



March 29, 2021

The DC Grassroots Planning Coalition is a citywide body of individuals and organizations united around principles of racially equitable community-led development. Since Spring 2017 we have convened monthly, engaging over 1,200 residents in analysis of DC’s housing and development issues. We have supported the engagement of hundreds of DC residents throughout the amendment process of the Comprehensive Plan, by providing regular updates, creating opportunities for learning and engagement, and mobilizing testimonies at the 2018 and 2020 DC Council hearings.

We authored the **Housing Justice Priorities** to outline our top concerns and suggestions for promoting housing justice in the Comprehensive Plan before it is finalized by the DC Council. We have also authored the attached **Housing Justice Amendments** to provide specific guidelines and suggestions for how text of the plan should be changed.

The attached amendments refer to Comprehensive Plan policies found in the respective Comprehensive Plan Elements, which can be viewed on plandc.dc.gov.

While these amendments cover the written chapters, they do not refer to the **Future Land Use Map (FLUM) or the Generalized Policy Map** – two critical pieces of the Comprehensive Plan whose proposed changes would essentially render any useful written policies meaningless. The maps, alone, have just as much legal weight as the 1500+ pages of text and are often used more frequently than the written chapters. Please see the pages within this packet for a further explanation of the consequences of changing the maps as proposed.

Thank you to the Steering Committee members of the DC Grassroots Planning Coalition who have contributed hundreds of hours to this work – Caitlin Cocilova, Renee Bowser, William Jordan, Reginald Black, Chris Otten, Nancy MacWood, Paul Johnson, Chris Williams, Maurice Cook, Beth Wagner, Lark Catoe, Nick DelleDonne and Andrea Rosen.

Please direct questions to Parisa Norouzi, Executive Director of Empower DC at (202) 234-9119 x 100 or parisa@empowerdc.org.

Comprehensive Plan Future Land Use Map Proposed Amendments

Status of this Map
This map reflects the Executive Proposal to Council in April 2020. It has not yet been acted on by Council and is not subject to law.

Purpose
This map uses color-coded categories to express public policy for future land uses across the City. The Future Land Use Map is intended to be used in conjunction with the Comprehensive Plan's policies and actions. The purpose of this map is to represent the land use policies contained in the proposed Land Use Element.

Guidelines for Using this Map

The Generalized Policy Map and Future Land Use Map are intended to provide general guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies. Generalized important parameters, defined below, apply to their use and interpretation:

The Future Land Use Map depicts the intended land use for an area generally. It is not a zoning map. A zoning map is parcel-specific and establishes detailed requirements and development standards for individual, single, use, parking, and other activities. In contrast, the Future Land Use Map does not follow parcel boundaries, and its categories do not specify allowable uses or development standards. By definition, the map is to be interpreted broadly and the land use categories broadly defined boundaries.

The map includes intended uses for the horizon year of the Comprehensive Plan. It is not a "zoning land use map," although in many cases there may be an area that is the same as that for each today.

While the boundaries within any given area on this map reflect all contiguous properties on a block, there may be individual buildings that are larger or smaller than these areas within each area.

The zoning of any given area should be guided by this map, interpreted in conjunction with applicable guidance from the text of the Comprehensive Plan, including the Urban Elements and the Area Element.

Some zoning districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation.

The intent of this map is to show use rather than ownership. However, in a number of cases, ownership is displayed to indicate the District's Board jurisdiction. Generally, ownership includes facilities that are owned or "leased" through the actual lease, including housing and utility (e.g., Existing Air Force Base), Office (e.g., the Federal Triangle, hospitals (e.g., Veterans Affairs Administration), and other facilities.

This map does not show density or intensity on individual and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes vacant or is redeveloped), the new designation should be generally compatible in density or intensity to those in the vicinity, unless otherwise specified in the Comprehensive Plan Area Elements or an approved Campus Plan.

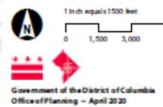
Streets and public rights-of-way are not an explicit land-use category on this map. Within any given area, the streets that pass through are assigned the same designation as the adjacent lands.

This map and the Generalized Policy Map can be amended. The Comprehensive Plan is intended to be a dynamic document that is periodically updated in response to the changing needs of the City. Requests to amend the map can be made by residents, property owners, developers, and the District itself. In all cases, such changes require formal public hearings before the Council of the District of Columbia, and are subject to review for their public good. The process of Comprehensive Plan amendments is described in the Comprehensive Element.

The generalized depiction shown on this map was designed to be essentially correct as printed, and if the print edition of this map that is incorporated in the Comprehensive Plan. Users of electronic copies of this map might be able to "zoom in" to reveal additional detail, but any information clearly visible in the print edition of the map has not been reviewed by Council, may or may not be correct, and does not reflect any policy or guidance by the District of Columbia government.

LEGEND

- Unincorporated Map Area**
Present day unincorporated land within the District of Columbia. Unincorporated areas are not subject to the Comprehensive Plan.
- Residential Land Use Categories**
 - Low Density Residential**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units.
 - Medium Density Residential**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
 - Medium Density Residential**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
 - High Density Residential**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
- Commercial Land Use Categories**
 - Low Density Commercial**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
 - Medium Density Commercial**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
 - High Density Commercial**
Single detached, detached, or semi-detached, single-family detached and attached housing units with two, three, or four units, and townhomes, row houses, and other attached housing units.
- Public and Institutional Land Use Categories**
 - Federal**
Federal government buildings, embassies, and other federal facilities.
 - Local Public Facilities**
Local government buildings, schools, and other public facilities.
 - Institutional**
Universities, hospitals, and other institutional facilities.
 - Parks, Recreation, and Open Space**
Parks, recreation areas, and open spaces.
- Mixed Land Use**
Mixed-use developments that combine residential, commercial, and public/institutional uses.
- Water Bodies**
Lakes, rivers, and other water bodies.
- Metro Stations**
Locations of the Metro system.



Government of the District of Columbia
Office of Planning | April 2020

Concerns with UpFLUMing

What is the Future Land Use Map (“FLUM”)?

The Future Land Use Map, or FLUM, is a map that paints color-codes across areas of the city, representing the anticipated future development of communities. The FLUM has four categories across residential and commercial properties, generally described as:

- Low density: single-family homes
- Moderate density: rowhouses, duplexes, and small garden apartments
- Medium density: four- to seven-story buildings
- High density: larger eight- to thirteen-story buildings

Why is the FLUM important?

The FLUM informs the DC Zoning Map. This means city planners, developers, and property owners can request to change the Zoning Map to a Zoning District that reflects the anticipated future height and density designations color-coded on the FLUM. By law, developments cannot be “inconsistent with the Comprehensive Plan.” If a proposed development is outside of the scope of what is allowed in the FLUM, the developers need to seek permission and approval from the Zoning Commission to change the map and move forward with the project. This is typically done through the Planned Unit Development (PUD) process, which often provides space for impacted neighbors and community groups to negotiate with the developer and receive benefits for their community (ex. more affordable housing, larger unit sizes, parks, scholarships), in exchange for the benefits given to the developer (i.e. increased air rights to build on that space).

What will be the impact of OP’s proposed amendments to the FLUM?

The Office of Planning has proposed to increase the allowable density on significant portions of the FLUM. This tactic of “upFLUMing,” or increasing the amount that can be built by right without getting approval from the Zoning Commission, will result in spot upzoning that largely cuts out community input and eliminates any conditions or benefits that these new bigger projects may be required to otherwise provide if they were approved.

In summary, here are our main concerns with the proposed upFLUMing:

- Circumvents community planning, such as Small Area Plans, which should inform and be in place prior to changes to the FLUM;

- Typically developer-driven and site specific without relevance to overall community priorities;
- Typically put forth without notice to or approval by ANCs and other impacted community bodies;
- Creates a domino effect, setting the stage for up-zoning on the site in question as well as surrounding properties;
- Fails to assess potential harms to neighboring residents – For example, property tax assessments change based on density change, which can affect the land value assessment for nearby properties and cause people to be displaced due to increased taxes;
- Circumvents the Planned Unit Development (PUD) process where impacted communities have standing and can negotiate Community Benefit Agreements (CBAs). Instead, projects may be “matter of right” avoiding a PUD altogether;
- UpFLUMing in Barry Farm, Crummell School, and other areas will harm community organizing efforts to achieve equitable outcomes;
- Some of OP’s proposed FLUM changes are to privately owned property and are being done without notice or consent of the property owners. For example, Pastor Monica Raines of Christ United Methodist Church at 900 4th St, SW was surprised to learn they are being UpFlumed and have specifically stated their opposition to this land use change for the church property.

We need to ensure more transparency and accountability in the development review process, not less. We should not make FLUM changes that will turn contested cases – where impacted communities have standing – into “rulemaking” cases that leave no room for community involvement. Thus, all zoning changes – including those where the FLUM has been changed – must be contested cases.

DC GRASSROOTS PLANNING COALITION

HOUSING JUSTICE PRIORITIES

FOR THE DC COMPREHENSIVE PLAN

In the midst of an ongoing housing crisis that has led to the displacement of tens of thousands of predominantly Black DC residents, the DC Grassroots Planning Coalition (DCGPC) and partner organizations call on the DC Council to strengthen the city's Comprehensive Plan by adding policies and actions that fortify existing affordable housing programs and require community-led equitable development strategies that further racial equity.

THE COMPREHENSIVE PLAN AMENDMENT PROCESS MUST BE CONDUCTED IN COMPLIANCE WITH DC LAW. The Comprehensive Plan is DC law and a 20-year planning document.[1] The Comp Plan requires the Mayor to submit reports to DC Council[2] at least once every 4 years on the District government's progress in implementing Elements of the Plan, the Plan's Action items, and the key projected implementation activities by land use policy over the succeeding 5 years.[3] Additionally, the Mayor shall submit amendments every 4 years for Council consideration and the amendments "shall be accompanied by an environmental assessment of the proposed amendments." [4] Notwithstanding the law, the Mayor initiated a full rewrite of the entire Plan with almost 1,000 pages of edits and substantial changes to the Future Land Use and Generalized Policy Maps, and did so without progress reports on the impact of current Elements, environmental assessment of proposed amendments, or in-depth community participation in every phase of the Plan's development.

Therefore, the Coalition asks that DC Council:

1. Ensure that all Ward level amendments as well as changes to the Future Land Use and Generalized Maps proposed by the Mayor's Office of Planning are examined and discussed with affected Ward-level residents at well-publicized, open and participatory roundtables led by the Ward Councilmembers;
2. Ensure that all proposed amendments to the Citywide Elements are examined and discussed at well-publicized, open and participatory Council roundtables held by the relevant Council Committee. (For example, the Housing Element should be reviewed at a public roundtable held by the Committee on Housing and Neighborhood Revitalization and the Committee on Human Services);
3. Ensure compliance with Comprehensive Plan law and regulations, as referenced above, before considering and voting on the substantial changes proposed by the Mayor. No Council vote should be taken without knowing in detail the impacts of the current Elements and their Action items on housing, land use, economic development, and all other facets of social, economic, and physical development influenced by the Comprehensive Plan.[5]

THE COMPREHENSIVE PLAN MUST PROACTIVELY ADDRESS DC'S HOUSING CRISIS BY STRENGTHENING THE FOLLOWING POLICIES:

RENT CONTROL:^[6] Rent control, also known as rent stabilization, is a popular affordable housing program. Rent control does not subsidize housing providers or tenants; rather, the program limits rent increases by tying them to increases in the Consumer Price Index (CPI).^[7] The Housing Element of the Comprehensive Plan must articulate the goals of: (1) expanding the number of rent-stabilized units, including extending coverage to buildings built after 1975; and (2) strengthening the law to close loopholes that have led to continuous erosion in the number of housing units and exorbitant rental increases in units subject to rent stabilization. Additionally, the Housing Element must mandate adherence by housing providers to DC's housing habitability laws. Finally, the Element should prohibit any District action that would siphon off rent-controlled inventory into other affordable housing programs, such as Section 8 voucher programs and Inclusionary Zoning, or use rent control as a substitute for preserving public housing.

