of the development potential that is supported by the underlying FLUM designation.
- Policy UD-2.2.10: Planning for Large Sites – Recommend revising this policy as follows:
 - **Ensure that urban design plans for large sites consider not only the site itself, but also the context of surrounding neighborhoods, including through the continuation and connection to existing street grids and necessary infrastructure (e.g., water and natural gas service).**
- Policy UD-4.2.2: Engaging Ground Floors – The language of this policy is too detailed for a Comprehensive Plan policy, particularly the reference to storefronts varying every 20 – 30 feet. Expressing the objective of having syncopated storefronts is appropriate for the Comprehensive Plan. However, the specific manner in which you achieve that objective quantitatively is handled through regulations that can be modified much easier than modifying the Comprehensive Plan.

DCBIA Comments on Community Services and Facilities Element (Chapter 11)

A. Comment Focus: Technical Errors, Omissions, Corrections

None.

B. Comment Focus: Generalized Issues / Themes

- The District of Columbia will need to manage its competitiveness risks over the next decade. Impact fees should not be increased. One of the few competitive advantages the District has over suburban jurisdictions relates to lower development “impact fees.”¹
- 1100.3 – Add additional critical issues/themes – There is a great deal of focus on libraries; however, we would recommend including Recreation Centers, Police, Fire, Educational, Health Care, FEMS, etc., to allow for the various neighborhood priorities for community facilities.
- 1100.3 and 1108.1 – Add additional critical issues/themes – Long-Term Care Facilities is an emerging critical issue/theme. For example, aging in place across D.C. households and how to care for elderly will be critical issue moving forward.
- 1103.6/7 – These sections (Adequate Facilities and Land) do not currently address the needs of private utility companies for land to build facilities that serve the public needs of D.C. residents. For example, PEPCO struggles to locate space/land for new substations in rapidly growing D.C. neighborhoods which negatively impacts the economic development potential for places in Ward 7 and 8.
- 1103.14 – Consideration of private and public uses as a co-location strategy needs to be a larger theme in the element to promote the most important goals, like health, well-being and affordable/mixed-income housing. We believe that the current text places too much emphasis on public-only co-location strategies, and there is an opportunity to set forth co-location concepts.

C. Comment Focus: Specific Issues and Proposed Text Revisions

- 1104.8 Policy CSF-1.2.6: Impact Fees – Continue to ensure that new development pays its “fair share” of the capital costs needed to build or expand public facilities to serve that development **through the current PUD Community Benefit process**. ~~Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large.~~ 1104.8

¹ Reference: DC Policy Center: Building a Competitive City: Strengths, Weaknesses, and Potential Paths of Growth for the District of Columbia: <https://www.dcpolicycenter.org/wp-content/uploads/2019/10/Chamber-State-of-Business-Report-2019-FINAL-spreads.pdf>

DCBIA Comments on Community Services and Facilities Element (Chapter 11)

A. Comment Focus: Technical Errors, Omissions, Corrections

None.

B. Comment Focus: Generalized Issues / Themes

- The District of Columbia will need to manage its competitiveness risks over the next decade. Impact fees should not be increased. One of the few competitive advantages the District has over suburban jurisdictions relates to lower development “impact fees.”¹
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- 1103.14 – Consideration of private and public uses as a co-location strategy needs to be a larger theme in the element to promote the most important goals, like health, well-being and affordable/mixed-income housing. We believe that the current text places too much emphasis on public-only co-location strategies, and there is an opportunity to set forth co-location concepts.

C. Comment Focus: Specific Issues and Proposed Text Revisions

- 1104.8 Policy CSF-1.2.6: Impact Fees – Continue to ensure that new development pays its “fair share” of the capital costs needed to build or expand public facilities to serve that development **through the current PUD Community Benefit process**. ~~Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large.~~ 1104.8

¹ Reference: DC Policy Center: Building a Competitive City: Strengths, Weaknesses, and Potential Paths of Growth for the District of Columbia: <https://www.dcpolicycenter.org/wp-content/uploads/2019/10/Chamber-State-of-Business-Report-2019-FINAL-spreads.pdf>

DC BIA Comments on Proposed Infrastructure Element (Chapter 13)

[DCBIA proposed additions](#)

[DCBIA proposed deletions](#)

[DCOP proposed additions](#)

[DCOP proposed deletions](#)

A. Comment Focus: Technical Errors, Omissions, Editorial Corrections

- Section 1300.4 –
 - Revise bullet point to state “Modernizing the aging water, natural gas and electric distribution systems.”
 - Reconsider deletion of bullet point pertaining to telecommunications systems.
- New section after Section 1300.4 – Revise to “...**District’s population grew to over 700,000**,...”
- New section on page 4 beginning with “Since 2006” – Revise to “...**potable water, wastewater, and stormwater are now managed together** *by one entity*...”
- Section 1302.7 – Revise to “...It ~~required~~ *requires* ...”
- Figure 13.2 – Increase image size
- 1304.4 – Revise to “...storage tanks and other necessary *operations infrastructure* so that adequate water ...”
- Section 1305.2 – Revise to “...**including maintenance. Portions of the existing sanitary sewer system**...”
- New Action IN-2.1.B – This action should refer to stormwater rather than wastewater
- Section 1307.1 – This policy should refer to stormwater rather than sanitary
- Section 1307.5 – Revise the first sentence of this action to provide clarity on the “integrated process” that is referred to in this policy.
- Section 1308.8 – Revise to “...**combined sewer system, and as is a significant beneficiary of the effort.**”
- Section 1311.2 – Insert “securing” as one of OCTO’s responsibilities.
- Section 1313.1 – Revise to “...**DERs will help Washington, DC achieve a clean energy future, avoid minimize infrastructure investments**...”

