



The Federation of Citizens' Associations of the District of Columbia

Founded 1910, Incorporated 1940

March 27, 2018

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RESOLUTION on the proposed Amendments to the Comprehensive Plan DC Council Bill B22-663:

After an Assembly Meeting of the Federation of Citizens Associations of the District of Columbia on Feb. 27, 2018 the following Resolution was adopted by the Board of Directors based upon the discussion with the members:

Whereas in January 2018 the Office of Planning sent the District Council amendments to the Framework Element of the Comprehensive Plan, which were introduced as Bill B22-663; Whereas the Council has scheduled a March 20 hearing on these amendments;

Whereas The Plan, which has the force of law, should be clear, rather than filled with vague definitions and descriptions that are meaningless and can be interpreted as anything a developer wants the zoning commission to do;

Whereas The maps, including the Future Land Use Map (FLUM) remove the predictability that residents and purchasers need for their decision-making by calling zones "broad guidelines" "not intended to be strictly followed"; People making huge financial decisions should not be subject to such uncertainty;

Whereas the plan ignores affordable housing criteria that work, like using the DC AMI rather than the SMSA number which is twice as high, meaning that DC's low income residents are effectively blocked out from affordable housing programs;

- Relying on current affordable housing requirements for new development does not work; Inclusionary Zoning does not provide family units which are defined as 3 BRs by the industry; for example, there are 6000 units planned for Union Market, although 10% are supposedly affordable (using an artificially high AMI), only 10 (ten) units are 3 BRs – this does not provide family housing IZ allows developers to decide what type of housing units they will build rather than requiring them to provide what we need. When they build studios that means that singles with incomes up to \$46,350 are eligible for the affordable housing (60% of AMI);

- The large majority of the City is built to less density than the current zoning would allow, yet the new plan says the description for any block's density is only general, and any block can be suitable for any other density; you could have a 10 story building next door to your row house;

- The Plan expands the size of the "downtown" zoning area by 3 times, but exempts it from even our inadequate Inclusionary Zoning; this means more development is exempt from proving affordable housing Zoning Commission expanded downtown during ZRR. The new plan does not address affordable housing at all, let alone whether downtown should be exempt from IZ;

- The plan allows the Zoning Commission to ignore it when it wants to; this violates the Home Rule Act which provides that Zoning Commission decisions be "not inconsistent with the Comprehensive Plan". Allowing the Zoning Commission to ignore the Comp Plan would also overrule two recent Court of Appeals decisions which citizens won; developers are desperate to have these decisions overruled;

Whereas the proposed changes to the Comp Plan would encourage and facilitate displacement of current residents from their neighborhoods by allowing the current housing stock to be replaced with bigger and denser buildings and this could further decrease the amount of affordable housing as rent controlled buildings and other moderately priced housing residential buildings are torn down and redeveloped.

Therefore be it resolved that the Citizens Federation hereby requests that the DC Council postpone further consideration of the amendments to the Comprehensive Plan until the District residents have been given the opportunity to propose ones that will better protect them.