



**Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3/4G**

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**ANC3/4G Resolution Regarding the
Comprehensive Plan Amendments Act of 2019
(B23-0001)**

1. On March 20, 2018, the Commission testified before the District of Columbia Council's Committee of the Whole on the Office of Planning's proposed Framework Element of the Comprehensive Plan. That testimony focused on two problems with the Office of Planning's draft: (1) it relied on vague or inconsistent prediction models and assumptions, resulting in unreliable, biased population growth conclusions; and (2) it abandoned the certainty that must be the hallmark for an effective Comprehensive Plan and created unacceptable ambiguity that will harm residents.
2. On July 2, 2019, Chair Mendelson released the Council Staff's revisions to the Framework Element of the Comprehensive Plan (<http://chairmanmendelson.com/2019/07/02/staff-draft-of-comp-plan-framework/>). On July 9, 2019 — only one week after the staff's revisions were made public — the Council passed these revisions, with certain amendments, on the first vote (<http://lims.dccouncil.us/Legislation/B23-0001?FromSearchResults=true>). The Council's second vote may be taken when it returns from recess in September, 2019.
3. The Council's revisions addressed many of our Commission's concerns with respect to the certainty that the Comprehensive Plan should provide. The new revisions retain much of the Comprehensive Plan's original language and eliminate some of the "flexibility" that the Office of Planning had inserted. While this revision does not go as far as we proposed in restoring the directives in the

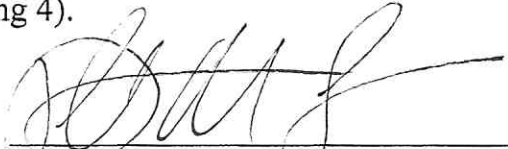
Comprehensive Plan, it is a significant improvement over the Office of Planning's proposal, and the Commission commends the Council for making those changes.

4. With respect to the Commission's concern about the Office of Planning's population growth methodology and projections, the Council's revisions continue to use a "supply-side" theory to predict a population in the District of about 990,000 by 2045. That overly simplistic approach drives the entire Comprehensive Plan to promote aggressive development.
5. Importantly, this population growth projection does not consider the impact that such an expansion would have on the District's infrastructure and livability. If the Council truly expects a 40% increase in population by 2045, the Commission urges the Council to include in the Framework Element provisions for commensurate increases in available schools, parks, libraries, recreation/community centers, and the transportation infrastructure. Without comprehensive planning for those elements, either the growth will not happen as expected or the quality of life in the District will deteriorate.
6. Given the very short time between the release of the Staff's Framework Element revisions and the Council's adoption on first reading, the Commission does not take a position on the other Comprehensive Plan changes. The Commission joins others, however, in urging the Council to provide a realistic opportunity for comments before finally adopting this key planning roadmap for the District's future.

Approved by ANC3/4G after a discussion at its regularly scheduled and noticed July 22, 2019 meeting by a vote of 6 to 0 (a quorum being 4).



Randy Speck, Chair



Abraham Clayman, Secretary