- Section 1314.3 – Current wording of first sentence is awkward. Revise this sentence to **“In order to maintain a reliable power distribution *system* in Washington, DC, A significantPEPCO maintains *several a presence on various other properties in the city will also be for* substations, fleet maintenance *facilities*, and storage and service yards throughout the city.”**
- Section 1314.3 – Revise sentence to **“*The cost of these* ~~These~~ capital improvements are estimated at more than \$943 million in investment.”**
- Section 1315 – Revise to “IN-5.2 *Natural* Gas Infrastructure 1315”
- Section 1317.5 – Thus section should be amended to include language in support of identification of the scope of infrastructure upgrades and which portions will be borne by the private developer versus government during initial development planning and not immediately prior to permit issuance.
- New section at bottom of page 41 – Change “gas” to “gasoline”
- **New Policy IN-6.3.2** – Revise to **“...such as water lines and *natural* gas pipelines, ...”**

B. Comment Focus: Generalized Issues / Themes

- N/A

C. Comment Focus: Specific Issues

- New section on page 19 below Figure 13.3 – The section starting with “the Clean Rivers Project...” should be revised to make it more apparent that the green infrastructure and diversion tunnels complement one another.
- New section on page 26 starting with “Technology advances..” – This section should be revised to mention the importance of security of technological infrastructure.

Chapter 14 - Proposed Edits – Arts & Culture

Overall, the Comp Plan should encourage the inclusion of Arts and Cultural spaces in a comprehensive and thoughtful approach in the overall place making including:

- Introduce financial incentives to the re-use of space
- Encourage the inclusion of arts component in public RFPs
- Encourage creation of resident artists in public facilities such as active Parks and Recs and vacant DCPS facilities
- Encourage BIDs to partner with arts organizations to promote arts and cultural spaces
- See arts as part of the creative economic which includes profits, nonprofit organizations, and individuals who contribute to the creative economic and commerce.

DC BIA Comments on Proposed Capitol Hill Area Element (Chapter 15)

A. Comment Focus: Technical Errors, Omissions, Corrections

- N/A

B. Comment Focus: Generalized Issues / Themes

- N/A

C. Comment Focus: Specific Issues and Proposed Text Revisions

[DCBIA proposed additions](#)

[DCBIA proposed deletions](#)

[DCOP proposed additions](#)

[DCOP proposed deletions](#)

- Section 1507.2(j) – This section is proposed to be deleted. Parking remains an issue that needs to be dealt with in Capitol Hill commercial areas, as well as for new development near the RFK stadium and Hill East. Therefore, this section should be re-inserted into the Capitol Hill Element. In addition, the following text should be added to the end of the section “[Consideration should be given to creating parking and transit alternatives to accommodate the new recreational facilities and future potential development activities at the existing RFK stadium site.](#)”
- Section 1508.4 – This section should be revised to express support for allowing additional density to support residential growth, and for maximizing opportunities within the commercial zones to create retail and tax generating business, particularly local business. This section should be amended as follows:

Policy CH-1.1.3: Upgrading Commercial Districts
Reinforce, [adding density](#) and upgrade the major commercial districts of Capitol Hill, including the H Street and Benning Road corridors, the Pennsylvania Avenue corridor, 7th and 8th Streets SE, and Massachusetts Avenue between Union Station and Stanton Park, [and redevelopment of RFK and Hill East.](#) Support the further development of these areas with corridor- appropriate **local-serving** retail services, provided that such uses are compatible with surrounding land uses and the historic architecture and scale of the shopping districts themselves. Support the retention of existing neighborhood-serving businesses in these areas through programs that provide technical and financial assistance to small, locally-owned establishments.
- Section 1508.8 – This section should be amended to express support for planning and use of alleys, especially on Capitol Hill given its long history of alley dwellings and large blocks of alleys. Greater utilization of alleys for residential use will assist the District in achieving its housing goals. This section should be amended as follows:

Policy CH-1.1.7: Alleys

Protect Capitol Hill's system of historic alleys and develop plans for the use of large block interior spaces where appropriate, *including the allowance of alley dwelling units*. These plans should be developed in coordination with the affected Advisory Neighborhood Commissions, residents, and community groups. *Greater utilization of alleys for residential use should be considered in the planning for infrastructure, such as water, sewer, and power lines to alley blocks.*

- Section 1508.12 – This section should be revised to allow for a broader set of zoning categories rather than a specific zone to allow more flexibility if particular cases arise. This section should be revised as follows:

~~Discourage~~ **Encourage the preservation and moderate expansion of** ~~the further expansion of~~ commercial uses along 15th Street SE **that are primarily neighborhood serving and in keeping with** *moderate density commercial development* ~~the MU-4 zoning~~. This corridor should **retain its mix of light commercial and moderate density residential to ensure that it can retain** the existing corner stores and small businesses which serve the community.