PUBLIC HOUSING: The Comprehensive Plan, as amended, must continue the District's commitment to public housing. This means that Comp Plan amendments must require action on maintenance, preservation, and redevelopment of existing public housing and the building of additional public housing to accommodate the District's 51,000 extremely low-income renter households^[8] (31% of all renter households and at or below 30% MFI) who can afford at most just over \$900 monthly rent.^[9]

Accordingly, the Housing Element must include the following policies and goals: (1) fully fund repair and renovation of deteriorating public housing units; (2) require 1-for-1 replacement of public housing units and more when increasing site density, with no loss of family size multi-bedroom units; (3) ensure no new barriers to residents' return and true affordability based on the HUD standard of 30% of income for housing expenses; (4) use a mandatory build first model to prevent displacement, strengthen anti-discrimination enforcement during periods of relocation, and cover residents' relocation and return costs; (5) create an enforceable right of return of displaced public housing residents; (6) reinstate the goal to create a minimum of 1,000 new, additional public housing units over the next ten years;^[10] (7) retain public ownership and control of publicly owned housing and developments; (8) mandate that public housing resident-led organizations share decision making authority in all phases of redeveloping public housing; (9) incorporate community development strategies that improve the economic condition of residents such as equity for and home ownership by public housing residents, land trusts, cooperatives, and worker-owned businesses; and (10) remove barriers to the ability of returning citizens to live in public housing.

SUBSIDIZED HOUSING: Housing DC's low wage workers, seniors, people with disabilities and other low-income households must be recognized as those with the need for increasing housing capacity overall. To do so requires expanding the Local Rent Supplement Program (LRSP) -which provides ongoing rental subsidies to make housing affordable to extremely low-income families - with the aim of realizing the 2006 Comprehensive Housing Strategy Task Force goal

of 14,600 locally funded rental subsidies in the District by 2020.[11] Additionally, the District must purchase expiring Section 8 projects to maintain operating subsidies. Transfer of expiring Section 8 projects should be made only to developers who agree to lifetime affordability requirements. The District must continue real property tax abatements as an incentive to preserve expiring project-based Section 8 facilities. Funding must be increased for the Housing Production Trust Fund, the main source of funding for the Tenant Opportunity to Purchase Act (TOPA) and District Opportunity to Purchase Act (DOPA) programs, which must provide opportunities to tenants and tenant associations to own and manage their housing units. The District must adopt the policy that affordable housing created and preserved with public financing be protected by lifetime affordability restrictions and monitored to prevent transfer to non-qualifying households while still allowing residents to build equity which can result in concrete wealth growth.

ENDING HOUSING INSTABILITY AND SUPPORTING THE UNHOUSED: The Comprehensive Plan must combine policies and actions in the Housing, Land Use, and Economic Development Elements to end homelessness in the District. Additionally, the Comp Plan must contain specific, concrete goals to end homelessness and identify clear deadlines for accomplishing the goals.[12] This includes endorsing the housing production goals set by Homeward DC[13] targeted for the unhoused that called for the production of more than 4000 permanent supportive housing units for the chronically homeless and an additional 2000 units of permanent housing for households who experience temporary homelessness or are at risk of becoming homeless by 2020.[14] Moreover, given the impending eviction crisis due to COVID-19, the District must proactively prevent homelessness by increasing investment in the Emergency Rental Assistance Program (ERAP), negotiating with landlords to forgive rental arrearages, and identifying vacant residential units to immediately house people experiencing homelessness who are most susceptible to COVID-19 in congregant settings.[15]

COMMUNITY-LED EQUITABLE DEVELOPMENT: The amended Comprehensive Plan must expressly endorse community-led and racially equitable development and augment pending Council legislation titled Racial Equity Achieves Real Change Amendment Act[16] by advancing the creation of an office to guide community-led and racially equitable development, defining clear directives for implementing equitable development, and setting forth procedures for monitoring and enforcing desired outcomes.

Equitable development is defined as development in which low wealth Black and brown communities and other working class communities fully participate from the beginning to ensure that the infrastructure and services they determine to be needed for their communities to grow and prosper are foremost features of the development.[17] Community Economic Development (CED) recognizes that neighborhood investment begins with investing in the capacity of low income residents to own, manage, maintain, and ultimately replicate the development process, leading to a significant shift in economic condition and overall power. To date, the development projects receiving generous taxpayer subsidies and assistance have primarily benefited new and wealthier residents while failing to adequately respond to the basic human needs of existing

markets and residents with “the false promise of trickle-down benefits that justify orienting development around the needs of well-heeled populations.”[18]

Accordingly, the Comprehensive Plan must adopt a new Community-Led Equitable Development model that mandates full participation by long-term community members with a record of community involvement. The process must start with organizing residents around engagement in small area community development plans as a principal measure of expression of community preferences. The Comprehensive Plan must expressly endorse providing significant equity to existing community members, particularly public housing residents, allowing them to withstand displacement and improve their economic standing. To support racially equitable development, the Comprehensive Plan must endorse shared equity models of homeownership such as community land trusts, deed-restricted housing programs, and limited equity housing cooperatives as they balance preservation of affordability with wealth creation.[19]

As the guiding document for development in the city, it is critical that the amended Comprehensive Plan reflect the realities and priorities that we face in the District. The issues of racial inequity must be tackled head-on in specific, actionable Comprehensive Plan priorities.

These priorities are endorsed by:

Empower DC

Adams Morgan for Reasonable Development

Brookland Manor Brentwood Village Residents Association

Brookland Manor Coalition

Committee of 100 on the Federal City

DC Democratic Party Black Caucus

DC Federation of Civic Associations

DC for Democracy

DC for Reasonable Development

DC Justice Lab

DC Mutual Aid

DC Statehood Green Party

Dupont Circle Citizens Association

Dupont East Civic Action Association

Federation of Citizens Associations of the District of Columbia

First Congregational United Church of Christ

Georgetown Law Housing For All

Health Alliance Network

National Lawyers Guild - DC Chapter

National Lawyers Guild - Georgetown Law Chapter

NCBL-DC Unhoused Collective

People for Fairness Coalition

People Power Action

Plymouth Congregational UCC Board of Social Action

Potomac Association of the Central Atlantic Conference, United Church of Christ
Save McMillan Action Coalition
Save Us Now Inc
Serve Your City/W6MA
Showing Up for Racial Justice SURJ-DC
Southwest Voice: The People's Paper
SW DC Action
The Platform of Hope
Us Helping Us, People Into Living
Ward 3 Housing Justice Working Group
Ward 5 Mutual Aid
Washington Legal Clinic for the Homeless
Washington Teachers' Union
We Power DC
Yannik Omictin, Commissioner ANC 2A01
Trupti Patel, Commissioner ANC 2A03
Tiffani Johnson, Commissioner ANC 4B06
Renee Bowser, Commissioner ANC 4D02
Ra Amin, Commissioner ANC 5B04
Sebrena Rhodes, Commissioner ANC 5D01
Holly Muhammad, Commissioner ANC 8A01

[1] DC Code §1-306.01 (2020).

[2] DC Council shall schedule a public hearing on the Mayor's progress report and following review issue findings to the Mayor and a copy of the public testimony. Id. at §1-306.04(b).

[3] DC Code §1-306.04(b), (c) (2020).

[4] DC Code §1-306.04(d) (2020).

[5] DC Code §1-306.01(b) (2020).

[6] The Rental Housing Act of 1985, DC Code §§42-3501.01-3502.24 (2020) was enacted to cover 5-unit and larger residential properties whose permits to build issued by 1975. Yesim Taylor, History of Rent Control in the District of Columbia, D.C. Policy Center, April 1, 2020 at 2. Rent control was legislated to protect low- and moderate-income tenants from the erosion of their income from increased housing costs and protect the existing supply of rental housing from conversion to other uses. DC Code §42-3501.02(1), (3) (2020). Purposes.

[7] DC Code §42-3502.08 (2020) Increases above base rent.

[8] Housing Needs by State 2020/District of Columbia, National Low Income Housing Coalition, (<https://nlihc.org/housing-needs-by-state>)

[9] Out of Reach 2020, District of Columbia, National Low Income Housing Coalition, July, 2020, (<https://reports.nlihc.org/oor/district-columbia>)

[10] 506.17 Action H-1.4.E: Additional Public Housing in current Comprehensive Plan Housing Element is removed in Office of Planning's proposed April, 2020 amendments submitted to DC Council.

[11] Homes for an Inclusive City, A Comprehensive Housing Strategy for Washington, D.C., Executive Summary, DC Government-Brookings Institute, June 13, 2006 at 8. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf) The 2006 Housing Strategy stated that DC "should directly assist an additional 14,600 extremely low-income renter households by adopting a local rent supplement program." The LRSP was set forth as a supplement to the goal of 55,000 additional units by 2020, including at least 19,000 affordable units. Id.

[12] Homelessness in Metropolitan Washington: Results and Analysis from the Annual Point in Time (PIT) Count of Homeless Persons, June 10, 2020, Metropolitan Washington Council of Governments, (<https://www.mwcog.org/documents/2020/06/10/homelessness-in-metropolitan-washington-results-and-analysis-from-the-annual-point-in-time-pit-count-of-homeless-persons-featured-publications-homelessness/>) There were 6380 residents identified as experiencing homelessness as of the January, 2020 point in time (PIT) street count.

[13] District of Columbia Interagency Council on Homelessness, Homeward DC Strategic Plan 2015-2020, DC, 2015.

[14] Id. at 31 and Table 11: System Conversion-Annual Projections for Single Adult System Inventory shows the change in inventory needed to get to a right-sized system. Given that Homeward DC earmarks production of 6000 housing units targeted specifically for the unhoused and those on the brink of homelessness and the 2006 Homes for An Inclusive City called for 19,000 affordable units by 2020, Homes for an Inclusive City A Comprehensive Housing Strategy for Washington D.C., Comprehensive Housing Strategy Task Force, 2006 at 3. (https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf), the Mayor's goal to produce 12,000 affordable housing units (up to 80% MFI) by 2025, contained in DCHCD, DCOP, Housing Equity Report: Creating Goals for Areas of Our City, October, 2019, (https://housing.dc.gov/sites/default/files/dc/sites/housingdc/page_content/attachments/Housing%20Equity%20Report%2010-15-19.pdf), marks a significant reduction in previous affordable housing goals, is wholly inadequate, and must be increased.

[15] Office of Revenue Analysis, DC Economic and Revenue Trends: December, 2019 OCFO, Dec., 2019 at 9 (As of November 15, 2019, there were nearly 10,000 vacant residential units in DC). (https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/DC%20Economic%20and%20Revenue%20Trend%20Report_December%202019.pdf)

[16] B23-0038, March 11, 2020.

[17] See generally Carlton Eley, Planning for Equitable Development: Social Equity by Design, American Planning Association, March/April 2017. (<http://planning-org-uploaded-media.s3.amazonaws.com/document/PASMEMO-2017-03-04.pdf>)

[18] Id. at 2.

