THE OFFICE OF THE ATTORNEY GENERAL'S RECOMMENDATIONS FOR DC 2050: SIMPLIFY, CLARIFY, AND MODERNIZE TO SERVE THE DISTRICT

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INTRODUCTION

In the spring of 2025, the District's Office of Planning (OP) began the process of drafting a new Comprehensive Plan (CP) for the District. The new CP, "DC 2050," will replace the current 20-year-old plan and will guide "where and how we build new housing, grow job opportunities, connect neighborhoods, preserve our rich history, and invest in amenities. As our city evolves, DC 2050 will align land use policies and investments to make the District more equitable, affordable and resilient."[1] As part of this process, OP is soliciting feedback from District residents, businesses, and government agencies to ensure that the new CP accurately captures the needs and concerns of all District stakeholders.

As part of that process, OAG respectfully provides these recommendations to OP as constructive approaches to rewriting and modernizing the format of the District's CP. These recommendations are informed by OAG's participation in the District's land use process and its research into the best practices used by other jurisdictions in writing their own CPs. Based on its research and experience with the current CP, OAG recommends simplifying the current CP's format and clarifying its priorities to avoid ambiguity that may result in legal challenges. OAG believes that a concise and focused CP will reduce the appeals of zoning orders that are based on the current CP's ambiguities and inconsistencies, which have imposed delays, added costs, and lost development opportunities for the District. The current CP's excessive length, well over 1,000 pages, and multiplicity of overlapping provisions also seed confusion among District residents, creating barriers to participation in the District's land use process.[2] The new CP should be accessible to District residents and property owners without requiring specialized zoning "translators." OAG hopes its recommendations will achieve a simpler and clearer CP.

This paper first reviews the best practices for CPs in other jurisdictions. It then discusses OAG's recommendations to update and reorganize the CP's current format for both Districtwide Elements and Area Elements. OAG's recommendations are not intended to change the CP's substance, but to transform the current outdated CP format into a focused statement of the District's development goals through 2050.

EXECUTIVE SUMMARY

Recent CPs have highlighted the importance of providing clear, focused land use guidance in order to advance citywide policy goals and ensure predictable development policies. To this end, the American Planning Association has identified several CP best practices, which have formed the basis for OAG's recommendations. OAG has also incorporated elements of exceptional CPs from other jurisdictions.

For the Districtwide portion of the CP, OAG recommends that OP take the following measures to simplify its structure and make it more accessible and predictable to District residents and property owners:

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[1] OP's DC 2050 Website.

[2] As a comparison, Baltimore's comprehensive plan has 421 pages, Chicago's has 154 pages, and Philadelphia's has 232 pages. More information about population and page counts may be found in Appendix A.

- **Adopt a simple interlinked organizational structure**. OAG recommends a pyramidal structure of four interconnected levels: three overarching goals at the top of the pyramid to establish an overall strategy; five thematic topics directly below to guide the focus to specific subject areas; followed by 31 targeted policy objectives that advance the aspirations of the thematic topics; and 128 specific implementation actions to achieve the stated policy objectives.

- **Focus the Land Use Topic on guidance for zoning**. As the only regulatory process affirmatively required to not be inconsistent with the CP, zoning requires clear guidance to avoid legal ambiguity that fosters residents' distrust and legal challenges.

- **Adopt a simplified FLUM**. OAG proposes a significant reduction in the number of FLUM categories from 59 to nine, all of which would permit a mix of uses based on clear density bands.

- **Foster effective communication**. Incorporate the best practices from other recent CPs by using visuals to convey data, as well as a streamlined, easily navigable, web-based format that complements the suggested organizational changes and allows average residents to use and interact with it in more meaningful ways.

  Additionally, OAG proposes the following to guide the new CP's approach to localized planning:

- **Use Wards as the geographic basis**. This change from 10 planning areas to the current 8 Wards would make the CP more intuitive for District residents given the existing common understanding of Wards as a geographic unit and a source of identity for residents.

- **Ensure Ward Elements provide detailed localized guidance**. Each Ward Element would be divided into a series of geographic Planning Focus Areas (PFAs), which would be centered on key locations expected to serve as the drivers of planning and development within the Ward.

- **Follow the Districtwide Element organizational structure**. Each PFA would include a series of policy objectives tied to the specific policy concerns of the PFA.

PART I: BEST PRACTICES FOR COMPREHENSIVE PLANS

CPs are fundamentally land use plans. They serve as "the statement of goals, recommendations, and policies guiding the development of the physical environment"[3] of a jurisdiction and serve as the "legal predicate for the exercise of the government's land use and zoning powers."[4] Zoning is the main implementation and enforcement mechanism of CPs,

[3] The Philadelphia Code §14-105(1).

[4] Thrive Montgomery 2050, p. 4; *see*, *e.g.*, Richmond City Charter §§ 17.01, 17.04, 17.07 (establishing the requirements for a master plan, and the effect of the adoption and approval of the plan including its review by the planning commission before adopting or amending the zoning plan); The Philadelphia Code §14-105(3) (requiring the

ensuring that the plan's broad, aspirational goals achieve physical reality. While CPs may suggest priorities on related topics such as economic development, transportation, or environmental protection, their ability to influence these issues is limited to what can be achieved through land use and zoning regulation, with more specific programmatic authority delegated to other government agencies and their respective plans.[5] Given the asymmetry between this important role as the foundation of a jurisdiction's physical development and the limited implementation mechanism of zoning, more cities and counties are realizing the importance of CPs that provide clear, focused land use guidance in order to advance citywide policy goals and "ensure a predictable development process."[6] The American Planning Association (APA) has identified a number of features and components that contribute to effective CPs in its "Best Practices for Comprehensive Plans." The APA notes that:

> *Traditional comprehensive plans often are not widely read because they are too long and contain too much planning jargon. Therefore, it is important to translate plans into concise, easily readable, and understandable content – including not only text and tables, but also maps, graphics, and digital images. Advances in technology and communication techniques make it possible to create comprehensive plans that are more interesting, attractive, and accessible.*[7]

Other comprehensive plans that OAG has reviewed, including the winners of the APA's Daniel Burnham Award for a Comprehensive Plan, a prestigious honor recognizing outstanding CPs,[8] share the following characteristics:

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city planning Commission or Zoning Board to consider the Comprehensive plan as "a factor in making any decision on a zoning permit application on a topic or area covered by the adopted plan".).

[5] *See* Thrive Montgomery 2050, p. 9 ("Thrive Montgomery 2050 can play an important role in strengthening our economic competitiveness by fostering the creation of places where people with diverse choices want to live and work**.** Its recommendations for land use, transportation, parks, and other public and private infrastructure lay the groundwork for economic development initiatives undertaken by other entities."), p. 29 ("Thrive Montgomery 2050 is primarily focused on land use, so it addresses only the aspects of economic development with a strong connection to real estate and public infrastructure."); *see also* Albuquerque & Bernalillo County Comprehensive Plan p.1-5 ("While a [CP] can suggest priorities for economic development or housing, it only has direct influence over land use decisions.").

[6] Philadelphia 2035, p. 16 ("A clear road map of where and how the city will grow, and clear rules about what is permitted or not, will make regulators, developers, institutions, and community members more comfortable and likely to work together to achieve common goals."); *see generally* Ezra Klein & Derek Thompson, *Abundance* (2025), Yoni Applebaum, *Stuck* (2025).

[7] D. Godschalk & D. Rouse, *Sustaining Places, Best Practices for Comprehensive Plans*, Planning Advisory Services Report 578, American Planning Association (2015), p. 21.

[8] APA's Daniel Burnham Award for a Comprehensive Plan.

Simple Broad Structure	Effective Communication
• Small number of overarching goals • Thematic citywide topics that integrate traditional silos into holistic focus areas • Cross-cutting objectives that advance the policy focus areas of their associated topic • Limited number of implementation actions that achieve multiple citywide and area objectives • Reserving in-depth planning for constituent planning areas • Simplified land use map that provides clear zoning guidance	• Charts and tables illustrating data • Maps illustrating data geospatially utilizing Geographic Information System (GIS) layers • Supplemental information in appendices instead of the body of the comprehensive plan • Web-based plan utilizing hyperlinks, drop-down navigation menus, popup windows, and expandable accordian content

One model of a streamlined and cogent CP that utilizes a number of the APA's best practices is *Thrive Montgomery 2050*, adopted by Montgomery County, Maryland in 2022. Montgomery County has been a leader in planning and land use for the past half century, including being the first jurisdiction to adopt an Inclusionary Zoning program, which has greatly influenced DC's affordable housing policy. Neighboring the District with a majority-minority population and neighborhoods of different densities, Montgomery County faces many of the same economic, environmental, and other pressures as the District. While Montgomery County has almost 50% more residents and covers more than seven times as much land as the District, *Thrive Montgomery 2050* provides land use guidance for future development in less than 250 pages, including extensive charts and data tables providing visual narratives in conjunction with the text. In sharp contrast, the District's current CP is more than five times as long, weighing in at a staggering 1,332 pages.

Through the incorporation of the best practices described here, jurisdictions seek to reduce barriers to both understanding and use of their CPs to ensure that they can guide growth efficiently, transparently, and equitably. OAG has used this research along with its experience with the District's land use process as the basis for its recommendations. As discussed in the following sections, OAG has identified what it believes to be the key elements of an effective CP and has analyzed the ways in which different jurisdictions have applied these principles to their plans.

A. Simple Interlinked Structure

Effective modern CPs adopt clear, well-defined organizational structures that focus the CP's priorities and recommendations and are intuitive for users to navigate. These plans align with the APA's guidance that CPs should be both clear and internally consistent, avoiding contradictions while providing actionable guidance.

Several jurisdictions, including Charlotte, Richmond, Kaua'i County, Nashville, Newark, Montgomery County, San Diego, and Philadelphia, have adopted "pyramidal" structures (*Figure 1 – San Diego CP Structure*).[9] Though the specifics and terminologies of the structure vary between plans, they all feature a tiered structure composed of approximately four levels:

1. A small number of overarching goals or themes at the top;
2. Thematic topics covering one or more planning subjects;
3. Objectives or subject-specific goals; and
4. Specific implementation action items to achieve these goals. (*Figure 2 – Phoenix CP Structure*)

A pyramidal structure establishes a clear hierarchical relationship between the different plan levels, while still facilitating integration and cross-cutting relationships between components. Overarching goals connect individual objectives thematically within their respective topics, while the actions that can support multiple objectives connect the plan components for the purpose of implementation. This system provides broad guidance at the city- or county-wide level, as well as an organizational structure that can be used to provide more detailed, geographically specific guidance in smaller area plans. By establishing clear relationships between plan components, this structure allows localized planning recommendations to connect back to broader objectives. This contrasts with older CPs like the District's, where information and concepts tend to be siloed and lack clearly defined relationships with other sections of the plan.