- Section 1508.13 – This section should be amended to support commercial/retail near the RFK Stadium Area to support visitors to the new recreational facilities at this site. Therefore, this section should be amended as follows:

Policy CH-1.1.12: RFK Stadium Area

Provide improved buffering and landscaping screening along 19th Street and elsewhere in the vicinity of RFK Stadium in order to reduce the effects of noise, dust, vibration, and air pollution on the adjacent Hill East community. Work collaboratively with the National Park Service, **District agencies, Events DC** and National Capital Planning Commission on long-range plans for the stadium and adjacent parkland, ~~and~~ parking lots, *and adjacent serving commercial and retail to support the activities at RFK Stadium park area (such as restaurants).*

Waterfront open space in this area should be retained and improved for the benefit of Hill East, Kingman Park, and Rosedale residents. Improvements should **include the creation, and maintenance, of a pedestrian and cyclist shoreline access path, and well-designed public spaces. Recreational and green spaces should include features for people with disabilities or aging adults. Reduce the amount of land occupied by surface parking and maximize activity along the waterfront. See the Urban Design Element for additional policies related to parks and open space.**

- Section 1508.15 – This section should be broadened and made more flexible by inserting a specific reference to mixed use development. Thus, the section should be revised as follows:

~~Mitigate the effects of the Southeast/Southwest Freeway, including noise, emissions, dust, and visual blight on adjacent Capitol Hill neighborhoods.~~

Continue to evaluate the transportation and land use **opportunities and** impacts associated with the freeway's **redesign of the Southeast Boulevard** as ~~proposed replacement with~~ an at-grade boulevard ~~and tunnel~~ **to better connect Capitol Hill residents to the Anacostia Waterfront by reconnecting parts of the street grid to the north. Add new *mixed use and* residential development where possible along a newly designed boulevard. Ensure that new pathways will safely serve both pedestrians and cyclists. Future planning efforts should reflect the importance of connecting neighborhoods to the river.**

- Section 1508.20 – Current street car operations are impacted by parked cars blocking access, thus making the street car less efficient, and a less desirable mode of alternative transportation. This issue needs to be resolved, especially if the streetcar system is going to expand to Minnesota Avenue / Benning Road Metrorail. Therefore, this section should be revised as follows:

Action CH-1.1.D: H Street Streetcar

Implement proposed streetscape improvements for the H Street/Benning Road corridor, including the development of a streetcar line between the Minnesota Avenue Metro station and **Oklahoma Avenue** *and study options to mitigate the parking impact on the operation of the street car.* ~~Union Station.~~

- Section 1509.2 – There is a need to balance development potential with historic preservation goals, especially given the ambitious housing goals recently established by the Mayor. It can be assumed that attempts at establishing new historic districts or individual landmarks are possible in order to stave off additional density made possible through proposed changes to the Future Land Use Map. To reach a better balance, input should also be sought from the development community on implementation of new historic districts and designations. This section should be amended as follows:

Policy CH-1.2.2: Implementation of Preservation Programs

Consistently implement and enforce historic preservation laws and guidelines for new construction, alterations and public space uses. Expand public access to surveys and evaluation of properties and areas eligible for historic designation in the planning area. Solicit additional *input from the* community ~~input~~ *and development community* on historic preservation needs and opportunities, *and the challenges to fully utilizing historic structures to help meet the District's goal to create additional residential units and new commercial/retail options.* ~~in the Capitol Hill Planning Area, including the surveying of additional areas, expansion of existing historic districts, and increasing the number of landmarked buildings in the city's current inventory. The Historic Preservation Office (HPO) should concentrate in the Capitol Hill Planning Area, including the surveying of additional areas, consider expansion of existing historic districts, and potentially increasing the number of landmarked buildings in the city's current inventory. The HPO should concentrate its efforts in the areas north and east of the Capitol Hill Historic District. Clarify and consistently implement zoning incentives intended to protect structures along H~~

~~Street, NE. and should seek to protect structures along H Street and in other areas that are not currently protected under the District's preservation law. Historic district laws and guidelines should be strictly monitored and enforced for all new construction, alterations, and public space uses.~~

- Section 1509.11 – The wording of this section suggests that rehabilitation of sites containing public housing would need to remain city owned rather than privately owned housing that maintains the same unit count and income levels. This section should be revised to support rehabilitation of public housing in a manner that retains, at minimum, the number of existing public housing units and the existing income levels while also supporting increased density to allow integration of market-rate units. This section should be amended as follows:

Policy CH-1.1.10: Public Housing

Rehabilitate public housing projects on Capitol Hill, ensuring that any units that are removed are replaced ~~in-kind~~ by new ~~public~~ housing units affordable at the same income levels and unit sizes/numbers within the community. ~~Explore opportunities to increase density to include both subsidized and market rate units on site.~~ Where feasible, rehabilitation projects should provide home ownership opportunities for public housing residents.

