February 11th, 2020

Re: Draft Comprehensive Plan Update

Dear Mr. Ghaffari,

For the past 123 years, Audubon Naturalist Society (ANS) has worked to help residents of the DMV enjoy, learn about, and protect nature. We specialize in conserving the last natural places left in our region for all to enjoy and are passionate about equal access to nature. We have not often engaged in land use advocacy within the District, instead focusing our efforts towards youth and adult nature education, water quality protection, and habitat conservation. For more than 25 years, our members have monitored water quality in three of Rock Creek’s tributaries, and for the last 2 years, we have worked with the Department of Energy and Environment and Anacostia Riverkeeper to get community members involved in monitoring the District’s waters for bacteria. However, the challenges facing humans in 2020, particularly climate change, endanger everything we have worked to protect since 1897. The threats of climate change are inextricably tied to the hazards facing vulnerable populations of both humans and wildlife in our region. The Comprehensive Plan (the Plan) will dictate how humans live in relation to each other and nature for years to come and has the power to solidify the city’s commitment to environmental justice. As such, on behalf of our more than 28,000 members and supporters, we appreciate the opportunity to provide public comment on the Comprehensive Plan.

Overview

Our comments focus on three main sections of the Plan: The Environmental Protection Element, the Land Use Element, and the Transportation Element. We address these elements through the lenses of improvements to the environment and to equity, with an emphasis on climate change. The Plan recognizes the interconnection between these elements and seeks to address them with recommendations and updated commitments. We applaud the vast effort devoted to planning for a climate resilient city with more affordable housing and equitable development. We also encourage the Office of Planning to enforce the Plan’s commitments to these ends to the maximum extent possible.

Environmental Protection Element

While there is much work to be done on restoring and conserving the natural world in the District, the Environmental Protection Element of the Plan is very strong. It appropriately maps the degree to which the city will be affected by increased flooding, extreme heat events, and other climate risks. It supports the city’s commitment to the Renewable Portfolio Standard and goals for greenhouse gas reductions. It conveys the urgency of climate change mitigation, adaptation, and especially resilience efforts and does not downplay the seriousness of climate impacts. We appreciate the attention given to reducing heat islands, stream erosion, and supporting natural infrastructure as a buffer against hazards. We encourage
the Plan to strengthen its pledge to prevent development in floodplains, particularly given the Plan’s recognition of the increased frequency and intensity of 100-year storms.

Some specific strengths of the Environmental Protection Element are:

- **Discussion of habitat conservation, restoration, and protection** through techniques such as meadow restoration, reduced pesticide use, maintenance of contiguous habitats and nesting corridors, erosion prevention, invasive management, and biophilic design. All of these environmentally friendly measures have benefits for the District’s climate goals. A thriving and biodiverse urban environment makes the city more resilient to climate impacts and mitigates our contribution to emissions and species extinctions. We encourage the District to implement these strategies to the maximum extent possible.

- **Support for electric vehicle charging infrastructure along public rights-of-way and in private residential and commercial buildings.** We encourage the Office of Planning to work with the Council of the District of Columbia to pass B23-0193, the Electric Vehicle Readiness Amendment Act of 2019. This is an important step towards reaching the city’s climate goals and codifying the District’s commitment to reducing greenhouse gas and smog emissions from the transportation sector. We hope that work towards electrifying private vehicle infrastructure will be met with equal energy devoted to expanding public transportation.

- **Support for zero-waste efforts in the District.** The Plan recognizes the importance of waste diversion as crucial to meeting climate change goals, making neighborhoods safer and more livable for residents, and conserving natural spaces and the wildlife who live in them. The Plan’s comments on promoting energy and water efficiency are also laudable. We encourage the Office of Planning to strengthen these efforts by supporting the passage of B23-0204, the Energy Efficiency Standards Amendment Act of 2019 and B23-0506, the Zero Waste Omnibus Amendment Act of 2019.

- **Emphasis on expanding bicycle safety and availability.** As the Office is aware, increasing access to multimodal transportation, including micromobility, is essential for getting personal-use vehicles off the road. We encourage the Office to create last-mile connections that improve pedestrian and bike infrastructure. We also support the conscious, careful regulation of many micromobility options, including electric scooters and electric-assist bicycles. We urge the Office to consider the importance of grid decarbonization in making electric micromobility a net climate benefit for the district.

