



Comments on Draft Comprehensive Plan Update

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Andrew Trueblood

Director, DC Office of Planning
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Dear Director Trueblood and Office of Planning Staff,

Please accept these written comments regarding the draft Comprehensive Plan updates on behalf of the Housing Association of Nonprofit Developers (HAND). HAND is a “change” association working across the private, public and nonprofit sectors, and committed to leveraging the power of our diverse collective comprised of nonprofit and for-profit developers, property managers, service providers, financial institutions, government agencies, architects, syndicators, law firms, foundations, universities, and others, to address our region’s affordable housing challenges and ensure that all have an opportunity to thrive. We have submitted a joint letter as a member of the DC Housing Priorities Coalition, but would also like to add additional comments on behalf of our organization.

HAND fully supports the amended Framework element of the Comprehensive Plan as passed by the DC Council in October 2019. The organization is pleased to see the revised Framework acknowledge the critical needs for increased affordable housing and protections against displacement. HAND also appreciates the opportunity to comment on Office of Planning’s (OP) amendments to the subsequent chapters of the Comprehensive Plan, so that our members’ interests continue to be represented in this process.

We stand behind our sentiments in the Housing Priorities Coalition letter in support of OP’s text amendments broadening access to historically exclusive neighborhoods. Specifically, we were pleased to see changes to the land use section that highlight the District’s commitment to housing affordability, equity and expanding transit-oriented development.

HAND members are working on the ground every day to not only create, but preserve affordable housing opportunities for individuals and families throughout the Capital Region of Washington, Baltimore and Richmond. Innovation is a key component to bringing most of these real estate developments (and critical resident services) to fruition. That said, HAND supports all the increases in new and affordable housing capacity in OP’s amendments to the Future Land Use Map (FLUM), and increased density - specifically in Rock Creek West, Near Northwest, and Capitol Hill, in order to reduce historical patterns of segregation and provide greater access to opportunity for low and moderate income families. Further, we support increased housing volume along all high-frequency transit and commercial corridors. In an effort to ensure a substantial increase in the amount of affordable housing available in the District, we recommend any future revisions to the zoning map based on the updated FLUM to require largely higher affordability thresholds than the current standard inclusionary zoning policy.

We also encourage the addition of Zoning Map Amendments as an example of an incentive (i.e. Planned Unit Developments and Inclusionary Zoning) that

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can be leveraged to create additional affordable units above baseline requirements. For projects that meet a certain threshold of affordable units, another option we recommend OP to explore is matter-of-right bonus density incentives. This process would lower risk and delay, and increase the chances of affordable housing developers taking advantage of the program.

We thank the Office of Planning for its leadership and dedication to the review of the Comprehensive Plan. We look forward to continued partnership in this process.

Best,

Heather Raspberry
Executive Director, Housing Association of Nonprofit Developers

