



Pathways to Removing Obstacles to Housing (PRO Housing) Action Plan

SUMMARY

The Metropolitan Washington region has made a historic commitment to housing. For the first time in 25 years, local governments worked together to create a regional fair housing plan to advance their obligations under Title VIII of the Civil Rights Act of 1964, 42 U.S.C. 3601-19. Convening through the Metropolitan Washington Council of Governments (COG), the region made an affirmative commitment to boost the production of affordable housing and improve access to housing from one community to the next. COG and its member jurisdictions will use its Pathways to Remove Obstacles to Housing (PRO Housing) grant from the U.S. Department of Housing and Urban development to implement this bold regional vision.

PRO Housing allows these jurisdictions to address a vexing issue: the region's lack of affordable housing, which is its most challenging and persistent barrier to creating communities of choice for all residents. Metropolitan Washington hasn't produced enough housing for almost two decades, and affordability continues to decline as housing costs rise.

COG has already laid the groundwork to address these changes through a commitment to increased housing production, a local housing predevelopment program, and its regional fair housing plan. Together, these tools have addressed components of the issue, but local land use restrictions still stand in the way. This PRO Housing Action Plan addresses these barriers. Together, COG and its member jurisdictions will pursue the following three strategies to boost production, improve affordability, and collectively address the region's housing needs, by:

Increasing the supply of housing that is affordable to low-to-moderate income families, especially in communities that lacked it in the past. The region hasn't produced enough housing and increased burdens on residents, especially in communities that have historically faced underinvestment. Under this grant, COG will encourage a new pipeline of housing through support of a pilot program to create income-restricted Accessory Dwelling Units; conducting regional zoning analysis to identify opportunities for additional housing production and alignment; and local inclusionary initiatives that work collectively to add housing at the regional level.

Working across jurisdictions to identify opportunities for zoning alignment and reforms to increase the overall supply of housing. The Washington region spans two states, a federal district, and numerous jurisdictions, and each of them has its own set of rules. This proposal develops and tests innovative zoning reforms that may be applied across multiple jurisdictions.

Preserving affordable housing and preventing displacement. Currently, the development of assisted affordable housing has been offset by a loss of affordable market-rate units. The region has committed to preservation tracking systems, a "no net loss" policy of affordable housing units and through anti-displacement mitigation strategies along the Purple Line corridor in suburban Maryland.

This Action Plan is a collective effort between the region and its jurisdictions. Regionally, COG will pilot new housing programs to boost supply. Locally, jurisdictions will advance reforms to encourage more housing. Together, the activities will result in a region with more abundant housing, lower costs, and increased access from one community to the next. If successful, the program will achieve four goals: an increase in the amount of land developable for multifamily housing, a higher level of housing production, an end to the net loss of existing affordable housing, and improvements on concentrations of low-income populations in certain areas of the region.

This Action Plan is based on the requirements of the FY2023 PRO Housing statute, the Consolidated Appropriations Act, 2023 (Public Law 117-328, approved December 29, 2022). The FY2023 PRO Housing requirements can be found in the PRO Housing Notice of Funding Opportunity (NOFO) (FR-6700-N-98, Issued November 06, 2023).

COG is the lead entity for the regional PRO Housing grant activities. COG will be responsible for all grant management activities, including regional planned tasks such as the zoning analysis, preservation workshops, and program evaluation, as well as programmatic work taking place within individual jurisdictions and by regional partners. Key COG staff include the following individuals with contact information as follows:

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RESOURCES AND BUDGET

The budget for this regional Action Plan includes the Metropolitan Washington Council of Government's management of the collaboration and consultant costs to expand staff capacity and augment existing expertise. This Action Plan includes funds to support local initiatives as well as work to be undertaken by regional partners at the Purple Line Corridor Coalition, Housing & Enterprise Community Partners (formerly known as the Housing Association of Nonprofit Developers (HAND)) and Enterprise Community Partners.