- Section 1511.7 – This section should be deleted. The substantial new residential development along the H Street corridor, revitalization of existing adjacent neighborhoods, and the street car now being operations make this section no longer valid. A greater distribution of retail options throughout the corridor can now be supported.
- Section 1512.3 – The existing language of this section is outdated; and therefore, should be revised as follows:

Two Metrorail subway stations along the corridor present both challenges and opportunities. The Eastern Market station entrance is an unwelcoming public space located in an otherwise attractive pedestrian-friendly area. ~~The possibility of developing the plaza as a Implement the District's currently planned "town square" concept that creates community spaces and improves pedestrian safety. has been explored in the past and should continue to be pursued. ~~Historic Eastern Market itself is in need of structural improvements, and there continue to be issues related to the lack of parking in the vicinity.~~~~

- Section 1514.3 – Recommend revising this section to refer to the 2009 adoption of the HE zone and include a summary of its zoning priorities. The section should be revised as follows:

A Master Plan for Reservation 13 was completed in 2002 and later adopted by the City Council. In April 2009, the Zoning Commission approved a new set of form-based zoning regulations specific to the future Hill East development that seeks to create attractive places unique and complementary in character, including new neighborhood commercial near C and 19th Street Metro stations, use of the grand

Washington “boulevard”; creation of a district of city-wide uses (healthcare, education, and recreation), and a grand waterfront park. It seeks to retain important civic uses, connect residential areas to the shoreline, and redevelop the site as an extension of the adjacent Hill East neighborhood. Since completion of the Plan, transfer of the site from federal to local ownership along with “pre-zoning” to reflect the uses envisioned by the Master Plan have both been initiated completed. As of early 2006, neither of these actions has been completed

DCBIA COMP PLAN COMMENT SUBMISSION FORM

Chapter 21 – Near Northwest Area Element
Proposer: DCBIA

Specific Edits to Proposed Text – Near Northwest Area Element

Chapter / Element:

Near Northwest Area Element
Subsection 2100.7 and other subsections

Existing Text: Specific organizations are named throughout.

Proposed Text: Eliminate specific organizations and create a more general phrase such as “There are a myriad of organizations in the area with specific interests which can be helpful in creating a higher quality of life for residents.” If decision is made to not eliminate specific organizations, add “Dupont Circle Business Improvement District” to language.

Explanation: Including some organizations and not others elevates some to a different status than others with no real justification. Eliminate and/or modify references.

Chapter: 2108.5 Near Northwest Area Element

Existing Text: “Policy NNW-1.1.4: Neighborhood Commercial Success and Stability
Support the success of the neighborhood shopping areas along 7th, 9th, and 11th, 23rd and North Capitol Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses that provide needed goods and services to area residents should be attracted. 2108.5”

Proposed Text: “Policy NNW-1.1.4: Neighborhood Mixed-Use Commercial Success and Stability. Support the success of the neighborhood shopping areas along 7th, 9th, 11th, 23rd and North Capitol Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses that provide needed goods and services to area residents should be attracted, as well as residential units.”

Recommendation: Insert “mixed use” and “residential units”

Explanation: Wherever the fabric of the City can be integrated with commercial and residential uses to create vibrant streets and spaces, should be encouraged.

Chapter: 2108.8 Near Northwest Area Element

Existing Text: Policy NNW-1.1.7: Loss of Housing.

Strongly discourage the demolition of viable housing or the conversion of occupied units to non-residential uses such as medical offices, hotels, and institutions. Maintain zoning regulations that limit the encroachment of non-residential uses into Near Northwest neighborhoods, particularly around the Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom.

Proposed Text: ~~Loss-Support~~ of Housing. ~~Strongly discourage the demolition of viable housing or the conversion of occupied units to non-residential uses such as medical offices, hotels, and institutions.~~ - -

~~Maintain zoning regulations that limit the encroachment of non-residential uses into~~ Allow ground floor commercial uses in Near Northwest neighborhoods, particularly around the Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom.

Recommendation: Modify as proposed above.

Explanation: Encouraging housing is one thing, but in the future there may be a need for commercial development and having a plan that expressly discourages this development is not conducive to providing services and economic development that residents may need.

Chapter: 2108.10 Near Northwest Area Element

Existing Text: Policy NNW-1.1.9: Affordable Housing

Protect the existing stock of affordable housing in the Near Northwest Planning Area, by bringing to bear new measures to preserve and to produce affordable housing in a way that advances fair housing goals and minimizes displacement.

Proposed Text: “Protect a higher quality stock of affordable housing and allow for the redevelopment of outdated buildings and units and encourage new, efficient mixed income communities.”

Recommendation: Strike original text and replace as noted.

Explanation: Existing housing may not be capable of reasonable upgrades and renovations and maintaining housing that cannot meet today’s standards does not help residents. New developments can provide better housing with mixed income and affordability controls.

Chapter: 2111.4 Near Northwest Area Element

Existing Text: NEW – Mid City East Small Area Plan

Recommendation: Adopt as part of Comprehensive Plan.

Chapter: 2111.5 Near Northwest Area Element

Existing Text: Policy NNW-2.1.1: Affordable Housing

Protect existing affordable housing within the Shaw/Convention Center area and produce new affordable housing and market rate housing on underutilized and future development sites. Use a range of tools to retain and develop affordable housing in the study area, including tenant organization and public education, inclusionary zoning, renewing project-based Section 8 contracts, tax abatements, public-private partnerships, and including affordable housing when development on publicly owned land includes a residential component.

Proposed Text: Policy NNW-2.1.1: Affordable Housing

~~Protect existing~~ Encourage **the development of** affordable housing within the Shaw/Convention Center area ~~by producing and produce new affordable mixed-income housing and market rate housing~~ on underutilized and future development sites. Use a range of tools to ~~encourage~~ retain and develop mixed-income affordable housing in the study area, including ~~tenant organization and public education~~, inclusionary zoning, ~~renewing project-based Section 8 contracts~~, tax abatements, public-private partnerships, incentive density bonuses, entitlement and regulatory relief, and increased ~~including~~ affordable housing when development on publicly owned land includes a residential component.

