

October 15, 2021

Mr. Anthony Hood
Chairman, DC Zoning Commission of the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

RE: Limited scope hearing re. Z.C. Case No. 16-11 (Park View Community & the District of Columbia – Consolidated PUD & Related Map Amendment (Square 2890, Part of Lot 849))

Dear Chairman Hood and Commissioners:

We wish to reiterate our continued support for the Bruce Monroe PUD order (Zoning Case No. 16-11) because it was created as a community-based plan that offers quality replacement homes for Park Morton residents, along with new amenities, including a new permanent park, and expands affordable housing in a neighborhood with rapidly rising prices. View our previous testimony in support [here](#), [here](#) and [here](#).

Most importantly, the plan addresses the needs of Park Morton, and other DC residents who are seeking quality, affordable homes in this centrally-located neighborhood. When the Zoning Order was appealed to the Court of Appeals, we joined with several organizations and Park Morton residents to submit an [amicus brief](#) in support of the DC Zoning Commission's order.

By implementing the Bruce Monroe/Park Morton PUDs, we will fulfill both the 2006 Comprehensive Plan and the 2020 amended Comprehensive Plan. We worked extensively on the 2020 updates, and are pleased that the updated Comp Plan strengthens the city's focus on prioritizing affordable housing, preventing displacement, and elevates the importance of the equitable distribution of affordable housing opportunities throughout the city.

The publicly-controlled lands at Park Morton and Bruce Monroe offer the Park View neighborhood a significant role to play in addressing the economic and racial equity divide that the 2020 Comp Plan called out as overriding concerns for the city. The Bruce Monroe PUD is the lynchpin to ensuring that Park Morton residents have quality replacement homes to enable them to remain in their Park View neighborhood, as well as allow other low income families to also have the chance to live in this transit-accessible, centrally-located neighborhood. With rapidly increasing property values and loss of African American residents over the last decade in this area, the Bruce Monroe PUD is an important contribution to achieving the goals set out by the 2020 amendments to the Comp Plan to prevent displacement of low income and African American residents from their communities.

The Comp Plan Amendments of 2020 clarify and remove much of the debate about previously questioned interpretations of the 2006 Comp Plan in the PUD decision.

For example, regarding the revised definition of Neighborhood Conservation Area (NAC): The Comp Plan revisions clarify that although a portion of the site is in the NAC, this does not

preclude the project that replaces and expands important affordable housing resources. The definition of NAC was amended by the DC Council to state:

225.5 The guiding philosophy in *Neighborhood Conservation Areas* is to conserve and enhance established neighborhoods, **but not preclude development, particularly to address city-wide housing needs.** [red added to indicate 2020 amendment]

Regarding the Future Land Use Map (FLUM) designation -- the new designation clarifies the density for the site as mixed use *medium* density commercial and *medium* density residential further supports the PUD. The PUD includes a 90 foot and 60 foot building, an FAR of 3.6, along with townhouses and a large new permanent public park. These heights and densities are all within the medium density range, especially as the definition notes: “The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space,” (227.7).

While these changes to land use policy guidance are important, the updated Comp Plan also requires us to examine this mixed use housing proposal through a racial equity lens.

In the amended Comp Plan Land Use Element (304.6) - “neighborhood character” is noted as a term used to exclude and discriminate on the basis of race and income. This section states that the Comp Plan recognizes the interest of balancing policy objectives of sustaining a sense of place defined by neighborhood architecture, visual landmarks, etc, and “improving affordability and racial equity.” The Bruce Monroe PUD meets this challenge. The mixed use housing both addresses local and citywide affordable housing needs, largely serving African American families. At the same time, it blends into the neighborhood by focusing taller buildings at Georgia Avenue and lower buildings to the west of the site.