This greater organizational clarity reduces internal inconsistencies and redundancies within plans, allowing them to be shorter and more efficient in their guidance. As shown below, the average length for the citywide or general plan in the following jurisdictions is approximately 300 pages, whereas the Districtwide elements in the District's CP currently total 768 pages. The combination of a clearer structure and shorter overall plan length makes these CPs easier to read and more accessible for the public.

Jurisdiction	Citywide/General Plan Page Length
Charlotte (2021) Population: ~874,000 Land Area: 297 sq. mi.	132
Philadelphia (2011) Population: ~1,600,000 Land Area: 134 sq. mi.	169
Phoenix (2024) Population: ~1,600,000 Land Area: 517 sq mi.	212
Montgomery County (2022) Population: ~1,060,000 Land Area: 507 sq. mi.	246
Richmond (2023) Population: ~226,000	271

[9] Charlotte, Richmond, Kaua'i County, and Newark are winners of the APA's Daniel Burnham Award.

Jurisdiction	Citywide/General Plan Page Length
Land Area: 62 sq. mi.	
Newark (2022) Population: ~311,000 Land Area: 24.11 sq. mi.	316
Minneapolis (2020) Population: ~429,000 Land Area: 58 sq. mi.	335
Baltimore (2024) Population: ~585,000 Land Area: 92.28 sq. mi.	421

1. Overarching Goals

The top of the pyramidal CP structure sets forth broad overarching goals or themes, which are intended to guide the subsequent parts of the plan. Most plans using this model have three or four goals or themes, typically relating to broad concepts such as equity and justice, environmental resiliency or sustainability, and economic vitality or prosperity.

Jurisdiction	Overarching Goals
Montgomery County	Racial Equity and Social Justice Environmental Resilience Economic Competitiveness
Philadelphia	Thrive Connect Renew
Charlotte	Equitable Authentic Integrated Resilient
Phoenix	Prosperity Health and Well-Being Environment
Kaua'i County	Sustainable Unique Healthy Equitable

Depending on the plan, these goals or themes can serve slightly different purposes. For example, Montgomery County's plan features three "Overarching Objectives." These objectives outline the opportunities and challenges facing the county, for example the "Economic Competitiveness" objective outlines the County's main industries, areas for growth, and ways in which land use policies can support these industries.[10] The plan then frames its policy recommendations in terms of these objectives by "keying" individual policy recommendations to

[10] Thrive Montgomery 2050, p.7-19, 28-37.

one or more of the overarching goals.[11] In this case, the objectives provide both high level policy direction and internal plan organization.

Similarly, Phoenix's three holistic "Community Benefits" outline the plan's main challenges and opportunities. As an example, the "Prosperity" benefit identifies environmental threats, resource scarcity, new/disruptive technologies, equitable transportation access, and workforce and employment trends as challenges to the city's prosperity. It also identifies the provision of transportation and housing choices as opportunities. Phoenix's holistic approach results in broad goals that touch on, and can therefore guide, a number of subsidiary topics.[12]

Other plans use their overarching goals to establish broad themes and aspirations for the plan rather than providing more detailed policy context. Philadelphia uses its three "themes" to group topics in a more cross-cutting and intuitive way, such as combining its transportation and infrastructure topics under the theme of "Connect."[13] Philadelphia's themes also visually organize the plan through a color-coding system that clearly identifies for the reader which theme connects to a specific topic or action. Kaua'i County's four goals are "aspirational in nature" and reflect the county's "desired state by the year 2035" as achieved through policies, objectives, and actions.[14] Charlotte's "guiding principles" are similarly aspirational in character and are intended to help align the plan's vision and specific goals with the way in which the city seeks to grow and change.[15]

Despite their differences, all of these plans use their overarching goals to provide clarity and narrative cohesion to their organizational structures. The District's CP currently lacks a concise set of organizing concepts, and sets forth instead 40 "guiding principles." Though these principles express admirable goals, they are far too numerous and narrow in their scope to effectively align or guide the plan's broad priorities and receive no further discussion later in the plan.[16]

2. Thematic Topics

The second level of the pyramid sets forth broad topics that directly support overarching goals. Echoing the APA's guidance, modern CPs have increasingly moved away from single subject topics, like the 13 carved out in the District's CP (including "Housing," "Transportation," and "Economic Development") to more thematic topics that break down traditional silos and address planning issues using a cross-cutting, holistic approach.

Jurisdiction	Topics
Richmond	High Quality Places Equitable Transportation Diverse Economy Inclusive Housing Thriving Environment
Baltimore	Livable Places

[11] Thrive Montgomery 2050, *see e.g.* p.73 (discussing policies for compact growth).
[12] PlanPHX 2025, p.32, 36-37.
[13] Philadelphia 2035 Citywide Vision, p. 58-59.
[14] Kaua'i County General Plan, p. 24.
[15] Charlotte 2040 – Guiding Principles, p.16.
[16] Current CP (Title 10A DCMR) Framework Element, p. 39-47.

Jurisdiction	Topics
	Equitable Access Healthy Communities Inclusive Economy
Newark	City Of: Prosperity Culture Neighborhoods Families Strength
Montgomery County	Economic Competitiveness Racial Equity and Social Justice Environmental Health and Resilience Compact Growth Complete Communities Design, Arts and Culture Transportation and Communication Networks Housing for All Parks and Recreation
Phoenix	Create a Network of Vibrant Cores Centers and Corridors Connect People and Places Strengthen Our Local Economy Celebrate Our Diverse Communities and Neighborhoods Build the Most Sustainable Desert City
Albuquerque	Strong Neighborhoods Mobility Economic Vitality Equity Sustainability Community Health
Greensboro	Filing in Our Framework Creating Great Places Becoming Car Optional Prioritizing Sustainability Building Community Connections Growing Economic Competitiveness

These broad, thematic categories reflect that planning issues cannot be neatly considered in the context of a singular concern and instead must be understood as part of an interconnected whole. For example, Richmond's "High Quality Places" topic includes a mix of goals and strategies to encourage holistic growth, including support for jobs and housing around identified development "nodes," planning for new public facilities and utilities, historic preservation, increasing neighborhood access and walkability, open space design, and increasing public outreach about planning and zoning actions.[17]

[17] Richmond 300, Chapter 2 – High Quality Places.

Similarly, Baltimore's "Equitable Access" topic addresses access to amenities and resources through recommendations for transportation-oriented development and multi-modal improvements, ensuring food access through stronger urban food systems, ensuring internet access and education, and expanding public open spaces and programing.[18]

Newark's "City of Prosperity" topic takes a cross-cutting approach to economic development, addressing such subjects as supporting local and small businesses as well as sustainable businesses; increasing transportation access; providing housing support for vulnerable residents such as the homeless, seniors, and people with disabilities; connecting residents with jobs and training through local medical and educational institutions; and improving the port and airport.

Albuquerque's plan centers community input through its six "Guiding Principles," which represent the most prominent themes expressed by residents during the engagement stages of drafting the plan.[19] These include strong neighborhoods, mobility, economic vitality, equity, sustainability, and community health. Each of the plan's subsequent elements address how they advance each one of its Guiding Principles.[20] (*Figure 3 – Albuquerque's Guiding Principles*)

Greensboro's "Six Big Ideas" are similarly community-focused and intended to bring the various components and subjects of the plan together in a holistic way that "facilitate[s] action across city departments and the community as a whole."[21] For example, the plan's "Building Community Connections" addresses Greensboro's cultural identity and resources, historic features, and major institutions such as colleges and universities, as well as the needs of its changing demographic composition.[22]

By combining a wide range of subjects under a single topic, these plans address planning issues holistically by recognizing and incorporating related issues, such as the need for robust transportation networks to support businesses and economic development as well as housing. This creative approach results in plans that are more intuitive and reflective of the interconnected modern world than rigorously segmented, older CPs like the District's. The use of thematic topics also creates plans that are clearer and more concise, as the combination of subjects reduces repetition and excess length. This structure also supports more creative and integrated implementation measures such as agency coordination, land use changes, public education campaigns, and financial programs. Such natural synergies reduce implementation costs, allow for closer collaboration with both private and public sector entities, and facilitate adoption of policies and programs that improve multiple aspects of resident wellbeing at once.

3. Policy Objectives

The individual thematic topics typically contain a series of objectives that advance the topic's broad policy goals and form the third level of the pyramid structure. The inclusion of objectives allows the topics to be broad and crosscutting, instead focusing on a specific subject

[18] Baltimore City Comprehensive Plan, p.163.
[19] Albuquerque & Bernalillo County Comprehensive Plan, p. 3-8, 3-9.
[20] Albuquerque & Bernalillo County Comprehensive Plan, p. 4-3.
[21] GSO 2040 – Six Big Ideas.
[22] GSO 2040 – Chapter 8: Building Community Connections.

within the overall thematic framing of the topic. Figure 4 shows the objectives included in Newark's "City of Prosperity" topic with objectives 1.1 and 1.2 excerpted as examples.[23] (*Figure 4 – Newark City of Prosperity Objectives*) Each objective includes a succinct statement of its policy goal, with two or three sentences providing some additional context to support the objective's position and connect it back to the thematic topic. Richmond's plan also clearly connects its objectives (or "Goals") to their respective topics through a brief introduction at the beginning of each goal section of the plan that provides the existing context for the goal and connects it back to the overall vision for the topic.[24] (*Figure 5 – Richmond Objectives*)

In keeping with the APA's recommendations for concision and simplicity, these plans and others typically limit the overall number of objectives to establish and focus on the highest priority goals. For example, Newark's plan includes only 27 objectives, Greensboro has 19, and Richmond has only 17. Even Philadelphia, a significantly larger city with an older plan, has only 72 citywide objectives spread amongst its nine topics. This contrasts sharply with the District's CP that includes 185 citywide objectives within its 13 elements.

4. Implementation Actions

a. Limited Number of Implementation Actions

Mirroring the top layer of overarching goals, the pyramid structure's fourth layer of implementation actions ties together the various components of the plan. Modern CPs have recognized that a key strategy for effective plan implementation is to limit the number of action items. This results in broader actions, with more authority and flexibility for the specific logistics of implementation outsourced to the government agency responsible, increasing the likelihood that the actions will actually be accomplished during the life of the plan. Beyond the logistics of implementation, reducing the number of actions per topic also allows plans to reduce complexity and length. For example, Greensboro's plan only includes two or three actions for each of its 19 objectives.[25] Similarly, Newark's City of Prosperity topic includes a total of seven objectives supported by 25 actions. Philadelphia's 72 objectives are supported by a total of 315 actions in its citywide plan. In contrast, the District includes a whopping 956 policies and 600 actions in its citywide elements alone.

The actions in these more recent plans are both fewer and broader in their direction. Newark's "City of Prosperity" Objective 1.1 "Connect Newarkers with well-paying jobs within the city" includes the following three actions:

1. Work with mid-sized businesses within the city and incentivize them to hire local
2. Introduce young Newarkers to opportunities in the local green economy
3. Add bus routes and other bus treatments to improve how Newarkers move around the city outside of the downtown core

[23] Newark 360, p.111-143.
[24] *See e.g.* Richmond 300 – Chapter 4, Diverse Economy, p.160-161.
[25] GSO 2040 – Six Big Ideas.