The many strengths of the Environmental Protection Element of the Plan can be enhanced by making changes in a few key areas:

- **Outlining the connection between the city’s tree-planting goals and invasive species-removal goals.** In the Plan’s tree-planting section, we encourage the Office to support the removal of
invasive plants that are themselves trees, or that place the city’s native tree population at risk, while ensuring their replacement with native tree species.

- **Limiting the expansion of Public Works and Production, Distribution, and Repair land uses** so that they do not impact low-income communities where these facilities are often built, particularly in Ward 5. The recommended expansion of industrial facilities such as a new WMATA bus garage should be done carefully and efficiently, as the Plan indicates.\(^1\)

- **Electrifying WMATA’s bus fleet.** Electrification should not just be “encouraged,” as the Plan states. This is a legal responsibility of WMATA as per Title V of the CleanEnergy D.C. Act.\(^2\)

- **Discouraging parking infrastructure at Union Station.**

- **Continuing the process of daylighting streams** and making sure that all streams in the city are mapped and named so that they can be properly cared for.

- **Prohibiting the development of properties that permanently damage the natural environment**, not just preventing this development.

- **Prioritizing lead pipe replacement and mold remediation in public housing**, as minority and low-income communities are often significantly impacted by these challenges. We ask that the Office work with the Department of Energy and Environment, the Department of Consumer and Regulatory Affairs, and the D.C. Housing Authority to conduct immediate and widespread mold remediation.

- **Focusing on the way that drastic changes in weather patterns caused by climate change put people experiencing homelessness at more risk than any other population.** In this way, housing affordability becomes paramount.

**Land Use Element**

The Land Use Element of the Plan introduces how humans, the built environment, and the natural world have intersected since this city’s beginning. It appropriately zooms out on broader patterns of density and access and begins to touch on two of the most pressing issues of this time, housing and climate change. The Plan indicates a growing awareness of the ways in which the District’s population has shifted as it grows and in line with Mayor Bowser’s goals, calls for more affordable housing as a result. Throughout the Plan is also woven a thread of consciousness about the ways that climate change has already impacted the District—leading to aspirations of a resilient city at every turn. The most recent updates to the Plan represent a major step forward in both environmental protection and housing security for all.

**Intersection Between Affordable Housing and Climate Change**

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\(^1\) District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §314

\(^2\) *CleanEnergy DC Omnibus Amendment Act of 2018*, §5-502(a)
The Plan cites research indicating that housing affordability indicators such as the decline in number of households paying more than 30% or 50% of their income for rent is “not due to improving affordability but rather the in-migration of wealthier households and the out-migration of lower income households.” This data echoes a 2019 study by the National Community Reinvestment Coalition showing that Washington, D.C. is the fastest-gentrifying city in the country. The displacement of long-time residents of the city has occurred primarily in African American communities, who are disproportionately forced out of their neighborhoods due to rising rent costs and systemic disinvestment. When residents are forced out of denser, downtown neighborhoods, they may move to outlying jurisdictions with less access to public transportation. There, people rely more on cars, if they can afford them, and contribute to the nation’s #1 source of greenhouse gas emissions—transportation.

Therefore, keeping residents in the city is a key way of fighting climate change. Paradoxically, environmental amenities in urban environments can sometimes even contribute to displacement. Private investment in neighborhood green space, LEED-certified buildings, and green infrastructure by large developers can make housing in those areas inaccessible to low and moderate-income residents. These neighborhood amenities provide benefits to all who live near them in the form of clean air, clean water, wildlife habitat, beautification, and the respite of natural spaces. All should have access to them, at all income levels and in all housing types. If residents cannot afford to live in the city or near those green amenities, though, they end up leaving—often for lower-quality housing with longer commutes to work and greater transportation emissions.

**We must maximize environmental protection without raising the costs of residential or commercial building stock.**

We appreciate the Plan’s recognition of the importance of maintaining neighborhood character as an essential component of a thriving city. Achieving our climate change goals is not possible without strong neighborhoods where patterns of trust and communication have been built over decades. Maintaining a cohesive, welcoming city for all should be the Office’s top priority when it comes to building a Climate Ready D.C. Strong neighborhoods will take full advantage of the programs offered by the city, such as the D.C. Sustainable Energy Utility, Housing Production Trust Fund, Housing Voucher System, the D.C. Green Bank, and the Solar for All program. Strong neighborhoods are more able to advocate for themselves on environmental issues such as proximity to industrial plants, stormwater pollution, heat island effects, and access to nature. Robust and community-oriented neighborhoods are also more equipped to be stewards of the environment when it comes to trash reduction, invasive plant removal, and installing green infrastructure. The city’s ability to maintain neighborhood character is tied closely to the availability of affordable housing, not just in new building stock, but in existing residential areas.

