

# COMMENTS ON THE DC COMP PLAN HOUSING ELEMENT

## CHAPTER 5 [www.dcgrassrootsplanning.org/roadmap](http://www.dcgrassrootsplanning.org/roadmap)

The Office of Planning’s definition of “displacement” is particularly troubling because it doesn’t represent the full scope of what has happened in the District. If we are truly striving towards an “equitable” and “inclusive” city, neglecting to mention that the thousands of residents lost to the effects of gentrification-based displacement are Black is disingenuous and a blatant act of erasure. Speaking on “cultural displacement” is not representative of the thousands of Black families forced out as a result of being priced out of their homes or having their homes snatched from under them due to mortgage scams, taxes, deaths in the family, etc. The loss of “a sense of belonging” is caused by forcing luxury developments and “mixed-income neighborhoods” on existing communities. To state that DC has “one of the strongest set of anti-displacement programs in the country” is a slap in the face to the thousands of low- and moderate-income Black residents who have been forced to leave their homes to make way for the wealthier class that DC is actively fighting to attract. Maintaining existing communities should be DC’s top priority, not attracting thousands who have no intention of staying. DC has always been transient by nature, but the culture leaves with each new iteration.

### **Callout Box: What is Displacement?**

Displacement is an issue that many residents and policymakers are concerned about and is a critical challenge when attempting to achieve an equitable city. But it is also not a clearly defined term. It often relates to observation of neighborhood change at a high level, as well as situations in which a household is forced to move from their residence at the individual level. For purposes of clarifying processes and use for the Comprehensive Plan, there are three forms of displacement: physical displacement as households must move when the properties they occupy are redeveloped; economic displacement as housing cost increases in the neighborhood force the household to find other housing options; and cultural displacement as residents lose a sense of belonging or shared identity in their neighborhood due to neighborhood change or growth. While these may relate, they each have different planning responses.

### **How Displacement Affects Washington, DC**

The loss of naturally occurring affordable housing units illustrated in Table 5.5 along with the decline of lower income, primarily black, households discussed in the Framework Element indicate Washington, DC has experienced significant displacement in many neighborhoods and across the city. National-level studies suggest that, by some measures, the District is the US city most impacted by both the increasing demand for housing from higher-income households and the decline in the number of lower income households.

Between 2006 and 2017, Washington, DC experienced a decline of more than

15,600 households earning between 30 and 80 percent of the MFI; 9,250 households were homeowners and 6,350 were rental households. Capitol Hill and other NE neighborhoods experienced the greatest decline with a decrease of 5,950 households earning between 30 and 80 percent of the MFI. During this time the data suggests there was a modest increase of extremely low-income households citywide; most moved East of the River and to Upper NW / NE where many have ended up paying more than 50 percent of their income on housing.

### **Addressing Displacement in Washington, DC**

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

Yet, protecting vulnerable citizens from the forces that lead to displacement clearly continues to be one of the greatest challenges to growing an equitable and inclusive city. Residents affected by physical displacement are relatively small on an annual basis and can be provided assistance more easily than the significantly larger number and range of households facing economic displacement from rising housing costs caused mainly by a lack of supply. Minimizing the impacts of physical and economic displacement requires balancing the cost-effective approach of preserving mixed-income housing in some locations and expanding housing supply in others through new construction and redevelopment. Achieving such balance will require a greater understanding of neighborhood submarkets, a more sophisticated approach to the allocation of funding, and difficult discussions among community stakeholders regarding approaches to increasing density. Addressing the broader economic displacement goes well beyond the responsibility of any single development. It is incumbent upon the District to strengthen existing policies and develop new ones to counteract and mitigate physical and economic displacement.

The decline in number of low-income homeowners, who are more insulated from rising housing costs, is an indication of cultural displacement. Older lower income households face many life changes or may pass their property on to heirs, leading to a natural turnover in residents and new faces in the neighborhood. Those who stay experience the loss of long-term friends, neighbors and local businesses, and often are confronted by the ever-increasing lure from the economic gain of selling. Confronting this form of displacement will require greater neighbor-to-neighbor and broader civic engagement. Housing policy can serve to retain vulnerable residents, but minimizing the impact of cultural displacement means maintaining community cultural institutions and businesses, creating civic spaces and events that cross-cultural divides and balancing different needs. The efforts must invite all to participate, interact, and grow a common experience and identity. Focusing efforts in this direction as discussed in other elements of the Comprehensive Plan, along with policies of the Housing Element, will help ensure that as our neighborhoods change and evolve, our neighbors continue to see that there is a place for them in their community and to share in the benefits of living in Washington DC.

