

HOUSING ELEMENT CHAPTER 5

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OP'S CHANGES FLAGGED AS PROBLEMATIC

* = text or language or paraphrasing from OP's redline document

CAPS = my take on OP's redlined changes; my CAPS comments located below the text its criticizing

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* Applying Inclusionary Zoning (IZ) requirements to a variety of residential uses including new market rate buildings, rowhouse conversions, penthouse habitable space, and the prioritizing proffers of additional affordable housing through Planned Unit Developments (PUD);

SETS THE CURRENT REQUIRED IZ VOLUME AS PUD BENEFIT BENCHMARK (8 to 10% of new units). LAUGHABLE IF NOT SO SAD GIVEN AFFORDABLE HOUSING CRISIS

* Requiring District-owned land sold for housing to include 20 to 30 percent of the units as affordable;

SETS BENCHMARK FOR PUBLIC PROPERTY DEALS WITH "AFFORDABLE HOUSING" AT A PITIFULLY LOW BAR OF 20 TO 30%

* However, as the District remains attractive to and retains higher income households, rising demand and competition will put upward pressure on rents and a greater number of lower-income households will experience greater pressure from rising housing costs. Thus, greater public action is needed to fulfill the vision of an inclusive city.

SUPPLY AND DEMAND MANTRA -- NO ANALYSIS OF VACANCIES -- 30,000 VACANT UNITS IN DC RIGHT NOW ACCORDING TO CENSUS

~~ page 3 ~~

* Broad affordability is a function of the overall market supply being able to meet rising demand. New supply can improve affordability by letting new residents move to the city without taking an existing unit, and by allowing existing residents to trade up thereby freeing up an existing unit for someone else to occupy.

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However, the supply of 'naturally occurring' affordable units can be unstable due to potential pressure from both sides. Too little demand and decreasing rents are insufficient to cover maintenance and they fall into a state of disrepair and

become vacant and blighted. Too much demand and they are rehabbed into higher cost units.

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Figure 5.2 shows change in housing value and purchasing power from 2000 to 2017. The figure illustrates how median sales prices of single-family and Cooperative/Condominium homes have changed in relation to changes in the purchasing power of married-couple families and non-family households. It shows that sales prices of single-family homes, while volatile, have tracked the purchasing power of married-couple families, whose incomes grew 3.9 percent per year since 2006, but whose purchasing power increased 7.0 percent per year as interest rates decreased. Over the same time, married couples in DC grew by over 14,600 new households, or just under half of all new households since 2006.

FACTS AND FIGURES COMPLETELY DEVOID OF RACE!!

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FAILED INCLUSIONARY ZONING PROGRAM BALLYHOOD BY OP

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* Moderating the cost of housing and expanding opportunities will require a regional effort. Consistent It will take a sustained multi-jurisdictional efforts coordination and partnerships, such as an analysis of the regional impediments to fair housing, and other approaches are needed to increase the supply of housing to and better meet demand at all incomes.

MORE UNSUBSTANTIATED SUPPLY AND DEMAND DOGMA -- NO MENTION OF VACANCIES NOW

* While housing is a regional market, it is also a very personal choice tied to family, community, and the unique identity shared by residents living in the District of Columbia and the Nation's capital. The fact that many residents place a priority on maintaining their identity as Washingtonians partially explains why 71 percent of the District's residents moving within the region stay within DC. The rate of retention is actually the highest for extremely low-income households with 77 percent staying in DC. This is due in part to Washington DC's investment in public transit and affordable housing keeping housing and transportation costs low relative to the rest of the region. However, the same migration data suggests that lower income households tend to move east of the river. In addition, the District struggles to retain moderate income households earning between 80 and 100 percent of the MFI, with only 60 percent of them choosing to stay in the city. ix

I MEAN JUST UTTER HORSE MANURE, AS OP'S NARRATIVE CUTS AGAINST THE REALITY OF DISPLACEMENT -- > FOLKS ARE STAYING IN DC EVEN IF THEY MOVE, REALLY?!