[19] Evidence Matters, Shared Equity Models Offer Sustainable Homeownership, PD&R, U.S. Dept. of HUD, Fall, 2012. (<https://www.huduser.gov/portal/periodicals/em/fall12/highlight3.html>)

HOUSING ELEMENT NARRATIVE, POLICIES & ACTIONS

Policy / Action # & Title	Paragraph # (Original / Revised) & pg #	DCGPC Proposed Language
Narrative Overview	500.2 500.2 pg 1	<p>Problem: Removes specificity of public housing. Does not recognize vacant units within DC’s housing stock that are liveable but still sit vacant. Reduces priority of ending homelessness by putting it at the end.</p> <p>Proposed: (Modify and add) Ending homelessness <i>(move to the top of the list)</i> Preserve existing affordable housing, including public housing; Ensuring use of vacant or underused properties and units [through, for example, restoration]</p>
Narrative Overview	(new) 500.4 pg 2	<p>Problem: Misrepresentation of forces shaping housing crisis</p> <p>Proposed: (Replace) Governments play a vital role in shaping private and public housing production, through public land giveaways, tax subsidies, direct cash subsidies, and tax abatements. The housing financing incentives that the District provides can improve or worsen a housing affordability and displacement crisis. For example, the city’s demolition of public housing and use of development incentives and subsidies for the construction of market rate and luxury housing has contributed to the upward pressure on rents and the displacement of lower income predominantly Black residents. Thus, targeted and refined public action is needed to fulfill the vision of an inclusive District.</p>
Narrative	500.3	<p>Problem: Does not specifically mention racial equity</p>

Overview	500.5 pg 2	Proposed: (Modify last sentence) ... improve health and educational outcomes, promote racial equity, and provide economic opportunity for all, especially for residents with extremely low, very low, and low incomes and for the unhoused.
Narrative	(new)	Problem: Mischaracterizes the housing market by perpetuating the supply and demand myth
Overview	500.5b pg 2-3	Proposed: (Add) While market supply and demand may help to regulate housing costs at the higher ends of the economic spectrum, for DC’s extremely low, very low and low income residents, no amount of housing production will result in rents low enough to meet their needs. Housing at these levels is only provided through intentional government policy and funding of needed subsidies.
Narrative	(new)	Problem: Needs increased specificity.
Overview Definition of affordable housing	500.5c pg 3	Proposed: (Replace) Affordable housing shall be defined as housing subsidized below market rate for households within specifically characterized annual income ranges. The phrase “affordable housing” must be coupled with identifying income group(s) for whom the referenced housing is intended in order for the affordability definition to be meaningful [when identifying maintenance, preservation, and production levels/targets of housing for households most in need of housing assistance]. The cost of affordable housing is limited to 30 percent of the identified income groups’ income. Identified groups’ incomes are based on the median family income (MFI) of the area, as annually determined by the U.S. Department of Housing and Urban Development. In 2020, MFI for a family of four was \$126,000. For the purposes of the Comprehensive Plan, “extremely low income” is up to 30% MFI, “very low income” is up to 50% MFI, “low income” is up to 80% MFI, and “moderate income” is up to 120% MFI.
Narrative	(new)	Problem: Add recent rental costs for further clarity
Overview	500.5d pg 3	Proposed: (Add to end of paragraph) By the end of 2020, the average rent of an apartment in DC was \$1,873, while the average rent of a Class A luxury unit was \$2,373. Class A units account for 29% of units in DC, and over 9,000 more Class A units are currently under construction, despite an 18.7% vacancy

Definition of affordable housing		rate. (DC Office of the Chief Financial Officer, District of Columbia Economic and Revenue Trends: February 2021)
Narrative Overview Definition of Market Rate Housing	(new) 500.5e pg 3	<p>Problem: Rationalizes counting rent-stabilized housing units as market rate, which (1) is only partly accurate; and (2) establishes premise for conversion of rent-controlled units to units that can officially be counted as “affordable,” through means-testing or other devices, while doing nothing to increase the actual number of units renting at rates below market. Also reasoning is biased toward real estate industry arguments.</p> <p>Proposed: (Modify) By contrast, market-rate housing is defined as housing with rents or sales prices that are allowed to change with market conditions, including increased demand. Some market rate housing may become affordable naturally over time to moderate and some low-income households. However the supply of naturally occurring affordable units is an unpredictable source of affordable housing. With too little demand, decreasing rents may be insufficient to cover maintenance and the units may be allowed to fall into a state of disrepair and become vacant and underused. With too much demand, rents may be raised frequently and/or steeply, or the units may be rehabbed into higher-cost units. Rent controlled-apartments occupy a special position between market rate and affordable units because while there are no occupancy restrictions by income, stabilized rents do not freely respond to market conditions. The District’s rent control law stipulates that rents on apartments permitted prior to 1976 may rise only as fast as the Consumer Price Index (CPI) for older adults and tenants with disabilities and the CPI plus two percent for everyone else.</p>
Narrative Overview Inequity and Displacement	(new) NEW: Insert after 500.5e pg 3	<p>Housing production has not equitably benefitted all populations in Washington, DC. More than 20,000 African American residents in Washington, DC were displaced from 2000-2013, the most "intense" form of gentrification in the US. Although a subsequent study showed an ostensible drop in DC’s ranking for the most gentrifying city, these statistics are misleading. First, the rate of displacement did not significantly moderate. Second, the rankings fell precisely because so many tracts were gentrified and thus these tracts were ineligible to be counted in the second study.</p>

		<p>As stated in the Comprehensive Plan Framework, “the rising costs of living, especially housing costs, became a significant factor” for Black residents. Washington, DC was recently ranked as the worst state for income inequality based on the standard-of-living Gini coefficient.</p> <p>US Census data tells the story of DC’s racial inequity. Based on the latest US Census data, DC poverty rates vary widely by race: Black (27%), Asian (12%), Hispanic/Latino (12%), and White poverty (6%). Growth in median household income from 2010-2014 and 2015-2019 also varied widely by race: Asian (30%), Hispanic/Latino (33%), and White poverty (24%) and Black (10%).</p> <p>Based on US Census data, 43% of renters and 23% of owners are burdened by housing costs, defined as spending more than 30% of income on housing costs.</p> <p>The public health pandemic starting in 2020 has exacerbated deep and chronic income and racial inequities in Washington, DC. This crisis forces the District to innovate and develop policies to address the pandemic’s disproportionate economic impact on Black residents. The city must be proactive in order not to repeat the harms of the Great Recession. Federal data from 2007-2017 shows that, white median income increased by 16% while Black median income decreased by 2%. In 2020, the median income of a Black family in DC is xxx, and for white families is xxx. Equitable housing is closely tied to household income.</p> <p>Low-income, racial minority communities East of the River have experienced increasing concentration of Black poverty in the last 10 years. According to the latest data, Washington, DC ranks 11th for Black-White residential segregation among US states.</p> <p>Proposed and anticipated development such as the redevelopment of large public housing communities could further harm economic and racial equity in DC, unless great measures are taken to further development that is truly equitable.</p>
Narrative	500.6	Problem: Chart inaccurate as to income groups served by HPTF and IZ.

<p>Overview Housing Program 2017 Income Limits and Main Household Targets</p>	<p>500.6 pg 4</p>	<p>Language: Chart corrected to show that Inclusionary Zoning units are produced for 50%, 60%, and 80% MFI households for rental units and 80% MFI households for homeowner units; Housing Production Trust Fund funds produce housing up to 80% MFI.”</p>
<p>Narrative Overview</p>	<p>500.4 500.7 pg 4</p>	<p>Problem: The negative impact of redevelopment of older buildings on rent stabilization and affordability go unmentioned. Increase in the sheer quantity of units is implicitly deemed an acceptable trade-off for loss of affordability.</p> <p>Proposed: (Replace) Washington, DC’s housing stock is becoming both older and newer as pre-1939 buildings are being preserved and remodeled to have more units while post-World War II buildings are more often torn down and the sites redeveloped to add new, modern apartment buildings. These trends have contributed to the erosion of the District’s rent-stabilized and naturally occurring affordable housing stock. The rent-stabilization program covers only rental units permitted before 1976, and their number has been significantly reduced by demolition and replacement; gut renovations; and conversions from rental to condominium/cooperative ownership. Although the government has not yet done a definitive count of the number of rent-controlled units that exist, the Urban Institute estimated in 2015 that the number of rent-controlled units numbered 91,386 in 2014, down from 130,000 in 1985, when the modern rent-stabilization law was enacted.</p>
<p>Narrative Overview</p>	<p>500.6 500.9 pg 5</p>	<p>Problem: Fails to mention role of DC policy and subsidy in driving housing development</p> <p>Proposed: (Modify)renewed confidence in the District government, and improvements in public services, and incentives provided to developers including land, tax incentives and other subsidies for the development of market rate housing.</p>

<p>Narrative Overview</p> <p>Rising rents; declining affordability</p>	<p>(new) 500.16</p> <p>pg 8</p>	<p>Problem: No mention of loss of rent-controlled units per se as a factor in loss of affordability nor of the loss of stabilizing effect on the market of rent-controlled units. No mention of the demolition of public housing.</p> <p>Proposed: (Modify and add to last sentence) Rents have also risen, making it more difficult for many to afford to live in the District. Between 2006 and 2017, at 3.4 percent per year, rents in Washington, DC, rose faster than the MFI of the region, which grew by only 1.8 percent per year. Much of the increase in rents was due to new amenity-rich buildings that attracted higher income households to the District. However, even rents in buildings built prior to 2006 rose at a rate of 2.7 percent per year. As a result, between 2006 and 2017, nearly 18,300 fewer units affordable were available that were affordable to households earning equal to or less than 60 percent of the MFI (See Figure 5.10 Change in Supply of Rental Units by Affordability). There are many reasons in addition to rising rents for the overall reduction in the number of lower cost units, including demolition of public housing and older buildings and conversion to condominiums, which has removed thousands of rent-controlled units from the affordable portfolio and weakened their stabilizing effect on the larger rental market.</p>
<p>Narrative Overview</p> <p>Inclusionary Zoning</p>	<p>(new) 500.19</p> <p>pg 9</p>	<p>Problem: Fails to mention the income levels for IZ units</p> <p>Proposed: (Modify/Add at the end) However, the IZ program targets affordable units at 60% and 80% of the Area Median Income, failing to address the need for housing affordable to DC's lowest income residents.</p>
<p>Narrative Overview</p>	<p>500.14 500.23</p> <p>pg 10</p>	<p>Problem: Fails to mention that new affordable housing is not a net gain because it includes replacement units</p> <p>Proposed: (Modify) ... the District is increasing the rate of developing new and preserving existing affordable housing with approximately 1,700 affordable units delivered per year since 2015. However, this figure does not represent a net gain of affordable units due to the loss of affordable housing, as a result of public housing demolition and other factors. DC also has not met its own goals for building housing for households at the 30% AMI level. While some of this production...</p>