The replacement of Park Morton public housing units and planned return¹ of Park Morton residents to the Bruce Monroe and Park Morton sites, provides an important contribution to preventing permanent displacement of many Black residents as their community changes. Not only does the plan preserve the public housing stock in the neighborhood, but also does more to address the housing and racial equity needs identified in the Comp Plan. The Bruce Monroe plan provides a substantial expansion of affordable housing, and diversification of housing types to meet the needs of residents with different kinds of households and different life stages (multi bedroom units, senior housing with elevators, homeownership townhouses). The sensitive design addresses transitions to moderate density residential uses while providing for more affordable housing in mixed use medium density buildings and a large permanent park. This fulfills the Comp Plan’s intention to balance neighborhood character with the urgent need to address the area’s housing needs. Specifically, the city must replace deteriorated public housing and provide quality new homes that fit the needs of the residents, enabling them to continue to live in their community, and also expand affordable housing options in a neighborhood with rapidly rising housing prices.

¹ The “Build-first” plan was made impossible by years of appeals of the PUD order by three people who live near the Bruce Monroe site.

The contributions of these new affordable homes in this neighborhood are meaningful from the perspective of retention of Black households in DC’s changing demographics. Recent [studies](#) of low income residents displacement by Census Tract show that from 2000 - 2016, the loss is concentrated in this portion of the District of Columbia (see attached figure). The preliminary data from the 2020 Census reports that Ward 1 (where Bruce Monroe is located) has thousands of fewer Black residents than in 2010. During this period, the ward’s total population rose by 10,000, with all other racial groups increasing (Table 3: District of Columbia Population by Ward by Race and Hispanic or Latino Origin 2010 & 2020, 2020 Census, [DC Office of Planning](#)).²

The 2020 Comp Plan update instructs us to look at housing through a racial equity lens (500.5). The Comp Plan tells us: “The District’s Black and Hispanic households experience higher levels of rent burden that increase the likelihood of displacement,” (500.19). With the DC Housing Authority focused on serving households earning 30% of median family income (MFI) and below, and the Comp Plan highlighting that median Black family income in DC is less than 50% MFI (500.7c). Providing new quality homes for public housing residents, and expanding affordable housing serve the Comp Plan’s intention to reduce the housing cost burden on Black and Hispanic residents. In the case of Park Morton households, who are predominantly African American, the [average annual income](#) is \$18,445 with an average family size of 2 persons. However, incomes range from \$0 to \$87,351. Average income is far below the [30% MFI](#) threshold of \$30,950 for a 2-person household. Given the incomes of Park Morton community members, the Bruce Monroe PUD will advance a major racial equity goal of the Comp Plan by both improving and expanding housing affordable to very low and extremely low income households, who are predominantly African American, in this Ward 1 neighborhood. Seventy-four percent of the housing proposed for the site will be either replacement housing for DC Housing Authority households, or housing affordable up to 60% MFI. This replacement of deteriorated public housing and increased affordable housing far exceed Inclusionary Zoning requirements. Exceeding IZ requirements is also sought by the Comp Plan.

Enabling the Park Morton households to remain in the neighborhood -- with new, quality homes that match their housing needs, and a new permanent park -- gives these extremely low income families the housing stability so they can pursue their aspirations and take advantage of the potential opportunities for education and employment in the area.

Stable, secure and affordable housing can support these families as they work to overcome the “result of historic, systemic practices such as redlining, racial covenants, and predatory lending that limited access to housing, restricted wealth building opportunities for communities of color, and created highly segregated development patterns,” (500.5). As Park Morton residents are predominantly African American and extremely low income, the PUD fulfills the Comp Plan goals of racial equity and equitable development through the revitalization of their homes. The PUD provides new mixed income housing, increased safety, park and other amenities, and unit types that better match their households’ needs. The PUD further addresses the goals of expanding long term affordable homes beyond replacing the public housing. This plan acts as a

² The 2020 Census documented loss might be in part due to an [undercount of African American households](#), nonetheless, recent [studies](#) of low income residents displacement are concentrated in this portion of the District of Columbia.

counterweight to the strong current of rising prices and displacement of lower income African American households in the Parkview neighborhood, advancing the 2020 Comp Plan’s goals to achieve equitable development and racial equity.

For these reasons, we continue to support the Bruce Monroe PUD (Zoning Case No. 16-11) and view the 2020 Comp Plan amendments as further support for this plan.

