***Equity and the Comprehensive Plan***

**An Open Letter to**

**Brian McClure, Ph.D., Director**

 **Office of Racial Equity, D.C. City Council**

**Laura Richards, Ward 7**

March 31, 2021

Dear Dr. McClure,

I am a long-time resident of Southeast who is deeply concerned that the amended Comprehensive Plan pending before the D.C. City Council will increase racial inequity under the guise of ending it. Among its most damaging and unexamined aspects, the Plan will restrict home ownership opportunities for African Americans and accelerate our ongoing displacement. It also will further disempower all D.C. residents from meaningful participation in the future development of our communities. As director of the Council’s Office of Racial Equity, you are uniquely able to identify these significant drawbacks in time for Council to cure them.

**Home Ownership**

In numerous amendments, the Plan lays the groundwork for abolishing single-family zoning in the District and replacing it with matter of right multi-family structures.[[1]](#footnote-1) The Administration is already pursuing this goal, described in the Mayor’s report on single-family zoning issued last year, which suggests 4- to 8-unit buildings in single-family zones.[[2]](#footnote-2)

The stated goal of abolishing single-family zoning is to increase the number of affordable units in sought-after or transit-friendly neighborhoods, thereby increasing housing choices at a mix of income levels while redressing longstanding patterns of segregation. While this may be the intent, the reality will be *rampant real estate speculation in lower land value communities*, which will fall hardest on neighborhoods where African American owners predominate.

Does anyone seriously expect Chain Bridge Road or Foxhall to become mixed-income neighborhoods hosting a mix of housing types? The conversions instead will take place principally in Wards 7, 5 and 8. These wards, which already are experiencing gentrification, will see blocks of single-family housing rebuilt as market rate condos or apartments. Families seeking to buy houses in the shrinking pool of affordable neighborhoods will find themselves priced out of the market, because the sales price will reflect the value of assumed conversion. Remaining families will experience a windfall when they sell but face soaring tax assessments in the meantime.

This is not a hypothetical scenario. It is exactly what happened in the city’s rowhouse neighborhoods (the R-4 zones) until concerted demand forced restrictions. The waves of increased density resulting from the rowhouse conversions led to higher prices and less diversity, as existing residents were pushed out. It is exactly what is happening in the city’s duplex (RF) zones, which permit the conversion of pre-1958 duplexes to apartments by special exception. There is no point is talking about the value of homeownership to building generational wealth – which the draft Plan does – while the District actively undermines opportunities for African Americans to purchase.[[3]](#footnote-3)

The city envisioned in the Plan has no room for the first house I bought in the District, a century-old 6-room frame house in Anacostia. It had no up-to-date amenities: window air-conditioning units, original plumbing fixtures and no insulation. I was happily and affordably housed. When I moved, I left the house better than I found it, but certainly no upscale makeover. I now live in a community of 50- to 75-year-old houses in Ward 7 in what is still an affordable neighborhood, although it is under pressure of gentrification that will only get worse over time. It is exactly the kind of neighborhood that will be targeted if single-family zones are opened to multi-family developers.

**A Plan for Developers, Not Residents**

In addition to its frontal assault on low-density neighborhoods, the proposed amendments to the Plan overall have reduced a clear statement of guiding policies to a set of flaccid suggestions that can be ignored without fear of adverse judicial review. The Office of Planning acknowledges weakening the Plan to increase development flexibility without public accountability. The construction and real estate industries made plain at the outset of the Comp Plan amendment process that they want to build what they want, when and where they want it, and the Office of Planning largely has accommodated them. A January 10, 2020 letter from the DC Building Industry Association to OP reads like an early draft of the Comp Plan bill. Much of its language has been incorporated, and its spirit permeates the draft Plan.

The draft Plan initiates another chapter in the District’s long and sorry history of African American displacement and gentrification.” DCBIA knows it. The Office of Planning knows it. And I believe that you know it.

I urge you to point out the negative racial impact of these amendments and persuade the Council to abandon them.

Sincerely,

Laura Richards, Ward 7

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cc. DC City Council

1. The following Land Use Element policies are examples of the intent to end single-family zoning. Compare them as they stand now and as they are proposed to be amended:

(Existing*) Policy LU-2.1.5 Conservation of Single Family Neighborhoods*

Protect and conserve the District’s stable, low density neighborhoods and ensure that their zoning reflects their established low density character. Carefully manage the development of vacant and the alteration of existing structures in and adjacent to single family neighborhoods in order to protect low density character, preserve open space and maintain neighborhood scale.

(As amended) *Policy LU-2.1.5 Neighborhood Support*

Support the District’s established neighborhoods. Carefully manage the development of vacant land in and around neighborhoods in order to respect character, housing, affordable housing, and civic space, as well as preserve open space and maintain neighborhood scale.

(Existing) *Policy LU-2.1.8: Zoning of Low and Moderate-Density Neighborhoods*

Discourage the zoning of areas currently developed with single family homes, duplexes, and row houses (e.g., R-1 through F-4RF) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood.

(As amended) *Policy LU-2.1.8: Zoning of Low- and Moderate-Density Neighborhoods*

Where indicated through neighborhood planning efforts, consider the rezoning of areas currently developed with single-family homes, duplexes, and row houses for missing middle forms of housing, where such action would result in the appropriate production of new housing and particularly new affordable housing. Infill and new development should respect existing neighborhoods, and should minimize demolition of housing in good condition. [↑](#footnote-ref-1)
2. The study is available at: <https://plandc.dc.gov/sites/default/files/dc/sites/Comprehensiveplan/page\_content/attachments/Single%20Family%20Zoning%20Report\_FINAL.pdf> [↑](#footnote-ref-2)
3. As your office’s website states, the District’s African American homeownership rate stands at 35% compared to 50% for whites. [↑](#footnote-ref-3)