

**DC's Comprehensive Plan
Generalized Policy Map & Future Land Use Map**

“Where the Rubber Hits the Road”

**A Presentation by Caroline Petti
to the
Grass Roots Planning Coalition
September 19, 2020**

Good afternoon.

The Grass Roots Planning Coalition has spent many months discussing and debating the District of Columbia's Comprehensive Plan. You weighed in on the DC Council's consideration of the Framework Element of the Comprehensive Plan. That is behind us now - the Comprehensive Plan Framework Amendment Act is now D.C. Law L23-0127 - and the DC Office of Planning has submitted proposed amendments to the rest of the Comprehensive Plan to the Council of the District of Columbia for the Council's consideration.

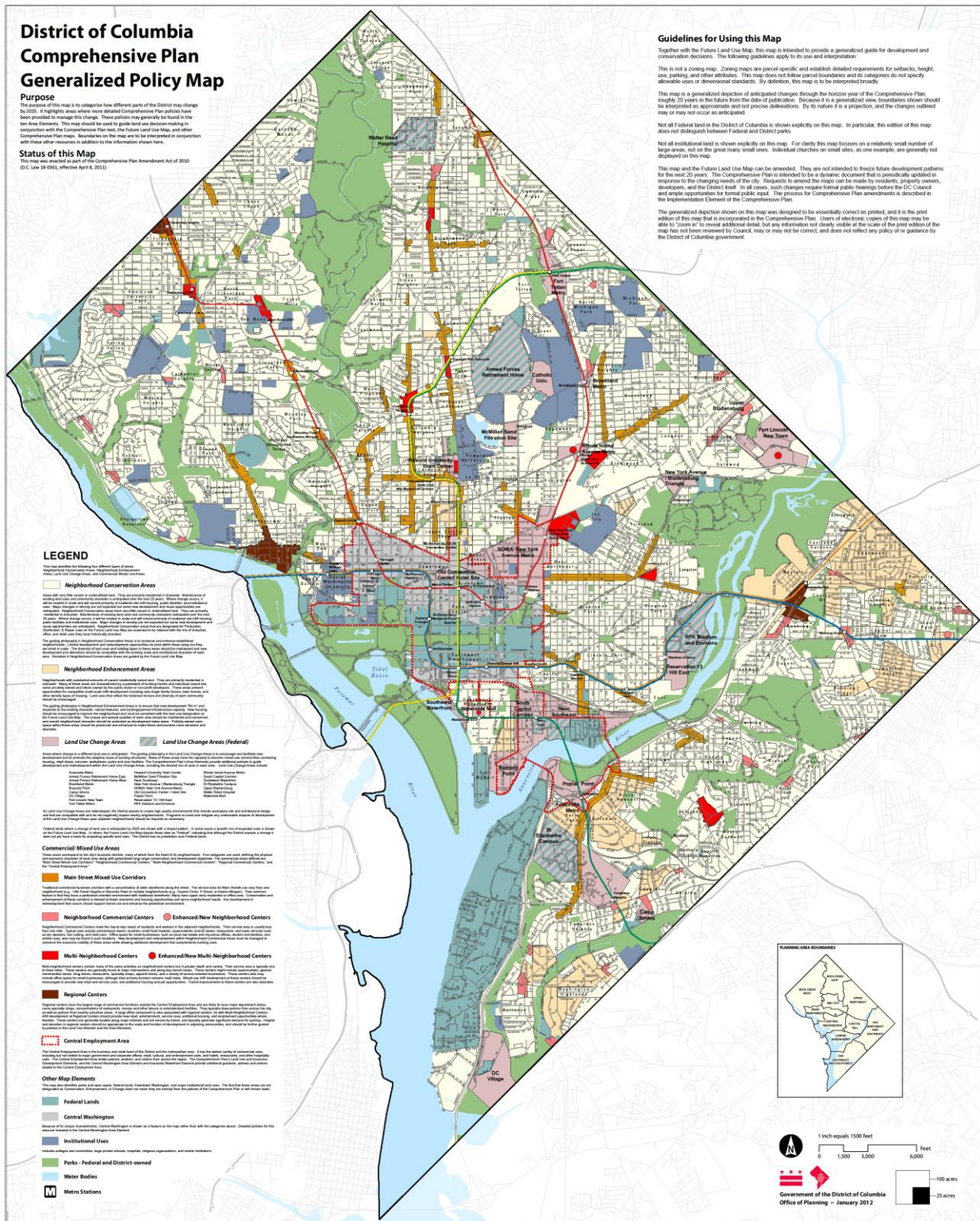
Besides the Framework Element, there are twelve other elements that make up DC's Comprehensive Plan. There are also “Area Elements” and last, but not least, there are two Maps: the Generalized Policy Map and the Future Land Use Map.

