November 19, 2017

Eric Shaw, Director
D.C. Office of Planning
1100 4th Street, SW
Suite 650 East
Washington, D.C. 20024

Re: Amending the D.C. Comprehensive Plan

Dear Director Shaw,

On November 8, 2017, at a duly noticed and regularly scheduled monthly meeting, with a quorum of six out of six commissioners and the public present, the commissioners voted 6-0 to support the following 11 amendments to the Comprehensive Plan. These amendments were previously submitted by Greater Greater Washington and a coalition of housing advocacy groups and developers and would strengthen the Comprehensive Plan’s language around building and preserving affordable housing near transit and building affordable housing for families. ANC6C commissioners agreed that this stronger language would have benefitted residents in ANC6C, particularly in the NoMa area and north of H Street NE during the construction boom, and likely would be beneficial to neighborhoods that will experience similar redevelopment in the future.

The amendments highlighted for unconditional support by ANC6C are the following:

**Amendment 1-1-1 - Framework Element 217.6:** Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must respond to and enhance existing neighborhoods, not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context, promote diversity of housing types, accommodate needed housing, particularly affordable housing, and affirmatively further fair housing. Adequate infrastructure capacity should be ensured as growth occurs.

**Amendment 1-1-2 - Framework Element 218.1:** The residential character of neighborhoods must be protected, maintained and improved-enhanced while ensuring they can include residents of many income levels and backgrounds, including extremely low income households. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places in which to live. These qualities can lead to development and redevelopment must be managed through zoning, good architectural design, and other means to retain pressures that threaten the very qualities that make the neighborhoods attractive. These pressures must be controlled through zoning and other means to, ensure that
the best qualities of neighborhood character are preserved and enhanced as the city guides growth and change, affirmatively furthers fair housing and reduces segregation, and satisfies the District's housing needs.

Amendment 1-1-7-LandUseElement 306.5: Beyond these core principles, station area development policies must respond to the unique needs of each community and the unique setting of each station. Some station areas wrestle with concerns over too much development that are desirable for development have land use designations that do not recognize the importance of creating opportunities for higher-density, mixed-use housing, making housing there inaccessible to all but the wealthiest households, while others struggle to attract development. Moreover, the District’s role in facilitating transit-oriented development must vary from station to station. Some parts of the city, weak demand may require public investment and zoning incentives to catalyze development or achieve the desired mix of uses. In other areas, the strength of the private market provides leverage for the District to provide density bonuses in exchange for require public benefits (such as affordable housing, plazas, parks, and child care facilities) when approval is requested.

Amendment 1-1-11 - Land Use Element Policy LU-1.3.2: Development Around Metrorail Stations: Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand—a history of under-investment, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance, or where a station area is not currently inclusive of people of a variety of income levels and backgrounds. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use, and maximize transit ridership, meet the District’s needs for housing, particularly affordable housing, and affirmatively further fair housing, while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas.

Amendment 2-1-4, Policy H-1.3.1: Housing for Families
Provide a larger number of housing units for families with children by encouraging new and retaining existing subsidized and unsubsidized single family homes, duplexes, row houses, and three- and four-bedroom apartments. 05.6 Preservation of affordable housing with 3 bedroom and larger units should be prioritized and if such housing is redeveloped it should be replaced by units of similar size and affordability levels in the re-development or developments close by.

Amendment 2-2-4 Page 5-9 Add a new section
Policy H-1.1.8: Best Use of Areas near Transit
Given the importance to the city’s workforce and high demand for housing close to public transit, the city shall prioritize moderate to high density mixed use development near Metro stations and main transit corridors. Public funds should be invested in providing long term affordable housing to lower-income and extremely low-income households in these locations.

Amendment 2-3-4, Page 5-22 Under H-2.1 Preservation of Subsidized Affordable Housing
Coupled with the loss of Section 8 units has been the demolition of 3,000 public housing units to make way for mixed income projects at East Capitol Gateway, Ellen Wilson, Henson Ridge, Wheeler Creek, and Arthur Capper Carrollsburg. Among these, only Ellen Wilson and Capper
Carrollsburg include “one for one” replacement units for each subsidized unit removed. However, long construction timelines and financing limitations mean that even the “one for one” replacement units can take upwards of ten years to build. For example, over 200 Capper Carrollsburg replacement units have yet to be built almost 15 years after families were relocated for demolition. The District should ensure that when affordable housing is undergoing redevelopment, tenants have a relocation plan, are allowed to continue their tenancy with minimal disruption, and will have the right to return to their units or an equivalent replacement. Whenever feasible, redevelopment should observe build-first principles. Resident return criteria should not be more restrictive than those of the affordable housing undergoing redevelopment.

Amendment 2-5-2 Page 5-13 Policy H-1.2.4: Housing Affordability on Publicly Owned Sites
Publicly owned sites should be redeveloped first and foremost to meet the needs of District, in particular the need for affordable homes. As such, the District should require that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for affordable housing, as provided for in the Disposition of Land for Affordable Housing Amendment Act of 2013, for both extremely low (0-30% AMI) and low (31-50% AMI) income households in rental units, and both low (31-50% AMI) and moderate (51-80% AMI) income households in ownership units. low and moderate income households

Amendment 2-5-15 - Action H-1.5.B: Changes to the Zoning Regulations:
Explore changes which would facilitate development of accessory apartments (also called “granny flats” or in-law units), English basements, and single room occupancy housing units. Any changes to existing regulations should be structured to ensure minimal impacts on surrounding uses and neighborhoods. 507.7
Act to spur development of accessory apartments, carriage houses and alley lots by clarifying zoning regulations, creating financial tools, and assisting homeowners. The District should support making these small, infill dwelling units a meaningful part of the city’s housing supply and provide access to high-opportunity neighborhoods. The District should also support making these units more affordable, while benefiting homeowners.

Two additional amendments originally proposed by Greater Greater Washington were supported by ANC6C with a few caveats:

Amendment 2-5-1
New section
Policy: Prioritize Affordable Housing as a Community Benefit
For any development that is approved for increased density through the PUD process or rezoning or granting significant zoning relief, the District should affirm that affordable housing (in addition to any underlying requirement, such as what is required by Inclusionary Zoning) is the a highest priority benefit and that other community benefits should be long-lasting.

Policy H-2.1.5: Long-Term Affordability Restrictions
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. Except where precluded by federal programs, affordable rental units should have affordability covenants attached to the land that run in perpetuity remain.
affordable for the life of the building. Except where precluded by federal programs, affordable ownership units should remain affordable long-term and have equity and asset build-up opportunities. With equity and asset build-up, opportunities can be provided for tenants to purchase the units.

The ANC noted that such a stringent condition risks creating disincentives to needed redevelopment of older buildings. Instead of proposing alternative language, the ANC voted to recommend noting this as a concern.

Thank you for giving great weight to the views of ANC 6C.

On behalf of ANC 6C,

Karen Wirt
ANC 6C chair

Cc: Tanya Stern (OP)
Brian Kenner (DMPED)
Andrew Trueblood (DMPED)