

#NoMoreBuildingAsUsual

Comp Plan Housing Justice Priorities

Testimony Preparation

Saturday, November 7, 2020
DC Grassroots Planning Coalition



THE DC GRASSROOTS PLANNING COALITION

- A citywide coalition of organizations and individuals fighting for community-led equitable development and against harmful development that causes displacement
- Led by Empower DC and a Steering Committee of grassroots and organizational leaders from Washington Legal Clinic for the Homeless, People for Fairness Coalition and other orgs
- Formed in Spring 2017 and since then has met monthly & engaged over 1,100 residents in learning, discussion and action on the Comprehensive Plan & related policies
- Mobilized support for the March 2018 14-hour City Council hearing on the “Framework Element” of the Plan, contributing to new racial equity and “return on investment” language in the text
- Held Study Circles in each of the city’s 10 planning areas last Fall
- Working to strengthen policies in the Comp Plan around deeply affordable, family size and permanently affordable housing

GUIDING PRINCIPLES

Racial Justice – District policies and actions must benefit, not harm, residents and communities of color especially the city's historic majority Black population.

Economic / Class Justice – Policies that exacerbate and perpetuate poverty and wealth disparity in the District must be changed. Human needs and human rights must always be prioritized above corporate interests.

Stop Displacement – Forced displacement, both commercial and residential, must be prevented. Housing and commercial/retail space that is truly affordable and accessible must be preserved.

Environmental Justice – District policies and actions must protect human health and the environment. Low income and communities of color must be protected from the placement of polluting facilities and other land uses that threaten human health and must share equally in the enjoyment of open/green spaces, clean air, soil and water.

Public Resources for Public Needs – Public money, public land, public housing, and public services must not be privatized or used as means of profit for private entities.

Equitable Access to Public Services – Low income and communities of color must have full, fair, and affordable access to amenities and services including community facilities and services such as public transportation, quality schools, recreation centers, libraries, emergency responders, senior services, healthy food options, and more.

Community Driven – District policies and actions must empower directly-impacted, long-term and low income residents and families, giving greater weight to those DC communities vulnerable to displacement.

COMP PLAN REFRESHER

- The Comprehensive Plan is a 1000+ page, 20-year framework which anticipates and guides future development decisions across many important topics, including economic development, housing, the environment, transportation, and more
- Plan must be re-written every 20 years and amended every 5-10 years. Current plan was adopted by the DC Council in 2006
- Broken into four elements:
 - Volume I: The Framework and Citywide Elements
 - Volume II: Area Elements
 - Volume III: Implementation and Glossary
 - Future Land Use Maps and Generalized Policy Maps

UPDATE AND TIMELINE

- Office of Planning (OP) submitted their final proposed changes to the Plan's 1,000+ pages in April 2020
- Council Chairman Phil Mendelson will hold hearings on the proposed changes November 12 & 13
- Council Chairman Phil Mendelson has predicted that the Council will vote on/pass the Plan when it returns next Council Session, in January/February

Review OP's proposed changes at plandc.dc.gov

DC GRASSROOTS PLANNING COALITION POSITION

The DC Grassroots Planning Coalition **does NOT** support passage of the Comp Plan amendments as proposed. **Amendments do nothing to stop displacement, expand affordability for low-income people, or promote community-led equitable development.**

Through the hearing and mark-up process we will seek to:

- Strengthen language that has been weakened (ex: should to shall)
- Incorporate language that reflects our top housing priorities (public housing, rent control, subsidies, community-led development)
- Require analysis of real housing needs (existing low-income housing needs vs perceived future needs), reporting of vacancy rates, and study of the impact of new development on other systems (education, transportation, environment, etc.)