Recommendation: Strike and insert the text as indicated.

Explanation: The development of new mixed-income housing should be encouraged with incentives and flexibility.

Chapter: 2111.6 Policy NNW-2.1.2: Reinforce Existing Development Patterns

Existing Text: Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is consistent with sensitive to and complements the neighborhood’s character. 2111.6

Proposed Text: Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area, while allowing higher density mixed-income buildings that are complementary to the neighborhood’s character. ~~Locate~~ Encourage multi-unit buildings ~~in areas already zoned for greater density, including areas~~ near the Mount Vernon Square, Shaw/Convention Center, and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. ~~Ensure that development on infill sites scattered throughout the row house portions of the~~

~~Shaw/Convention Center area is consistent with sensitive to and complements the neighborhood's character.~~

Recommendation: Strike and insert the text as indicated.

Explanation: Fundamentally we must build more housing to ease the affordability problem in the city. Metrorail stations and the Convention Center area are primary candidates for more multifamily. These neighborhoods should evolve to accommodate higher density mixed-use, mixed income buildings if we are serious about building 36,000 units in 5 years.

Chapter: 2111.7 Policy NNW-2.1.3: Shaw/Howard University and Mount Vernon Square/7th St-Convention Center Metro Stations

Existing Text: Encourage mixed-income residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots and Metro station entrances.

Proposed Text: Encourage mixed-income mixed-use residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots and Metro station entrances.

Recommendation: Strike “residential” and replace with “mixed-use.”

Explanation: Allow for higher density and ground-floor retail in these areas to grow housing supply and enhance neighborhood livability.

Chapter: 2111.22 Action NNW-2.1.J: Expiring Section 8 Contracts

Existing Text: Implement the DC Housing Preservation Strike Force recommendations for Develop a strategy to renew all affordable housing the expiring project-based Section 8 contracts within the Shaw area, and beyond, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include, at a minimum, an equivalent number of affordable units, and additional market rate units, and measures to avoid displacement of on-site residents.

Proposed Text: Implement the DC Housing Preservation Strike Force recommendations for Develop a strategy to renew all affordable housing the expiring project-based Section 8 contracts within the Shaw area, and beyond, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include ~~at a minimum, an equivalent a~~ significant percentage of affordable units, and additional market rate units, and measures to avoid displacement of on-site residents. Offset affordability cost burdens with incentives such as: flexibility with zoning requirements including height, density, lot occupancy and setbacks, entitlement and regulatory relief, permissive design review, reduction or elimination of parking requirements, expedited entitlement review and permitting tracks, waivers of entitlement, review, permitting, and impact fees, tax credits and abatements, and other financing tools.

Recommendation:

Explanation: The District should focus on building new, efficient mixed-income multifamily buildings across the city. One-for-one replacement is an extraordinary economic burden that likely renders a project “uninvestable” by private markets. Affordability requirements must be offset with appropriate relief.

Chapter: 2112.1 Near Northwest Area Element

Existing Text: The general pattern of land use in Dupont Circle is well established. Future development in the area is managed by the area’s designation as an historic district and the application of the Dupont Circle zoning. The area is an attractive residential neighborhood due to its proximity to Downtown, restaurants and shopping, pedestrian-friendly streets, historic architecture, and diverse housing stock. Commercial and residential infill development and renovation are anticipated to continue, creating economic opportunities and concerns about the displacement of local services by national chains and region serving retail uses. The

healthy mix of commercial and residential uses necessitates careful management and balance of parking, public safety, and noise to maintain a high quality of life.

Proposed Text: The general pattern of land use in Dupont Circle is well established. Future development in the area is managed by the area’s designation as an historic district and the application of the Dupont Circle zoning. The area is an attractive **mixed use residential** neighborhood due to its proximity to Downtown, restaurants and shopping, pedestrian-friendly streets, historic architecture, and diverse housing stock. Commercial and residential infill development and renovation are anticipated to continue, creating economic opportunities and concerns about the displacement of local services by national chains and region serving retail uses. The healthy mix of commercial and residential uses necessitates careful management and balance of parking, public safety, and noise to maintain a high quality of life.

Explanation: Dupont Circle is a mixed-use neighborhood that includes commercial corridors, including Connecticut Avenue, P Street, 18th and 17th Streets.

Chapter: 2112.3 Near Northwest Area Element

Existing Text: Policy NNW-2.2.1: Maintaining Dupont Circle’s Residential Character

Discourage the expansion of commercial uses into residential areas while maintaining the Dupont Circle neighborhood as a primarily residential area. For the purposes of this policy, Dupont Circle shall be defined as the area generally bounded by Rock Creek Park on the west, 15th Street NW on the east, Massachusetts Avenue (east of Connecticut Avenue NW) and N Street (west of Connecticut Avenue) on the south, and Florida Avenue and U Street on the north.

Proposed Text: Policy NNW-2.2.1: Maintaining Dupont Circle’s Residential Character Outside of the Commercial Corridors.

Discourage the expansion of commercial uses into **solely** residential areas, while maintaining the Dupont Circle neighborhood as a **primarily residential mixed use** area. For the purposes of this policy, Dupont Circle shall be defined as the area generally bounded by Rock Creek Park on the west, 15th Street NW on the east, Massachusetts Avenue (east of Connecticut Avenue NW) and N Street (west of Connecticut Avenue) on the south, and Florida Avenue and U Street on the north.

