

## DC Housing Priorities Coalition

Coalition for Nonprofit Housing and Economic Development □ Coalition for Smarter Growth  
DC Fiscal Policy Institute □ Enterprise Community Partners □ Greater Greater Washington  
Housing Association of Nonprofit Developers (HAND)  
Local Initiatives Support Corporation (LISC) □ Somerset Development □ Ward3Vision

September 30, 2020

The Hon. Phil Mendelson, Chairman  
Committee of the Whole  
Council of the District of Columbia  
1350 Pennsylvania Avenue, NW  
Washington, D.C. 20004

RE: Pass the Comprehensive Plan in 2020 (B23-736): It is essential to a recovery with housing and health equity

Dear Chairman Mendelson and members of the DC Council:

We write to urge you to review and approve the Comprehensive Plan Amendment Act of 2020 (B23-736) this year, and not delay its passage into 2021 or beyond. We recognize that the Council is responsible for many urgent matters this fall. An updated Comprehensive Plan is one of these urgent matters. Our coalition comprises advocates, policy analysts, and affordable housing developers who believe the updated Comp Plan is integral to addressing racial inequities in the District and prioritizes housing, health, and economic equity in our plans for recovering from the worst public health crisis in the past 100 years.

The existing Comp Plan is outdated and does not provide the long-term vision we need to address the District's significant racial disparities in housing, health, and economic opportunity. At the heart of the updated Comp Plan are provisions to increase housing options across the District, including creating more affordable homes in currently exclusive neighborhoods. The plan also includes policies and actions for COVID-19 response and recovery.

The stark racial inequities of the District have been spotlighted during the COVID-19 pandemic and economic crisis, which has disproportionately sickened and killed black and Latinx residents, cost jobs, and placed many at risk of homelessness. Severe housing cost burdens are faced by very-low income District households, who are most likely to represent black and brown communities. Further, the District has significant shortfalls in housing affordable to households earning 50 percent of Median Family Income and below.<sup>1</sup> The District's deficits in

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<sup>1</sup> Doni Crawford, "[Affordable Housing: All Residents, Especially Longtime Black and Brown Native DC Residents, Have a Safe and Affordable Place to Call Home.](#)" (DC Fiscal Policy Institute. February 2020).

affordable housing are geographically skewed, with large gaps in Rock Creek West, Capitol Hill, and Near Northwest planning areas.

The Comp Plan update is a key step toward addressing a legacy of redlining, racial segregation, and other discriminatory practices that have led to today's disparities in wealth, health outcomes, and housing security for so many black and brown residents. The Comp Plan sets affordable housing goals for each part of the District to expand options for where low-income households and people of color can choose to live, shop, go to school, and work. It provides clearer guidance to the Zoning Commission, in response to recent court decisions that have stalled needed new housing, and prioritizes affordable housing creation and preservation and the prevention of displacement of residents from their communities.

While the Comp Plan update on its own will not create affordable housing automatically, it is a necessary precondition for producing more affordable housing, particularly in the high opportunity areas mentioned above. When paired with the Office of Planning's proposed changes to strengthen Inclusionary Zoning requirements for zoning map amendments, the Comp Plan update--particularly the revised Future Land Use Map and Generalized Policy Map--will add significant development capacity to these neighborhoods, thereby providing opportunities for creating both new primarily affordable housing projects, as well as primarily market-rate projects with significant affordable components. Without the update, and given existing restrictions in the Comp Plan maps, such projects will not be possible. The update will not resolve all threats of future litigation for any specific development, but it will enable these projects to take their first steps forward.

For four years, from 2016 through February 2020, the District's Office of Planning conducted an extensive public outreach process to gain public and government input on the Comp Plan revision process and feedback on its recommendations. The Council deliberated the important Framework Element for nearly two years before approving it in 2019. Following Council approval of the Framework Element, the Office of Planning released the rest of the draft Comp Plan for public review. The Office of Planning extended to the public and ANC Commissioners additional time through February 2020 to review the maps and chapters. Finally, the Office of Planning submitted the proposed Comp Plan amendments to Council in April 2020. While the extension of the public-review period meant that the Office of Planning delivered its amendments to the Council past its initial promises of November 2019, and then January 2020, it was granted at the request of parties who are likely to ask the Council again for a longer period of review for the final amendments. Rather than delay, we ask the Council to use the benefit of the added time for public input to bring this important bill to completion. Beyond this critical bill, we are eager to work with the community, ANCs, other stakeholders, and you to fully revamp the Comp Plan beginning next year.

We appreciate that you have set two hearing dates for the Comp Plan on November 12 and 13, 2020. However, given the proximity of these dates to the end of the current Council session, we urge the Council to engage now on reviewing the Comp Plan to ensure that it is adopted by the end of December 2020. If consideration of Comp Plan revisions continues into 2021, the seating of new Councilmembers, changing committee assignments, unforeseen complications of the

COVID-19 pandemic, and the difficult decisions of a new budget season under reduced revenues will further delay its passage and, thereby, the review and approval of new housing, including much needed affordable housing, and inhibit investments we need for an equitable economic recovery.

Passing the Comprehensive Plan Amendment Act of 2020 is one of the critical racial justice changes you can make right now.

Thank you for your consideration.

Sincerely,

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Coalition for Smarter Growth

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Susan Kimmel  
Ward3Vision

## About the DC Housing Priorities Coalition

The Housing Priorities Coalition formed four 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](http://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