* 501.1 The overarching goal for housing is: Develop and maintain new residential units to achieve a total of 360,000 by 2025 that provide a safe, decent, accessible and affordable supply of housing for all current and future residents of throughout all neighborhoods of the District of Columbia.501.1

THE MAYOR'S NEW GOAL IS IN THIS HOUSING ELEMENT, 36000 NEW HOUSING UNITS WITHOUT TAKING INTO ACCOUNT FOR WHOM? NO ACCOUNTING FOR 30,000 VACANT UNITS NOW

* 502.3 As noted in the Land Use and Framework Elements, the city already has the land resources to meet this demand. But land alone is not enough to ensure the production of housing. And housing production alone does not guarantee that a portion of the new units will be affordable to all households. The approach must vary with the characteristics of the site and surrounding conditions. For instance, infill housing development in Neighborhood Conservation Areas typically has infrastructure but can be constrained by lot sizes and is dependent on surrounding market strength. Redevelopment of ground floor uses along the city's Main Street Mixed Use Corridors is often delayed until market demand drives housing prices high enough to overcome the return provided by the existing uses. Neighborhood Enhancement Areas not only need comprehensive infrastructure investment, but catalytic projects as well to demonstrate the viability of further private sector investment. Finally, large sites with significant capacity need major infrastructure investment to knit them into their surrounding neighborhoods. 502.3

ABSOLUTE GIBBERISH

* NEW Participation from private sector investors is critical to achieving Washington, DC's housing goal and presents several challenges as they pursue investment opportunities. Some locations remain underutilized within the permitted density for a variety of reasons. In some locations, existing ground floor uses produce a sufficiently high return that discourages and delays redevelopment. In other locations, the increased construction costs needed for taller building types sometimes lead investors to use lower density, less expensive methods that underutilize a site's potential development capacity. Finally, development of new supply tends to slow down as soon as supply starts to meet demand, and the pace of absorption and revenue growth slows or declines below investors' expectations. These are economic realities that all cities face.

WHAT IS THIS ABSOLUTELY UNSUBSTANTIATED BUFFOONERY

. Public investment in high quality public infrastructure including transportation, public space, schools and libraries is also critical to

ensuring all neighborhoods provide a high degree of access to opportunity. Administration of regulatory processes shall aim to encourage, not discourage, the creation of new housing. 503.1

PUTS ALL OF THE BURDEN ON US TO DEAL CONSEQUENCES OF DEVELOPERS HOUSING PROFIT; NO SHARING OF INFRASTRUCTURE COSTS FOR NEW LIBRARIES,, SCHOOLS, PIPES, UTILITIES, PARKS, CLINICS, ETC.

* The supply of housing should grow sufficiently to slow rising costs of market rate rental and for-sale housing. Expanding supply alone will not fulfill all of Washington, DC's housing needs at lower income levels, but it is one important element of the strategy to ensure unmet demand at higher price points does not further hasten the loss of 'naturally occurring' affordable housing.

MORE UNSUBSTANTIATED SUPPLY AND DEMAND DOGMA

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* NEW Policy H-1.1.8: Production of Housing in High Cost Areas
Encourage development of both market rate and affordable housing in high cost areas of the city making these areas more inclusive. Develop new innovative tools and techniques that support affordable housing in these areas. Doing so increase costs per unit but provides greater benefits in terms of access to opportunity and outcomes.

WHEN WILL THE TOOLS FOR AFFORDABLE HOUSING BE IMPLEMENTED; O YEA, AFTER THE "MARKET RATE HOUSING" IS BUILT

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* NEW Action H.1.1.D: Research New Ways to Expand Housing
Continue research to expand market rate and affordable housing opportunities in Washington, DC such as expanding existing zoning tools and requirements. Consider a broad range of options to address housing constraints which could include updating the Height Act of 1910, a federal law, outside of the monumental core if it can promote housing production.