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3 District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §504.1
Without truly affordable housing that suits multiple income levels even below 50% of Median Family Income, neighborhood character cannot be strengthened.

**Land Use Element Recommendations**

ANS supports these policy initiatives but recommends the following modifications and considerations:

- **Section 304.13a Policy LU-1.1.8 Reconnecting the City through Air Rights:** maximizing the potential of the rights-of-way currently occupied by railways and roads should be conducted with additional consideration for air quality regulations. Those living close to highways are much more likely to suffer health issues than those living far away.

- **Action LU-1.3.C: Metro Station and Inclusionary Zoning:** we applaud this section’s attempts to maximize the amount of affordable housing centered around Metro stations. However, Inclusionary Zoning has all but eliminated the ability of residents below the 50% MFI threshold to access affordable housing. We recommend that the MFI be updated to accurately reflect the financial makeup of the city.

- **Policy LU-1.1.9: New Waterfront Development and Policy LU-1.1.10: Public Space Design:** we recommend that the sea wall lining the Anacostia River be removed and the wetland area be restored. This is a critical step in supporting resilience both to climate impacts and normal stressors for communities along the Anacostia, including wildlife communities. We appreciate the Plan’s consideration of the fact that stricter floodplain standards may need to be developed as rainfall frequency and intensity are increasing steadily as a locally felt impact of climate change.

- **Section 305.9, Policy LU-1.2.4: New Methods of Land Regulation:** this paragraph should be amended to read, “Recognize the opportunity afforded by large sites for innovative land regulation and the application of sustainable design...on a large scale. Seek to implement these design principles to the maximum extent practicable.”

**Fully use the opportunities already in place to make housing affordable and climate-friendly:** Such opportunities abound in the Energy D.C. Omnibus Amendment Act of 2018 (the Act). This law invests $105 million of public funding in the D.C. Green Finance Authority (the D.C. Green Bank) revolving fund, which will spur efficiency and renewable energy improvements to buildings throughout the District. The Office of Planning should work closely with the D.C. Green Bank to ensure that the benefits of the Bank accrue to low-income residents in affordable and public housing.

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6 District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §304.13a
7 Ibid.
9 Ibid.
10 Ibid.
11 District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §305.9
12 CleanEnergy DC Omnibus Amendment Act of 2018, §2-201c(3)(D)
Ensure the Sustainable Energy Trust Fund meets its commitment to low-income residents: The Act also requires that a portion of 30% of additional funds placed in the Sustainable Energy Trust Fund be directed towards “benefit[ing] low-income residents, which may include energy bill assistance, energy efficiency, and weatherization, including programs making improvements to commercial and institutional buildings that primarily serve low-income residents.”

Encourage coordination and break down siloes between agencies: ANS strongly supports coordination between government agencies responsible for housing access and those responsible for environmental protection. Currently, government silos existing between the Council, the Department of Energy and Environment, the Mayor’s office, the Deputy Mayor for Planning and Economic Development’s office, the Department of Consumer and Regulatory Affairs, and others have prevented a coordinated effort to involve low-income residents in decision-making. This is evidenced by the current dearth of affordable housing options, the dangerous state of disrepair in public housing, the public mistrust of renewable energy subsidy programs, and the continued presence of toxic mold in low-income housing.

Transportation Element

To make sure that the benefits of an environmentally sustainable city are accessible to all, we support the aims of the Plan to expand and improve the District’s public transportation network. In particular, ANS endorses Transit-Oriented Development, multi-use zoning, upzoning, and modifications to Inclusionary Zoning requirements to be used as tools of equity and climate resilience. We are also grateful for the Plan’s expressed commitment to reducing District residents’ dependence on cars.

Access to Public Transportation and Density

The Plan notes that the lowest density residential areas are the most expensive parts of the city, particularly in Rock Creek West. This is also the area in which there is the least amount of affordable housing and as such, has been targeted by the Mayor for increased housing options. We support this goal and recommend that increasing housing options in this area be coupled with the development of additional public transportation options to cater to residents without vehicle access, as well as preserving the extraordinary resource of Rock Creek Park and the smaller neighborhood trails and parks that connect to it.