Newark's plan provides general guidance for each of these actions but largely leaves the specifics to the assigned agency to determine how best to achieve the plan's goals. Likewise, Nashville's implementation section details longer-term goals and provides broad guidance on community decision making rather than prescribing particular tools for implementation. This ensures that residents have ample opportunities to engage in the city's planning decisions and hold the city accountable for following up on suggestions.[26] This contrasts with the District's current CP which includes multiple policies that attempt to address a myriad of sub-issues within a given topic, for example there are almost 20 different policies and actions within the current CP's Economic Development element that address supporting local businesses to hire District residents, compared to Newark's one.[27]

b. Implementation Actions Are Shared across Objectives

While Newark provides an excellent example of how to clearly connect a limited number of actions to specific objectives, other modern CPs take a more creative approach, viewing actions as measures that can apply across a range of objectives in different topics. This is a radical change from older plans like the District's that viewed actions as hyper-specific and siloed within particular topics and objectives. The use of broader actions supporting multiple objectives advances the modern concept of a CP as a holistic, cross-cutting document. For example, Minneapolis's plan developed a set of 100 "policies" that each support multiple plan goals and topics. (*Figure 6 – Minneapolis Policy List*) As discussed below, Minneapolis's web-based plan format allows for users to sort policies by the goals and topics they relate to and to quickly navigate between the various plan levels. (*Figure 7 – Minneapolis Access to Housing Policy*)

c. Ongoing Reporting of the Status of Implementation Actions

Modern CPs, like Charlotte and Richmond, have also adopted a more proactive approach to CP implementation, often one of the most difficult aspects of a plan, focusing on improving tracking and accountability. Charlotte provides a significant amount of detail about timelines, funding sources, and metrics for evaluation and is developing a digital dashboard for tracking implementation progress across agencies.[28] Centralizing this relevant information for the public both saves time, as such information is otherwise located on multiple agency websites or reports, and helps conceptually link metrics to broader goals.

Similarly, Richmond adopted a system of broader metrics that are not tied to specific plan goals but rather track the city's changes over time. Richmond also identified six "Big Moves," reflecting major initiatives such as a rewrite of the zoning ordinance that would place the city on track to meet the plan's goals. Richmond also imposed an annual reporting requirement to track the status of the identified metrics, the "Big Moves," and the plan's 17 other identified goals.

Kaua'i County's plan sets forth "forward-looking" actions that detail exactly which agencies or parties are responsible for implementation as well as what they must do, at a minimum, to achieve the plan's objectives.[29] The plan presents this information in a clear implementation

[26] NashvilleNext, p. I-4.
[27] Current District Comprehensive Plan, Ch. 7 Economic Development Element, p.53-57.
[28] Charlotte Future 2040 – Implementation Dashboard (Note – there appears to be a coding error on the site).
[29] Kaua'i County General Plan, p. 25-26.

matrix meant to be accessible to the public and responsible to community feedback gathered during the drafting process and beyond. In all the above cases, having clear, publicly accessible reporting and tracking mechanisms allow the public to understand how the plan is impacting the city.

5. Separate Area Planning

Recent CPs have primarily applied their improved organization features to their citywide guidance. Jurisdictions that utilize localized area plans to supplement their broader guidance will typically model these plans on the organizational structure of the jurisdiction-wide plan and seek to clearly connect the two components.

Philadelphia provides one of the clearest models of this approach, dividing the city into 18 separate planning districts. The district plans provide more specific guidance, particularly concerning future land use and zoning changes, and identify specific "Focus Areas" that are specific sites or corridors identified for major change or redevelopment. This is similar in some ways to the District's model of "Area Elements," each focusing on a geographic portion of the city and including more specific guidance, principally focused on the identified "Policy Focus Areas." However, unlike the District, Philadelphia's district plans follow the same organizational structure of the citywide plan and specifically link the localized actions back to related citywide goals and the plan's three overarching themes. This very effectively links the "macro" and "micro" sections of the plan together and reinforces how the district plans advance citywide objectives.

To ensure that the district plans reflected the guidance of the citywide plan, Philadelphia used a staggered plan development and adoption process. The citywide plan was adopted first in 2011, with development and adoption of the district plans occurring over the following five years.[30] This two-step process allowed Philadelphia's citywide plan to focus on "broad, holistic, and visionary" long term guidance, while the district plans focused on more specific, short-term strategies and actions.

6. Simple Future Land Use Map (FLUM) Focused on Zoning

In addition to a simplified organization, some modern CPs have also simplified their land use maps that guide zoning. For example, both Richmond and Charlotte have adopted a system of 10 mostly mixed-use categories, all of which are clearly and specifically defined and include guidance concerning anticipated heights and broad density parameters.[31] Notably, both cities include greater options for mixed-use residential as well as mixed-use industrial categories, thereby expanding the range of anticipated uses in what have traditionally been the most restrictive land use categories.[32] In both cities as well as in Philadelphia and Newark, the FLUM categories more directly correspond to specific zoning districts that provide more detailed guidance about density maximums and allowable uses. (*Figure 8 – Charlotte Place Types & Zones Chart*)

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[30] Philadelphia 2035 – Citywide Vision, p. 172-173.
[31] Richmond 300, Future Land Use (Note: One of Richmond's "Big Move" implementation measures is to revise its zoning ordinance to more closely track the CP's land use map categories, "Big Moves" p.184-186); Charlotte Future 2040 – Complete Communities and Policy Map Manual.
[32] Richmond 300, Future Land Use, p.88-89.

Rather than providing clear direction, the District's method of combining use categories results in conflicting and ambiguous density guidance and confusion. This is a critical concern as the FLUM is the CP component that most directly links the CP to its main implementation and enforcement mechanism—zoning. Other FLUMs, particularly Richmond's and Charlotte's, are significantly simpler compared to the District's, which includes 59 separate categories. Only 13 of the District's categories are defined and only nine provide density guidance. Rather than specifically defined mixed-use categories, the District relies on various combinations of residential and commercial categories. This represents a more traditional approach to land use planning that focuses on separating uses, rather than the modern approach used by these other cities that recognizes the increasing prevalence of mixed-use development. Given this material, "real world" connection, the FLUM is also the component of the CP most likely to be used by the public. Overly complex maps and map categories place residents at a distinct disadvantage in understanding how the maps can impact future land use decisions and patterns in their communities. OAG provides additional suggestions for a revised FLUM in a subsequent section of this paper.

B. Effective Communication

In addition to streamlined organization structures, modern CPs have sought to improve their accessibility and efficacy through their communication mediums. This includes greater incorporation of visual data through charts, tables, and increasingly sophisticated maps. This increased reliance on data has resulted in the growing use of separate appendices to house supplemental data reports and analysis so that they can support the plan without overwhelming it or obscuring its broader objectives. Further, plans are increasingly embracing technological advancements to move away from the limitations of traditional paper-based plans and provide more content through web-based, interactive formats. As discussed below, these components break down traditional barriers to CP use by providing information that is more accessible and understandable to a wider range of users.

1. Use of Charts and Tables to Display Contrasting Data

The best examples of modern CPs have recognized that their audience is primarily consuming information both digitally and visually, as 90% of American adults have smartphones and go online every day.[33] As such, CPs are increasingly visual, moving beyond just photos and small illustrations, to use sophisticated tables and charts that combine multiple data points to present complicated concepts simply and in a more accessible format.[34]

Montgomery County utilizes graphs and charts to effectively support its recommendations on housing and transportation improvements, as well as more abstract concepts such as racial and social equity (*Figure 9 - Montgomery County Housing Prices vs. Incomes*; *Figure 10 – Montgomery County Building permits vs. Population; Figure 11 – Montgomery County Multimodal Trip Length; Figure 12 – Montgomery County Low Income Student Academic Performance*). These charts illustrate how multiple data points can be combined to provide a more

[33] Pew Research Center, "Americans' Use of Mobile Technology and Home Broadband," January 31, 2024, https://www.pewresearch.org/internet/2024/01/31/americans-use-of-mobile-technology-and-home-broadband/ (last consulted on September 19, 2025).
[34] *Thrive Montgomery 2050*, p. 125.

nuanced understanding of key concepts and arguments in a way that is more readily accessible for the average CP user. This contrasts with the District's CP, which tends to only provide simple, single topic charts and graphs accompanied by significant amounts of text written in a technical style, rather than relying on images or jargon-free explanations.

Newark's plan similarly relies on charts and graphs to support its recommendations. These visualizations combine and contrast data points while utilizing a variety of chart types, including line graphs, bar charts, pie charts, and charts overlayed on maps. This not only provides visual interest that captures the reader's attention but also takes advantage of a data set's unique features to choose the most effective means of visualization. (*Figure 13 - Various Newark Charts*) Kaua'i County's plan includes creative graphics detailing the population and housing growth allocations by planning district to express projected housing unit demand for the life of the plan.[35] (*Figure 14 – Kaua'i Growth Data*)

Memphis created a Data Dashboard to accompany its CP to both guide implementation and make progress available to the public. Especially notable are the charts displaying the city's intended future land use mix and its progress in rezoning parcels to come into compliance. Each future land use designation is accompanied by a brief description, so the user does not have to locate the same information in the plan itself.[36] (*Figure 15 - Various Memphis Charts*)

2. Use of Maps to Illustrate Contrasting Data Geospatially

In addition to using charts and graphs, modern CPs have also enhanced their visual content through maps that display multiple data sets geospatially. The increased integration of map applications like Google Maps and Apple Maps into daily life has made people more familiar with how to read and understand maps as well as relate them to their own interests or concerns. Just as CP charts and tables have become more sophisticated in both their appearance and data complexity, GIS map layers now allow for the combination of multiple data layers within a single map. Montgomery County, Newark, Charlotte, and Baltimore all utilize multiple multi-layer maps to present and analyze concepts such as access to opportunities and resources, and environmental burden. [37] (*Figure 16 - Charlotte Access to Housing Opportunity Map; Figure 17 – Montgomery County Median Home Value vs. Transit Map; Figure 18 - Newark Social Vulnerability Map*)

These maps reflect the significant technological advancements that have occurred since the District's last CP rewrite, when mapping technology was significantly more limited. In alignment with the APA's best practices, the maps allow the newer CPs to break down the silos of traditional planning topics by layering and combining data to present information and concepts in a more readily understandable format for the average resident. In doing so, these maps provide a more nuanced, spatial understanding of the issues and trends affecting their jurisdictions. Charlotte utilized the combination of multiple map layers focusing on "equity metrics" like access to transit and other amenities, poverty rate, environmental risk, educational attainment, and race and age, to create a holistic "Vulnerable to Displacement Overlay."[38] Charlotte then used this overlay (as well