ATTACK ON THE DC HEIGHT ACT

~~ page 25 ~~

504.6 Policy H-1.2.1: Affordable Housing Production as a Civic Priority
Establish the production and preservation of affordable housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all neighborhoods of the city. 504.6

EDITS HERE ELIMINATE LOW INCOME HOUSING AS A PRIORITY

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* NEW Table 5.4 Major Housing Programs in the District 504.9

USING GENERAL CALL TO CITY PROGRAMS TO DISMISS DISPLACEMENT CONCERNS AROUND PUD SITES; NO STUDY OF WHAT PROGRAMS AND HOW SUCCESSFULLY THEY HAVE BEEN IMPLEMENTED OVER THE PAST 12 YEA

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504.14 Policy H-1.2.7: Density Bonuses for Affordable Housing

Provide zoning incentives, such as through the Planned Unit Development process, to developers proposing to build low- and moderate-income a substantial amount of affordable housing. Affordable housing above and beyond any underlying requirement. The affordable housing proffered shall be considered a top-priority public benefit for the purposes of granting density bonuses when new development is proposed, especially when the proposal expands the inclusiveness of high cost area by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood. 504.14

EDITS HERE ALLOW FOR BONUS DENSITY WITHOUT APPLYING A STRICT UNDERSTANDING OF "SUBSTANTIAL" AMOUNT OF AFFORDABLE HOUSING -- ALTHOUGH IMPLICATIONS COULD BE SET BY THE POLICY ABOVE ABOUT PUBLIC LAND WHERE HOUSING REQUIREMENTS ARE AT AROUND 20 TO 30%

* NEW Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas

Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across the city. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods.

REDUCTION FROM OVERALL GOAL OF 30% AFFORDABILITY THROUGHOUT THE CITY TO JUST 15% PER WARD OR NEIGHBORHOOD

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504.19 Action H-1.2.B: Commercial Linkage Assessment

Prepare an assessment of Review the District's existing commercial linkage requirements to determine improve the effectiveness of this program and assess its impacts, advantages, and disadvantages such as how and when linkage fees are paid. Based on findings, adjust the linkage requirements as needed. 504.19

THIS WAS A 2006 ACTION ITEM --> NEVER COMPLETED, AND NOW STILL JUST A HOPE TO DO A REPORT AT SOMETIME? NO STUDY OF HOW THIS POLICY HAS BEEN IMPLEMENTED OVER THE PAST 12 YEARS

* 504.21 Action H-1.2.D: Land Banking

Develop a strategic land acquisition program to purchase land in the District to achieve specific housing and neighborhood goals, particularly for the District's three major development entities: the National Capital Revitalization Corporation, the Anacostia Waterfront Corporation, and the DC Housing Authority. Completed
– See Implementation Table 504.21

OP ELIMINATES LAND BANKING~!! – NO STUDY OF HOW THIS POLICY HAS BEEN IMPLEMENTED OVER THE PAST 12 YEARS

* 504.24 Action H-1.2.G: Land Trusts

Support the formation of one or more community land trusts run by public, non-profit, or other community-based entities. The mission of the trust would be to acquire land while providing long-term leases to developers of rental and for-sale units. This approach helps ensure that the units remain affordable indefinitely. Completed – See Implementation Table 504.24

MAYOR AND OP ELIMINATING LAND TRUSTS – NO STUDY OF HOW THIS POLICY HAS BEEN IMPLEMENTED OVER THE PAST 12 YEARS

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505.6 Policy H-1.3.1: Housing for Families Larger Households

Provide a larger number of Increase the supply of larger family sized housing units for families with children for both ownership and rental by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across the city. The effort should focus both on affordability of the units and the unit and building design features that support families as well as the opportunity to locate near neighborhood amenities such as parks, transit, schools, retail and others. 505.6

!!GOOD CHANGES HERE!!

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* 506.10 Policy H-1.4.4: Public Housing Renovation

Public housing is a critical part of meeting the demand for affordable housing and preventing displacement. Continue efforts to transform distressed public and assisted housing projects to create into viable equitable mixed-income neighborhoods., providing Minimize displacement and resident moves, and ensure one-for-one replacement within the District of Columbia of any public housing units that are removed, and observe build-first principles where feasible. Target such efforts to locations where private sector development interest can be leveraged to assist in revitalization. 506.10

WHERE FEASIBLE! PUBLIC HOUSING, REALLY?! WE NEED MORE PUBLIC HOUSING NOT LESS.

