

DC Housing Priorities Coalition
Comment on Comprehensive Plan Draft Amendments
December 16, 2019

To Director Trueblood and Office of Planning staff:

The DC Housing Priorities Coalition includes the Coalition for Nonprofit Housing and Economic Development, Coalition for Smarter Growth, Enterprise Community Partners, Greater Greater Washington, Local Initiatives Support Corporation, Housing Association of Nonprofit Developers, and Somerset Development.

The Housing Priorities Coalition formed in 2016 to help update the DC Comprehensive Plan, the land use policy that guides development decisions in the District. Coalition members include representatives of for-profit and nonprofit developers, affordable housing policy organizations, direct service providers, and housing and development advocates.

The Housing Priorities Coalition fully supports the amended Framework element of the Comprehensive Plan as passed by the DC Council on October 8, 2019. We feel that the revised Framework more appropriately addresses the dynamics of growth and development in the District: It acknowledges that a specific emphasis on affordable housing and protections against displacement are necessary alongside a mandate to build more housing as the city's population continues to grow.

We appreciate the opportunity to comment on Office of Planning's (OP) amendments to the subsequent chapters of the Comprehensive Plan. Likewise, we feel that OP's amendments to the text of the Comp Plan and the Future Land Use and Generalized Policy maps build on the sensibilities of the revised Framework element.

Our affirmative support for both the overall tenor of OP's text amendments and amendments to the Future Land Use Map (FLUM) to allow for increased housing opportunities undergirds our specific comments in this letter.

Our review of OP's amendments to the 2006 Comp Plan are as follows:

Support for text amendments broadening access to exclusive neighborhoods

We are pleased to see that OP's amendments substantially change the rhetorical direction of the 2006 Comp Plan. The description and conceptualization of growth as something that is necessary to provide robust services for residents, but that should also be harnessed and redistributed so as to benefit those who are already here or are historically vulnerable, is a great step forward.

We particularly support the following changes to the land use section:

- Deleting “stability” from Section 302.1, and adding “a discussion on supporting growth” to Section 303.1 (page 9 of 72, Land Use): This is the description of the land use section’s goal. Removing “stability” from the line “to sustain, restore, or improve the character, and stability, affordability, and equity of neighborhoods in all parts of the city” acknowledges that neighborhoods are not static; this line also adds “affordability, and equity,” reinforcing a shift in the city’s principles.
- Deleting Section 306.9 (page 27 of 72, Land Use), which begins with, “To avoid adverse effects on low- and moderate-density neighborhoods, most transit-oriented development should be accommodated on commercially zoned land.” Low- and moderate-density neighborhoods—which are defined by the Future Land Use Map, and which often have within them a Metro station or a high-frequency bus line—should not be off-limits from transit-oriented development. This, also, is an example of how the text amendments to the Comp Plan link to the FLUM.
- Including the substantial amendments to Section 309.10 (page 37 of 72, Land Use), which rework the protection and conservation of “stable, low-density neighborhoods” to “support” and “respect” for the District’s “established” neighborhoods.
- Discouraging “mansions” (Section 309.11, page 36 of 72, Land Use), whereby smaller, “naturally affordable” homes are torn down and replaced with larger single-family homes, and replacing “protect single-family homes” with “respect” in Section 309.10 (page 36 of 72, Land Use)

Support for adding housing capacity through the Future Land Use Map

We support all the increases in new and affordable housing potential in OP’s amendments to the FLUM, and we support additional increased density, specifically in Rock Creek West, Near Northwest, and Capitol Hill. Further, we support increased housing capacity along all high-frequency transit corridors (i.e. Metro stations, and bus routes running, at a minimum, every 15 minutes during peak commute times) and commercial corridors.

Planning areas with robust transit and commercial corridors should see increased density, up to high-density mixed use, across the board. We should promote these changes by first targeting planning areas such as Rock Creek West, Near Northwest, and Capitol Hill, where the least amount of affordable housing has historically been built. As amendments through the FLUM generate rezoning applications to build more housing over time, the District should require additional affordable housing set-asides to capture a significant portion of the value provided through the rezoning.

Recommended additions to the Land Use Element and Area Elements

We ask that the Land Use Element link the increased housing capacity in the FLUM to greater set asides of affordability that exceed the baseline requirement set by Inclusionary Zoning.

The Housing Priorities Coalition also provided comment on The Department of Housing and Community Development’s (DHCD) draft Analysis of Impediments (AI), specifically to support

the construction of affordable housing in parts of the city, like Rock Creek West, Near Northwest, and Capitol Hill.

While we find OP's amendments to the Comp Plan favorable, we would like to see more language throughout the Comp Plan committing the District to Affirmatively Furthering Fair Housing principles. As DHCD develops its forthcoming Analysis of Impediments to Fair Housing report, integration of AFFH principles into the Comp Plan is critical.

While there are numerous references to fair housing in the Housing Element, we encourage inserting more specific references to AFFH in particular, as well as more references in introductory portions of the land use element and individual area elements. The District has functionally agreed to carrying out AFFH principles even as the federal government has walked back its commitment to enforcing them. But there are only references to AFFH on pages 196 and 222 of the amended Comp Plan. A reference to AFFH on page 1,018, in the Near Northwest area plan, was removed. While the overarching tone of OP's amendments—because they change the document's text in subtle ways to accommodate more density, and more development, in places where it has previously been off-limits—is more AFFH-esque than the 2006 plan, we feel that it is useful to specifically reference the policy itself to provide consistent ideological links between DHCD, OP, and subsequent development that is shaped by regulations.

We also support the amendments to the Housing Element that emphasize making affordable housing available throughout the city and promote furthering fair housing opportunities, especially in high-cost areas. The Housing Element does this by setting numeric goals for affordable housing by planning area, an approach we support. We support the 15 percent minimum goal for affordable housing in each planning area by 2050 as a minimum. We support the Housing Element's policies and actions proposed to achieve these numeric goals including bonus density, flexibility in zoning, and other measures.

Recommended additions to the Housing Element

In addition to Planned Unit Developments and Inclusionary Zoning named as examples that could leverage increased affordability, we recommend including "Zoning Map Amendments" named as an example of an incentive that can be leveraged to create additional affordable units above baseline requirements.

Public Input

Finally, we would like to note our appreciation for Office of Planning's commitment to a 60-day timeframe for public review, and a 90-day timeframe for Advisory Neighborhood Commission resolutions. While we understand that some may not feel that this is not enough time to digest the 1,500 total pages of redlines to the 2006 Comp Plan, there is much to be said for a swift assessment of a document that has been open for review, in some form, since early 2017.

Thank you.