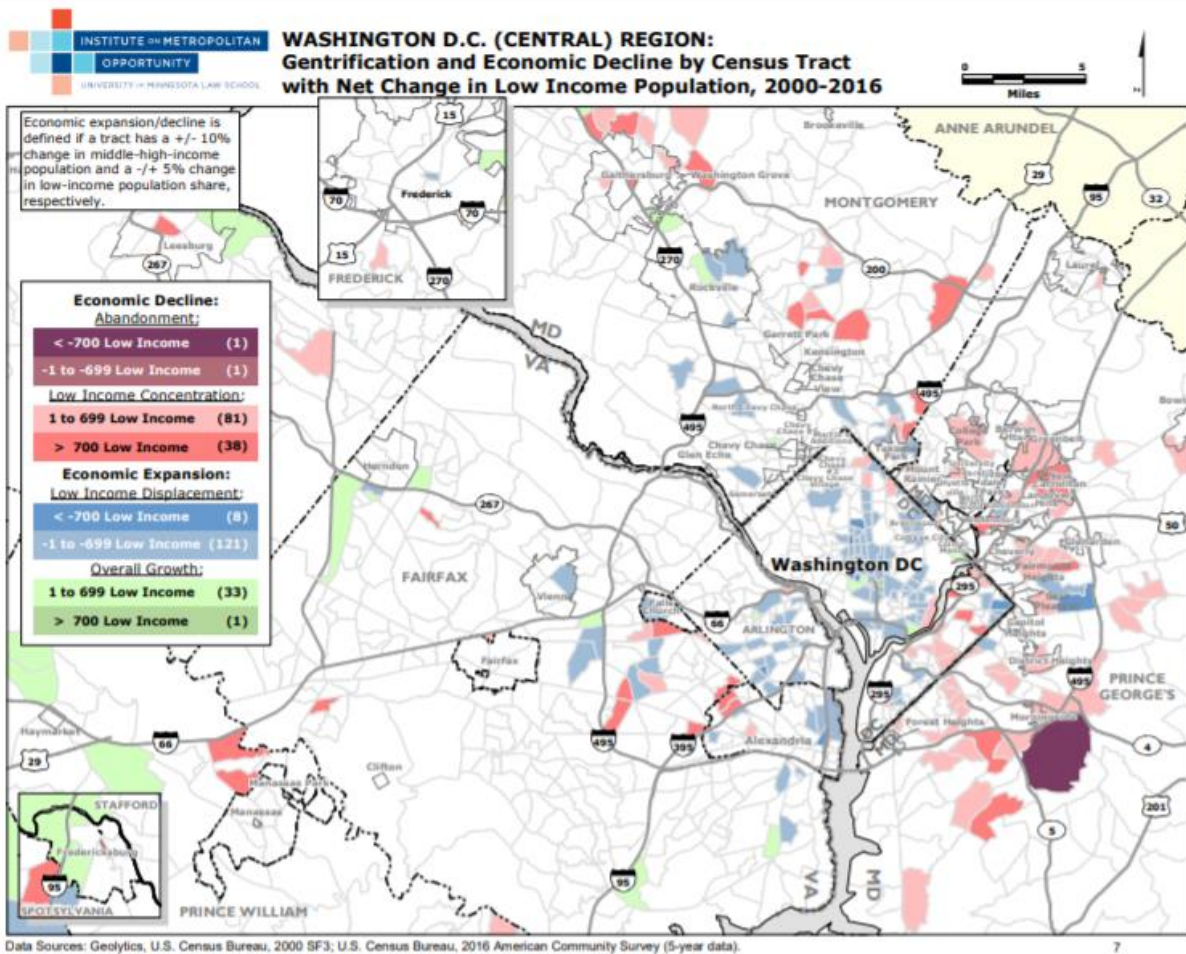
Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director

Attachment: Map of Washington, DC Region, Institute for Metropolitan Opportunity



Source: [Institute for Metropolitan Opportunity, Washington DC Region, American Neighborhood Change in the 21st Century April 2019.](#)