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*** 506.12 Policy H-1.4.6: Whole Neighborhood Approach**

Ensure that the planning for, and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, child care, food access, parks, community gardens and open spaces, health care facilities, police and fire facilities, transportation, and emergency response capacity. 506.12

!! GOT BETTER !! NO STUDY OF HOW THIS POLICY HAS BEEN IMPLEMENTED OVER THE PAST 12 YEARS

*** 506.13 Action H-1.4.A: Renovation and Rehabilitation of Public Housing**

Continue federal and local programs to rehabilitate and rebuild the District's public housing units, including but not limited to the HOPE VI Choice Neighborhood program, Rental Assistance Demonstration (RAD) program, capital and modernization programs, the Community Development Block Grant program, and the District-sponsored New Communities program. 506.13

ALMOST DIDN'T CHANGE AT ALL -- STILL WEAK -- NO STUDY OF HOW THIS POLICY HAS BEEN IMPLEMENTED OVER THE PAST 12 YEARS

*** 506.16 Action H-1.4.D: Tax Abatement**

Consider geographically targeted tax abatements and other financial incentives to encourage market rate housing with affordable housing that exceed minimum Inclusionary Zoning standards development in areas where housing must compete with office space for land, similar to the former Downtown Tax Abatement Program. Abatements should consider the potential created by the conversion of existing office to residential. The potential costs and benefits of tax abatements must be thoroughly analyzed as such programs are considered. 506.16

WEAKENED TO INCLUDE PUBLIC FINANCING OF "MARKET RATE HOUSING" AKA MORE LUXURY BEING PAID FOR WITH OUR CITY TAX DOLLARS

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*** 506.17 Action H-1.4.E: Additional Public Housing**

Support efforts by the DC Housing Authority's planning goals to use its authority to create 1,000 additional units of for its public housing units by studying the need for additional units and developing strategies to meet the needs of existing units., Use subsidized subsidies by funding from the US Department of Housing and Urban Development under the public housing Annual Contributions Contract (ACC), RAD, and other sources. This action is contingent on the availability of funds for a local rent subsidy to cover the annual operating costs

for the new units. 506.17

STUDY STUDY AND MORE STUDY -- UNTIL ALL PUBLIC HOUSING HAS BEEN PRIVATIZED

* NEW Action H-1.4.F: Non-Housing Investment in Areas of Concentrated Poverty
Make non-housing neighborhood economic and community development investments, along with the preservation of existing subsidized affordable housing in Racially/Ethnically Concentrated Areas of Poverty (R/ECAP as defined by HUD) to improve the neighborhood amenities and attract private sector investment to expand housing supply.

CONCENTRATED POVERTY AREAS TO INCLUDE MORE NON-HOUSING INVESTMENT; COULD BE GOOD IF THE COMMERCIAL/RETAIL PROJECTS ACTUALLY HIRE AND INCLUDE DIRECTLY AFFECTED AREA RESIDENTS

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* NEW Action H-1.5.G: Remove Regulatory Obstacles
Continue to identify and review regulatory impediments to the production of market rate and affordable housing. Remove unnecessary and burdensome regulations, and propose more efficient and effective alternatives for achieving important policy and regulatory goals.

THE MAYOR JUST WANTS REMOVE ALL COMMUNITY INPUT AND OVERSIGHT ALREADY!!!

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WHAT IS DISPLACEMENT, LOL!

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* NEW
Addressing Displacement in Washington, DC
Washington, DC has one of the strongest set of anti-displacement programs in the country, which includes rent control, eviction protection, Tenants' Opportunity to Purchase Act, District Opportunity to Purchase Act, locally subsidized rents, tax assessment caps, and finally tax credits for low income and older homeowners.

USING GENERAL CALL TO CITY PROGRAMS TO DISMISS DISPLACEMENT CONCERNS AROUND PUD SITES; NO STUDY OF WHAT PROGRAMS AND HOW SUCCESSFULLY THEY HAVE BEEN IMPLEMENTED OVER THE PAST 12 YEARS

* Yet, protecting vulnerable citizens from the forces that lead to displacement clearly continues to be one of the greatest challenges to growing an equitable and inclusive city. Residents affected by physical displacement are relatively small on an annual basis and can be provided assistance more easily than the

significantly larger number and range of households facing economic displacement from rising housing costs caused mainly by a lack of supply.