FALSE NARRATIVES - HOUSING GOALS

The Mayor frames her changes as essential to achieving “Housing Equity Goals” of building 36,000 units by 2025, and claims 12,000 will be “affordable,” however:

- She has not defined what levels of affordability will be achieved. We need strong mandates for 30% AMI housing.
- She is counting public housing replacement units towards that 12,000 goal (not a net gain)
- Housing needs are defined by the development pipeline and population growth data
 - Do not address the current level of vacancy in the city (10,000 units pre-COVID)
 - Do not address disputed population growth data
 - Do not address the well-established need for low income housing documented in other city reports
- The housing pipeline will not be built for 5-10 years, yet the city counts these housing units today, meanwhile displacing those in need of housing

FALSE NARRATIVES - ZONING APPEALS

- ✓ Proposed changes to the Comp Plan were designed by the Mayor & Office of Planning to stop resident-led court appeals – not to achieve equitable development.
- ✓ Resident-led appeals came about as a result of the Zoning Commission failing to do its statutory duties of assessing the adverse impacts of Planned Unit Developments (PUDs), such as gentrification, displacement and the impact on housing. Residents frustrated by displacement used the appeals process, and the Comp Plan, to seek accountability.
- ✓ While approving every PUD, the Zoning Commission repeatedly found that displacement was outside its purview, which the courts later refuted. During this time (2000-2013), DC became the most rapidly gentrifying city in the country; over 20,000 Black residents were displaced.
- ✓ Rather than addressing the equity issues in DC, changes to the Comp Plan will silence this dissent and usher in more of the same development that created the displacement crisis.

FALSE NARRATIVES – “BUILD MORE” = AFFORDABILITY

- The FANTASY
 - ✓ Making it easier for developers such as JBG Smith, Douglas Development or even non-profit developers such as The Community Builders (TCB) via the city's New Community Initiative to high density projects will produce more and more affordable housing for DC residents.

- The REALITY
 - ✓ Affordable housing is needed now, not the 5 years these projects take to deliver
 - ✓ Sucks public subsidy away from small projects that produce housing faster and cheaper
 - ✓ Public subsidies are designed to pay for profits margins not affordable units.

- EXAMPLES
 - ✓ JBG's Wren: \$30M in public land, took 6 years to produce 132 affordable units at \$6,300/month
 - ✓ PN Hoffman's Wharf: \$300M in subsidy 150 affordable units after 9 years
 - ✓ New City \$38.5M in low-income subsidy, 57 units in 6 years
 - ✓ TCB Park Morton NCI, 0 units after 6 years

DCGPC HOUSING JUSTICE PRIORITIES

The following areas are covered in the position statement of the DC Grassroots Planning Coalition that has been endorsed by a number of organizations including: DC Federation of Civic Associations, Washington Legal Clinic for the Homeless, People Power Action, SW DC Action, Washington Teacher's Union, and more

- ✓ **Expand rent control to buildings built before 2005**
- ✓ **Preserve and improve public housing**
- ✓ **Meet the Homeward DC goals to house the unhoused**
- ✓ **Expand rental subsidies**
- ✓ **Promote community-led equitable development**

TAKE ACTION - TESTIFY

Hearing info:

**Thursday, Nov. 12 at 10am AND
Friday, Nov. 13 at 9am**

Watch hearings live:

- (1) Live Zoom Video Conference Broadcast
- (2) Council Channel 13 (Cable TV)
- (3) DC Council website
(www.dccouncil.us/council-videos/)

➤ Sign up to testify

- ✓ Go to <http://chairmanmendelson.com/cow/compplan/>
- ✓ **Deadline to sign up: Mon., Nov. 9 at 5pm**