Recommendation: Strike and insert the text as indicated.

Explanation: Acknowledge Dupont Circle as an existing mixed-use neighborhood.

Chapter: 2112.4 Near Northwest Area Element

Existing Text: Policy NNW-2.2.2: Dupont Circle Building Design

Use the following standards in evaluating new buildings and alterations in the Dupont Circle area:

- a. Require a scale of development sensitive to the nature and character of the Dupont Circle area in height and bulk;
- b. Ensure a general compatibility in the scale of new buildings with older low-scale buildings by enacting sensitive design and appropriate transitions;
- c. Preclude demolitions or partial demolitions that would lead to an increase in height and floor area ratio inappropriate to the area;
- d. Enhance the residential character of the area by maintaining existing residential uses and controlling the scale, location, and density of commercial and residential development; and
- e. Ensure compatibility of development with the Comprehensive Plan including citywide goals to address the affordable housing crisis by promoting increased housing opportunities

Proposed Text:

Eliminate c. ~~Preclude demolitions or partial demolitions that would lead to an increase in height and floor area ratio inappropriate to the area;~~ and

Revise d. as follows: “Enhance the residential character of the area by maintaining existing residential uses and controlling the scale, location, and density of commercial and residential development.”

Recommendation: Eliminate c. Edit d. to read as proposed.

Explanation: Recognize DuPont as an existing mixed-use district and continue to encourage and incentivize vibrant development opportunities with appropriate density.

Chapter: 2112.5 Near Northwest Area Element

Existing Text: Policy NNW-2.2.3: Q Street Plaza

Maintain the Dupont Circle Q Street Metrorail entrance as a civic plaza that is compatible with the adjacent mixed use neighborhood. Encourage the restoration of storefronts as active retail uses along Connecticut Avenue from Q Street to the Circle. 2112.5

Proposed Text: Policy NNW-2.2.3: Q Street Plaza

Maintain the Dupont Circle Q Street Metrorail entrance as a civic plaza that is compatible with the adjacent mixed use neighborhood. Encourage the restoration of storefronts as active retail uses along Connecticut Avenue from Q Street to the Circle. **Incorporate appropriate design principles in Dupont Plaza that will encourage pedestrian-friendly public space for activation.**

Recommendation: Add language on Dupont Plaza.

Explanation: Include a mention of the planned Dupont Plaza.

DCBIA COMP PLAN COMMENT SUBMISSION FORM

Chapter 24 – Upper Northeast Area Element
Proposer: DCBIA

Errata – Upper Northeast Area Element

None.

Specific Edits to Proposed Text – Upper Northeast Area Element

Chapter / Element:

Upper Northeast Area Element
Subsection 2400.2

Existing Text: 2400.2 Northeast is principally known as a residential community, with stable single family neighborhoods including ~~like~~ Arboretum, ~~Brookland~~, Woodridge, Queens Chapel, and Michigan Park. It also includes row house neighborhoods such as ~~like~~ Stronghold and Trinidad, and apartments and higher-density housing in communities such as ~~like~~ Fort Lincoln, Edgewood, and Carver Terrace. Some communities ---like Brookland, Ivy City, and Fort Totten, for example -- offer a traditional base of single family housing and an emerging cluster of transit-oriented development around Metrorail stations. 2400.2

Proposed Text: Retain “Brookland” in the first sentence. Delete “Ivy City” in the last sentence.

Explanation: Clarification

Chapter / Element:

Upper Northeast Area Element
Subsection 2400.3

Existing Text: 2400.3 The mix of uses in Upper Northeast is particularly diverse compared to other parts of the city. The Planning Area contains the largest concentration of industrial land uses in the District of Columbia, following the CSX rail lines north and east from Union Station. It includes three major institutions of higher learning—the Catholic University of America (CUA), Trinity University, and Gallaudet University—and numerous other institutions serving other missions. For many years, the Catholic University planned to repurpose land along Michigan Avenue once occupied by residence halls. In 2014, approximately 11 acres were transformed into Monroe Street Market, a cluster of residences, restaurants, and shops located next to the Brookland/CUA Metro Station. ~~# Upper Northeast includes two one hospitals—Providence and the Hospital for Sick Children.~~ It includes several large federal properties, including the Brentwood Postal Facility and the U.S. National Arboretum. It includes ~~the corporate headquarters of Black Entertainment Television (BET) network, one of the city’s largest night clubs,~~ a Federal Express distribution center, and the now- ~~vacant~~ revived Hecht’s Warehouse ~~facility site.~~ 2400.3

Proposed Text: Insert a reference to Children's National Hospital. Refer to the Hecht’s warehouse site as “redeveloped.”

Explanation: Clarification

Chapter / Element:

Upper Northeast Area Element
Subsection 2406.2

Existing Text: 2406.2 More than half of the additional households are associated with specific sites that

are in various stages of planning ~~right now~~ **and development**. These include the remaining vacant parcels at the Fort Lincoln New Town, WMATA-owned land at ~~the~~ **the** three metro stations, and private development projects such as the ~~500-unit~~ **approximately 257-unit** Arboretum Place **built** north of Hechinger Mall, **Union Market, Brookland Manor, and Catholic University**. 2406.2

Proposed Text: 2406.2 More than half of the additional households are associated with specific sites that are in various stages of planning ~~right now~~ **and development**. These include the remaining vacant parcels at the Fort Lincoln New Town and WMATA-owned land at ~~the~~ **the** three metro stations, as well as private development projects such as the the Flats at Atlas, Hecht Warehouse residential tower, ~~500-unit~~, **Brookland Press, The Bately, The Edison, and the Highline at Union Market, Brookland Manor, and Catholic University**. A 16-acre multi-phased redevelopment is planned for the parcel along Montana Avenue and New York Avenue NE. 2406.2

Explanation: Clarification.