Narrative	500.19	Problem: Increase specificity of current supply
Overview	500.28 pg 13	Proposed: (Modify) ...three or more bedrooms. Studios and one bedrooms have largely characterized the new housing in Washington, DC within the last 10 years. Because the vast majority...
Narrative	(new)	Problem: Focus needs to be on production of affordable housing, not market rate.
Overview	500.34 pg 15	Proposed: (Add before or Replace) Housing production has not always been adequately coordinated in Washington, DC to ensure timely and effective responses to such economic conditions, housing needs, and displacement trends. In order to ensure equitable distribution and use of the District’s housing stock, particularly for those with extremely low and low incomes and for large families, it is critical that the District support the overall creation of affordable housing.
Narrative	501.1	Problem: Does not mention share of affordable housing
Housing Goal	501.1 pg 15	Proposed: (Modify) ...a total of 36,000 units, at least 12,000 of which are affordable to households earning below 50% of Area Median Income, by 2025....”
Narrative	(new)	Problem: Lacking additional specific solutions.
H-1 Expanding Housing Supply	NEW: 503.3 pg 19	Proposed: The District must support non-market driven strategies for housing production such as the use of Community Land Trusts, cooperatives and publicly controlled “social housing” to secure long term affordability.
Policy H-1.1.5	503.6	Problem: No requirement that design of affordable and accessible housing meet same architectural standards as market rate housing. OP proposes to weaken language by removing “require.”.
Housing Quality	503.7	

	pg 19	Language: (Revise 1st sentence) “Require that design of affordable and accessible housing meet or exceed the high-quality architectural standards of market-rate housing.”
Policy H-1.1.6	503.7	Problem: no requirement to create affordable housing in central Washington and no requirement to create housing affordable to lowest income groups most in need of housing assistance.
Housing in Central Washington	503.8 pg 20	Proposed: (Revise 3rd sentence) “Require an equitable share of housing in central Washington for extremely low-income, very low-income, and low-income households, including family size units,so that these income groups can become a significant part of the vibrant fabric of central Washington.”
Policy H-1.1.7	503.8	Problem: no requirement to provide neighborhoods with needed public services. OP proposes to weaken the language from “must” to “should.”
New Neighborhoods / Large Sites	503.9 pg 20	Proposed: (Revise 2nd sentence) “In addition to giving priority to affordable housing for extremely low-income, very low-income, low-income households, ensuring an equitable share for households most in need of assistance, these neighborhoods must include or have access to well-planned retail, public schools, attractive parks, open space and recreation as well as supportive services for older adults and persons with disabilities.
Action H.1.1.B	503.10	Problem: No mention of long-awaited, actually funded data collection effort by Office of Tenant Advocate. Need more frequent reporting/evaluation.
Annual Housing Reports and Monitoring Efforts	503.11 pg 21	Proposed: (Replace) Develop an Annual State of the District Housing Report, which improves the quality of information on which to make housing policy decisions, and create a Housing Oversight Board composed of impacted tenants, housing legal services providers, for-profit, and non-profit developers that working alongside agency representatives reports twice annually on the effectiveness and outcomes of the District’s housing programs. Include in the report: information on housing development trends; thorough assessment of current housing need incorporating known rates of homelessness and housing instability, rent burdened households, waiting lists for subsidized housing, returning citizens coming back into communities, people exiting other institutional settings, and housing pending redevelopment or rehabilitation where tenants will be relocated; the availability and

		affordability of units by income, tenure, building type, number of bedrooms, accessibility and location; production patterns and capacity by Planning Area; areas where rising housing costs or building sales/redevelopments constitute a displacement threat; opportunities for build first housing and housing preservation; impact of recent zoning changes on land value, speculation, tax rates and availability of affordable housing; and other characteristics necessary to understand the city’s housing ecosystem. Incorporate data collected by the Office of the Tenant Advocate on rent-stabilized units. The report should also include a framework for evaluating progress and toward and revising measurable goals.
Action H-1.1.B-1	503.10 NEW: 503.11a pg 21	Problem: Need increased accountability over development projects that are given tax dollars, in order to ensure DC’s planning processes are meaningful and fulfilled. Proposed: DC Council must provide great oversight of development processes in order to ensure future goals and priorities are met. This must include thorough assessments of the projected impacts of any development project subsidized through the provision of land or other subsidies.
Policy H-1.2.1 Affordable Housing Production as Civic Priority	504.6 504.7 pg 23-24	Problem: OP removed focus on low-income households most in need of housing assistance. Proposed: (Revise 2nd sentence) “Establish the production and preservation of affordable housing for extremely low-income and very low-income households as a major civic priority ...”
Policy H-1.2.2 Production Targets	504.7 504.8 pg 24	Problem: Provision is misleading; it refers to 2006 Comprehensive Housing Strategy whose goals were to have been met by 2020; but fails to mention percentage of 2006 target met. Need to create requirement for developing and evaluating progress towards housing production goals. Proposed: (Replace with) Review progress of the 2006 Comprehensive Housing Strategy goal that one-third of new housing built in DC over 20 years be affordable to persons earning 80% or less of the area-wide MFI. Develop a process for evaluating and updating housing production goals annually based

		on changing conditions, specifically addressing the needs of housing for extremely low and very low income households, families needing 3+ bedroom units, and persons with disabilities. Require DC Council approval of annually produced housing production evaluation and goals report.
Policy H-1.2.3	504.8	Problem: No specification of affordability groups
Mixed-Income Housing	504.9 pg 24	Proposed: (Replace) Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing for extremely low-income and very low-income households, particularly large households, and establishing a minimum percent of deeply affordable units by Planning Area to create affordable housing options in high-cost areas and meet fair housing requirements.
Policy H-1.2.4	504.11	Problem: No requirement to build housing for residents most in need of housing.
Housing Affordability on Publicly-Owned Sites	504.11 pg 25	Proposed: (Replace) Require that housing affordability be maximized on publicly owned sites by using development strategies that produce the highest number of permanently and deeply affordable units for extremely low and very low income households, above and beyond the 20-30% of units required by current DC law. District-owned land no longer required for its previous use, housing co-located with local public facilities, and sites being transferred from federal to District jurisdiction must be developed in a manner that maximizes housing for extremely low-income and very low-income households and for large families (i.e. at least 3 or 4 bedrooms per unit). When developing public land, affordable home-ownership opportunities, such as limited equity co-operatives (LECs) and community land trusts, shall be given priority. This will not only fulfill the recommendations set out in the 2019 LEC Task Force report, but are also a more efficient use of city dollars funding long term affordability. Public land development must be guided by a community-led equitable development approach and prioritize projects that advance racial equity by providing direct benefit to Black households with low incomes.
Policy H-1.2.7	504.14	Problem: No leveraging of District incentives to construct housing for income groups most in need of housing assistance.

<p>Density Bonuses for Housing Affordability</p>	<p>Pg 26</p>	<p>Proposed (Replace) <i>Policy H-1.2.7: Affordable Housing a Required Public Benefit</i> In order to be approved for zoning incentives, such as increased density through the PUD process, rezoning, changes to the Future Land Use or Generalized Policy Maps, or granting significant zoning relief, a development must contain a substantial amount of extra affordable housing – in addition to any underlying requirement, such as what is required by Inclusionary Zoning. This affordable housing must be permanently affordable for people making 30% MFI and below for rental units and 50% MFI and below for ownership units, shall not include studio apartments and must address the need for housing units for larger families.</p>
<p>Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas</p>	<p>(new) 504.16 pg 26-27</p>	<p>Problem: Too vague because no goal for each Planning Area and no focus on low-income with greatest need of housing assistance.</p> <p>Proposed: (Replace) Proactively plan for, facilitate, and invest in market and nonmarket strategies that advance racial and economic equity throughout DC. Create a plan to achieve the equitable distribution of housing affordable to extremely low income and very low income residents, with no less than 30% of new units built in higher income Planning Areas (those where the median income exceeds 100% of the MFI) for these households. Provided 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.</p>
<p>Action H-1.2.F Establish Affordability Goals by Area Element</p>	<p>(new) 504.26 pg 30</p>	<p>Problem: Too vague because no requirement to establish housing production goals for income groups with greatest housing needs.</p> <p>Proposed: (Replace) Establish measurable housing production goals by Planning Area through an analysis of best practices, non market strategies, housing conditions, impediments, unit and building typology, forecasts of need and opportunities to utilize public land or acquire land through DOPA. Include a minimum share of 30% housing affordable to extremely low and very low income households in Planning Areas where median income exceeds 100% MFI, 20% in other areas. Provide recommendations for incentives, financing tools, and community development strategies to meet fair</p>

		housing requirements, particularly in high cost areas, and services populations of need include returning citizens, people with disabilities and larger families.
Action H-1.2.H Priority of Affordable Housing Goals	(new) 504.28 pg 30	Problem: Lacks any requirement to use public investment for construction/conversion of affordable housing for households most in need of housing assistance. Proposed: (Revise 1st sentence and add new 2nd sentence) Prioritize public investment in the new construction of, or conversion to, affordable housing for extremely low-income, very low-income, and low-income households in Planning Areas with high housing costs and few affordable housing options. Exclude units covered by the rent-stabilization program from conversion programs to avoid cannibalizing existing affordability and displacing one group to accommodate another.
Action H-1.3.A Create Tools for Production & Retention of Larger Family-Sized Units in Multi-Family Housing	(new) 505.14 pg 34	Problem: no requirement to develop affordable units and no requirement to focus on financing low-income households who need housing most. “research” should be “implement” Proposed: (Replace) Implement land use tools and techniques, including development standards, to encourage the development of residential units that meet the needs of larger families, with a focus on financing units affordable to extremely low, very low and low income families, especially in high-cost areas. Require the inclusion of affordable family-size units with 3, 4, or more bedrooms in projects receiving any form of District subsidy or bonus density, and the replacement of existing affordable family sized units when a redevelopment is occurring.
Narrative New Communities Initiative Discussion	506.5 506.4a2 pg 36	Problem: eliminates requirement of one-for-one replacement of public housing units and eliminates requirement that units be replaced. Language: (Revise 2nd sentence) One-for-one replacement of older publicly assisted housing units with new publicly assisted units is required to avoid displacement and the net loss of affordable units.

<p>Policy H-1.4.1</p> <p>Restoration of Vacant Housing</p>	<p>506.7</p> <p>506.6</p> <p>pg 37</p>	<p>Problem: no requirement that restored housing serve households in greatest need of housing assistance. Incorporate community-led approach.</p> <p>Proposed: (Replace) Work with communities to identify nuisance vacant properties and redevelop them into housing that is affordable to extremely low, very low and low income households using tools including DOPA and Land Trust to acquire these properties for transformation.</p>
<p>Policy H-1.4.2</p> <p>Opportunities for Upward Mobility</p>	<p>506.8</p> <p>506.7</p> <p>pg 37</p>	<p>Problem: Needs to include ownership opportunities and incorporate findings and recommendations of LEC report from 2019.</p> <p>Proposed: (Modify) Provide opportunities for residents of District-owned and District-assisted housing to achieve self-sufficiency and upward mobility. Specifically, explore mechanisms for residents of District-owned and District-assisted housing to become homeowners. The redevelopment of any public or low income housing shall offer affordable home-ownership opportunities for current and future residents by partnering with the Douglass Community Land Trust, and encouraging the creation of limited equity co-operative, fulfilling the recommendations in the 2019 Limited Equity Cooperative Task Force report of increasing the number of limited equity cooperative units by 45% (2,000 new LEC units) by 2025. At the same time, work to replace units purchased with new District-owned and District-assisted housing stock. 506.87</p>
<p>Policy H-1.4.4 Public</p> <p>Housing Renovation</p>	<p>506.10</p> <p>506.9</p> <p>Pg 37</p>	<p>Problem: eliminates requirement to replace public housing with public housing which serves extremely low-income households (0%-30%) and weakens build first with “where feasible”</p> <p>Proposed: (Replace) Public housing is a critical part of meeting the demand for affordable housing and preventing displacement. Any efforts to renovate and revitalize public and assisted housing projects must utilize build-first principles and other efforts that prevent displacement, provide one-for-one replacement (of like or larger unit size) on-site or in the immediate surrounding area of any public housing units that are removed or re-developed with permanent affordability for extremely low and very low income residents. Where density is increased significantly on a public housing site, at least 30% of additional new units (above the replacement of original units) must be reserved at permanent affordability for</p>

		extremely low, very low and low income households. Public housing must be kept in public control (through the DC Housing Authority, Community Land Trust or similar entity), and the share of any private entity who assists in the redevelopment must be less than 50%. Public housing tenants displaced by demolition and redevelopment shall be provided the right of return, memorialized in contract, to renovated units that can reasonably accommodate a family of their size.
Policy H-1.4.6 Whole Neighborhood Approach	506.12 506.11 pg 38	Problem: OP version removes mandatory language to provide neighborhood services and amenities to newly constructed housing developments. Proposed: (Reinstate/Modify) Require that the planning, construction and redevelopment of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, child care, services for older adults, food access, parks, libraries, community gardens, and open spaces, health care facilities, emergency services, transportation and other needs specifically identified by communities during neighborhood level planning.
Action H-1.4.A Renovation and Rehabilitation of Public Housing	506.13 506.12 pg 38	Problem: need to expand funding strategies for public housing rehab. OP version changes “public housing” to “affordable” Proposed (Modify) Title “Renovation and Rehabilitation of <i>Public & Affordable</i> Housing.” Pursue innovative community development strategies to rehabilitate and rebuild the District’s public and affordable housing unit, not limiting the city to use of the federal Choice Neighborhood and Rental Assistance Demonstration (RAD) programs) or the local New Communities Initiative (NCI) which has not had favorable results. Continue to increase local funding in the DC budget for the maintenance and repair of public housing to create healthy living conditions. Explore opportunities to rehabilitate badly deteriorated public housing using District issued Bond financing.
Action H-1.4.E	506.17 506.16	Problem: Removes requirement to build 1,000 more public housing units.

