



The Washington, DC region is great >> and it can be greater.

Feb. 23, 2023

Oversight testimony: Office of Planning and Office of Zoning

Good morning. My name is Alex Baca and I am testifying on behalf of Greater Greater Washington, where I serve as D.C. policy director.

Office of Planning

Comp Plan

It is our understanding that a rewrite of the 2006 Comprehensive Plan, which was amended in 2021, will begin in 2025. We look forward to the Office of Planning's proposal for how the rewrite will work. GGWash would like the rewritten Comp Plan to reflect the recommendations made by OP in its 2021 staff report, and legalize apartments District-wide. We are prepared to work closely with the executive and the council to bring this to bear in a way that is racially and economically equitable.

Affordable housing

- While the District has a considerable toolset to develop and preserve income-restricted, subsidized housing, such housing—"affordable"—is either illegal to build or subject to a discretionary process. Affordable housing should not be discretionary or a concession made by developers during a negotiation. Rather than using planned unit developments as leverage to develop more affordable units, we'd like to see OP find a way to legalize by-right projects that have a certain percentage of affordable units, perhaps through a zoning text amendment.
- GGWash had advocated for several years now for the District to retain ownership of its land by ground-leasing it, to start an acquisition fund to facilitate the purchase of more land, and to zone for the maximum possible density allowed by the Future Land Use Map on that land. We'd like proposed map amendments for those zoning changes to come from OP, not from developers once their bid for any given specific project has been awarded. A precedent for this process is currently being set by OP's proposed map amendment to rezone 1617 U Street NW from MU-4 to MU-10, which we support and which we've urged our readers, who are members of the public and who can submit any comments, anytime, to support, as we've assumed that what is of interest to us is of interest to them.
- Historic preservation regulations impede the production of more housing, and more affordable housing. I wish that weren't the case, [but it is](#). In order to reach the mayor's housing targets, particularly in Rock Creek West, we would suggest a moratorium on

historic districts until, at the very least, affordable-housing targets are met.

- Our comments on OP's November 2022 affordable housing roundtable can be found [here](#), and our FY22 oversight testimony on OP, for reference, can be found [here](#).

Streets for People

A decrease in funding for the Streets for People program in FY23 disemboweled the program as designed. Originally intended by the Office of Planning to fund infrastructure that would enable repeated open-streets events, it is funding, basically, street fairs. The District of Columbia does not make it possible to close streets to cars without demanding an extraordinary amount of resources, including Metropolitan Police Department overtime. The Streets for People program isn't working as designed, because it can't cover the cost of infrastructure, like retractable bollards, that would sensibly replace the MPD officers, DPW vehicles, etc.

Downtown

The executive's two great policy interventions to "save downtown" appear to be office-to-residential conversions, and reexamining the Height Act. We're supportive of both, though would prefer that tax abatements not be granted for conversions, given that the concern regarding downtown is at least in part the lack of tax revenue generated from it.

Knowing that downtown will continue to be of concern even if the District's financial future is actually fine, I would hope that the Office of Planning, or, really, anyone, clearly defines downtown.

Office of Zoning

Racial equity tool

The Office of Zoning has not yet finalized its racial equity tool. It should.

Quality-control of comments to the zoning commission

OZ should require forms to be filled when individuals submit comments through IZIS, so that no one can submit a comment without including their full name and address. I myself have had comments I've submitted through IZIS classified as in opposition when I've submitted them in support; OZ staff has always, very graciously, responded to my panicked emails asking them to please change the classification of my comment, ASAP. The IZIS form should account for this apparently frequent discrepancy.