The Plan also comments on the low density of Southeast D.C. at the confluence of the Potomac and Anacostia Rivers. Were the city to spur development in these areas, it would be unwise to do so without also increasing the accessibility of reliable, low-cost public transportation options for the area’s residents. This includes maintaining affordability around transportation hubs, where the fastest rent increases are seen throughout the city. This is particularly relevant given employment density that is almost exclusively concentrated in Central Washington. A robust public transportation system paired with decreased parking availability in the city’s core encourages all residents, regardless of income, to reduce private and for-hire vehicle use. This has benefits for the entire region by driving down

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13 Ibid.
15 District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §301.8
16 Ibid.
17 District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §301.9
greenhouse gas emissions, helping us to halve our emissions by 2032 and become carbon neutral by 2050.\textsuperscript{18}

**Transportation as a Factor in Stormwater Runoff**

The District’s continued growth would not be possible without the transportation infrastructure that already exists. However, much of this paved infrastructure, particularly roadways, has contributed to environmentally-damaging stormwater runoff that also endangers human health. We appreciate the attention given to stormwater management in the Plan and ask that these efforts be carried out in full force. 27% of the city’s surface areas includes road rights-of-way, and 60% of these rights-of-way are paved. At the time of the 2006 Comprehensive Plan, only 50% of the road rights-of-way were paved.\textsuperscript{19} **The increase in impervious surface is a step backward for the District, and we should aim to reduce impervious surface cover whenever possible.** Impervious surfaces such as pavement and asphalt are responsible for stream degradation, combined sewer overflows that make the Potomac and Anacostia rivers dangerous to interact with, and they generate urban heat island effects that exacerbate the already rising heat levels throughout the city. Making the District more resilient in the face of climate change means encouraging the replacement of paved road infrastructure with public transportation and green space designed to accommodate many modes of micromobility.

**Transportation Element Recommendations**

**Integrate the Plan with the Transportation Improvement Plan, including electrifying bus fleets:** The Office of Planning should seek to integrate the goals of the Comprehensive Plan around transportation with the federally mandated Transportation Improvement Plan (the TIP). The Comprehensive Plan is valid for much longer than a single Transportation Improvement Plan, so this Comprehensive Plan should lay the groundwork for how the city assesses the upcoming 2021-2024 TIP and future plans. This makes it crucial that the Comprehensive Plan focus on expanding public transportation infrastructure and emphasize the importance of electrifying bus fleets as mandated by Title V of the Clean Energy DC Omnibus Amendment Act of 2018.\textsuperscript{20}

**Engage with ANCs to identify more transit opportunities:** We recommend fully engaging with Advisory Neighborhood Commissions to discern where additional transit opportunities are needed outside of the context of major streets and thoroughfares. We agree that major arteries throughout the city would benefit from investments in transit infrastructure, although these thoroughfares should be accessible to anyone, regardless of mode of transportation. One should also be able to reach the center of the city with ease regardless of location, which is currently not the case.

**Assess methane emissions in land use impacts assessments:** We recommend including methane emissions in addition to carbon dioxide (already listed) as a greenhouse gas to be included in land use impacts assessments as per \textit{Policy T-1.1.2: Land Use Impact Assessment}.\textsuperscript{21}


\textsuperscript{19} District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §301.6

\textsuperscript{20} \textit{CleanEnergy DC Omnibus Amendment Act of 2018}, §5-502(a)

\textsuperscript{21} District of Columbia Office of Planning, Draft Comprehensive Plan (2019), §403.8
Audubon Naturalist Society also supports the aims of the Plan’s Environmental Justice Section, which addresses the ways in which communities that have been marginalized are much more vulnerable to the changes that climate change and environmental degradation bring. We see this section as one that ties together many of the goals of the Comprehensive Plan. Any work towards environmental justice will involve all other elements of the Plan and coordination with as many District agencies as possible. Environmental justice is not an end goal, but a process of rebuilding a society that is conscious of the interconnections between the natural and human-made world—a world that should work for every single District resident, both human and non-human alike. We hope that striving towards making this city an equitable one will be a continued commitment evidenced by strong implementation of the District’s climate change, environmental, transportation, and affordable housing goals.

We hope that the updated Comprehensive Plan will serve as a unifying document to guide collaboration between all government agencies as it pertains to the environment, land use, housing and transportation. We encourage the Office of Planning to engage representatives from all District agencies in continuing discussion about implementation of the Plan, and to continue conducting public outreach to all residents about how the Plan will affect them once it is passed.

Thank you,

Ari Eisenstadt
DC Conservation Advocate
Audubon Naturalist Society