An overview of the planned use of HUD's PRO Housing grant award of \$3,509,112 follows below.

| Lead Entity | Funding Amount | Project Tasks Overview |
|--|-----------------------|--|
| Metropolitan Washington Council of Governments | \$352,037 | Overall project management, coordination of project schedule and budget, development of metrics, coordination with partners and consultants. |
| City of Alexandria, VA | \$450,000 | Implement Phase 2 of zoning reforms for Housing for All/Zoning for Housing and consultant management |
| District of Columbia | \$137,575 | Develop an anti-displacement strategy and incorporate into the District's comprehensive plan update |
| District of Columbia | \$300,000 | Support for the Residential Accessory Apartment Program (RAAP) pilot to create income-restricted Accessory Dwelling Units. |
| Enterprise Community Partners | \$350,000 | Complete an evaluation at project conclusion of tasks completed, assess outcomes, and synthesize lessons learned. |
| Fairfax County, VA | \$175,000 | Implement Preservation and Manufactured Housing Task Force Strategies and review other regulatory barriers |
| Housing& (formerly Housing Association of Nonprofit Developers/HAND) | \$341,000 | Support for the Housing Indicator Tool and expansion of the survey to include additional data and outreach to communities |
| Loudoun County, VA | \$175,000 | Develop policies and incentives to increase affordable housing near transit and in urban planning areas |
| Montgomery County, MD | \$175,000 | Review and enhance Moderately Priced Dwelling Unit (MPDU) program |
| Prince George's County, MD | \$300,000 | Implement recommendations to preserve Naturally Occurring Affordable Housing (NOAH) |
| Prince William County, VA | \$175,000 | Develop phase 2 of the county's first Affordable Dwelling Unit ordinance; develop policies and program materials for the Housing Trust Fund |

| | | |
|--------------------------------|-----------|---|
| Purple Line Corridor Coalition | \$275,000 | Create policy tools for redevelopment, preservation, and BIPOC developer capacity building |
| Urban Institute | \$300,000 | Research on regional zoning opportunities (\$200,000), Preservation workshop and follow up support to jurisdictions (\$100,000) |

An additional \$3,500 will provide supplies (printing/copying) as well as support for regional meetings to review progress for the overall program evaluation throughout the grant period.

Other budget changes beyond adjusting the scope to meet the grant award from the initial proposal include elimination of the following tasks:

1. Regional rental application portal: As described in the grant application, a 50 percent funding cut rendered moving forward with this task infeasible. In addition to having insufficient funding to move forward with design of the portal, local jurisdictions and state housing finance agency partners were unable to commit to providing funding in future years after expenditure of the HUD PRO Housing funds. This meant that the ability to sustain the portal long-term would be in jeopardy.
2. Adaptive Reuse Best Practices Guidebook: Shortly after submission of COG’s proposal, HUD published its own Adaptive Reuse Guide, so this task was deemed redundant and eliminated to help offset the reduction in awarded grant funds.
3. Arlington County, VA Missing Middle Study for Affordable Homeownership Types: This task was eliminated following a lawsuit brought against the county by a group of homeowners contesting the zoning reforms that eliminated exclusive single-family only zoning. While appeals continue, it is unclear if this task can be legally completed.
4. Lawyers Committee for Civil Rights Under Law: Project management support eliminated to save costs (COG staff will cover all program management needs); zoning review tasks were consolidated with zoning analysis tasks under the Urban Institute’s scope of work.
5. Prince George’s County, MD opted to program the entirety of its reduced award amount towards furthering its preservation efforts.

Federal funds will be leveraged with in-kind contributions of staff time and other local resources from COG, local governments, and partners for a total value of \$2,933,086. This reflects a significant commitment to leveraging federal funds and ensuring the successful completion of all planned tasks in the program. This brings the total project budget to \$6,442,199.

Budgeted items for each task were based primarily on actual costs incurred for similar past projects as well as cost estimates from consultants who have provided services to MWCOG and/or its government members previously.

The funds will be expended primarily in the first and second years of the program, as much of the work will be completed by consultants providing expanded staff capacity.

All funds and all committed leverage will be expended by the end of the period of performance of September 29, 2029. The final task will be an evaluation brief completed by Enterprise Community Partners in calendar year 2029.