[35] Kaua'i County General Plan p. 27.
[36] Memphis3.0 – Data Dashboard.
[37] *Thrive Montgomery 2050*, p. 129.
[38] Charlotte 2040 – Equitable Growth Framework Manual.

as the supporting data maps and equity metrics) to inform the development of the plan's goals and recommendations, to identify priorities for future area planning efforts, and to serve as a metric for tracking the plan's progress. (*Figure 19 - Charlotte Vulnerability to Displacement Map*)

3. Use of Multiple Charts and Maps to Illustrate and Support Analysis

Some CPs, notably Newark, Albuquerque, Kaua'i County, and Chicago, take their visual content a step further by incorporating multiple charts, graphs, and maps onto a single page to illustrate various facets of a single topic. These plans rely on the visuals to "tell the story," making the plan's point without significant amounts of explanatory and jargon-heavy text. Both Chicago and Newark utilize full pages of multiple graphs and tables to establish context on issues like housing availability and cost burden and poverty. This allows the plans to succinctly lay the groundwork for their ensuing recommendations on these topics in a way that is impactful for readers. Albuquerque also uses multiple graphics to express discrepancies between the county's current housing mix and desired future mix based on community input in paired ring graphs, the findings of which are discussed in further detail in the accompanying text.[39] (*Figure 20 - Chicago Housing Data Page; Figure 21 - Newark Poverty Data Page; Figure 22 - Albuquerque Housing Data*)

This strategy is a more modern means of conveying information, influenced by the heavy reliance on visuals by websites and social media platforms. This reliance and trust that they will be readily understandable to the public also helps to simplify and streamline the overall plan. By comparison, in the District's CP, charts, graphs, and maps are often accompanied by significant amounts of explanatory text that repeat the same information conveyed by the visual. Furthermore, the use of technical language with limited definition or discussion poses a barrier for readers that are not experts in the subject, thus obscuring the information's significance to most residents. This is ultimately a reflection of the plan's age, having been developed when there was more limited capacity for including visuals in CPs, and more importantly based on an audience that was not as accustomed to getting information through purely visual mediums.

4. Move Supplemental Information to Appendices or Supporting Documents

Increasingly, contemporary CPs have reduced their overall length and improved their organizational clarity by moving secondary information to appendices or relying on separate reports. For example, Newark's appendices provide summaries of its community engagement process, its community survey engagement report, a vulnerability assessment, and more detailed information on land use patterns and zoning policies.[40] Philadelphia provides a series of appendices for each of its 18 planning districts including a detailed zoning appendix, technical memos, and public outreach information and responses (*Figure 23 - Philadelphia 20235 Central District Plan Home Page*).[41] Minneapolis provides separate hyperlinked appendices for 10 separate topics including housing, transportation, and land use that include data, charts, and maps.[42] Montgomery County provides a dedicated webpage with links to various supporting

[39] Albuquerque & Bernalillo County Comprehensive Plan, p. 2-10.
[40] Newark 360 Appendices I-V.
[41] Philadelphia 2035 Planning District Plans, *see, e.g.*, Central District.
[42] Minneapolis 2040 – Appendices.

documents including research papers, outreach materials, draft plans, and related studies.[43] Kaua'i County provides a similar supplemental package in PDF form while specifying that the documents are not controlling and are meant only as a courtesy guide to provide context for the plan.[44] Richmond provides hyperlinks on its CP website to several supporting reports including an "Insights Report" that provides a summary of data and trends that serve as background for the plan, two reports prepared by the Center for Urban and Regional Analysis at Virginia Commonwealth University analyzing census data and historic trends, and parking and circulation studies.[45]

The use of appendices clarifies the plan by reducing the total length and maintaining the focus on the plan's key priorities and guidance. As Richmond's website notes, the background information provided in the reports and appendices may only be of interest to individuals seeking a more in-depth understanding of the plan. Further, use of appendices allows the information to be updated regularly, outside of any statutory CP amendment cycle. This is especially critical for demographic and economic data, which can change significantly during the time between cycles. By contrast, the District CP's priorities are often obscured by the sheer amount of information that the plan contains, much of which has become outdated over the lifespan of the plan. As discussed further below, this growing use of appendices is supported by increasingly web-based CP formats that allow residents to quickly and easily access supplemental information through navigation menus and hyperlinks.

5. Web-Based Display with PDF Option

One of the most important developments for CPs is the growing use of web-based formats. Websites facilitate a more intuitive format and a more accessible, user-driven experience than the traditional, static PDF format like that used by the District. Further, by including additional web accessibility features such as language translation and audio capabilities, websites provide more inclusionary access than traditional printed plans. Charlotte, Minneapolis, and Greensboro utilize websites as their primary plan format, while also offering a PDF version.

Each plan's website includes a mix of common features along with unique components showcasing the plan's organization. Charlotte's webpage employs a clear navigation system consisting of two menu bars at the top of the page.[46] The topmost includes links to secondary information such as Charlotte's zoning ordinance, public comments received on the plan, and the PDF version of the plan. Below that, another menu bar breaks down the three main components of the plan—the actual plan policy document, the implementation strategy, and the supporting manuals and metrics. The pages for all three of these components include a table of contents menu on the left-hand side that allows users to expand and contract subparts of the plan to navigate to the specific section of interest. Charlotte continues the use of accordion menus within the body of the plan itself, allowing users to expand and contract sections to simplify navigation and allow users to focus on specific objectives or policies without visual clutter. Additionally, Charlotte's Community Area Plan webpages allow residents to comment on the pages of the plans themselves,

[43] Thrive Montgomery 2050 – Resources.
[44] Kaua'i County General Plan – Appendices.
[45] Richmond 300 – Supporting Reports.
[46] Charlotte Future 2040

opening an interactive forum for community engagement. (*Figure 24 - Charlotte 10 Minute Neighborhood Page*)

Greensboro utilizes several web-specific tools to present its CP and supporting information. Like Charlotte, its website uses a hyperlinked menu bar for navigation, with individual pages including links to topic subsections, as well as to external information such as related ordinances, city agencies, and news stories.[47] Greensboro also provides the option to view the plan using the enCodePlus platform that the District currently uses for its unofficial zoning regulations.[48] (*Figure 25 - Greensboro enCodePlus*). This platform allows for easy navigation to specific sections of the plan via an accordion menu on the left-hand side of the page. The plan text also includes hyperlinks to external sources such as supplemental reports and data analysis. (*Figure 26 - Greensboro Supplemental Information*) Some of these reports are available in an online "e-reader" format that allows users to jump between different sections while still viewing the report like a more traditional document.[49] (*Figure 27 - Greensboro Data Report E-reader*) Greensboro's multiplicity of formats does potentially add confusion for users but it illustrates the various platforms that can be used for a CP website.

Minneapolis uses a relatively simple online CP format with a navigation bar on the left-hand side that allows users to navigate to the main plan components such as the goals, policies, and implementation section.[50] Within each section, the site makes extensive use of hyperlinks to connect the various sections of the plan, for example linking from individual goal or topic pages to their supporting policies and providing links from policy pages to all of the goals and topics that specific policy supports. Minneapolis also relies heavily on hyperlinks on its implementation page to link users to related information otherwise not included in the plan such as regional planning documents, city budget documents, and specific ordinances. Similar to both Charlotte and Greensboro, Minneapolis's format allows users to quickly navigate to specific parts of the plan while still providing a sense of the overall context through the various navigation menus. This contrasts with traditional paper-based plans like the District's, which even when available online, require multi-step navigation to the plan components without providing simultaneous references to the other sections of the plan.

While Charlotte, Greensboro and Minneapolis feature especially strong web-based plans, other jurisdictions are increasingly moving to a hybrid model that combines the traditional PDF format with newer technological features. For example, Albuquerque uses a PDF format, but its online e-reader includes hyperlinks to different sections of the document as well as a drop-down navigation menu allowing users to easily navigate and search within the document.[51] (*Figure 28 - Albuquerque CP Interactive PDF viewer*) Montgomery County and Richmond rely on PDFs but their websites provide clear navigation menus to locate individual plan sections, highlight key plan actions and goals, and provide links to supporting resources.[52] (*Figure 29 – Thrive Montgomery 2050 Website*) While Memphis also relies on a PDF format, its website includes helpful

[47] GSO 2040 – Website
[48] GSO 2040 – enCodePlus
[49] GSO 2040 – Data Book
[50] Minneapolis 2040
[51] Memphis3.0 – Website.
[52] Thrive Montgomery 2050 - Website; Richmond 300 - Website

information, tools, and links for residents to supplement their reading experience. Such features include an interactive map of the city's Planning Districts, a list of FAQs about the purposes of CPs generally as well as what is included in the Memphis CP, and a dashboard providing up-to-date datasets referenced in the plan itself.

PART II: OAG RECOMMENDATIONS FOR NEW CP FORMAT FOR DISTRICTWIDE ELEMENTS

Based on this research into comprehensive plans of other jurisdictions, together with its experience with the District's land use process, OAG recommends that OP simplify the Districtwide portion of the CP to make it more accessible and predictable to District residents and property owners.

A. Adopt a Simple Interlinked Organization

OAG recommends that the new CP adopt a simple pyramidal structure of four interconnected levels of planning analysis for the Districtwide portion of the CP:

3 Overarching Goals to provide an overall strategy;
↳ **5 Thematic Topics**[53] to focus on specific subject areas;
↳ **31 Policy Objectives** of targeted aims within the five Thematic Topics; and
↳ **128 Implementation Actions** to achieve the Policy Objectives.

This proposed concise organization reflects the best standards of other jurisdictions' CPs such as *Thrive Montgomery 2050*. Focusing on a limited number of provisions at each level will clarify the CP's Districtwide priorities and avoid potential redundancies and ambiguities created by numerous overlapping provisions. This clear structure, with cross-referencing levels, will enable residents to easily understand the organization and intent of the Districtwide portion of the CP. Focusing the CP at a higher, strategic level, instead of expanding the focus to address minute details that are likely to become outdated in a rapidly changing world, will enable the CP to provide clear guidance while providing flexibility to District agencies for implementation. Limiting the supporting text for each of these provisions to a concise statement will further increase the accessibility and effectiveness of the CP by giving District residents and agencies a smaller number of provisions to understand and balance.

This focused new CP would dramatically simplify the current CP's Districtwide Element, with its 956 Policies and 600 Actions scattered across 13 thematic Elements, in addition to the standalone 40 Guiding Principles. This surfeit of directives creates confusion and ambiguity in the zoning regulatory process to which the CP is legally applicable.[54]

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[53] OAG believes that "Thematic Topics," based on the term used by Minneapolis' CP, better describes the role of this second level of planning analysis than the current CP's "Elements." Similarly, OAG believes that "Policy Objectives" for the third level of planning analysis emphasizes the goal-oriented nature of these provisions than the current CP's "Policies."