➤ Submit testimony

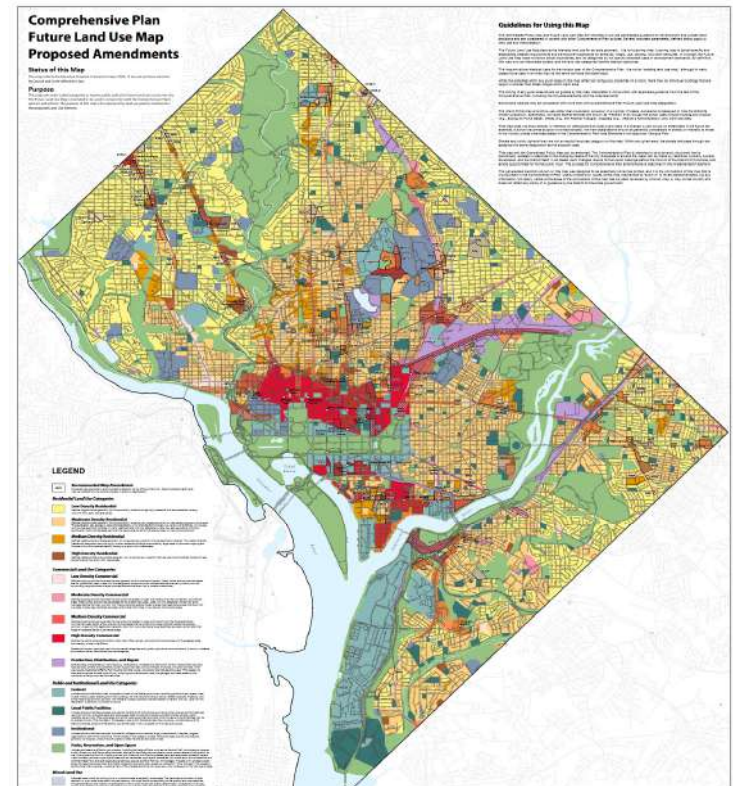
- ✓ Email: cow@dccouncil.us
- ✓ Voicemail up to 3 min (will be transcribed): 202-430-6948
- ✓ **Deadline to submit: Thurs., Dec. 3 at 5pm**

TESTIMONY TALKING POINTS

- Building more, alone, will not further affordability for the lowest incomes
 - ✓ “Build more” is premised on density bringing down prices or eliminating competition for housing. These arguments have no bearing on low-income housing that will not be provided by the private market, no matter how much new housing is built.
- Building more, alone, will not further racial equity or affordability
 - ✓ There are no mechanisms in place to prevent the continued displacement of Black residents or to require affordability beyond Inclusionary Zoning requirements.
 - ✓ New proposed density in FLUM is not limited to Ward 3/high income communities. Unchecked increased density in lower-income areas will increase property valuations and taxes and further displacement.

TESTIMONY TALKING POINTS

- Concerns with UpFluming
 - ✓ Circumvents community planning such as Small Area Plans
 - ✓ Typically developer driven, with no notice or approval by ANC's and other impacted community bodies
 - ✓ Creates a domino effect, setting the stage for upzoning
 - ✓ Makes projects “matter of right” and eliminates public’s ability to shape projects / gain benefits through PUD process
 - ✓ UpFluming in Barry Farm, Crummell School, other areas will harm community organizing efforts to achieve equitable outcomes



TESTIMONY TALKING POINTS

- No data is available regarding the impacts of proposed new density
 - ✓ Achieving low income housing goals, rising tax rates, environmental impacts, need for city services, etc. (which is evidence of a lack of real planning)

- Amendment process did not comply with DC law
 - ✓ DC Code requires the Mayor to submit reports to DC Council 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. This has not happened.
 - ✓ 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." This has not happened.

QUESTIONS/DISCUSSION

TESTIMONY TALKING POINTS

- Building more, alone, will not further affordability for the lowest incomes
- Building more, alone, will not further racial equity or affordability
- Concerns with UpFluming
- No data is available regarding the impacts of proposed new density
- Amendment process did not comply with DC law

DCGPC HOUSING JUSTICE PRIORITIES

- ✓ Expand rent control to buildings built before 2005
- ✓ Preserve and improve public housing
- ✓ Meet the Homeward DC goals to house the unhoused
- ✓ Expand rental subsidies
- ✓ Promote community-led equitable development

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STAY CONNECTED

DC Grassroots Planning Coalition
compplan@empowerdc.org

- **Contact us with questions or for help preparing testimony**
- **Send us your testimony**
- **Work with us on next steps**
 - Create language to introduce as amendments
 - Follow up with councilmembers on hosting ward-level roundtables
(empowerdc.org/equitable_development_now)
 - Sign onto the Housing Justice Principles
(tinyurl.com/CP-sign-on)