Additional Public Housing	pg 39	Proposed: (Replace) Work proactively with the DC Housing Authority to increase the city’s available public housing stock. Explore District financing measures and invest in a long term plan to rehab or rebuild badly distressed public housing and to leverage redevelopments, city owned land, and other opportunities to create a net increase in available public housing units, especially in high-cost areas.
Narrative Demolition of Public Housing	509.3 510.3 pg 45	Problem: Statement that “Ellen Wilson and Capper Carrollsburg included one-for-one replacement units for each subsidized affordable removed” is false. Language: (Delete or Revise 2nd sentence) Delete, as there was no one-for-one replacement of public housing units OR replace with, “Among these, none included “one-for-one” replacement units for each subsidized unit removed.”
Narrative Preservation of Affordable Housing / Addressing Displacement in Washington, DC	(new) 510.3b pg 46	Problem: Change for clarity. Proposed: (Modify) Information about the loss of affordable housing units, including public housing units, illustrated in...
Narrative Preservation of Affordable Housing / Addressing Displacement in Washington, DC	(new) 510.3b pg 46	Problem: Amend for clarity and specificity. Proposed: (Modify 2nd sentence) National-level studies on gentrification and displacement found that, by some measures, the District was the “most intensely gentrified” city in the U.S. between 2000 and 2013, with more than 20,000 Black residents in Washington, DC displaced. (National Community Reinvestment Coalition)

<p>Narrative</p> <p>Preservation of Affordable Housing / Addressing Displacement in Washington, DC</p>	<p>(new)</p> <p>510.3d</p> <p>pg 46</p>	<p>Problem: Failure to fully recognize that rent-stabilized housing program measurably stabilizes tenants, except where it's undermined</p> <p>Proposed: (Add 2nd sentence) Washington, DC has one of the strongest sets of anti-displacement programs in the country, which includes rent control, eviction protection, Tenant Opportunity to Purchase Act (TOPA), District Opportunity to Purchase Act (DOPA), locally subsidized rents, tax assessment caps, and tax credits for low-income and older homeowners. For District residents to fully realize the benefits of these programs, rent control, which has lost an estimated 40,000-50,000 units since 1985 (Urban Institute 2011, 2015) must be expanded and strengthened; and DOPA must be funded and utilized.</p>
<p>Narrative</p> <p>Preservation of Affordable Housing / Addressing Displacement in Washington, DC</p>	<p>(new)</p> <p>510.3e</p> <p>pg 46-47</p>	<p>Problem: Does not address need to fill vacancies in current and forthcoming housing stock.</p> <p>Proposed: (Modify 3rd sentence) Minimizing the impacts of physical and economic displacement requires balancing the cost-effective approach of preserving low- and mixed-income housing in some locations, expanding housing supply in others through new construction and redevelopment, and ensuring access to the growing vacancies in our current and forthcoming housing stock.</p>
<p>Narrative</p>	<p>(new)</p> <p>NEW: After 510.3a-h, before 510.4</p> <p>pg 47</p>	<p>Problem: Housing Element does not sufficiently address public housing.</p> <p>Proposed: <u>Text Box: Public Housing Redevelopment</u></p> <p>510.3.5a Public housing redevelopment has led to the displacement of thousands of Black residents. To date, there has not been an analysis of public housing redevelopment to determine any adverse impacts on displaced residents, such as the loss of social networks of support, physical and mental health, determining where displaced residents went, how DC's stock of affordable housing stock was affected, and whether redevelopment catalyzed gentrification in the surrounding community.</p>

		<p>510.3.5b The District launched the New Communities Initiative in 2005 but has not yet implemented “build first” or one-for-one replacement of units in any NCI development, though such methods are stated in the principles.. For example, torn down in 2002, over 200 promised public housing units at Arthur Capper still have not been rebuilt. Original residents were or are currently being displaced from Temple Court, Barry Farm, and Park Morton. New housing developed through the federal HOPE VI and local New Communities Initiative programs has been predominantly market rate with few original residents returning to rebuilt properties.</p> <p>510.3.5c Public housing redevelopment disproportionately affects Black residents and must be conducted utilizing a racial equity lens and approach with the goal of improving the quality of life and economic conditions of residents.</p>
Narrative	(new)	Problem: Does not include public housing. Does not specify what “family-sized housing” means.
Preservation of Affordable Housing / Addressing Displacement in Washington, DC	510.4a pg 48	Proposed: Implement one-for-one replacement of all affordable units, including public housing units; Provide family-sized housing, including multigenerational families, with 3, 4, or more bedrooms;
Policy H-1.2.1.5 Long Term Affordability Restrictions	509.9 510.9 pg 49	Problem: Provision weakens long-term affordability restrictions by removing “ensure” and adding “should” Proposed: “Ensure that affordable housing units that are created or preserved with public financing are protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Affordable units shall remain affordable for the life of the building, particularly for land disposition and affordable housing tied to zoning relief, with equity and asset

		build-up opportunities provided for ownership units. Make the affordable housing permanent on District-owned land through a covenant on the land where possible.
Policy H-2.1.1 Protecting Affordable Rental Housing	509.5 510.5 pg 49	Problem: Omits rent-controlled housing from conservation/preservation/ protection. No justification given for geographical prioritization. Proposed: (Modify) Recognize the importance of preserving rental housing affordability to the well-being of the District and the diversity of its neighborhoods throughout the city . Undertake programs to protect and preserve the supply of subsidized rental units, rent-controlled units , and low-cost market-rate units, including those in high-cost or rapidly changing neighborhoods, where the opportunity for new affordable units is limited.
Policy H-2.1.3 Avoiding Displacement	509.7 510.7 pg 49	Problem: Add specificity around ownership opportunities to incorporate LEC Task Force recommendations from 2019. Proposed: (Add after "...Preservation Fund") When TOPA and DOPA rights are exercised, the DC government shall give priority to ownership options that offer shared equity.
Policy H-2.1.4 Conversion of At-Risk Rentals to Affordable Units	509.8 510.8 pg 49	Problem: Add specificity around ownership opportunities to incorporate LEC Task Force recommendations from 2019. Proposed: (Modify): Support efforts to purchase affordable rental buildings that are at risk of being sold and converted to luxury apartments or condominiums, to retain the units as affordable. Consider a variety of programs to own and manage these units, such as land banks, DOPA, TOPA, the Douglass Community Land Trust , and sale to nonprofit housing organizations. Encourage a "right to sell" approach for households at risk of foreclosure. Residents shall be allowed to sell property to the District to be turned into public housing or transferred to the Douglass CLT.
Policy H-2.1.6 Rent Control	509.10 510.10	Problem: Failure to recognize that rent-stabilization law in its current state is a leaky sieve, incapable of performing the function assigned to it in DC Code and by the Comp Plan.

	pg 50	Proposed: (modify) Maintain, expand, and strengthen rent control as a tool for preserving the affordability of rental properties and protecting residents from unpredictable and destabilizing rent increases . In acting on improvements to the rent control program, the District should focus primarily on whether proposed changes will advance equity , fairness, adherence to building codes , and affordability, and ensure preservation of rent- stabilized housing units. Rent control must not be restructured as a subsidized housing program, and units subject to rent stabilization must not be applied so as to reduce the city’s affordable housing commitments.
Action H-2.1.F Affordable Housing Preservation Unit	[new] 510.18 pg 51	Problem: Given OP’s definition of rent-controlled housing as market-rate housing, this new paragraph puts rent-stabilized housing directly in the cross-hairs of conversion. Proposed: (modify) Establish and maintain a division within District government to systematically and proactively work with tenants, owners of affordable housing, investors, their representatives, and others associated with housing advocacy and real estate in Washington, DC, to establish relationships and gather intelligence to preserve affordable housing and expand future opportunities by converting naturally affordable unassisted units, excluding units covered by the rent-stabilization program , to long-term dedicated affordable housing.
Action H-2.2.A Housing Code Enforcement	510.7 511.7 pg 53	Problem: Too limited in scope and impact Proposed: (modify) Improve the enforcement of housing codes, including the collection of fines, to prevent deteriorated, unsafe, and unhealthy housing conditions, especially in areas of Washington, DC with persistent code enforcement problems and to prevent the loss of low-cost rental properties in neighborhoods where it is scarce. Ensure that information on tenant rights, such as how to obtain inspections, use “repair and deduct,” contest housing provider petitions, purchase rental properties through the Tenant Opportunity to Purchase Act, and vote in conversion elections, is provided to tenants. Use fines collected to set up an abatement fund. Prevent landlords who are repeat code offenders from receiving government contracts, grants or other incentives.
Action H-4.3.D	[new]	Problem: Failure to acknowledge importance of rent-stabilization program to seniors’ housing stability.

Aging in Community	518.19 pg 72	Proposed: (modify) Establish programs to facilitate low-income older renters aging in place. Examples include tenant-based vouchers or other rental assistance to older adults on fixed incomes or fund for renovation of multi-unit buildings, individual apartments, and single-family homes to create appropriate housing for older adults to age in community. The rent-stabilization program facilitates renters aging in place; strengthening and expanding that program will stabilize housing for additional residents on low fixed incomes.
-----------------------	-----------------	--

LAND USE ELEMENT POLICIES & ACTIONS

Policy / Action # & Title	Paragraph # (original / revised) & page #	Problems with Text / Proposed Changes
Policy: LU-1.1.2 Resilience and Land Use	304.6 pg 11	Problem: No role is identified for involvement of impacted communities to make their communities resilient. Proposed (modify) Implement District-wide, neighborhood-scale, and site-specific solutions with accessible early and ongoing participation of neighborhood residents who are/may be impacted by any development in order to produce community-led climate adaptive, emergency responsive, and resilient District communities.
Action: LU-1.1.A Resilience, Equity, and Land Use	304.7 pg 11	Problem: No role is identified for impacted communities to develop their communities to ensure equity for them. Proposed: (modify) Ensure the participation of currently or likely impacted communities from the outset of planning through project completion and work with these communities to develop projects that decrease the vulnerability of people and places to climate risks and public health emergencies, as well as promote future resilience.
Policy: LU-1.2.4 Urban Mixed-Use Neighborhoods	304.11 305.11 pg 16	Problem: No requirement of affordable housing in the development of Central City neighborhoods. Proposed: (modify last sentence) Affordable housing, particularly for extremely low-income, very low-income, and low-income households, shall be a condition of District upzoning and other subsidies with respect to future land use, with particular focus on areas from which these low-income households have suffered displacement.