[54] Although Tax Increment Financing (TIF) legislation requires that the Office of the Chief Financial Officer (OCFO) determines that the TIF project is "consistent with the Comprehensive Plan" (DC Code § 2-1217.03), this has not been a subject in the OCFO reports for the past three TIF laws (*see* B23-0351, Reunion Square Tax Increment Financing

The Zoning Act requires that "*[z]oning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital.*"[55] In considering challenges to orders issued by the Zoning Commission based on alleged inconsistencies with the CP, the DC Court of Appeals (DCCA) has interpreted this requirement to require the Zoning Commission to review zoning applications for CP consistency as follows:

> *The Comprehensive Plan is a broad framework intended to guide the future land use planning decisions for the District. Even if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole. The Comprehensive Plan reflects numerous occasionally competing policies and goals, and, except where specifically provided, the Plan is not binding. Thus, the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole. If the Commission approves a PUD that is inconsistent with one or more policies reflected in the Comprehensive Plan, the Commission must recognize these policies and explain why they are outweighed by other, competing considerations.*[56]

This task of balancing potentially competing or conflicting CP provisions is manageable if the number of CP provisions is limited. However, the excess of 1,500 Districtwide policies and actions of the current CP create an almost endless number of potential conflicts that applicants, OP, and the Zoning Commission must consider and balance when reviewing a zoning application. This has led to numerous appeals to the DCCA based on allegations that the Zoning Commission failed to identify every potential conflict with a CP provision or inadequately justified ignoring a CP provision that potentially conflicts with the zoning application. The DCCA has upheld most of the Zoning Commission's orders. Even so, an appeal to and remand from DCCA adds significant time and cost to the zoning process. This has caused the downsizing of projects to fit within matter-of-right zoning requirements as well as increasing the cost of new housing units.

The confusion and ambiguity created by the excessive number of CP provisions leads to a trust deficit for many District residents who are not land use professionals and who find the CP's breadth and lack of prioritization difficult to navigate at best and incomprehensible at worst.

OAG's proposed streamlined structure, based on the best practices of other CPs, would clarify the District's strategic land use goals by eliminating less important provisions that distract from priorities. As a result, the new CP would clearly communicate to District residents and property owners the choices to be made by the Zoning Commission when reviewing a specific application. OAG believes that this would increase confidence in the zoning process and lead to fewer appeals.

Act of 2019; B21-0906, Bryant Street Tax Increment Financing Act of 2016; B22-0382, Union Market Tax Increment Financing Act of 2017). Indeed, this requirement was not raised by Councilmember Silverman when opposing the Union Market TIF as subsidizing excess parking despite multiple CP provisions supporting her position.

[55] DC Code § 6-641.02.

[56] *Friends of McMillan Park v. District of Columbia Zoning Comm'n*, 149 A.3d 1027, 1035 (D.C. 2016) (internal quotations and citations omitted).

1. Level 1: Establish Three Overarching Goals for the CP

OAG recommends that the new CP adopt three broad goals to focus and establish priorities based on a common vision of the District's future. As discussed above, many jurisdictions place overarching goals at the top of a pyramidal CP structure to guide the various policy objectives and implementing actions of their respective plans to ensure that they realize their plan's overall vision. OAG proposes the following goals that address vital aspects of the District's future:

- **Prosperity** ensures that the District remains economically vibrant and financially stable;
- **Sustainability** ensures the protection of the environment and public health; and
- **Equity** ensures that all District residents share in the District's growth and enjoy access to its resources and opportunities.

These goals would consolidate the current CP's 40 "Guiding Principles" into a strategic template that would be interconnected with the CP's other levels to focus and guide individual CP Policy Objectives and Implementation Actions. [57] Each Policy Objective and Implementation Action would identify which of the Overarching Goals it advances, linking the broad strategy to the detailed implementation of the CP.

For each of these overarching goals, the CP should include a concise analysis of the District's current progress toward achieving the goal and how the CP will seek to address challenges to achieve the goal (approximately two pages for each goal), similar to *Thrive Montgomery 2050*. For example, the **Prosperity** Goal could include a brief explanation of the District's current economic outlook, including the challenges to its workforce caused by changing Federal work policies and the expansion of teleworking options, as well as retail leakage to web-shopping and surrounding jurisdictions. The remainder of the Prosperity discussion would identify the strategic steps the CP would take to address these challenges. For all of OAG's suggested objectives and actions by goal, see Appendix B.

2. Level 2: Analyze the District through Five Cross-Cutting Thematic Topics

As the second level analysis, OAG recommends that the new CP focus on five broad Thematic Topics:

- **Housing & Community**: Develop and grow the District's communities in a holistic manner that provides high-quality and accessible housing, amenities, and opportunities to all residents.[58] [*Prosperity, Sustainability, Equity*]

[57] Current Framework Element, §§ 218-223. The 40 Guiding Principles are grouped into five sections: *Managing Growth and Change; Creating Successful Neighborhoods; Increasing Access to Education and Employment; Connecting the City;* and *Building Green and Health Neighborhoods*.
[58] Current Housing, Urban Design, and Community Services & Facilities Elements.

- **Connectivity & Networks**: Connect District residents and visitors to resources and opportunities through efficient and sustainable transportation, utility, and communications networks.[59] [*Prosperity, Sustainability*]

- **Economic Vitality**: Recognize the District's existing economic bases of tourism, culture, education, and government, while ensuring that its economy remains dynamic and provides diverse and innovative economic opportunities for its residents and businesses.[60] [*Prosperity; Equity*]

- **Environment & Public Health**: Provide a resilient, sustainable, and healthy environment for all District residents.[61] [*Sustainability, Equity*]

- **Land Use**: Ensure the District's land use patterns and policies support the vision of the District as an equitable, sustainable, and prosperous city for all of its residents, businesses, institutions, and visitors.[62] [*Prosperity, Sustainability, Equity*]

Focusing on a few cross-cutting citywide topics will clarify the new CP's priorities. The integrated and holistic approach of these Topics will enable the new CP to address synergies across typical governmental agency silos and flexibly respond to the exponential rate of social and technological change expected over the plan's lifespan to 2050. These Topics will link the first and third analysis levels by identifying the specific Overarching Goals each Topic will advance as well as the narrower Policy Objectives falling within the Topic's scope.

OAG's proposal significantly streamlines the current CP by consolidating the current 13 Districtwide Elements into five broader Topics. This simpler structure will help pare down the almost 800 pages in the current CP's Districtwide Elements and eliminate many of the redundancies generated by the current CP's sprawling scale.

3. Level 3: Limited Policy Objectives for each Thematic Topic

Within each Topic, OAG recommends that the new CP use a limited number of Policy Objectives to accomplish the applicable Overarching Goals. Ideally, the number of Policy Objectives should be less than 10 per Thematic Topic to ensure a clear statement of priorities, although the number may vary. As an illustration, OAG's proposed Policy Objectives for the **Connectivity & Networks** Topic are as follows:

CN-1 Ensure that the public transit network serves all residents and communities equitably by supplementing WMATA service. [*Prosperity, Equity*]

CN-2 Focus new density along transit corridors and around Metro stations to increase the percentage of households and jobs within ¼ mi. of transit. [*Prosperity*]

[59] Current Transportation and Infrastructure Elements.
[60] Current Economic Development, Arts & Culture, Historic Preservation, and Educational Facilities Elements.
[61] Current Environmental Protection, Parks Recreation & Open Space, and Community Services & Facilities Elements.
[62] Current Land Use and Framework Elements.

CN-3 Ensure that transit stations and stops along transit corridors have adequate facilities for bikes and scooters. [*Prosperity, Sustainability, Equity*]

CN-4 Ensure that the street and alley network is efficient and safe for all users and residents. [*Prosperity, Sustainability*]

CN-5 Improve the District transportation and communication system's ability to serve residents during emergencies (i.e., climate, public health, security). [*Sustainability*]

CN-6 Ensure that all District residents and businesses have affordable and reliable access to internet.[63] [*Prosperity, Equity*]

CN-7 Ensure that District energy networks are resilient against climate change and other disasters.[64] [*Sustainability*]

CN-8 Develop a resilient network of water and sanitation related green infrastructure. [*Sustainability*]

The remainder of OAG's proposed Policy Objectives are in Appendix B.

This format would radically slim down the current CP's approximately 75 Policies per Districtwide Element and provide a clear, organized framework that is easily comprehensible by all residents and not just land use professionals. This more focused approach will reduce repetition and the resulting risk of inconsistent guidance between elements.

4. Level 4: Assign Actions to Implement Objectives

A series of specific, discrete Actions will implement each Policy Objective, with each Action linked to the applicable strategic Goals. As with the other levels, OAG believes it is critical that the number of Actions be limited to ensure that the new CP clearly articulates its priorities. This focused number of citywide actions reflects the practices of other jurisdictions such as Minneapolis.[65] Here is an example of the Implementing Actions OAG recommends assigning to one of the proposed Policy Objectives in the **Environment & Public Health** Topic:

EPH-3 Address the underlying causes of public health concerns [*Equity, Sustainability*]

A. Develop a map to identify areas of the District that are overburdened by public health and environmental issues, factoring in the presence of industrial uses

[63] Consolidating current IN-4 (*Digital Infrastructure*).
[64] Consolidating current IN-5 (*Energy Infrastructure*) and IN-7 (*Infrastructure Resilience*).
[65] Minneapolis 2040 – www.minneapolis2040.com (last accessed July 24, 2025).

and pollution sources, urban heat islands, proximity to parks and open space, asthma rates, etc.[66] [*Equity, Sustainability*]

B. Develop a map showing locations of all grocery stores, farmers markets, and community gardens or urban farms in the District to inform further planning.[67] [*Equity, Sustainability*]

C. Prioritize the development of healthy food options in food deserts.[68] [*Equity, Sustainability*]

D. Assess the condition of neighborhood recreation facilities and prioritize upgrades in areas with the lowest public health scores.[69] [*Equity, Sustainability*]

E. Expand health education programming in underserved areas.[70] [*Equity, Sustainability*]

F. Increase the number of mental and behavioral health support facilities.[71] [*Equity*]

Together with the reductions proposed by OAG for the other analysis levels, this streamlining should reduce the total number of Districtwide Actions to a little over 100. This is far more manageable to implement than the current 600, especially given that the Planning Area section of the CP has additional actions. Moreover, a limited number of actions more clearly articulates the CP's priorities to residents and property owners. A list of OAG's proposed Districtwide Actions, sorted by Topic, are in Appendix B.

B. Focus the Land Use Thematic Topic on Guidance for Zoning

OAG recommends that the Land Use Topic be refined to focus on guidance for zoning based around the Future Land Use Map (FLUM), which is exclusively used to guide the Zoning

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[66] Consolidating current E-1.1.A (*Update Regulations for Resilience*), E-1.1.G (*Design Guidelines for Resilience*), E-3.2.4 (*Energy Availability*), E-3.2.5 (*Reducing Home Heating and Cooling Costs*), E-3.2.J (*Neighborhood-Scale Energy*), E-6.7.1 (*Addressing Environmental Injustice*), E-6.7.2 (*Expanded Outreach to Underserved Communities*), E-6.7.3 (*Capital Facilities*), E-6.7.4 (*Health Impacts of Municipal and Industrial Uses*), E-6.7.A (*Clean and Reuse Contaminated Properties*), and E-6.7.B (*Environmental Health Threats in Affordable Housing*).