Chapter / Element:

Upper Northeast Area Element
Subsection 2408.2

Existing Text: 2408.2 *Policy UNE-1.1.1: Neighborhood Conservation*

Protect and enhance the stable neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond Riggs, and Arboretum. The residential character of these areas ~~shall~~ **should** be conserved **while allowing new housing opportunities for all incomes**; and places of historic significance, gateways, parks, and special places ~~shall~~ **should be preserved and** ~~be~~ enhanced. 2408.2

Proposed Text: Insert “residential” as follows: “Protect and enhance the stable residential neighborhoods of Upper Northeast...”

Explanation: Clarification.

Chapter / Element:

Upper Northeast Area Element
Subsection 2408.10

Existing Text: 2408.10 *Policy UNE-1.1.9: Production, Distribution, and Repair Uses*

Retain the existing concentration of production, distribution, and repair (PDR) uses in Upper Northeast, but encourage the upgrading of these uses through higher design standards, landscaping, and improved screening and buffering. Emphasize **a mixture of** new uses **to be co-located with the PDR uses**, including retail and office space, that create jobs for Upper Northeast area residents, and that minimize off-site impacts on the surrounding residential areas. 2408.10

Proposed Text: Insert “technology and innovation” as follows: “Retain the existing concentration of production, distribution, and repair (PDR) uses in Upper Northeast, but encourage the upgrading of these uses through higher design standards, **technology and innovation**, landscaping, and improved screening and buffering. Emphasize **a mixture of** new uses **to be co-located with the PDR uses**, including retail and office space, that create jobs for Upper Northeast area residents, and that minimize off-site impacts on the surrounding residential areas.”

Explanation: Clarification.

Chapter / Element:

Upper Northeast Area Element
Subsection 2409.1

Existing Text: 2409.1 Policy UNE-1.2.1: Streetscape Improvements

Improve the visual quality of streets in Upper Northeast, especially along North Capitol Street, Rhode Island Avenue, Bladensburg Road, New York Avenue, Eastern Avenue, Michigan Avenue, Maryland Avenue, Florida Avenue, West Virginia Avenue, and Benning Road. Landscaping, street tree planting, street lighting, and other improvements should make these streets more attractive community gateways. 2409.1

Proposed Text: Include “sidewalk widening and repair.”

Explanation: Will enhance the pedestrian experience and safety.

Chapter / Element:

Upper Northeast Area Element

Subsection 2409.8

Existing Text: 2409.8 Policy UNE-1.2.8: Environmental Quality

Improve environmental quality in Upper Northeast, with particular attention given to the reduction of emissions and particulates from trucks and industrial uses in the area. Increase tree canopy in Ivy City and other areas where tree cover is limited. 2409.8

Proposed Text: Insert: “Existing and proposed industrial uses should consider clean energy alternatives such as electrical and hybrid technologies.”

Explanation: Include a greater range of impactful solutions.

Chapter / Element:

Upper Northeast Area Element

Subsection 2411.9

Existing Text: 2411.9 Action UNE-2.1.A: ~~Capital City~~ Florida Avenue Market

~~Develop and i~~Implement ~~plans~~ recommendations in the Florida Avenue Market Small Area Plan for the revitalization and development of the ~~Capital City~~ Florida Avenue Market into a mixed use residential, ~~and~~ commercial, ~~and wholesale industrial~~ Destination, centered around a low-rise core of historic buildings.

Implementation of Rredemption plans for the site shall be achieved through a collaborative process that involves the landowners and tenants, the project developers, the District government, and the surrounding community. 2411.9

Proposed Text: Strike “surrounding community” and replace with “directly impacted community members.”

Explanation: Narrow the range of opposition to community members who are actually impacted by a project.

Chapter / Element:

Upper Northeast Area Element

Subsection 2412.4

Existing Text: 2412.4 The Hechinger/Benning area is ~~expected to undergo~~ experiencing significant change ~~during the next 20 years~~, driven in part by the revival of northeast Capitol Hill, the H Street corridor, and the Anacostia Waterfront area. ~~Some 500~~ Approximately 257 units of housing ~~are planned~~ were delivered at the Flats at Atlas building just north of Hechinger Mall. The Mall itself offers long-term opportunities for redevelopment as a more pedestrian-friendly and urban mixed use center, with additional square footage and possibly new uses such as housing. Pedestrian-oriented retail storefronts along Bladensburg Road hold the potential for revival and restoration. ~~Langston Terrace has been suggested as a possible~~

~~“new community” site, raising the possibility of infill development and new mixed income housing around the complex.~~ The historic 42-acre Schools on the Hill campus also has been considered as the showpiece for a “city of learning” ~~initiative (Hilltop Career Academies)~~, with new educational facilities, mixed use development, and

services that are integrated with the adjacent neighborhood. The H Street/Benning Road NE streetcar line started passenger service in 2016. The Spingarn streetcar and training facility was also delivered at that time and includes space for light vehicle maintenance and a community room. 2412.4

Proposed Text: Strike “the Arboretum Place” and replace with “the Flats at Atlas building.”