NEED

Efforts to Identify, Address, Mitigate or Remove Barriers to Affordable Housing Production and Preservation

The Metropolitan Washington Council of Governments (COG) envisions a region where all people can live in a home that meets their needs, regardless of their income, age, or ability, in communities with access to transit, jobs, and quality schools. In many neighborhoods throughout the region, there are not enough high-quality, affordable, and accessible housing options to make that vision a reality. Three barriers stand in the way: (1) chronic underproduction of housing units, especially affordable housing, because of restrictive local land use and entitlement systems; (2) rapid loss of affordable housing, partially as a consequence of chronic underproduction; and (3) longstanding barriers to fair access to housing, which results in lower-income residents living in neighborhoods of concentrated poverty. Through coordinated policy and practice, COG and its member jurisdictions have come together to increase the production of affordable housing and create communities of opportunity for all metropolitan Washington residents.

A historic commitment for jurisdictions to commit to regional housing targets, aimed at solving the supply shortage by producing units at affordable prices and near transit. COG's historic commitment to regional housing targets is aimed at solving the supply shortage by producing units near transit at affordable prices. For more than a decade, metropolitan Washington did not add enough housing units to keep pace with its growth in population and employment. Starting in 2006, housing construction in the region slowed, and it never fully recovered.¹ Today, after years of underproduction, the region has a large deficit in housing units.

In 2019, the COG Board unanimously committed to addressing the need for affordable housing and adopted targets for regional housing production over the next decade: 320,000 new housing units by 2030. COG member jurisdictions have committed to setting aside 75 percent of new units as affordable for households earning low to moderate incomes² and 75 percent of new units

¹ See COG chart of housing permit production on page 5 of this narrative exhibit.

² This proposal defines "low-income household" as a household earning 60 percent of the area median income and "moderate-income household" as a household earning 80 percent of the area median income.

being in activity centers near high-capacity transit. COG and local jurisdictions worked together to identify where this new housing would go and determined that the region could add as many as 167,000 new housing units in activity centers, primarily infill locations with access to high-capacity transit.

COG's housing targets advance not only the region's housing production efforts but also support other regional long-range goals for transportation and air quality. The housing targets originated with the National Capital Region Transportation Planning Board's long-range plan [Visualize 2045](#). The plan included the aspirational initiative of developing housing closer to jobs to optimize transportation system performance. Increasing affordable housing near high-capacity transit also reduces dependency on cars and lowers vehicle emissions regionwide.

A second, equally historic commitment to reduce barriers to housing as protected under Title VIII of the Civil Rights Act of 1964, 42 U.S.C. 3601-19 through the first Regional Fair Housing Plan. For the first time in 25 years, local governments came together to create a joint housing plan for metropolitan Washington. Eight participating jurisdictions collaborated and committed to a joint plan that advances local policy strategies to address housing opportunity at the regional level. The following jurisdictions developed the plan with COG: City of Alexandria, VA; Arlington County, VA; the District of Columbia; Fairfax County, VA; City of Gaithersburg, MD; Loudoun County, VA; Montgomery County, MD; and Prince William County, VA.

Together, these eight jurisdictions committed to dismantling systemic, shared housing challenges, which include the loss of affordable housing in the past decade, a lack of production of new affordable housing, limited accessibility to transit options, and discriminatory practices that prevent access to housing. Through a coordinated commitment to local actions, the plan seeks to create more communities that not only meet, but exceed, the aims of Title VIII of the Civil Rights Act of 1964, 42 U.S.C 3601-19 throughout the metropolitan Washington region.

The eight jurisdictions committed to seven shared regional goals, including the following which advance the primary aims of HUD's Pathways to Removing Obstacles to Housing (PRO Housing) program:

1. Reform zoning and land use policies to increase the production and geographic distribution of affordable housing;
2. Increase the supply of affordable housing for low-income families;
3. Implement policies that preserve affordable housing and prevent displacement of residents; and
4. Increase homeownership and end discriminatory practices that prevent some residents from buying a home in neighborhoods with good schools and amenities.

Local governments in COG are innovative and dynamic and regularly incubate solutions to meet these goals. Some have already implemented reforms (described below), and all meet regularly in the Housing Directors Advisory Committee to discuss their progress and challenges. Different reforms may be necessary in communities that are traditionally exclusive, rapidly appreciating and/or disinvested. The committees worked together to develop and propose activities for this grant application that address production and preservation barriers in each market context.