<p>Action: LU-1.2.D</p> <p>Development on Former Federal Sites</p>	<p>305.21</p> <p>pg18</p>	<p>Problem: mentions residential use; but fails to mention affordable housing</p> <p>Proposed (modify last sentence) Encourage mixed-use development with residential uses that include substantial housing affordable to extremely low-income, very low-income, and low-income households, including family-sized units, as well as retail and cultural uses to help support a living downtown.</p>
<p>Policy LU-1.3.1</p> <p>Reuse of Large Publicly-Owned Sites</p>	<p>305.5</p> <p>306.6</p> <p>pg 20</p>	<p>Problem: lacks specifics on income groups who will be focus of affordable housing.</p> <p>Proposed (modify) Recognize the potential for large, government-owned properties to supply needed community services and facilities; create affordable housing for extremely low-income, very low-income, and low-income households, including family-sized units; remove barriers between neighborhoods; enhance equity and inclusion...”</p>
<p>Policy LU-1.3.2</p> <p>Mix of Uses on Large Sites</p>	<p>305.7</p> <p>306.8/p. 22</p>	<p>Problem: removes requirement that new uses of large redeveloped sites be compatible with adjacent uses and benefit surrounding communities.</p> <p>Proposed (Reinstate/modify) Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods by requiring the early and ongoing participation of impacted neighborhoods to determine the uses that best benefit their communities, including a focus on family size housing for extremely low-income and very low-income households.”</p>
<p>Policy LU-1.3.5</p> <p>Public Benefit on Large Sites</p>	<p>305.10</p> <p>306.11</p> <p>pg.22</p>	<p>Problem: no requirement to use affordable housing as public benefit.</p> <p>Proposed (modify 2nd sentence) Housing construction, with an emphasis on family size housing affordable to extremely low-income, very low-income, and low-income HUD defined households, shall be a high priority public benefit on redeveloped District-owned property, particularly where communities of color and low-income communities have suffered and risk displacement. New parks and open spaces; health care</p>

		facilities and infrastructure; civic facilities; public educational facilities; and other public facilities are additional, important public benefits.
Policy LU-1.3.6 New Neighborhoods and Urban Fabric	305.11 306.12 pg 22	Problem: vague language regarding how sites should be developed to enhance “resilience” and promote “inclusion.” Proposed (modify last sentence) Large sites shall be developed as communities integrated with surrounding communities and have convenient access to public schools, hospital and medical infrastructure, parks, recreation centers, libraries, job training facilities, and other public services so as to create communities of resilience and inclusion. Housing developed on large sites must include a mix of housing types and affordability levels including no less than 30% of housing for extremely low, very low and low income residents.
Policy LU-1.3.8 Large Sites and Waterfront	305.13 306.14 pg 23	Problem: no consideration of affordable housing as part of resilience and equity. Proposed (modify/add new sentence) Integral to redevelopment of large sites to achieve resilience and equity is the requirement to focus on creating housing affordable to extremely low-income and very low-income households.
Action LU-1.3.B Encouraging Livability of Former Federal Lands	305.14 306.16 pg 23	Problem: no mention of affordable housing and weakens commitment to mixed-use neighborhoods.. Proposed (modify 2nd sentence) Encourage cultural, residential for extremely low-income, very low-income, and low-income households, open space, job creation and training, recreational, and retail to ensure mixed-use neighborhoods, even if the site is designated high-density commercial on FLUM.”
Policy LU-1.4.1	306.10 307.9	Problem: no mention of housing affordability levels.

Station Areas as Neighborhood Centers	pg 27	Proposed: (modify 2nd sentence) The establishment and growth of mixed-use centers at Metrorail stations shall provide access to housing opportunities at all income levels, with a substantial percentage (50%) of housing affordable to extremely low-income, very low-income, and low-income households as well as economic development opportunities for which impacted communities express need ...”
Policy LU-1.4.3 Affordable Rental and For-Sale Multi-Family Housing Near Metrorail Stations	(new) 307.12 pg28	Problem: removes reference to affordable housing for first time buyers; uses vague term “mix of incomes and household types” Proposed (modify) Require that 50% of permanent rental and for-sale multi-family housing built with any type or measure of District subsidy be permanently affordable to extremely low-income and very low-income households for rentals and very low-income and low-income households for sale, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations.”
Action LU-1.4.B Zoning Around Transit	306.19 307.20 pg 30	Problem: no specification of housing affordability levels; says using zoning incentives for the provision of new housing and affordable housing should be encouraged; but is not required. Proposed (modify) “Use zoning incentives to facilitate new and mixed-use development and require the provision of new housing, particularly housing affordable to extremely low-income, very low-income, and low-income households, in high opportunity areas to address more equitable distribution.”
Action LU-1.4.C Metro Stations and	(new) 307.21 pg 30	Problem: phrase “with appropriate density bonus” is too vague. Proposed (modify) Encourage developments in and around metro station areas to exceed the affordable units required by the Inclusionary Zoning Program, by building housing units affordable to extremely low-income and very low-income households, which are not served by IZ, using a formula providing the

Inclusionary Zoning		greatest density bonus for deepest affordability levels, 3+ bedroom family size affordable units, and the largest number of units reserved for low-income households most in need of housing assistance.
Policy LU-1.4.3 Zoning of Infill Sites	307.7 (deleted) pg 32	Problem: eliminated requirement that new infill development be compatible with surrounding neighborhoods. Proposed (reinstate) Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development.
Introductory Language extolling District Neighborhoods	309.1	Problem: removes requirement that all neighborhoods have adequate access to public services. Proposed (reinstate): Land Use policies must ensure that all neighborhoods have adequate access to commercial services, parks, educational and cultural facilities, economic mobility, and sufficient and accessible housing opportunities, particularly for extremely low-income and very low-income families, while protecting their rich historic and cultural legacies.
Policy LU-2.1.2 Neighborhood Revitalization	309.7 310.9 pg 35	Problem: no specification regarding what constitutes equity and opportunity. Proposed (modify 1st sentence) Facilitate neighborhood revitalization and stabilization by requiring District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions be used in those areas most in need, especially where projects advance racial equity and economic opportunity for the lowest income disadvantaged persons, and in areas where residents have experienced or are at risk of displacement.
Policy LU-2.1.8 Zoning of Low and Moderate Density	309.13 310.15 pg36	Problem: no protection of single family homes, duplexes, row houses. Proposed (replace) The rezoning of low and moderate density neighborhoods shall require analysis of impact on housing access, affordability and displacement, be informed by the input of impacted neighborhoods, with particular attention to the early and ongoing participation of the lowest income households, and shall maintain or expand affordability for extremely low, very low and low income groups.

Neighborhoods		
Policy LU-2.1.13 Planned Unit Developments in Neighborhood Commercial Corridors	309.19a 310.20 pg38	Problem: no requirement that planned unit developments provide housing affordable to income groups most in need of housing assistance. Proposed (modify) Planned unit developments (PUDs) in neighborhood commercial areas shall provide high-quality developments with active floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces, and public benefits, particularly family size housing affordable to extremely low-income, very low-income, and low-income households, and commercial spaces affordable to small and local businesses.
Action LU-2.1.B Study of Neighborhood Indicators	310.22 pg 39	Problem: too vague - “periodic publication,” “social & economic indicators, “neighborhood diversity.” Proposed (replace) Conduct an ongoing review with annual publication of social and economic neighborhood indicators, disaggregated by race, for the purpose of targeting neighborhood investments, particularly for the purpose of achieving neighborhood diversity, improving economic conditions for low income residents of color, preventing displacement, and furthering fair housing.
Action LU-2.2.A Vacant Building Inventories	310.9 311.9/ pg 41	Problem: no requirement that purchase of vacant buildings be used to support housing and economic development for income groups most in need of housing and economic assistance. Proposed (modify last sentence) Strategically purchase such properties at tax delinquency sales or through other means for the creation of housing that is affordable to extremely low-income, very low-income, and low-income households, serves high need groups such as people with disabilities or returning citizens, or creates economic development opportunities for these groups. Partner with nonprofit organizations to operate housing with supportive services.
Policy LU-2.4.1	312.5	Problem: No emphasis on job training and entrepreneurship centers.

Promotion of Commercial Centers	313.9/ pg 47	Proposed (modify 1st sentence) Promote the vitality of commercial centers and provide for continued growth of commercial land uses to meet the needs of residents, expand employment opportunities, particularly with the creation of job training and entrepreneurship centers, accommodate population growth, but not by displacing current residents, and sustain the District’s role as the center of the metropolitan area.
Policy LU-3.2.6 Siting of Industrial-Type Public Works Facilities	314.12 316.7/ pg 55	Problem: Weakens compatibility requirement by changing “ensure” to “promote” Proposed (modify) Use performance standards (such as noise, odor, and other environmental controls) minimum distance requirements, and other regulatory and design measures to ensure the compatibility of industrial-type public works facilities such as trash transfer stations with surrounding land uses.
Policy LU-3.5.4 Federal Workplaces and District Goals	318.9 319.9/ pg71	Problem: fails to recognize that extremely low-income and very low-income households are part of federal workplaces. Proposed (modify) Strongly support the implementation of Federal Element policies for federal workplaces calling for parking guidelines that align with local guidelines, sustainable design, energy conservation, additional housing affordable to extremely low-income, very low-income, and low-income households, recognizing that households in these income groups are federal employees and employees of federal contractors, and creation of job opportunities in underserved communities within the District.
Narrative		Problem: Current amendments do not address forthcoming racial equity impact assessment. Proposed: The development of the Comprehensive Plan has historically not involved a racial equity impact assessment. Only recently has the District acknowledged in planning documents “structural racism” and racial equity principles. In order to reach meaningful equitable development goals, the District requires an action-based plan, innovative new tools and strategies, and enforceable policies to support equitable development. The historic role of housing and land use policy in establishing racial inequity will best be

		<p>reversed through a thorough analysis of the laws, policies, systems and structures that perpetuate inequities. A core element of equitable development is the early and ongoing engagement of impacted residents. Residents most harmed by historical and structural inequities must be given special attention in planning for the future of their communities, including additional resources and accommodations to support their full participation in planning activities.</p>
<p>Policy</p>		<p>Problem: Need to incorporate 2019 LEC Task Force recommendations and allow for ownership opportunities for upward mobility.</p> <p>Proposed: When developing public land, affordable home-ownership opportunities, such as limited equity co-operatives (LECs) and community land trusts, shall be given priority. This will not only fulfill the recommendations set out in the 2019 LEC Task Force report, but is also a more efficient use of city dollars funding long term affordability.</p>

ENVIRONMENTAL PROTECTION ELEMENT

Policy # and Title	Paragraph # (original and revised) and page #	Problem with text / Proposed Changes
Title	n/a	<p>Problem: This section covers issues of environmental justice. However, the title is misleading and does not reflect the importance of all forms of environmental protection.</p> <p>Proposed: (New Element Title) Healthy Environments</p>
narrative	600.1	<p>Problem: Environmental justice discussion does not have the level of detail that other sections have. The Housing element addresses healthy home environments. This element should support the equity provisions of the Housing element.</p> <p>Proposed New Section (add before E-1:) Equity and Environmental Racism</p>
narrative	600.1	<p>Problem: This section is completely missing the key importance of environmental protection.</p> <p>Proposed (add as new first sentences) Healthy environments are vital to human thriving and sustainability. This Element seeks to promote principles and policy actions that improve both the indoor and outdoor quality of life for work, life, and play in Washington, DC. To achieve environmental justice and protection, this document lays out approaches to promote community health, management risk, and promote long-range planning for climate change mitigation</p>
narrative	600.2	<p>Problem: Current priorities do not acknowledge deep and chronic environmental inequalities, including environmental racism.</p> <p>Proposed (add before “reducing greenhouse gas):</p> <ul style="list-style-type: none"> ● Ensuring environmental justice for all ● Acknowledging and eliminating environmental racism ● Enabling communities to have meaningful impact on development processes that perpetuate environmental threats ● Ensuring that low-income and minority communities do not face disproportionate indoor or outdoor environmental burdens and enjoy clean and safe places to live, work, play, and learn. (see Environmental Protection, 628.2)