Explanation: Clarification.

Chapter / Element:

Upper Northeast Area Element

Subsection 2413.3

~~In 2005, the District’s Department of Transportation completed a multi-modal corridor study for New York Avenue and presented a number of recommendations for consideration. These included adding a tunnel from I-395 to 1st Street NE, building a “signature” bridge across Florida Avenue, reconstructing the Brentwood Avenue bridge, adding a traffic circle at Montana Avenue, and adding a gradeseparated traffic circle at Bladensburg Road (through traffic on New York Avenue would pass beneath the circle). The recommendations also include widening the road and adding a landscaped median and turning lanes in selected areas, a linear park on the road’s north side, and significantly upgrading the corridor’s appearance from Bladensburg Road to South Dakota Avenue. The Corridor study included land use recommendations for key sites along New York Avenue, and also recommended architectural guidelines to reinforce the street edge.~~

In 2014 the District’s Department of Transportation completed moveDC, the District’s multimodal long-range transportation plan, which includes multiple recommendations for New York Avenue. The plan recognizes the significant transportation pressures New York Avenue faces from daily commuters and as a primary freight corridor. The plan recommends improvements to New York Avenue to help meet these needs, including managed lanes from I-395 to the District line and freight capacity improvements. The plan also recognizes that safety enhancements are needed along the corridor at major intersections with North Capitol Street, Florida Avenue, 4th Street and Bladensburg Road. The Plan also suggests building a trail and associated streetscape improvements along New York Avenue from Mt. Vernon Square connecting to the Arboretum, Fort Lincoln and the Anacostia River. 2413.3

Proposed Text: DDOT did a New York Avenue Streetscape and Trail project study in 2017, should this be included here?

Explanation: Potential clarification.

Chapter 25 - Implementation Element Comments:

Errata

None.

Proposed Edits

- 2502.5 – consider inserting the following highlighted language:
 - ***Policy IM-1.1.1: Mitigation of Development Impacts***
To the greatest extent feasible, use the development review process to ensure **that potential positive impacts are maximized, and potential negative impacts on neighborhood stability, the transportation network, traffic, parking and environmental quality are assessed and adequately considered mitigated and/or deemed acceptable.** 2502.5
- 2502.11 Policy IM-1.1.7: Housing as a PUD Amenity – consider inserting the following highlighted language, since without this language moderate-income housing would potentially not be considered as part of a PUD’s benefits and amenities package:

Consider the provision of on-site housing for low **and moderate**-income households, seniors, persons with special needs **and larger family-sized units, to serve growing and multigenerational families** as an important, **high-priority** amenity in Planned Unit Developments, **particularly in areas of high land value where the provision of affordable housing is otherwise difficult to achieve.** 2502.11

- 2503.1: Policy IM-1.2 Small Area Planning - consider inserting the following highlighted language:

Small Area Plans cover defined geographic areas that require more focused direction than can be provided by the Comprehensive Plan. The intent of such plans is to guide long-range development, and improve neighborhoods, achieve citywide goals, and attain **economic and community** benefits. The Comprehensive Plan Area Elements identify **recommended locations for Small Area Plans**, with an emphasis on the Land Use Change Areas, Enhancement Areas, and business districts shown on the Comprehensive Plan’s Generalized Policies Map. **A Small Area Plan provides supplemental guidance to the Comprehensive Plan, unless incorporated into the Comprehensive Plan by adopted Council act, in which case it will amend the Comprehensive Plan. In exceptional cases, it may be appropriate to prepare a Small Area Plan for an area not called for in the Comprehensive Plan.** ANC and public involvement in the development of Small Area Plans is desired and expected. 2503.1

Thematic Comments

- 2502.2 – In order to achieve the broader civic policies, particularly of increasing the production of housing including affordable housing, increased scrutiny and a reduction in the ability to proceed as a matter of right towards building permits seem antithetical. We would recommend altering this section along the lines of the following highlighted language:
 - Of course, not all projects are subject to review **prior to filing an application for a building permit**. **Some Much** of the city’s development is permitted as a matter-of-right under existing zoning, **which allows for projects to be reviewed more efficiently as part of the building permit process.** **affording few opportunities for the Office of Planning to ~~determine review it for~~ Comprehensive Plan consistency.** In the future, **of increasing the increased** scrutiny of **incentives for** matter-of-right projects **may that to voluntarily address urban design, environmental and/or affordable housing issues to a greater extent than otherwise required, should be developed and implemented.** **may be needed, particularly with respect to urban design, and environmental impacts and affordability.** This could **be included through** adjustments to the thresholds for projects requiring “Large Tract Review”, implementation of a Site Plan Review process, changes to the city’s Environmental Impact Screening Forms, and additional standards to ensure that **new development addresses broader civic policies, including ~~sufficiently mitigates its effects on housing, open space, the transportation network, arts and culture, traffic,~~ parking, infrastructure, the natural environment and public service needs, and affordability.** 2502.2
- 2502.3 – Consider lowering the 15,000 square foot of lot area referenced in this section to 10,000 square feet to unlock greater activity and investment in more constrained but more numerous smaller infill sites.
- 2520 - Table 25.2 Housing Linkage - Language is stricken completely. Confirm that this deletion was intentional.