

Dear Zoning Commissioners,

This letter is to request that you reject the proposed development (20-34), unless it offers one-third of its units for individuals and families earning 0-50% AMI, one-third for households earning 60-80% AMI, and one-third for market-rate. Otherwise, you will be approving the continued gentrification of the Southwest neighborhood, something our small area plan specifically states residents do not want.

It is unfathomable that Douglas development cannot afford to offer more than 8% affordability in this project. Douglas Development is one of the largest developers in the city, and already have a 453-unit project in Buzzard Point, Rivermark, that has zero affordable units. If this project is approved, Douglas Development will be bringing over 1000 units to the Southwest neighborhood and only 50 will be affordable; that's 5% in the middle of an affordable housing crisis. Shameful.

The madness of building for the affluent and making those who have historically been underserved continue to wait for an opportunity to stay or live in the city must stop. The Office of Planning and the Zoning Commission must demand more from developers. The best way to address the affordable housing crisis is to build more affordable housing. We cannot continue to rely on "trickle-down housing" to address this issue, because it simply does not work. Consider this excerpt from the book *Chocolate City*, describing the 1930s in Washington, DC, "In a city where tens of thousands of low-income residents needed housing, the inability of private housing developers to meet demand only underscored the magnitude of the problem."

Developers and land-use attorneys rely on silly, inaccurate reports like *Bridges to Opportunity* to support their flawed, unjust housing model. The report, released in 2013 has the nerve to say that "the recent increase in market rate housing does not appear to have led to significant gentrification, by which we mean the displacement of lower income residents." This report is literally discussing the time period in which the National Community Reinvestment Coalition found that DC experienced the most "intense" gentrification of any city in America¹. Additionally, the DC Chamber of Commerce, in their 2018 report stated that, "affluent families are displacing low- and middle-income families."² The Mayor's own Housing Equity Report of 2019 states that most development has been aimed towards people earning 120% AMI.³ It's no wonder the Housing and Non-profit Developer organization stated that DC is woefully behind in meeting its affordable housing goals.⁴

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<https://ncrc.org/the-washington-post-study-d-c-has-had-the-highest-intensity-of-gentrification-of-any-u-s-city/>

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<https://dc.curbed.com/2018/10/10/17960742/dc-gentrification-economic-development-chamber-commerce-housing>

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<https://planning.dc.gov/sites/default/files/dc/sites/housingdc/publication/attachments/Housing%20Equity%20Report.pdf>

⁴ <https://hit.handhousing.org/>

Moreover, the *Bridges* report can be refuted simply by looking at development patterns in Southwest over the last decade that I have lived here. During that period, the area has been flooded with market-rate units. In describing the Southwest neighborhood, the Office of Planning stated that “Most of the new residential buildings have primarily consisted of market rate one-bedroom units attracting more young professionals.”⁵ Just in the last two years, 4,850 units have been built (only 3% have been affordable), so one would think everything would be fine according to the *Bridges* report.⁶ Unfortunately, the opposite is true, as the title of a Bisnow article suggests, “Apartment Rents on D.C.’s Waterfront rise 6% Even as Area Leads City In New Supply.”⁷ As a consequence, the median income has increased 110%, median sales price has increased 55%, the Black population has declined while the White population has more than doubled. Simply put, the *Bridges* report should not carry any weight in zoning hearings.

Instead, a more accurate way of viewing the housing market should be adopted; one that sees the market as segmented. This means building high-end units may lower the price of other expensive units, but will either have no effect or raise the price of lower and more moderately priced units. The Covid-19 pandemic has made this clear. In some areas, rent has dropped 19% and yet units are still unaffordable.⁸ Watermark is offering 3 months of free rent for people to move in. I bet they wouldn’t have to make those concessions if the units were truly affordable to begin with. Again, if we are going to address the affordable housing crisis, we need to produce affordable housing; not expensive housing we hope will maybe become affordable sometime in the undetermined future.

Given the mismatch in what is stated in the Comprehensive Plan and the Southwest Neighborhood plan, it makes me wonder what their purpose is. The Southwest Neighborhood Plan says the neighborhood should “remain an exemplary model of equity and inclusion” yet the bare minimum in affordability is allowed? Since when has the bare minimum ever been considered exemplary?

Finally, as a teacher and the father of a 7-month-old baby, I do not want to keep spending my time writing testimony and testifying about these issues. I’d like to go enjoy my free time and family, but too many people in positions of power are failing us in our collective pursuit of justice. This case is the latest unfortunate example of this phenomenon. In exchange for the pitiful amount of affordable housing this project provides, our elected officials decided that the appropriate “benefits” for the community would be the following: that the building will join the

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<https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Chapter%252019%2520Comp%2520Plan%2520Updates%2520Opti.pdf>

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https://dc.urbanturf.com/articles/blog/dc-is-nearly-halfway-to-meeting-mayors-housing-production-goals/17804?fbclid=IwAR1a3Hn16iWJ5clEfqPcfQEPcMboEjCh3gcLybvtPeh-96Cjw5a4_MzFCcs

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<https://www.bisnow.com/washington-dc/news/multifamily/apartment-rents-on-dcs-waterfront-rise-6-even-as-area-leads-city-in-new-supply-94127>

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<https://www.bisnow.com/washington-dc/news/neighborhood/apartment-developers-compete-for-tenants-in-dcs-supply-heavy-waterfront-market-107796>

Southwest Business Improvement District, “affordable” units will be treated like the market-rate units, and a \$100,000 donation will be made to a local non-profit.

All three of these stipulations are insulting to the level of need the Southwest neighborhood needs. For one, it is well documented that business improvement districts grease the gentrification machine, so they are not allies in the pursuit of social justice.⁹ Second, the Comprehensive Plan in section H.1.1.5, says that affordable units should be “indistinguishable” from market-rate units, therefore this stipulation is completely unnecessary. And finally, the \$100,000 donation to the non-profit is not only a crystal clear example of a conflict of an interest, but illustrates a completely perverse use of funds during a time where there is so much need. ANC Commissioner, Andy Litsky, who voted in favor of the project, sits on the board of the non-profit that is supposed to receive the donation. In a previous community benefits agreement, this same non-profit received \$250,000 from Mill Creek. That money was spent to commission a study and presentation for how a series of parks in Southwest could be developed. The final presentation was just that, a presentation, that suggested tens of millions of dollars for the vision to be implemented with no mechanism or next steps to make it happen. Again, given the level of need in our community, I would not categorize the study as a worthwhile expenditure.

For the aforementioned reasons, the zoning commission needs to reject this project and tell the ANC to have a true community conversation about what the community benefits agreement should be.

⁹ <https://fb.watch/4fO-SLH9N9/>