		<ul style="list-style-type: none"> Ensuring equity across Washington, DC in access to outdoor, safe public space for recreation, exercise, and social life
narrative	600.11 pg 4	<p>Problem: Section 600.7 indicates that Wahsington, DC has signed on to the Global Covenant of Mayors. No affirmation to environmental justice principles appear in section.</p> <p>Proposed (add to existing policy) Washington, DC must sign on to a national or global affirmation(s) of environmental justice principles and join other cities to achieve more environmental justice and eliminate environmental racism.</p>
NEW	602	<p>Problem: The centrality of protecting people and communities is missing from the Environmental Protection element (“Healthy Environments”). Environmental protection is a goal in and of itself, but also serves an instrumental purpose. The penultimate goal of environmental protection is human thriving and sustainability.</p> <p>Proposed New Section (before the existing E-1 Adapting to and Mitigating Climate Change)</p> <p>E-1 Equity and Environmental Racism</p> <p>Environmental equity refers to a state where adverse health impacts due to exposures both indoor and outdoor are non-existent. In addition, environmental equity is achieved when work and living conditions associated with income, housing type, race or ethnicity, geography, disability status, or age do not diminish health or quality of life.</p> <p>Washington, DC aims to eliminate environmental inequity and to create healthy environments for human thriving and sustainability. This goal supports the Universal Declaration of Human Rights, “Everyone has the right to a standard of living adequate for the health and well-being of himself (or herself) and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.”</p> <p>As a Human Rights City, Washington, DC has joined other human rights cities around the world in striving to secure, protect, and promote human rights for all people</p> <p>Active regulation and oversight are required to address and penalize actors responsible for maintaining hazardous environmental health conditions. Everyone who provides or receives housing carries at least some responsibility for ensuring health environments.</p> <p>Washington, DC has often struggled with acknowledging and addressing environmental racism. Sources of heavy industrial pollution are located in communities of color. Engagement with and responsiveness to frontline communities have been inadequate. The deep and chronic racial chasm in employment, income, educational attainment, and opportunities have led to racial differences in access to quality housing.</p>

In recent years, development patterns have exacerbated racially inequitable access to healthy environments. Displacement and the increasing low-income concentration are widely accepted.

Children represent a highly vulnerable population since early exposure to environmental hazards can irreparably reduce quality and length of life. Lead exposure is a leading public threat for children in Washington, DC, particularly those residing in low-income households and older housing. Lead on playgrounds, in schools, and in soils also contribute to this crisis. As recently as 2019, Washington, DC failed to spend federal funds to remediate lead paint hazards for low-income tenants with small children.

Policy E-1.1: Interagency Collaboration

Encourage interagency efforts to achieve environmental equity by creating policy that addresses environmental racism in Washington, DC's policies in residential and commercial development, and the enforcement of housing codes,

Policy E-1.2: Public Housing

Form a coalition of cross-sector representatives, including residents who reside in public housing, and create a plan to eliminate environmental inequities due to poor maintenance and living conditions in public housing. This coalition must publish a report summarizing current challenges and recommended action in 2021. A significant portion of the recommendations must be funded in FY22.

Policy E-1.2 Community Monitoring

Conduct a rigorous community monitoring program to assess the severity of indoor environmental threats with a focus on lead, asbestos, toxic mold, secondhand and thirdhand smoke, air quality, vermin, and other materials or conditions that cause adverse impacts. Study findings must include data on race/ethnicity and differences by neighborhood and housing type.

Policy E-1.3 Worst Housing for Health

Develop strategies to overcome impediments and obstacles to improve the living conditions of the worst housing that is negatively impacting health.

Policy E-1.4 Incentives and Regulations

Provide housing incentives and regulations to eliminate within both residential and commercial buildings pollutants that are hazardous to health, especially within households that include children, seniors, and other vulnerable populations. Significantly reduce the prevalence of lead, asbestos, fumes, mold, noise, and achieve healthy water, air quality, appropriate indoor temperatures, and conditions that completely meet building codes. A subsidy program for indoor air quality monitoring systems and air filters should be implemented to support renters and landlords.

Policy E-1.5 Common Areas

		<p>Provide housing incentives and regulations for condominium, cooperative, or homeowner association to remediate indoor mold in common areas and subject them to a cause of action by a unit owner for violations of the DC Housing and Property Maintenance Codes.</p> <p><i>Policy E-1.6 Protective Factors</i> Support and research protective factors against environmental health threats. Develop collaboratives across governmental agencies that increase and connect access to medical care, fresh fruits and vegetables, safety net services, educational programs, legal services, and products and services from non-profit and commercial entities. Implement the Public Facilities Environmental Safety Amendment Act of 2020</p> <p><i>Action E-1.A.1 Modifiable Behaviors and Practices</i> Develop a permanent public campaign to educate households about housing related determinants of health such as indoor smoking, violence, noise, temporary lead mitigation, housekeeping, child proofing, benefits of air quality monitoring and air filtering.</p> <p><i>Action E.1.A.2 Improving Standards</i> Review the District's existing indoor and outdoor healthy environments standards to improve the effectiveness of programs and services and assess its impacts, advantages, and disadvantages.</p> <p><i>Action E.1.A.3 Interagency Collaborative Model</i> Develop recommendations for the establishment of an interagency governmental collaborative model to eliminate indoor and outdoor building determinants of health for the most vulnerable populations residing in the most inferior housing.</p> <p><i>Action E.1.A.4 Lead Exposure Remediation</i> Advertise and expand the Lead Reduction Program to maximize the number of children under the age of six years old protected from lead poisoning.</p>
Action E-2.4.A Expand Tree and Slope Protection	606.7 608.7	<p>Problem: All initiatives should involve coordination with the community and using neighborhood-level knowledge. Only one section appears (608.7) to explicitly leverage the knowledge that comes from Advisory Neighborhood Commissions (ANCs) to identify areas of concern. ANCs can provide expertise and community input on all issues, not just on identifying areas for Tree Slope Protection.</p> <p>Proposed (add to existing policy) "The ANCs must have the ability to provide feedback and affect change on conserving natural resources, promoting environmental sustainability, and reducing environmental hazards."</p>
Policy E-64.436	621.10 624.10	<p>Problem: No protection or mitigation provided to communities currently living in such areas.</p> <p>Proposed (add to existing policy) Washington, DC must determine and mitigate effects for current residential areas significant exposure to hazardous substances and air particulates both indoor and outdoor.</p>

Hazardous Substances and Land Use	pg 74	
Policy E-64.61 Prudent Avoidance of EMF Impacts	624.4 627.2 pg 81	<p>Problem: Making sure that facilities are not located in areas that will lead to “involuntary public exposure to potential adverse effects” (627.2) does not protect those who are currently living in such areas.</p> <p>Proposed (add to existing policy) Some communities such as Southwest are facing disproportionate burdens associated with EMF exposure. Washington, DC must eliminate this neighborhood-level inequity. Additional action must be taken to rigorously evaluate EMF exposure throughout the District. Residential areas adjacent to power plants and other EMF-emitting industrial activities must be continuously monitored. Results must be readily made available to the public.</p>
Policy E-64.7.1 Addressing Environmental Injustice	625.3 628.4	<p>Problem: The section addressing environmental injustice (628.4) needs expansion beyond “adverse effects of industrial uses.” Adverse effects also come from construction, demolition of old structures that contain hazards such as asbestos and PCBs, cleanups of contaminated land. Addressing environmental injustice, much less environmental racism, seldom appears in this section.</p> <p><i>You may consider adding this section to E-1 Equity and Environmental Racism (proposed)</i></p> <p>Proposed (replace) “Develop aggressive and innovative solutions to mitigate the adverse effects of industrial uses, particularly when proximate to residential areas. Communities proximate to these uses must be continuously monitored, including community health assessments and engagement. These community health assessments must assess whether racial inequities exist in exposure to the adverse effects of industrial uses and transient pollution. An annual environmental justice report must be published with results from assessments, engagements, and mitigation efforts. This report must also include recommendations that subsequently receive funding to implement. The report must also document racial inequities and rank communities based on environmental injustices.</p> <p>Data from quarterly testing during typical exposure in no fewer than 25 neighborhoods should inform report. Washington, DC should fund and implement a longitudinal study to determine the typical indoor/outdoor environmental exposures. Subjects should differ in race, gender, age of residential housing, employment type, exercise, diet, family size, and geography.</p> <p>As part of evaluating exposure, assessments should be realistic based on housing type and use (e.g. central A/C, outdoor social activities) and indoor home and work conditions.</p> <p>Each community must have public access to a dashboard of neighborhood report cards showing the level of exposures in the following areas: lead exposure, PM2.5, PM10, carbon monoxide, volatile organic compounds, nitrogen oxide, sulfur dioxide, noise pollution, light pollution, and additional asthma-triggering irritants.</p>

		<p>Assessment of adverse effects must also include sources from construction, demolition of old structures that contain hazards such as asbestos and PCBs, cleanups of contaminated land.</p> <p>Communities ranked high for environmental injustices according to the above mentioned report must receive resources above and beyond mitigation due to effects of industrial uses. These communities must experience reversal or elimination of adverse effects such that it achieves equity. Equity means that environmental exposures and mitigation efforts for a given community must be no greater than for Washington, DC as a whole.</p> <p>The District of Columbia Department of Health, Office of Health Equity must conduct a health and safety study prior to approval of any major development, which is considered more than 4 stories or 12 units. In addition, the Council Office on Racial Equity must conduct a racial equity impact assessment prior to approval of any major development. Neither report can use the community's historic or contemporary vulnerability or state of inequity to approve a project.</p>
<p>Policy E-64.7.2</p> <p>Expanded Outreach to Underserved Communities</p>	<p>625.4</p> <p>628.5</p> <p>pg 83</p>	<p>Problem: "Fair and meaningful opportunity to participate" (628.2) in environmental decisions needs to be defined with specific requirements, along with a more detailed description of processes for expanded outreach (628.5). Presentations in the past to residents have been rushed, not allowing enough time for residents to fully engage. Presentations in the past have informed residents of decisions that have already been made. This communicates to the residents a lack of caring for communities that have the most at stake about environmental decisions in their immediate neighborhoods, the ones who face the burdens from those decisions.</p> <p>Proposed (add to existing policy): Provide free legal services for entire communities, particularly vulnerable population and low-income racial minorities, to understand and defend against pollutant exposures, - particularly those from power plants, trash stations, and other industrial activities. Communities must be informed of legal and regulatory avenues to combat pollutant exposures.</p> <p>"Communities, particularly vulnerable populations and low-income racial minorities, must receive reading level-appropriate materials and presentations and be advised of their rights to understand pollutant exposures. Prior to full engagement, all presentations and engagement proposals must seek and apply feedback from a representative community advisory board. Community engagement must be receptive to feedback and be able to accommodate community feedback.</p>
<p>Action E-5.1.D</p> <p>Air Quality Monitoring</p>	<p>618.17</p> <p>620.22</p> <p>pg 63</p>	<p>Problem: Section 602.22 about air quality monitoring focuses solely on detecting exceedances of federal standards. Yet states such as California often follow stricter standards. Federal standards are only as good as the administration; for example, this year it failed to make stricter PM2.5 and PM10 NAAQS standards. DC should be at the forefront of air quality standards. [given vulnerable]</p> <p>Proposed (add to existing policy) Washington, DC must set air quality standards higher than federal standards and must aim to be at the forefront of air quality standards in the US."</p>