[67] Consolidating current E-4.3.A (*Community Gardens and Urban Farms in Wards 7 and 8*), ED-2.2.6 (*Grocery Stores and Supermarkets*), and CSF-1.1.11 (*Developing a Food Systems Network*).

[68] Consolidating current E-4.3 (*Enhancing Urban Food Production and Community Gardening*), ED-2.2.6 (*Grocery Stores and Supermarkets*), CSF-1.1.E (*Opportunities to Promote Local Food Businesses*), and CSF-2.1.F (*Advancing Grocery Store Access in Underserved Areas*).

[69] Consolidating current E-7.2.C (*Sustainability in Schools, Recreation Centers, and Libraries*), PROS-2.1 (*Assessing Recreational Facilities*), PROS-2.2.D (*Data Tracking*), and PROS-2.2.I (*Performance Monitoring*).

[70] Consolidating current PROS-1.3.7 (*Health and Wellness*), PROS-2.2.3 (*Program Diversity*), PROS-2.2.4 (*Data-Driven Programming*), PROS-2.2.5 (*Youth Recreational Services*), PROS-2.2.H (*Hospital and Clinic Partnerships*), and CSF-2.1.E (*Built Environment and Health Outcomes*).

[71] Consolidating current CSF-2.2.1 (*Behavioral Health and Resilience*) and CSF-2.3.5 (*Development and Coordination of Behavioral Health Issues and Substance Abuse Treatment Facilities*).

Commission and no other District agency. As the only regulatory process affirmatively required to not be inconsistent with the CP, zoning requires clear guidance from the CP to avoid legal ambiguity that fosters residents' distrust and legal challenges. These obstacles add cost and delays to the zoning process, preventing the housing and growth vital for the District's prosperity and the welfare of all residents.

C. Adopt a Simplified FLUM

As previously discussed, OAG recommends simplifying the FLUM, as part of the District-Wide Element, in line with the best practices of other jurisdictions' CPs. This section further identifies and suggests adoption of these best practices, including maps with a limited number of categories, more detailed guidance about density transitions and specific uses, and separate chapters focused on localized planning with more geographically specific information (similar to the District's planning areas).

As detailed below, OAG proposes a significant reduction in the number of FLUM categories from 59 to nine. These categories would all permit a mix of uses and would be based on clear density bands. More detailed information about density transitions, and integration of specific uses such as low-intensity industrial, would be handled in the individual Ward Element Planning Focus Areas (Ward PFAs), which would replace the policies in the current CP's Area Elements, as discussed in Part III below. This would effectively streamline the Area Element of the CP .

In spring 2026, OP published a draft version of a new FLUM. It features 10 map designations, called Place Types. Each Place Type encompasses an area's use, building form, street connectivity, and public spaces.[72] As this section explains, OAG agrees with OP's effort to reduce the number of FLUM categories and move toward accommodating more mixed uses throughout the District. At the same time, OAG emphasizes the importance of specifying density ranges for each FLUM designation in order to eliminate ambiguity and avert legal challenges down the road. Even so, OAG's proposals for the FLUM are largely compatible with OP's draft; they simply provide additional suggestions for enhancing the draft and advancing the policy goals it reflects.

1. Simplify and Clarify the FLUM Based on Clear Density Bands to Guide Zoning

OAG recommends that OP revise the FLUM based on a single, continuous scale of density and use intensity to simplify and clarify the CP's zoning guidance. OAG recommends the following system of nine mixed-use categories based on progressive and clearly defined density bands:

[72] DC 2050 - https://dc2050.dc.gov/pages/draft-future-land-use-map (last accessed April 1, 2026).

PERMITTED DENSITY (by Floor Area Ratio/FAR)								
up to 0.5 FAR	**0.6-0.99 FAR**	**1.0-1.99 FAR**	**2.0-2.99 FAR**	**3.0-3.99 FAR**	**4.0-4.99 FAR**	**5.0-5.99 FAR**	**6.0-8.99 FAR**	**9.0+ FAR**
Simplified Names								
Lowest Intensity Mixed Use	Very Low Intensity Mixed Use	Low Intensity Mixed Use	Limited Medium Intensity Mixed Use	Medium Intensity Mixed Use	Enhanced Medium Intensity Mixed Use	High Intensity Mixed Use	Very High Intensity Mixed Use	Highest Intensity Mixed Use

This scale accounts for the full range of density currently permitted by the zoning regulations. As seen in Appendix C, when fully mapped, it functions effectively as a density heatmap, providing a clear visual representation of where density is concentrated and making it more readily understandable to residents and businesses.[73] A graduated schematic like the one OAG proposes here is compatible with OP's Place Types model as it provides additional detail relating to density while retaining the core functions of the proposed Place Types.

The adoption of a universally applied density scale will remove the current redundancy of multiple FLUM categories that prescribe the same maximum densities. For example, the proposed Enhanced Medium Intensity category incorporates the 16 separate, current FLUM categories that permit up to 4.0 FAR. This approach will also make it easier for the Zoning Commission to determine zones appropriate to each category, as the sole consideration would be whether a zone's maximum density falls within a category's prescribed range. Changing to density-based categories from the current system of FLUM categories based on use type (residential and commercial) would provide additional simplicity and clarity by focusing on the overall intensity of use rather than on use categories that are not clearly defined and create confusion when combined. The utilization of mixed-use categories recognizes the reality that the modern world is a mixed-use world; a fact reflected in the zoning regulations that already permit a mix of uses in all zones, including the lowest-density residential zones. In fact, at least two CPs, Richmond and Charlotte, currently employ similar categories. OAG believes that these changes will radically clarify the FLUM's guidance, making it easier for the Zoning Commission and public to use, and reduce the confusion and legal ambiguities that have resulted from the current FLUM.

2. *Recategorize FLUM Categories that Do Not Provide Zoning Guidance*

OAG recommends that OP recategorize the three existing FLUM categories that do not provide zoning guidance to further simplify the FLUM and enable it to provide uniform guidance for all properties subject to zoning. Currently, the Institutional, Local Public Facilities, and Parks, Recreation and Open Space categories do not provide any density or zoning guidance, even though the properties within these designations are subject to zoning. To remove the ambiguity that results

[73] *See* Appendix C – OAG Proposed FLUM

when these properties become subject to zoning actions, these properties should receive a FLUM category that provides density guidance. Further, Federal Properties, including some Federal parkland currently designated as Parks, Recreation and Open Space (i.e. District-controlled), should be removed or shown as white areas on the FLUM. This would track the way Federal properties are shown on the District's zoning map and would clarify that they are not subject to District control.

3. Integrate Production, Distribution and Repair Categories Using the Proposed Density Categories

OAG recommends that areas currently classified as Production, Distribution, and Repair (PDR) be reclassified using the revised FLUM categories. The current PDR category reflects the historic planning and zoning practice of physically separating PDR or industrial uses from other uses to mitigate their impacts. With the overall reduction of traditional industrial uses, as well as changes in technology that mitigate the impacts of such uses, this need for separation is less of a concern today. In fact, the current CP calls for the retention of PDR uses and incorporation with lower intensity uses, including residential, as seen through the many PDR combination categories on the FLUM.[74] However, these CP policies conflict with the current zoning regulations that do not permit residential uses in PDR zones.[75] By focusing purely on density and use intensity rather than prescribing specific uses, the FLUM would provide a clearer and more flexible framework for mixed-use development.

Additionally, several areas categorized as PDR on the current FLUM correspond to fixed transportation infrastructure such as highways, rail lines, and above-ground Metro Rail. Many of these areas are public rights of way or are Federally owned and therefore not subject to District zoning law. Recognizing that these areas are unlikely to change or be redeveloped, OAG recommends that they be recategorized as "Fixed Heavy Transportation Infrastructure" and shown as dark gray on the FLUM, indicating that they are not developable space.

Reclassifying areas currently classified as PDR using the revised mixed-use, density-based FLUM categories would encourage a wider mix of uses in these areas, including residential co-located with light industrial/manufacturing and commercial. This move toward mixed-use industrial zoning recognizes advancements in technology that reduce industrial impacts, as well as the transition from traditional heavy industry to less impactful uses including light manufacturing, artisan or "maker" uses, specialty food and beverage production, warehousing, and distribution centers.[76] These lighter "industrial" uses not only have fewer external impacts but also benefit from proximity to residential and commercial development. OAG notes that fully addressing the future of PDR uses will also require incorporation of more specific PDR policy guidance into the proposed Districtwide Economic Vitality Element as well as in the area elements with a high level of PDR uses and zoning. Additionally, changes to the PDR zoning regulations would be needed to bring the guidance of the FLUM and other CP elements to fruition.

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[74] Current Comprehensive Plan Framework Element § 225.4.
[75] Zoning Regulations, Title 11 DCMR Subtitle U, Chapter 8.
[76] Strungys, Arista, "Industrial Evolution", *American Planning Association, Zoning Practice June 2020* (Issue No.6) – Practice Industrial Zoning, at p.3-5.

Several other cities have adopted industrial mixed-use zones, including Denver, Providence, Rockville, and Tacoma.[77] OP also advanced this mixed-use model in its October 2024 Production, Distribution, and Repair Land Use Report (PDR Report),[78] which called for adopting a mix of exclusively PDR zones to account for sites that currently include intensive industrial/infrastructure uses and mixed-use industrial (including residential) for other areas.[79] This model would retain some of the District's traditional industrial land, predominantly used as infrastructure support by District government and utility companies, while expanding the range of uses permitted on some of the District's most critical, transit-adjacent sites.