Implementation grants to add housing supply, meet regional targets, and mitigate displacement through the Housing Affordability Planning Program (HAPP). Launched by COG in 2021, this new program addresses the unique pre-development barriers to affordable infill development, particularly in highly desirable locations near transit. These barriers include local planning for infrastructure, site development, community engagement, and in most jurisdictions, the zoning and entitlement process. These barriers increase the time, cost, and risk for affordable housing developers, especially at premium sites near transit.

To reduce these barriers, COG, with support from Amazon's Housing Fund, developed HAPP. HAPP awards small, flexible grants of up to \$75,000 to local governments and nonprofit developers (who must apply in coordination with a local jurisdiction) engaged in the planning, approval, or development of housing around transit stations. HAPP grants provide funding for predevelopment activities, implementation activities, or policy studies that lead to new affordable housing units near transit. Since its first year of operation in 2022, COG has provided 17 awards.

Innovative, award-winning local land use reforms intended to increase production, mitigate displacement pressures, and increase access to housing for all. Across the metropolitan region, jurisdictions have been implementing local solutions to liberalize land use and improve housing supply. Many have seen results:

- *Arlington, Virginia:* Arlington reformed its zoning ordinance to allow multifamily housing in some areas previously designated exclusively for single-family homes. After conducting a housing study in 2020, Arlington updated its ordinance in 2023 which allowed between 4 and 6 units per lot in the rezoned areas. Although this zoning reform was subsequently struck down by an Arlington County circuit court judge in September 2024, the county is appealing the decision.
- *Alexandria, Virginia:* In 2020, Alexandria launched Zoning for Housing/Housing for All to reform zoning, improve local housing production, and reduce barriers for fair access to housing in the city. Since the launch of the initiative, Alexandria has allowed more housing types, including accessory dwelling units (ADU), auxiliary dwellings, and new co-living spaces. More reforms are under consideration.
- *Fairfax County, Virginia:* Since 2021, Fairfax County has made housing and zoning reforms that enable ADUs, reduce parking requirements, target moderate-income households and allow density bonuses. Reforms also include amending manufactured-housing policies and adopting an affordable housing preservation policy and comprehensive plan to co-locate housing with county facilities.
- *Montgomery County, Maryland:* In 2020, Montgomery County approved property tax exemptions for transit-oriented development near Metro stations. The county also provides density bonuses for affordable units, reduced parking requirements, and a reduced need to plan for infrastructure at transit-served sites. In 2025, the County Council passed the More

Housing N.O.W. (New Options for Workers) Act to increase housing supply, reduce costs, and increase pathways to homeownership by allowing more residential building types along major transportation corridors.

- *Washington Metropolitan Area Transit Authority:* WMATA launched a historic partnership with Amazon, which will use \$125 million from its Housing Equity Fund to finance affordable housing on WMATA-owned land. This partnership will create 1,000 units of affordable housing by 2025, beginning with two developments at College Park and New Carrollton that will add 742 new units for moderate-income households.

Most of these reforms have been passed in the past several years. Over time, their effectiveness in producing and preserving affordable housing will become apparent. COG's committees allow these jurisdictions to share examples and recommendations with other jurisdictions to emulate as all implement the Regional Fair Housing Plan.

Acute Demand and Remaining Need for Affordable Housing within the Geographic Scope

COG's membership represents 169 priority geographies that have an acute need for affordable housing as the result of 15 years of underproduction. Many jurisdictions also face other housing challenges that stem from a lack of supply of affordable and attainable housing.

The geographic scope of this Action Plan includes the District of Columbia; in Maryland, Montgomery County, the City of Gaithersburg, and Prince George's County; and in Virginia, the City of Alexandria, Arlington County, Fairfax County, Loudoun County, and Prince William County. All meet the HUD definition of "priority geography" for the PRO Housing program. These priority geographies have committed to reversing the combined impact of underproduction and segregation.

The metropolitan region also contains 163 priority jurisdictions at the local level. Every county in this Action Plan contains at least one priority jurisdiction and some are coterminous. Across the region, jurisdictions qualify as priority by all three metrics. First, affordable housing production has not kept pace with need. A combination of underproduction and appreciation in value has worsened shortages in many communities, especially those with access to jobs, schools, and amenities. For example, the District of Columbia has a score of 0.23 on the Affordable Housing Not Keeping Pace metric. The District added about 31,000 housing units between 2010 and 2020 but lost an equivalent number of naturally occurring affordable housing (NOAH) units, so the net growth it experienced was only in units affordable to households earning wages above 100 percent of AMI.³

Other jurisdictions have long lacked affordable housing for low- and moderate-income households. Many parts of the region, largely to the west, consist predominantly of single-family homes on larger lots. These communities were never affordable, but they have become even less so as home prices have soared. For example, Franconia, VA, has a rating of 3.59 on the

³ U.S. Department of Housing and Urban Development, "Comprehensive Housing Affordability Strategy" Data, 2010–2020.

