

DC Housing Priorities Coalition: Supporting a more inclusive District

Amend B23-1 to prioritize affordable housing and preventing displacement

On October 8, the DC Council will vote on the [Comprehensive Plan Framework Element bill \(B23-1\)](#). The District's [Comprehensive Plan](#) defines priorities for development and will shape our city for years to come.

While we have made much progress in amending B23-1, we still need to ensure that we are prioritizing the creation of affordable housing, preventing displacement, and addressing racial equity. We must also amend provisions added in July that would freeze the status quo, prioritizing “physical and visual character” and “character and scale” over more affordable homes when Planned Unit Developments (PUDs) are being considered. The 2006 Comprehensive Plan focused too much on preserving the status quo rather than planning for a growing population and the need for more housing that is affordable to lower- and middle-income residents. Opponents of new housing have used the 2006 Comprehensive Plan to delay thousands of new homes, and hundreds of new affordable homes--increasing rather than reducing displacement of long-time residents.

To fix these problems, the Council should adopt two amendments to B23-1:

Amendment 1, proposed by Councilmember Nadeau, addresses racial and social equity in the District by prioritizing affordable housing and the prevention of displacement in PUDs. The amendment would be added to the end of Section 224.9 and would require that the following items be considered as high-priority public benefits in the evaluation of residential PUDs:

- The production of new affordable housing units above and beyond existing legal requirements, and/or a net increase in the number of affordable units that exist on-site,
- The preservation of housing units made affordable through subsidy, covenant, or rent control, or replacement of such units at the same affordability level and a similar household size,
- The minimizing of unnecessary off-site relocation through the construction of new units before the demolition of existing occupied units, and
- The right of existing residents of a redevelopment site to return to new on-site units at affordability levels similar to or greater than existing units.

Amendment 2, [proposed by the Office of Planning](#) (OP), would either remove the current Section 227.2 from the Engrossed bill or replace it with the following language:

227.2. Each land use category identifies representative zoning districts and states that other zoning districts may apply. A zoning district may be appropriate to be mapped, either through the Planned Unit Development or zoning map amendment process, if it is not inconsistent with the Comprehensive Plan, including the Future Land Use and Generalized Policy maps, the text of the Plan and the intent of the land use category. Under Zoning Regulations, a proposed Planned Unit Development should not “result in unacceptable project impacts on the surrounding area.”

Amendment 2 would replace the current section 227.2 from the Engrossed bill:

~~227.2. Each land use category identifies representative zoning districts and states that other zoning districts may apply. The Zoning Commission, in selecting a zone district, such as through a Planned Unit Development or Zoning Map Amendment, shall determine if it:~~

- ~~* Is not inconsistent with the Comprehensive Plan;~~
- ~~* Meets the intent of the Future Land Use Map land use category;~~
- ~~* Is generally compatible with the character and scale of the Future Land Use Map land use category when considering the site in total; and~~
- ~~* Is generally compatible with the physical and visual character of the surrounding neighborhood.~~

Why the OP amendment to section 227.2 is so important:

In its September 11, 2019 [letter](#) to the Council Chairman, the Office of Planning proposed its amendment in order to “avoid unintended consequences that could undermine the District’s ability to meet the needs of its residents, especially the need for affordable housing.” Specifically, OP is concerned that the Engrossed bill section 227.2 errs by:

Singling out the intent and “character and scale” of the FLUM [Future Land Use Map] category in a list that includes the larger and Charter-mandated “not inconsistent with the Comprehensive Plan” standard that governs all zoning decisions suggests a parity between these considerations. It may read to suggest other parts of the Comprehensive Plan are of lesser importance. The final bullet creates a new zoning standard that increases the risk of litigation and cannot be applied in the case of a zoning map amendment because the Zoning Commission does not have a specific development proposal to consider.

DC Housing Priorities Coalition

Who We Are

The DC Housing Priorities Coalition includes: Enterprise Community Partners, DC Fiscal Policy Institute, Coalition for Nonprofit Housing and Economic Development (CNHED), Somerset Development, Coalition for Smarter Growth, Greater Greater Washington, United Planning Organization (UPO), Local Initiatives Support Corporation (LISC), and Housing Association of Nonprofit Developers (HAND).

Why We Formed

The Housing Priorities Coalition formed three years ago to help update the DC Comprehensive Plan, the land use policy that guides development decisions in the District. (Learn more from DC Office of Planning on the DC Comprehensive Plan amendment process at: plandc.dc.gov). See the full Housing Priorities Coalition amendment package [here](#). The Housing Priorities Coalition’s guiding principles for amending the DC Comprehensive Plan are:

- Meet the housing demand
- Equitably distribute housing
- Best utilize areas near transit
- Include families: ensure homes for people of all income levels and of all household sizes, including families.
- Prioritize affordable housing as a community benefit
- Preserve existing affordable housing
- Protect tenants
- Support neighborhood commercial corridors
- Clarify zoning authority
- Improve data collection and transparency