<p>Action E-64.5.A</p> <p>Expanded Trash Collection and Street Sweeping</p>	<p>623.7</p> <p>626.7</p> <p>pg 79</p>	<p>Problem: Expanded trash collection and street sweeping (626.7) only puts a bandaid on trash by cleaning it up but not correcting the source. To make sure that the plan’s intentions are indeed realized, residents would like to see more details and specifics of how enforcement will be conducted in each case. Who will be responsible for enforcement in each case? There are several sections that outline enforcement specifically, and the same level of specificity should be throughout, for example in Sections 628.4, 624 (hazardous material transport).</p> <p>Proposed (add to existing policy) “Practices concerning the timing, frequency, and quality of trash collection, street sweeping, and snow removal must reflect the highest standards of racial equity. The Council Office of Racial Equity should conduct an annual assessment of adherence.”</p>
<p>narrative</p>	<p>625.2</p> <p>628.2</p> <p>pg 82</p>	<p>Problem: This is past tense as if salient issues of environmental inequity do not exist</p> <p>Proposed (modify 2nd sentence) “Some District neighborhoods are being adversely impacted by pollution-generating uses and other forms of environmental degradation, particularly in Wards 5,6,7, and 8.””</p>
<p>narrative</p>	<p>625.2</p> <p>628.2</p> <p>pg 82</p>	<p>Problem: The language is weak around racial inequity.</p> <p>Proposed (modify) “Washington, DC must eliminate neighborhood inequity due to adverse impacts from pollution-generating uses. Achieving equity means that environmental exposures must be no greater than for Washington, DC as a whole. Environmental threats include but are not limited to sources from industrial plants, EMF, commercial and residential vehicular pollution, construction, demolition of old structures that contain hazards such as asbestos and PCBs, cleanups of contaminated land.</p> <p>Where inequity is found, elimination of threats or robust mitigation must be implemented to eliminate neighborhood inequity.</p> <p>Mandatory annual assessments that demonstrate neighborhood environmental inequity for low-income and minority populations must be forwarded to the Council of Racial Equity and the Office of Attorney General for additional recommendations and assessment, including an evaluation of environmental racism. A significant portion of these recommendations must be fully funded and applied to elimination and mitigation efforts.</p>
<p>Text Box: The Environment & Health</p>	<p>628.3a</p>	<p>Problem: This contains nice language, but language in the text box is not actionable.</p> <p>Proposed (modify and take out of text box) Washington, DC must reduce social inequities within the environment by reducing social inequities, often referred to as social determinants of health, including differences in individual behaviors, socio-cultural influences, access to health services, economic status, and literacy levels. All environmental policy, including development approvals, should support the goal of eliminating social and environmental inequities in Washington, DC for current and incoming populations.</p>

**DC Grassroots Planning Coalition’s Comments on the
Office of Planning’s Draft Amendments to the Comprehensive Plan
Community Services and Facilities Element**

Policy # and Title	Page Number, Paragraph	Redline Text to be Deleted / Modified
Policy CSF-1.1.2 Adequate Land	1103.7 (1103.14) Pg 7	<p>Problem: Weakens language from “ensure that” District government owns sufficient amount of land to DC government “should” own sufficient land. Allows DC government to more easily get rid of District-owned land.</p> <p>Proposed (modify): Ensure that the District government owns a sufficient amount of land in appropriately distributed locations to accommodate the equitable distribution of needed public facilities and meet the long-term operational needs of the government.</p>
Policy CSF-1.1.4 <u>Retention of Prioritization of Publicly-Owned Land</u>	1103.9 (1103.15)	<p>Problem: Weakens language to allow for District-owned property to be used for other things and not retained. Could easily be countered by a different “priority.”</p> <p>Proposed (restore to original): Retain District-owned property for community facility uses. Wherever feasible, the District should use short- or long-term leases for lands not currently needed so as to preserve the District’s long-term supply of land for public use.</p>
Action CSF-1.1.F Co-location of Housing with Public Facilities	New 1103.29 Pg 12	<p>Problem: does not specify affordable housing as a priority for colocation</p> <p>Proposed: (modify) As part of facilities master planning and the CIP, conduct a review of and maximize opportunities to co-locate multi-family housing for extremely low, very low and low income residents, particularly in high-cost areas.</p>
Policy CSF- 1.2.6 Impact Fees	1104.8 Pg 14	<p>Problem: removed requirement that development pay “fair share” of capital costs</p> <p>Proposed (modify) Ensure that new development pays its “fair share” of the capital costs needed Implement the use of impact fees....Nonprofit and deed restricted affordable housing shall be exempt from this provision</p>

NEW	NEW	<p>Add New</p> <p>Action: Community-Led Planning & Development</p> <p>Support community-led planning to identify current and future facility needs. Consider the use of public land to support community-identified needs not supplied by the private market - such as space for community based nonprofit organizations, small business incubation, and other community facilities. Prioritize uses that incorporate community ownership models such as Land Trust and Cooperatives.</p>
NEW	NEW	<p><i>Add new</i></p> <p><i>Policy – D.C. Government-Owned Land and Building Use for Street Vendors, Flea Markets, and Farmers’ Markets</i></p> <p>Provide government owned land to indigenous District residents for the creation of flea markets and farmers markets. This strategy will allow grassroots entrepreneurs to bring fresh farm produce, general merchandise, and services to the underserved areas of the District and allow District citizens to revitalize obsolete commercial areas of the city, especially in southeast D.C.</p>

IMPLEMENTATION ELEMENT POLICIES & ACTIONS

Policy / Action # & Title	Paragraph # (Original / Revised) & pg #	DCGPC Proposed Language
Policy IM-1.2.1: Small Area Plans	2503.2 Pg 5	<p>Problem: No identification of importance of community involvement in drafting small area plans.</p> <p>Proposed: (Modify 1st sentence) “Ensure continuous involvement of impacted communities in the drafting of Small Area Plans and other planning studies where studies are needed to guide land use, transportation, urban design, and other future physical planning decisions so that land use, transportation, urban design, and other planning decisions will enure to the benefit of these communities.”</p> <p>(Reinstate 3rd sentence) “Citizens shall have the right to petition or suggest small area plans to be proposed by the Mayor.”</p> <p>(Delete last sentence inserted by OP)</p>
Policy IM-1.2.2: Protocol for Small Area Plans	2503.3 Pg 6	<p>Problem: provision limits authority of Small Area Plans.</p> <p>Proposed: (Modify 2nd new OP sentence) “If approved by DC Council, the Small Area Plans crafted with impacted community input shall be used as detailed guidance by the Zoning Commission regarding land use of the impacted communities.”</p>
Action IM-1.3.D: Adoption of Future Land Use Map and Policy Map	2504.1 1 2504.9 Pg 8	<p>Problem: weakens requirement that text of Comp Plan governs between inconsistencies between illustration on map and textual description.</p> <p>Proposed: (Reinstate) Reinstate the word “shall” in the phrase “Comprehensive Plan legislation shall be resolved in favor of the text.”</p>
Action IM-1.4.A: Progress Reports	Formerly 2505.6 Pg 9	<p>Problem: OP reduces transparency by deleting requirement to prepare Comp Plan progress reports.</p> <p>Proposed: (Reinstate and Modify) As least once every two years, prepare a Comprehensive Plan Progress Report for the Council that documents, with data and explanation, the progress being made on implementation of the District Elements.</p>

	2507.2 Pg 10	<p>Problem: deletes consideration of an independent city planning commission to enhance implementation and accountability.</p> <p>Proposed: (Reinstate and Modify) Commission an independent study addressing the pros and cons for establishing an independent planning commission for the District of Columbia that shall include examination of OP’s level of accountability, including providing detailed information regarding progress of implementation and justification for amendments to the the Comprehensive Plan with a view to improving accountability and implementation.</p>
Policy IM-1.5.1: ANC Involvement	2507.3 2507.2 pg 10	<p>Problem: provision deletes ANC “great weight” for recommendations.</p> <p>Proposed: (Reinstate and Modify 2nd sentence) Consistent with the DC Code, ANC issues, concerns, and other feedback, as formally adopted by the ANCs, shall be given “great weight” as land use recommendations and decisions are made.</p>
IM 3.1 Monitoring and Evaluating Comprehensive Plan Implementation	2512.1 Pg 14	<p>Problem: OP deletes requirements for public transparency regarding monitoring and evaluating Comp Plan implementation.</p> <p>Proposed: Reinstate language requiring status and progress reports.</p>
	2512.2	<p>Problem: OP deletes language, proposing less transparency and less public discourse regarding Comp Plan progress reports.</p> <p>Proposed: Reinstate original language</p>
IM-3.2.2 Amendment Submittal Process	2515 through 2515.3	<p>Problem: Deletes all provisions regarding providing, data, explanation and justification for amending the Comp. Plan.</p> <p>Proposed: Reinstate 2515, 2515.1, 2515.2, and 2515.3</p>
IM-3.2.3 Analysis and Review Process	2516 through 2516.4	<p>Problem: Deletes all provisions setting forth requirements of analysis and review process.</p> <p>Proposed: Reinstate 2516, 2516.1, 2516.3, 2516.4</p>

<p>IM-3.2.4 Approval Process</p>	<p>2517 through 2517.3</p>	<p>Problem: Deletes all provisions for DC Council review and adoption.</p> <p>Proposed: Reinstate provisions</p>
<p>Policy IM-1.1.1</p>	<p>2502.5</p>	<p>Problem: OP doesn't fully describe negative impacts of new development on existing DC communities</p> <p>Proposed (modify): To the greatest extent feasible, use the development review process to ensure that potential positive impacts are maximized and potential negative short- and long-term impacts are assessed and mitigated regarding neighborhood services such as on existing schools, parks, clinics, libraries, recreation centers, the transportation network, traffic, emergency response time, parking, displacement pressures, and environmental quality. Cumulative adverse development effects can be evaluated using a Whole Neighborhood Approach Policy H-1.4.6.</p>
<p>Policy IM-1.1.2</p>	<p>2502.6</p>	<p>Problem: Op deletes "traffic" as a planning issue</p> <p>Proposed: Reinstate provisions</p>
<p>Policy IM-1.1.3</p>	<p>2502.7</p>	<p>Problem: OP limits planning and doesn't include key public functions to align development capacity with.</p> <p>Proposed: (modify) Align development with infrastructure capacity. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit, and other travel modes, and the adequate availability and capacity to serve the existing community and new development and growing population with water, sewer, drainage, solid waste, and other public services, including emergency response services, and existing community facilities such as schools, recreation centers, libraries, clinic, parks, etc. Cumulative adverse development effects can be evaluated using a Whole Neighborhood Approach Policy H-1.4.6.</p>
<p>Policy IM-1.1.5</p>	<p>2502.9</p>	<p>Problem: OP inserts discretionary "where applicable" eliminating the directive of this policy.</p> <p>Proposed: (modify) Delete Op's "where applicable"</p>
<p>Policy IM-1.1.6</p>	<p>2502.10</p>	<p>Problem: OP weakens this very important policy with discretionary qualifiers replacing words like "ensure" with "consider" and "should". And, OP didn't put in analysis of displacement, the environment, and other evaluations we expect with planning.</p>

		<p>Proposed: (modify) Ensure development review and approvals such as PUDs require: (1) transportation and infrastructure studies and recommended conditions of approval to mitigate potential impacts; (2) agreements for financing any necessary improvements, including public and private responsibilities; (3) agreements to comply with District employment and hiring requirements; (4) analysis of land value destabilization affecting neighboring residents and local small businesses to protect those especially vulnerable to displacement; (5) analysis of existing capacities at local community facilities, like schools, libraries, recreation centers, and emergency responders to ensure development doesn't overwhelm existing public services; and (6) evaluations of impacts on natural environment, such as air quality, water quality, noise, refuse, and emissions, to mitigate negative effects especially for those more vulnerable and sensitive to these issues like children and seniors.</p>
<p>Policy IM-1.3.3</p>	<p>2504.5</p>	<p>Problem: OP substantially weakens this policy, eliminating “require” and replacing it with “should” and capriciously removes the Zoning Administrator from these requirements.</p> <p>Proposed: Reinstate original stronger language.</p>
<p>Action IM-1.4.A</p>	<p>2505.6</p>	<p>Problem: OP completely deletes this provision to escape any accountability from reporting to the Council and public how the existing Comp Plan policies are being used and to what efficacy and success.</p> <p>Proposed: Reinstate original requirements for regular progress reporting to the public on the Comprehensive Plan.</p>