These are not just any maps. These are very, very important maps. In my view, these maps are where the ‘rubber hits the road’. They play a leading role - if not THE leading role - in determining future land-use, growth, and development in our city.

What are these maps? Well, there are two of them. There's the Generalized Policy Map (GPM) and the Future Land Use Map (FLUM). They both cover the entire city and they map out in different color-coded categories desired land-use and density across the city.

The Generalized Policy Map depicts intended land-use using categories like “neighborhood conservation”, “commercial areas” and “institutional uses”.

Here is a copy of the current Generalized Policy Map:



You can find an easier-to-read version of the GPM on-line at:
<https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/2011CompPlanPolicy.pdf>

The Future Land Use Map - or “FLUM” - depicts the intended density of locations across the city using categories like low, moderate, medium and high residential and commercial. The FLUM also identifies typical density and character of buildings associated with each category as well as representative zoning districts.

Let’s look at one category - “Moderate Density Residential” - as an example:

“This designation is used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category, and other zones may also apply.”

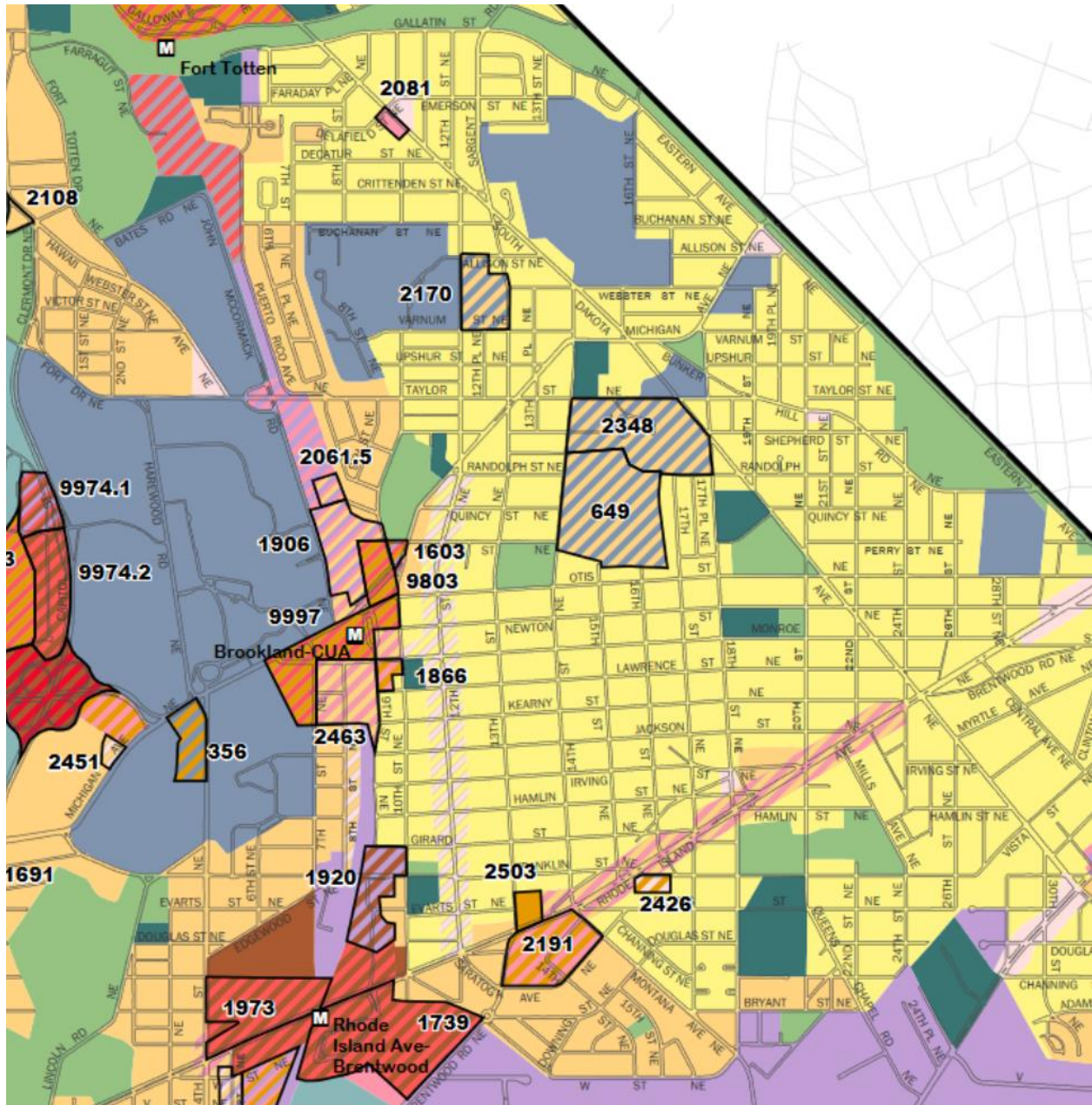
Future development in areas identified on the FLUM as “Moderate Density Residential”, would generally have to correspond with this representative description and zoning. Descriptions for each of the FLUM categories can be found in Section 227 of the newly-enacted D.C. Law L23-0127 “Comprehensive Plan Framework Amendment Act of 2019”.