AGAIN, DISMISSING REALITY OF THE DISPLACEMENT NUMBERS, ESP OF BLACK FOLKS!

* Achieving such balance will require a greater understanding of neighborhood submarkets, a more sophisticated approach to the allocation of funding, and difficult discussions among community stakeholders regarding approaches to increasing density. Addressing the broader economic displacement goes well beyond the responsibility of any single development. It is incumbent upon the District to strengthen existing policies and develop new ones to counteract and mitigate physical and economic displacement.

CONTINUING ON TO REMOVE THE RESPONSIBILITY OF PUD DISPLACEMENT FROM THE ZONING COMMISSION, IN HOPES THAT ONE OF THE GENERAL CITY PROGRAMS LISTED ABOVE WILL DEAL WITH IT! NO STUDY OF WHAT PROGRAMS AND HOW SUCCESSFULLY THEY HAVE BEEN IMPLEMENTED OVER THE PAST 12 YEA

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* NEW

Displacement is a citywide issue and all residents have a stake in addressing it, as it affects all – both current and future residents. Policies in the Comprehensive Plan, along with the District's housing programs and initiatives, will bolster the manner in which all forms of displacement are addressed.

AGAIN TO REMOVE DISPLACEMENT FROM ZONING COMMISSION RESPONSIBILITY DURING PUD REVIEW

~~ page 52 to 53 ~~

* Principles for the Redevelopment of Existing Affordable Housing

* As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies critical to Washington, DC's growth as an inclusive city, such as:

- Increase the capacity of housing overall, including both market rate and affordable units;
- Advance mixed income neighborhoods with both market rate and affordable housing;
- One-for-one replacement of affordable units;
- Provide family-sized housing, including multi-generation families;
- Build affordable units first to minimize displacement and maximize the return of residents to their community;

- Include tenants' rights of return and comprehensive relocation plans for tenants prior to the redevelopment.

MARKET RATE IS SHOWN IN ALL THE NEW POLICIES -- NO FOCUS ON AFFORDABILITY, IT HAS TO BE BOTH MARKET AND AFFORDABLE UNITS. REALLY EMPHASIS SHOULD BE ON LOWEST INCOME HOUSING AT THIS POINT!

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* NEW Many of these strategies will be difficult to achieve, and some may not be appropriate for an individual redevelopment, but the redevelopment of existing affordable housing should strive to employ as many of these strategies as possible. Critical to achieving the goal of inclusivity and the strategies above are the availability and certainty of the land use and financial incentives necessary to make the projects feasible.

AGAIN, THE MAYOR TRYING TO SHEILD ZONING COMMISSION FROM LOOKING AT DISPLACEMENT DURING REVIEW OF "INDIVIDUAL" PUD PROJECTS

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* 509.7 Policy H-2.1.3: Avoiding Displacement

Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing loss of rental housing units due to demolition or conversion, and the financial hardships created by rising rents on tenants. These programs should include Employ the Tenant and/or the District Opportunity to Purchase Acts (TOPA and DOPA respectively) and other financial tools such as the HPTF and the Preservation Fund. In addition, provide technical, and counseling assistance to lower income households and the strengthening of strengthen the rights of existing tenants to purchase rental units if they are being converted to ownership units. 509.7

THIS COULD BE MUCH STRONGER EXPECTING CITY OFFICIALS TO PROACTIVELY IDENTIFY AND DIRECTLY HELP VULNERABLE FAMILIES AND AT RISK AFF HOUSING ESPECIALLY DURING PUD REVIEW OR WHEN UPZONING IS HAPPENING.

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* NEW Policy H-2.1.8: Redevelopment of Affordable Housing

As affordable housing reaches the end of its functional life, support the redevelopment of the site to the greatest extent feasible in line with the District's goals and strategies regarding equity and inclusion.

WHAT DOES THIS EVEN MEAN... TO THE GREATEST EXTENT FEASIBLE

stopped at page 55 of page 79 -->