



June 18, 2019

Dr. Danilo Pelletiere  
Housing Development Advisor, Office of the Director  
Department of Housing and Community Development  
1800 Martin Luther King Jr. Avenue SE  
Washington DC 20020 via: QAP.input@dc.gov

RE: Comments on the draft 2019 Qualified Allocation Plan (QAP) by DC DHCD

Dear Dr. Pelletiere:

Please accept these comments on behalf of the Coalition for Smarter Growth. We are a regional organization based in the District of Columbia focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas.

1. Extended Use Restriction - restore to maximum 5 points for in perpetuity affordability commitments.

We wish to express our surprise and disappointment that the Extended Use Restriction for an in perpetuity commitment to affordability is proposed to be reduced from 5 to 2 points. We object to this devaluing of long term affordability commitments given how successful this incentive has been. DCHD has successfully attracted a majority of selected applicants committed to in perpetuity affordability. Without the strong incentive of the 5 points, the District is unlikely to leverage its funding process to secure permanently affordable housing investments. We question why DCHD would devalue permanent affordability when it was clearly feasible for many qualified applicants to make that commitment – whether non-profit or for-profit entities. We strongly urge DCHD to restore the maximum points to 5 for in perpetuity affordability.

In addition to the successful experience of two years of DHCD allocating 5 points for in perpetuity affordability, we commend to you the experience of the city of Boston, our own research [publication](#), and a day-long experts' roundtable validating this approach. DC's experience with a majority of selected applications committing to in perpetuity affordability terms only further validates what our colleagues in Boston have observed: strong housing markets can be leveraged to further public affordability investments. DC has clear market acceptance of this higher level of use restriction. For an administration that has prioritized affordable housing preservation, this would be a surprising and disappointing reversal of this policy approach.

2. Restore points for transit-proximity and green building, both reduced from 5 points to 3 points.

We request that the points for transit-proximity and green building be restored as a prioritization of the ways that we need to build higher quality housing for more sustainable and more efficient living. To

reduce the points from these two categories is a retreat from important sustainability commitments for our future housing stock and the families that will live in them. Living near frequent transit reduces transportation costs for households, enabling them to access more opportunities without owning a car. Encouraging higher standards in green building helps construct a housing stock for the future, that more efficiently uses materials and energy. Validating green building investments with 5 points encourages savings on both economic cost and environmental impacts in the long run. Rewarding both transit proximity and achieving higher green building standards are the part of the District's commitment to addressing climate change, Sustainable DC and a more resilient city. We urge DHCD to restore the 5 points to both these categories.

3. TOPA preference - add DOPA preference to this category for 5 points.

DOPA is the next major preservation tool after years of success saving affordable homes through TOPA, and years of waiting for DOPA implementation. DOPA should be strengthen and actively used to fulfill the administration's commitment to preserving affordable homes and preventing low income renters from displacement.

4. Opportunity Zones – should not receive points

Opportunity Zones do not need points through this process. Projects taking advantage of OZ are provided economic feasibility through the provisions of that program. In addition, the locations of OZ could reinforce concentration of poverty and pose a fair housing problem.

5. Preference of Projects with District Land (Maximum 8 points) -- we reiterate our objection to any points for District Land allocated by DMPED through a land disposition

We again express our concern that a project proposed with District Land allocated by DMPED does not need additional points, let alone 8 points. DMPED public land dispositions are subject to requirements that the project use all of the value of the land before seeking outside subsidy. We do not believe that a public land disposition should be awarded additional points for additional subsidy since it already has received substantial subsidy and will score well from this benefit. Giving substantial preference to DMPED dispositions risks undermining the requirement that the land value be maximized to subsidize the affordability of the affordable units. Only after the land value has been maximized to fully fund affordability requirements, is a public land disposition project ripe for consideration for additional subsidy. At this point, the merits of the project should be the basis for competing for additional funding, not the fact that it originated as a public land disposition.

Last, we want to thank DHCD for providing a redline version of the draft QAP, this was a helpful format for our analysis and comparison to previous QAPs.

Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director