Here is a copy of the existing Future Land Use Map:

The Office of Planning is proposing a large number of changes to the FLUM. Many of these changes were initially proposed by developers and/or property owners and most, if not all, propose a change to a higher density category. Hence, the term “up-FLUMing”.

All of the Office of Planning’s proposed changes to the GPM and the FLUM can be found on the Office of Planning’s Comprehensive Plan website at <https://plandc.dc.gov/page/future-land-use-map-and-generalized-policy-map>. There you’ll find interactive maps and you can focus-in on whatever location or neighborhood you’re interested in. All of OP’s proposed changes are outlined, numbered, and color-coded so you can see clearly what’s being proposed. (E.g., See the following two FLUM snips from different sections of DC.) These proposed changes are now pending before the DC Council for approval. They will not go into effect until they are approved.

Here is a snip of OP proposed FLUM changes in my neighborhood of Brookland:



The GPM and the FLUM are NOT zoning maps. When and if the Council approves them, it won't mean an automatic re-zoning of the city. But these maps carry legal weight and they set the stage for re-zoning.

Let me describe how that process typically unfolds:

If the Council approves the GPM and FLUM changes, developers, property owners, and/or the Office of Planning will then move to submit "map amendment" requests to the DC Zoning Commission. They may even submit a package of multiple requests. Map amendment requests are requests to re-zone properties. Most of these will likely be requests for higher, denser zones.

The timeline for these requests is hard to predict. It will depend on development schedules and other priorities, but it's a safe bet that the requests will start to roll in to the Zoning Commission almost immediately after the Comprehensive Plan and map changes are enacted into law. Some are starting to roll in now. Many developers are sitting on developable properties waiting for OP, the Council, and the Zoning Commission to up-zone them so that they can build denser, more profitable developments.

Zoning regulations require applicants to 1) send a written notice of intent to file a map amendment application to the Advisory Neighborhood Commission (ANC) and the owners of all property within 200 feet and 2) make all reasonable efforts to attend a duly-noticed meeting of the affected ANC. This notice and comment period must last at least 45 days. The submission must make the case that the GPM and FLUM designations applicable to the location(s) at issue support a re-zoning, as do other Elements and provisions of the Comprehensive Plan. Zoning Commission rules of practice and procedure for map amendment applications can be found in DCMR Title 11 Subtitle Z https://dcoz.dc.gov/sites/default/files/dc/sites/dcoz/publication/attachments/Subtitle_Z_2.pdf

To approve the requests, the Zoning Commission must consider the applicable provisions of the various elements of the Comprehensive Plan, applicable GPM and FLUM designations, and any pertinent Small Area Plan. After input from the Office of Planning, the applicant, ANCs and the public, the Zoning Commission will approve the request if it determines it is "not inconsistent" with the Comprehensive Plan.

Once the map amendments are approved and properties re-zoned, developers can build matter-of-right on the property. They must comply with the development standards (e.g., height limits, density limits, lot size requirements, etc.) and use restrictions specified for the applicable zone, but unlike a Planned Unit Development (PUD), for matter-of-right projects, there is no required opportunity for ANC or public comment and no required opportunity for negotiating affordable housing or other community amenities.

So, where does all this leave us? Where it leaves us is: If you have an opinion about land use and future development in your neighborhood or elsewhere, now is the time to engage: before the DC Council approves final changes to the Comprehensive Plan and Maps. If you wait until map amendment requests are before the Zoning Commission, it will be too late. Start by going to the OP website and taking a close look at the GPM and FLUM maps. If you have your own preferred changes or concerns about OP's, now is the time to share those preferences and concerns - with lot and square specificity - with your Ward Councilmember, Council Chairman Mendelson, the at-large Councilmembers, and others who you think may exert influence on your behalf.

DC residents have as much right to chart a future for where we live, work, and play as anyone. If you have a vision, if you have a preference, if you have a concern, now is the time to express it.

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