Displacement is a citywide issue and all residents have a stake in addressing it, as

it affects all – both current and future residents. Policies in the Comprehensive Plan, along with the District’s housing programs and initiatives, will bolster the manner in which all forms of displacement are addressed.

In addition to policies contained in the Housing Element, see also the Arts and Culture Element and the Equity Crosswalk for policies and actions that address cultural displacement.

**No language around displacement or policies/actions in Far NE/SE, Lower Anacostia Waterfront, Rock Creek East, Rock Creek West**

<p>Action CW-2.8.D</p>	<p>Action CW-2.8.D: Northwest One New Community</p> <p>Redevelop Northwest One as a mixed income community, including new market rate and subsidized housing, a new school and recreation center, a library and health clinic, and neighborhood-serving retail space. Redevelopment of Northwest One should:</p> <ul style="list-style-type: none"> <li>a. Restore the city street grid through Sursum Corda;</li> <li>b. Emphasize K Street NW as a “main street” that connects the area to NoMa<del>A</del> and the Mount Vernon District; <del>and</del></li> <li>c. Maximize private sector participation</li> <li><b>d. <u>One-for-one replacement of affordable units;</u></b></li> <li><b>e. <u>Provide family-sized housing, including multi-generation families;</u></b></li> <li><b>f. <u>Build affordable units first to minimize displacement and maximize the return of residents to their community;</u></b> <b><u>and</u></b></li> <li><b>g. <u>Include tenants’ rights of return and comp</u></b></li> </ul>
<p>Policy FSS-2.6.3</p>	<p>Policy FSS-2.6.3: Bellevue-Washington Highlands Infill</p> <p>Encourage refurbishment and/or replacement of deteriorating apartment complexes within Bellevue and Washington Highlands. Where buildings are removed, encourage their replacement with mixed income housing, including owner-occupied single-family homes and townhomes as well as new apartments. Every effort shall be made to avoid resident displacement when such actions are taken, and to provide existing residents with opportunities to purchase their units or find suitable housing in the community. 1816.6</p>
<p>Policy NNW-1.1.9</p>	<p>Policy NNW-1.1.9: Affordable Housing</p> <p>Protect the existing stock of affordable housing in the Near Northwest Planning Area, <del>particularly in the Shaw and Logan Circle neighborhoods. Sustain measures to avoid displacement, such as tax relief and rent control, and to encourage the production of new affordable housing throughout the community.</del> <b><u>by bringing to bear new measures to preserve and to produce affordable housing in a way that advances fair housing goals and minimizes displacement.</u></b> 2108.10</p>