OAG believes that its FLUM recommendations are supportive of the PDR Report's proposal by providing greater flexibility for potential zones in these anticipated mixed-use areas. Site-specific recommendations for zoning or mitigations could be subsequently addressed in detail in the Ward PFAs. Ward 5, which contains the majority of industrial land, is illustrative of how this system would function. For example, one of the objectives for the Ft. Totten Metro Station Area PFA specifically concerns the retention of the existing industrially zoned trash transfer station to the south of the station area.[80]

4. OAG's Suggestions Are Compatible with OP's Proposed FLUM Changes

OP has announced its plan to adopt a "Place Type" model for the new FLUM. This model has been adopted by other jurisdictions, notably Charlotte and Richmond, and provides greater detail for the FLUM categories, including "policy guidance for a range of topics including use, building form, street connectivity, and public spaces".[81] OP is also proposing to significantly reduce the number of FLUM categories down to nine, principally by consolidating the 55 existing mixed-use categories down into three "Center" types. The proposed FLUM categories would include:

Residential Place Types	Center Place Types	Special Use Place Types
Small-Scale (Low Density) Moderate-Scale (Moderate Density) Medium-Scale (Medium Density Large-Scale (High Density)	Neighborhood Center (Low & Moderate Density) Urban Center (Medium Density) Regional Center (High Density)	Industrial Institutional

OAG fully agrees with OP's proposal for simplifying the FLUM and providing clearer land use guidance to residents and property owners. OP's proposed categories not only radically reduce the number of FLUM categories but also merge them with the Generalized Policy Map's guidance concerning planning centers. OAG's suggestions for a simplified FLUM based on density bands are simply an extension of OP's proposal. OAG maintains that given the fundamentally mixed-use nature of the urban environment, it makes sense to move away from a system that separates

[77] *Id*. at p.2.
[78] DC Office of Planning Production, Distribution and Repair Land Use Report at p. 24-25 (October 2024).
[79] *Id*.
[80] Current UN 2.7.3 Municipal/Industrial Uses (OAG Proposed Objective 5.1.2).
[81] DC 2050 – Place Types: A new Approach (last accessed January 20, 2026). *See also*, Charlotte Future – Complete Communities (last accessed January 29, 2026), and Richmond 300 – Future Land Use (last accessed January 29, 2026).

residential uses from all others and rather focus on the scale and intensity of uses. This total mixed-use system is also compatible with the place type model as can be seen in other CPs, notably Richmond's, whose land use categories are almost all mixed-use.[82]

D. Effective Communication

To effectively communicate its arguments and recommendations, the new CP should incorporate the best practices from other recent CPs by using visuals to convey data, as well as a streamlined, easily navigable, web-based format that complements the suggested organizational changes and allows average residents to use and interact with it in more meaningful ways.

1. Use of Charts and Tables to Display Contrasting Data

The new CP should make extensive use of visuals to present data and explain its recommendations. In the current age of smartphones and social media, people are communicating predominantly through visual mediums as opposed to written text. It will not be sufficient for the CP to merely include photographs and the occasional simple graph. Instead, the CP should use a variety of graphics and interactive features to display information. More sophisticated use of graphics will not only help to hold readers' attention but will also make the information more approachable and accessible to a wider range of residents of various ages, interests, and education levels.

As seen in Section I.B.1, both Montgomery County and Newark provide striking examples of how data tables, charts, and graphs can be used to effectively present information in dynamic and engaging ways. The new CP should follow Newark's example of extensive use of tables and graphs to illustrate current trends and issues and establish the foundation for its recommendations. (*Figure 13 – Various Newark Charts*) Like Newark's, the District's CP should pay particular attention to how various graph and chart types convey information in different ways and seek to use those that are most effective for the subject data while still being creative and providing visual interest.

The District's plan should also follow Montgomery County's example of using graphs to combine and contrast data in novel ways. Use of multi-factor graphs like Montgomery County's Low Income Student Academic Performance graph would allow the CP to provide insight into how multiple variables interact and provide a more nuanced picture of complicated issues and trends. (*Figure 12 - Montgomery County Low Income Student Academic Performance*) Even for simpler data sets, like Montgomery County's trip length by transportation method, the CP should utilize graphs to effectively highlight specific nuances like the overlap between the lengths of bicycle and car trips. (*Figure 11 - Montgomery County Multimodal Trip Length*) Such methods are effective for both capturing information at a static point in time and allowing comparison to other time periods as appropriate. Using graphs more extensively and creatively will add greater nuance to the CP's arguments while also improving its accessibility to the average resident.

[82] Richmond 300 – Future Land Use (last accessed January 29, 2026).

2. Use of Maps to Illustrate Contrasting Data Geospatially

Along with greater use of charts and graphs, the new CP should also make extensive use of maps, particularly multi-layer data maps, to illustrate information and support the plan's guidance. Just as smartphones and social media have changed the public's relationship to visual information, the growing use of digital maps has also made people more familiar with maps as a vehicle for information. The fact that the CPs is a *land use* plan that guides the spatial development of the District emphasizes the need to present data geospatially.

The District should follow the lead of other cities like Newark, Baltimore, and particularly Charlotte, which have made extensive use of multi-layer maps in their CPs. This would allow the plan to spatially compare factors like Montgomery County's map showing median home values vis-à-vis transit lines. (*Figure 17 – Montgomery County Median Home Value vs. Transit Map*) Even more importantly, multiple GIS layers could be combined to produce maps showing the interaction of multiple variables such as income, access to transportation, and proximity to amenities such as green space, grocery stores, medical facilities etc. As was done in Charlotte, these could then be used to develop composite maps and overlays showing access to opportunity, environmental/health risk, and vulnerability to displacement. (*Figure 19 – Charlotte Vulnerability to Displacement Map*) When combined with existing land use maps like the FLUM and zoning maps, these overlays could help inform land use decisions such as changes to FLUM categories and zones. They could also be particularly helpful to the Zoning Commission in the evaluation of Planned Unit Developments (PUD). By identifying the opportunities and burdens impacting different areas of the District, these maps would allow the Commission to better evaluate the impact of a PUD's proffered public benefits. This could result in land use and zoning decisions that are more carefully calibrated to the specific needs of District neighborhoods.

It should be noted that the District already utilizes GIS mapping technology in the current Zoning Map and the publicly available DC Atlas Pro. Both applications are examples of GIS maps that combine various District data layers from the Office of the Chief Technology Officer and allow them to be displayed together. Equally important, these maps are interactive. Viewers can search by different categories, such as street address, square, or zoning case number, and can add or remove data layers such as lot lines, zone districts, and FLUM categories at their discretion. While the maps within the CP would remain static, the potential use of a web-based format (see B.4 below), combined with the District's existing mapping applications, opens up the possibility of developing interactive maps related to the CP. This format would allow residents to take a "hands on" approach to CP data and make it more broadly accessible. Indeed, OP has already started incorporating some of these interactive mapping features as part of its outreach efforts for the new CP, specifically its web module "Where Can the District Grow?" that allows users to place "pins" on a virtual map identifying areas that they believe are appropriate for additional housing or other uses.[83]

3. Use Multiple Charts and Maps to Illustrate and Support Analysis

Given how impactful tables, graphs, and maps can be in CPs, the new CP should seek to maximize their usage. As seen in plans like in Montgomery County, Newark, and Chicago, use of

[83] OP DC2050 – Explore Possible Futures "Where can the District Grow?"

a combination of these visual mediums on a single page can be particularly impactful at the beginning of CP chapters or sections to "set the scene" and establish the foundation for the plan's ensuing recommendations. (*Figure 20 - Chicago Housing Data Page, Figure 21 - Newark Poverty Data Page*) Based on the proposed organizational structure, the use of similar data pages would be particularly effective to illustrate the CP's overarching goals and thematic topics. For example, data about housing costs and rent burden could be presented along with a map showing concentrations of affordable housing as an introduction to the proposed Housing & Community topic. As seen in the examples from Newark and Chicago, it is possible for plans to convey a substantial amount of information entirely through images with relatively little accompanying text. This is the model that the new CP should emulate as it will not only help to simplify and streamline the CP but will also make it more approachable to the average user.

4. Move Supplemental Information to Appendices or Supporting Documents

The new District CP should move secondary information such as historical background and the bulk of its data to separate appendices, which the CP could then cite in its body and link to relevant web sources. As can be seen in other jurisdictions, this strategy would reduce the CP's overall length, allowing it to focus on its key findings and recommendations, while still retaining its depth of information. In particular, housing the majority of the CP's supporting data and data analysis in separate appendices would allow for it to be updated on a regular basis, outside of the CP amendment cycle. This would allow the data to keep pace with demographic and economic changes to better inform these subsequent revisions. As discussed further below, the use of a web-based CP format would facilitate easy connections to these appendices through hyperlinks and would also allow for the CP to link to other data and reports housed on the websites of other District agencies such as OP, DDOT, and DOEE.

5. Web-Based Display with PDF Option

To effectively advance the foregoing recommendations for both organizational structure and communication strategies, the new CP should adopt a web-based display as its principal format. As discussed in Section 1.B.5, an increasing number of CPs like in Charlotte, Greensboro, and Minneapolis are utilizing creative web-based platforms to overcome the limitations of traditional paper-based plans. Use of a web-based format will radically simplify navigation through the CP, making it easier to use and more accessible to both District residents and agencies. A web platform will also allow the CP to better keep pace with the ever-accelerating rate of technological change over the course of its lifespan.

Any web format that the District adopts should include clear navigation menus like those used in the websites for Charlotte's and Greensboro's plans, with clear titles and a drop-down and/or accordion function allowing for easy, intuitive navigation of the plan. Rather than forcing a linear review of the CP, a well-designed website will allow users to move organically between those sections of the plan that are of greatest interest. At the same time, a visible navigation menu will provide a sense of the overall plan structure, allowing users to better orient themselves. The site should also make extensive use of hyperlinks to connect internal sections of the plan, as well as to link to external sources such as appendices. These features will not only

facilitate easy navigation of the plan but will support OAG's proposed cross-cutting and holistic organization structure that emphasizes connections between different components and levels of the plan. A web-based format would also support the inclusion of an implementation dashboard that could be used by residents to track the completion of specific implementation actions. Charlotte has already proposed the development of such a dashboard as part of its plan, and the District has also developed a similar online dashboard to track progress on the mayor's housing goals.[84]

While the plans discussed in Section 1.B.5 present a variety of web formats and aesthetics, it is worth noting Greensboro's use of enCodePlus for its CP. This is a platform already being used by the District to house its unofficial Zoning Regulations. The use of enCodePlus greatly improved the ability to navigate and search the regulations and provides a local example of the efficacy of web-based formats. Further, the fact that this platform is already in use by the District might result in greater ease of set-up and synergies between the two documents that are essential for governance of land use.

As seen in other cities, the District would still maintain a PDF version of the CP that could be printed as needed. However, there are still technological improvements that the CP could incorporate to make this traditional format more user-friendly. The District should consider adopting a web-based PDF viewer, like that used by Albuquerque, that incorporates a navigation and search bar as well as a drop-down table of contents menu to facilitate use of that form of the plan.

Finally, a web-based format provides the potential for greater accessibility options and interactive components to drive greater public engagement with the CP. Use of a website would allow the CP to provide accessibility features like text to voice, and translation options that would allow District residents of different cultural backgrounds and ability levels to access and understand the plan. Additionally, a web format would also support interactive plan components like maps and data tables. As discussed above, incorporation of an interactive mapping component that would allow users to explore and combine data layers, as well as search for specific properties, would improve understanding and use of the CP.

OAG believes that OP's DC 2050 website is an excellent starting point for a web-based CP. The site, which provides information to District residents about the status of the CP rewrite, incorporates a number of key features that can be adapted to the eventual CP site. These include an easily navigable format and interactive elements like the "Explore Possible Futures: Virtual Workshop," which allows users to complete online surveys and use interactive mapping tools to provide real time feedback.[85] OAG encourages OP to continue developing and adapting these web features for the eventual CP.

