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March 17, 2021

The Hon. Phil Mendelson  
Chairman, Committee of the Whole  
District of Columbia Council  
1350 Pennsylvania Ave. NW  
Washington, DC 20004

**Re: Testimony regarding the Performance Oversight Hearing for Office of Planning**

Dear Chairman Mendelson and members of the Committee:

Thank you for the opportunity to provide testimony. Please accept these comments on behalf of the Coalition for Smarter Growth, the leading non-profit organization in the D.C. region advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

Over many years, we have worked on a number of important planning issues with the Office of Planning (OP): community planning, development review, Inclusionary Zoning, the Comprehensive Plan, and 2016 zoning regulations revisions (ZRR).

Over the last year, OP has worked diligently with stakeholders to bring an update to the 2006 Comprehensive Plan the DC Council, which was submitted April 2020. OP also achieved a major milestone with the creation of Expanded Inclusionary Zoning (or IZ+), which applies an increased IZ standard to upzonings. OP is also supporting the expansion of regular IZ to cover areas that were previously exempt, and is increasing set asides for wood-frame construction. We are also encouraged that a number of small area plans have kicked off recently, including the Chevy Chase Small Area Plan. We hope to support other local planning efforts in the next few years.

After four years and multiple rounds of public engagement, we eager to complete this update cycle for the Comp Plan. It has been a lengthy process, but during this time, we made some major advances. The [Housing Equity Report](#), and the public process that informed it, is a significant change for the city and the Comp Plan. This report takes on the task of seriously addressing DC's failure to meet fair housing obligations by setting minimum goals for affordable housing availability in each part of the city. The housing equity report's approach and goals were then incorporated into the Comp Plan, especially the Land Use and Housing Elements. Overall, the Comp Plan update greatly advances a more equitable and sustainable future. We'd like to highlight some of the important policy changes:

1. *The Comp Plan sets the goal of a minimum of 15 percent of all homes in each planning area should be affordable to low income families. This is a helpful approach to building a truly equitable city and directly addressing the need to undo a legacy of racial discrimination and segregation.*

The Housing Element incorporates the results of the Housing Equity Report and highlights the disparities in availability of affordable housing choices across the city. It notes that one percent of the city's affordable homes are located in Rock Creek West Planning Area (equates to the geography of Ward 3). It recommends using land use, zoning, and financial incentives to bring more affordable housing to areas falling short of the minimum 15% threshold. This language, along with elsewhere in the plan, provides helpful guidance to the Zoning Commission to put a high priority on affordable housing as the Commission reviews individual development proposals.

The plan specifically calls out the need for public policy action to bring more housing choices in higher-cost neighborhoods, such as in new Section 514.3 of the Housing Element: "...to avoid disparate impacts on protected classes, public sector decisions should provide the opportunity for both multi-family housing and affordable subsidy investment in higher-cost neighborhoods that provide greater opportunity because of access to good jobs, schools, transit, and other services."

2. *The Future Land Use Map changes add 15 percent housing capacity, focused around transit nodes and corridors to ensure that we have enough housing to be available in appropriate locations. These proposed changes to create new mixed use housing capacity, mostly around transit, is preparing for a future. In the short term, we may have an overhang of new rental apartments, but as our city recovers from the health and economic crisis, DC is again likely to attract increasing numbers of people moving in. Ensuring we have the room to house people moving here so they don't bid up existing housing prices reduces pressure on existing, older, and lower priced, and more affordable housing.*
3. *The Comp Plan removes exclusionary language and emphasizes the importance of housing affordability. For example, in the beginning of the Land Use Element, the proposed amendments show a clear change in priorities for the Comp Plan. The shift is away from preserving the status quo, above all else. This is illustrated in the change for with the first bullet listing "critical land use issues addressed in the Land Use Element: "Promoting neighborhood conservation" to "Providing adequate housing, particularly affordable housing." "Conserving" is added to the bullet below that, but so is "inclusive" and "accessibility and diversity while allowing new growth." This demonstrates how the revised language balances the importance of caring for existing neighborhoods while elevating the importance of providing enough housing, especially affordable housing, to meet the city's likely continued growth.*

See the redline version here (from the Land Use Element):

300.2

The critical land use issues ~~faciing the District of Columbia~~ are addressed in this element. These include **the following:**

- ~~• Promoting neighborhood conservation~~
- **Providing adequate housing, particularly affordable housing;**
- **Conserving, ~~C~~reating, and maintaining ~~sucessful~~ inclusive neighborhoods, accessibility, and diversity while allowing new growth;**
- Strengthening **downtown;**
- Enhancing neighborhood commercial districts and centers;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality **and creating jobs** while minimizing adverse impacts on residential areas and open spaces;
- **Promoting transit-accessible, sustainable development;**
- **Improving resilience; and**
- Siting challenging land uses. 300.2

- Facilitating construction of more than a thousand affordable homes stalled at the Zoning Commission. The Zoning Commission has a backlog of proposals that are on hold until the Comp Plan and FLUM are adopted. After four years, further delay undermines the ability of financing to be secured, and opportunities can be lost. For example, the Westminster Church PUD, 400 I Street, SW (ZC Case 20-12) is a mixed income project supported by the ANC. It is still waiting for anticipated FLUM changes. The proposal will build 220 residential units, of which 123 will be affordable senior units.

Related to the Comp Plan is OP's work on **Expanded IZ** (aka IZ+). IZ+ was just enacted by the Zoning Commission, and will leverage any upzoning, including one resulting from the proposed increased land use designations in the Future Land Use Map. An increased set aside of IZ units will be required, based on the additional density gained in an upzoning up to 20 percent set aside of IZ units (regular IZ is 8-10 percent set aside). OP is also supporting the Zoning Commission in making other changes to regular IZ to expand the policy's coverage.

In conclusion, we want to express our gratitude for the work of OP to update and modernize the Comp Plan with an emphasis on affordable housing and fair housing, its support for expanding IZ, and work on community planning, which will all support the broader effort to address the great racial and economic disparities of our city. Land use policy plays a specific role in the perpetuation of racial exclusion. We welcome these changes to address it.

Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director