<p>Action NNW-2.1.J</p>	<p>Action NNW-2.1.J: Expiring Section 8 Contracts</p> <p><b><u>Implement the DC Housing Preservation Strike Force recommendations for <del>Develop a strategy to renew all affordable housing</del> the</u></b> expiring project-based Section 8 contracts within the Shaw area, <b>and beyond</b>, recognizing the vulnerability of these units to conversion to market rate housing. Consider the redevelopment of these sites with mixed income projects that include, <b>at a minimum</b>, an equivalent number of affordable units, and additional market rate units, <b>and measures to avoid displacement of on-site residents.</b> 2111.22</p>
<p>Policy UNE-1.1.4</p>	<p>Policy UNE-1.1.4: Reinvestment in Assisted Housing</p> <p>Continue to reinvest in Upper Northeast’s publicly-assisted housing stock. As public housing complexes are modernized or reconstructed, actions should be taken to minimize displacement and to create homeownership opportunities for current residents. 2408.5</p>
<p><b>NEW</b> Policy H-1.2.11</p>	<p><b><u>Policy H-1.2.11 Inclusive Mixed Income Neighborhoods</u></b></p> <p><b><u>Support mixed income housing by encouraging affordable housing in high cost areas as well as, encouraging market rate housing in among low income areas while taking steps that build in long term affordability to minimize displacement and achieve a balance of housing opportunities across the city.</u></b></p>
<p><b>NEW</b> CALLOUT BOX</p>	<p><b><u>Principles for the Redevelopment of Existing Affordable Housing</u></b></p> <p><b><u>Many of Washington, DC’s affordable housing developments are aging past their functional lives. This means that not only are the affordability controls expiring, but the structures and systems are sometimes in a state of disrepair, inefficient, and without modern amenities. In addition, the neighborhoods, the surrounding land uses, and the needs of the city have changed. As the cost of housing rises, the need for dedicated affordable units becomes even greater. For these reasons, redevelopment of expiring affordable housing should use several strategies critical to Washington, DC’s growth as an inclusive city, such as:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Increase the capacity of housing overall, including both market rate and affordable units;</u></b></li> <li>• <b><u>Advance mixed income neighborhoods with both market rate and affordable housing;</u></b></li> <li>• <b><u>One-for-one replacement of affordable units;</u></b></li> <li>• <b><u>Provide family-sized housing, including multi-generation families;</u></b></li> <li>• <b><u>Build affordable units first to minimize displacement and maximize the return of residents to their community;</u></b></li> <li>• <b><u>Include tenants’ rights of return and comprehensive relocation plans for tenants prior to the redevelopment.</u></b></li> </ul>

	<b><u>Many of these strategies will be difficult to achieve, and some may not be appropriate for an individual redevelopment, but the redevelopment of existing affordable housing should strive to employ as many of these strategies as possible. Critical to achieving the goal of inclusivity and the strategies above are the availability and certainty of the land use and financial incentives necessary to make the projects feasible.</u></b>
Policy H-2.1.3	<p>Policy H-2.1.3: Avoiding Displacement</p> <p>Maintain programs to minimize displacement resulting from the <del>conversion or renovation of affordable rental housing to more costly forms of housing loss of rental housing</del> <b><u>units due to demolition or conversion, and the financial hardships created by rising rents on tenants. These programs should include</u></b> <b><u>Employ the Tenant and/or the District Opportunity to Purchase Acts (TOPA and DOPA respectively) and other financial tools such as the HPTF and the Preservation Fund. In addition, provide</u></b> technical, and counseling assistance to lower income households and <del>the</del> <b><u>strengthening of</u></b> <b><u>strengthen</u></b> the rights of existing tenants to purchase rental units if they are being converted to ownership units. 509.7</p>
<b>NEW</b> Action H-2.1.J	<p><b><u>Action H-2.1.J: Tracking Displacement</u></b></p> <p><b><u>Track neighborhood change, development and housing costs to identify areas of Washington DC that are experiencing, or likely to experience, displacement pressures. Use the information to improve program performance and targeting of resources to minimize displacement and help residents stay in their neighborhood.</u></b></p>
Policy H-3.1.1	<p>Policy H-3.1.1: Increasing Home Ownership</p> <p>Enhance community stability by promoting home ownership and creating opportunities for first-time home buyers in the District. Provide loans, grants, and other District programs in order to raise the District’s home ownership rate from its year <del>2000</del> <b>2016</b> figure of <del>41</del> <b>39</b> percent to a year <del>2015</del> <b>2025</b> figure of 44 percent. Increased opportunities for home ownership should not be provided at the expense of the District’s rental housing programs, or through the displacement of low income renters. 512.4</p>