[84] DMPED 36,000 by 2025 Dashboard.
[85] OP DC 2050 - Explore Possible Futures: Virtual Workshop

PART III: OAG RECOMMENDATIONS FOR NEW CP FORMAT FOR AREA ELEMENTS

A. Use Wards as the Geographic Basis

As an initial matter, OAG recommends that the Area Elements be changed from the current 10 geographic planning areas to match the eight District Wards. This change would make the CP more intuitive for District residents given the existing common understanding of Wards as a geographic unit and a source of identity for residents. Except for Wards 2 and 6, which include a mix of planning areas, the District's Wards largely align with a single planning area, and indeed Wards were previously used for localized planning in earlier versions of the CP.[86] No other District plans beyond those directly related to the CP utilize the Planning Areas, and thus using the preexisting framework of Wards would allow the CP to better align with the District's other Ward-based plans and policies.

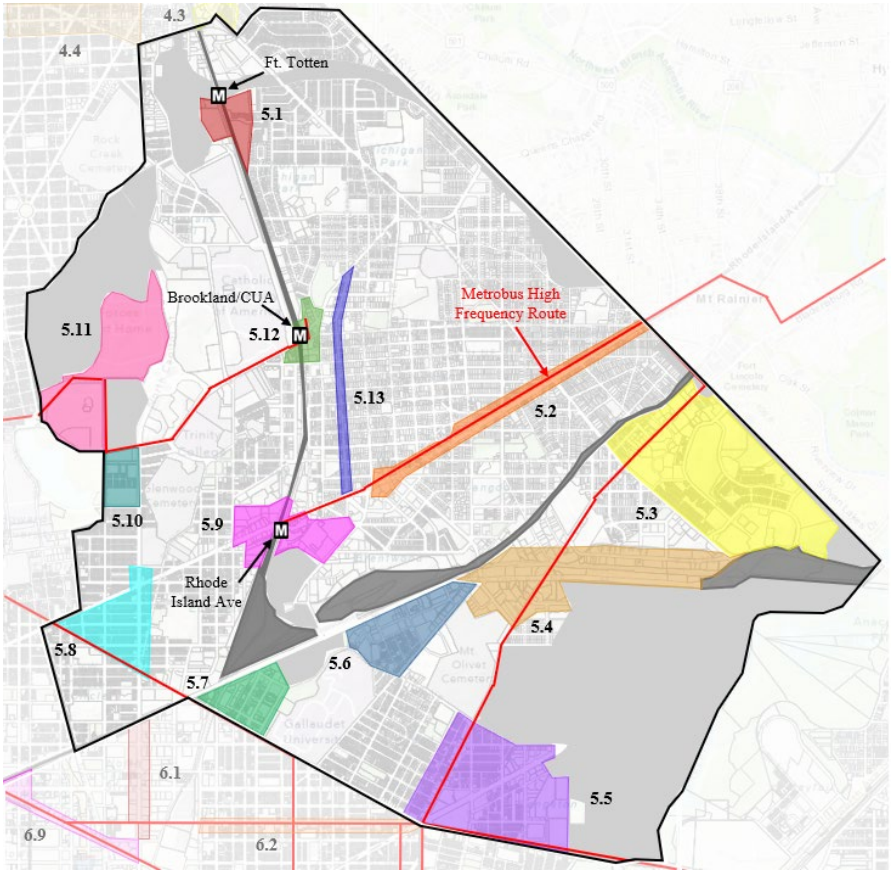
B. Ward Elements Will Provide Detailed Localized Guidance

With the Districtwide Elements focused on providing broad high-level direction, the Ward Elements would be focused on providing localized guidance to center the Districtwide policy goals and the FLUM's density guidance within a specific geographic context. The use of area level planning is a common feature in CPs as seen in Philadelphia, Charlotte, and Chicago, recognizing that jurisdictions require a balance of broad and specific direction.

Each Ward Element would be divided into a series of geographic Planning Focus Areas (PFAs), reflecting the current CP's model of dividing the planning areas into a series of policy focus areas. All proposed Ward maps featuring constituent PFAs are in Appendix D. These PFAs would be centered on key locations—corridors, nodes, and sites expected to serve as the drivers of planning and development within the Ward. Here is an example for Ward 5:[87]

[86] Title 10A DCMR § 104.3 – The Comprehensive Plan of 2006 (Stating that prior to the 2006 Comprehensive Plan, the District used Wards as the basis for its more specific geographic planning).

[87] As discussed further in OAG's Area Element Appendix, these PFAs largely reflect the current Upper Northeast Policy Focus Areas.



The areas outside the PFAs would be expected to largely retain their existing character, corresponding roughly to the current Generalized Policy Map's Neighborhood Conservation Areas. Conversely, the PFAs largely align with the Generalized Policy Map's categories for Land Use Change Areas, Neighborhood Enhancement Areas, and Main Street Mixed Use Corridors. Given the significant overlap in guidance between the current Generalized Policy Map and area elements concerning anticipated development, OAG believes it is possible for the two plan components to be combined into the revised Ward Elements to provide clearer, more concise guidance concerning the siting of the density called for by the FLUM. Rather than broad guidance concerning neighborhood "conservation" or "enhancement," individual PFAs would be able to provide specific guidance through their policy objectives and implementation actions (see Section C below) as to how density changes should be integrated into the existing context. PFAs could provide nuanced guidance for needed transitions and retention of existing uses that would both provide greater clarity for the Zoning Commission in deciding zoning cases, and help residents understand the development plans for their neighborhoods.

C. Follow District Organizational Structure

The Ward Elements would largely replicate the pyramidal structure proposed for the Districtwide Elements. Each PFA would include a series of policy objectives tied to the specific policy concerns of the PFA. The following are example proposed policy objectives for the Fort Totten PFA in Ward 5:

- **Objective 5.1.1 - Support Mixed Use Redevelopment around the Fort Totten Metro Station** - Encourage the reuse of WMATA-owned land and other underused property in the immediate vicinity of the Fort Totten Metro station, focusing on the area bounded by the Fort Circle Parks on the west and south, Riggs Road on the north, and South Dakota Avenue on the east.[88]

- **Objective 5.1.2 Retain the Municipal/Industrial Uses Around the Ft. Totten Metro** - Retain the established municipal/industrial land uses located to the south of the Fort Totten station.[89]

These objectives would include references and links to the overarching CP goals they support, as well as to any related Districtwide objectives. This would provide a key connection between the "macro" and "micro" components of the plan and emphasize that while they address more specific and localized issues, the Ward Elements are still critical for advancing Districtwide goals.

Continuing the Districtwide structure, each PFA objective would be advanced by a series of specific implementation actions. Example actions for Objective 5.1.2 above include:

- **Action 5.1.2.A -** Specifically retain the existing municipal uses including the trash transfer station on the west side of the tracks and salt dome on the east side.[90]

- **Action 5.1.2.B -** Guide future development in the vicinity of these activities in a way that does not impede their ability to function.[91]

- **Action 5.1.2.C-** Improve the interface between residential neighborhoods, industrial/ commercial areas, and the railroad and Metro rail lines. Develop and utilize zoning regulations and other regulatory measures to buffer neighborhoods from noise, truck traffic, commuter traffic, odor, and compromised infrastructure, and take steps to reduce the damaging effects of excessive noise and vibration from Metro and commercial train traffic for homes along the CSX and Metro lines.[92]

As noted in Section B above, the PFAs' objectives and actions would provide nuance to broader Districtwide policies like those concerning retention versus redevelopment of industrial sites, by centering them in a particular geographic context. This would allow the PFAs to provide site-specific guidance on mitigations like buffering or setback requirements, as well as land use and zoning changes like rezoning certain properties to reflect FLUM guidance about the redevelopment of formerly industrial sites with a greater mix of uses. Appendix D lists all proposed objectives and actions for each PFA.

This clearer structure would streamline and condense much of the guidance currently provided in the current Area Elements' Planning & Development Priorities sections, which are often duplicative of guidance contained in the existing planning focus areas. As at the Districtwide

[88] Current UN 1.1.3 Metro Station Development, UN 2.7.1 Fort Totten Metro Station
[89] Current UN 1.1.9 Production, Distribution, and Repair Uses, UN 2.7.3 Municipal/Industrial Uses
[90] Current UN 1.1.9 Production, Distribution, and Repair Uses, UN 2.7.3 Municipal/Industrial Uses
[91] Current UN 1.1.9 Production, Distribution, and Repair Uses, UN 2.7.3 Municipal/Industrial Uses
[92] Current UN 1.1.11, UN 1.2.9, UN 1.2.B

level, this structure would also clarify the relationship between specific policy goals and the actions needed to implement them.

D. Utilize the Effective Communication Best Practices

The Ward Elements would utilize the communication best practices detailed in Sections I.B and II.C, including the extensive use of visuals including graphs, charts, and maps, to support the Ward guidance. Specifically, pages using a combination of graphs and maps could be used in the introduction section for each Ward to establish the planning context and highlight key trends and issues in a clear and engaging way as opposed to pages of text. As with the Districtwide elements, additional background data, historical information, and public outreach information could be relocated to separate appendices that would be linked to the specific Ward by hyperlinks.[93] This would help to radically streamline the introductory sections of the Ward elements, which currently average around 10 pages, totaling close to 100 pages between the 10 planning areas. The use of multi-layer data maps would be particularly helpful at the Ward level. The ability to see how individual PFAs relate to spatial trends within a Ward such as high use transportation corridors, PDR zoned land, and public green space would help to focus and support the more detailed and geographically specific guidance provided by the Ward element.

As with the Districtwide Elements, a web-based format will be critical to the effective integration of the Ward Elements with the other plan components. As discussed above, the policy objectives and implementation actions for the individual PFAs would include connections to related Districtwide goals and objectives that would be facilitated through the incorporation of hyperlinks to allow plan users to easily jump between the broader and more localized sections of the plan, similar to the way in which Minneapolis linked its various policies to multiple goals and topics. This would make the plan more accessible to residents by allowing them to focus on their particular Ward while understanding how it connects back to the District as a whole. Additionally, the use of hyperlinks would allow the Ward Elements, and even individual PFAs, to connect to related reports and studies prepared by OP or other District agencies.

CONCLUSION

OAG believes that the foregoing suggestions will help to simplify, clarify, and modernize the CP, allowing it to provide clearer and more accessible guidance to District agencies and residents. As noted, OAG developed these recommendations after significant review and research of both the District's current CP and the CPs of other major cities and jurisdictions. One of OAG's key takeaways from that research is that there is no single "right" way to draft a CP. OAG hopes that its suggestions will help to facilitate a dialogue and exchange of ideas among OAG, OP, stakeholders, and District residents about the CP rewrite.

The CP rewrite represents a once in a generation opportunity for both District government and residents to shape the future of land use in the District. OAG believes that, by working collaboratively with all stakeholders, OP will be able to craft a plan that ensures the District's prosperity, health, and sustainability and serves all its residents equitably.

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[93] *See e.g.* Philadelphia's Central District Plan homepage (Figure 23) with links to appendices.