Land Use

Policy LU-1.1.5	<p>Policy LU-1.1.5: Urban Mixed Use Neighborhoods</p> <p>Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas:</p> <ol style="list-style-type: none"> <li>1. Mt Vernon Triangle;</li> <li>2. North of Massachusetts Avenue (NoMA);</li> </ol>
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	<ol style="list-style-type: none"> <li>3. Downtown East <b>and Pennsylvania Avenue;</b></li> <li>4. <del>South Capitol Street corridor/Stadium-area</del> <b><u>Buzzard Point/National Park/Audi Field;</u></b></li> <li>5. Near Southeast//Navy Yard;</li> <li>6. <del>Center Leg Freeway air rights</del> <b><u>Capitol Crossing (neighborhood between Capitol Hill and Gallery Place);</u></b> <del>and</del></li> <li>7. Union Station air rights; <b>and</b></li> <li>8. <b><u>Near Southwest/Wharf/L'Enfant Plaza Metro Area.</u></b></li> </ol> <p>The location of these areas is shown in the Central Washington, <b><u>Downtown East</u></b>, and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should <b>require ensure</b> that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land use mix. 304.11</p>
<p>Policy LU-1.1.8</p>	<p>Policy LU-1.1.8 Reconnecting the City through Air Rights</p> <p>Support the development of air rights over rail tracks and highways. In several parts of the central city, there is the potential to build over existing railway tracks and highways. These undeveloped air rights are the result of the interjection of massive transportation infrastructure after the establishment and development of the original city. The tracks and highways have created gaps in the historic urban fabric that have left large areas of the center city divided and difficult to traverse. With substantial investment, these sites represent opportunities for development of housing, retail, and commercial buildings, and for the reconnection of neighborhoods and the street grid.</p> <p>Where possible, streets should be reconnected and air-rights development should be constructed at and measured from grade level consistent with adjacent land. When development at grade level is not physically possible, air rights should be measured by a means that provides for density and height commensurate with the zone district. Establishment of a measuring point for any particular air-rights development shall be consistent with An Act To regulate the height of buildings in the District of Columbia, approved June 1, 1910 (36 Stat. 452; D.C. Official Code § 6-601.01 et seq.) (“Height Act”), and should not be taken as precedent for other development projects in the city. Densities and heights should be sensitive to the surrounding neighborhoods and developments and be sufficient to induce the investment needed for such construction. 304.13</p>
<p>Action LU-1.1.C</p>	<p>Action LU-1.1.C: Development of Air Rights</p> <p>Analyze the unique characteristics of the air rights development sites within <b>Washington, DC</b> <del>the District</del>. <b><u>Development sites should address the growing need for housing and affordable housing.</u></b></p>

	<p><del>reconnect the L'Enfant grid, and enhance mobility. Determine appropriate zoning and means of measuring height for each unique site consistent with the Height Act, taking into consideration the ability to utilize zone densities, the size of the site, and the relationship of the potential development to the existing character of the surrounding areas.</del> 304.16</p>
Policy LU-1.2.1	<p>Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites</p> <p>Recognize the potential for large, government-owned properties to supply needed community services <b>and facilities</b>, create local <b>affordable</b> housing, <b>education</b> and employment opportunities, remove barriers between neighborhoods, <b>enhance equity and inclusion</b>, provide large and significant new parks <b>including wildlife habitat</b>, enhance waterfront access, improve resilience, and improve <del>and stabilize</del> <b>Washington, DC's the city's</b> neighborhoods. 305.5</p>
Policy LU-1.2.5	<p>Policy LU-1.2.5: Public Benefit Uses on Large Sites</p> <p>Given the significant leverage the District has in redeveloping properties which it owns, include appropriate public benefit uses on such sites if and when they are reused. Examples of such uses are <b>housing, especially</b> affordable housing;; new parks and open spaces;; health care and civic facilities;; public educational facilities;; and other public facilities, <b>as well as employer attraction</b>. 305.10</p>
Policy LU-1.2.8	<p>Policy LU-1.2.8: Large Sites and the Waterfront</p> <p>Use the redevelopment of large sites to achieve related urban design, open space, environmental, <b>resilience, equity, accessibility</b>, and economic development objectives along the Anacostia Waterfront. Large waterfront sites should be used for water-focused recreation, housing, commercial, and cultural development, with activities that are accessible to both sides of the river. Large sites should further be used to enhance the physical and environmental quality of the river. 305.13</p>
Policy LU-1.3.1	<p>Policy LU-1.3.1: Station Areas as Neighborhood Centers</p> <p>Encourage the development of Metro stations as anchors for <b>residential, economic and civic development and to accommodate population growth with new nodes of residential development, including affordable housing in all areas of the District in order to create great new walkable places and to enhance access and opportunities for all District residents.</b> <del>in locations that currently lack adequate neighborhood shopping opportunities and employment.</del> The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to <b>provide housing opportunities at all income levels</b> <del>reduce automobile congestion,</del> improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide. This <b>policy must be</b></p>