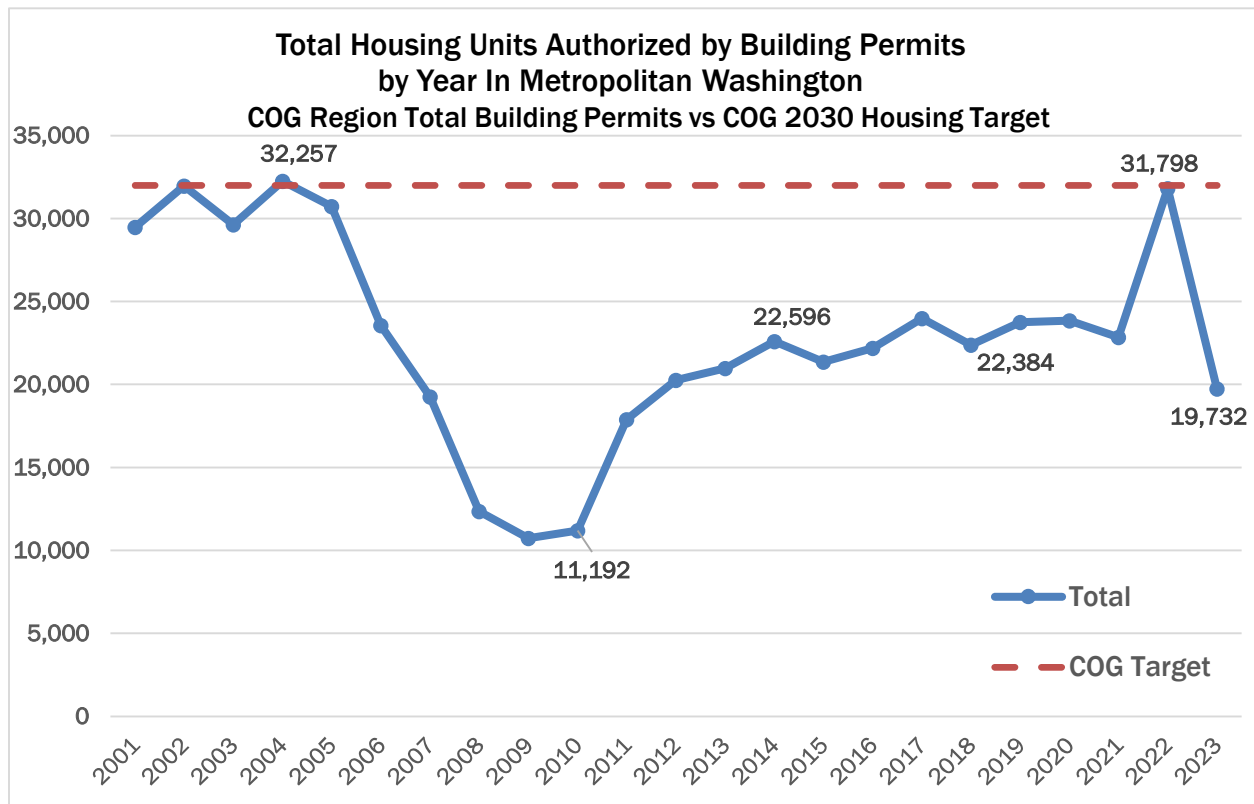
Insufficient Affordable Housing metric. Franconia has high housing prices and little multifamily housing. It experienced limited housing production between 2010 and 2020, even though it is close to the Metrorail system.

Still others face substandard housing and high housing costs. These problems are rooted in the region's longstanding imbalances in investment. These jurisdictions are mainly in northern Virginia; for example, in McLean, 46 percent of units fall into the Widespread Cost Burden category. In the District of Columbia, 1 in 7 renters are behind on rent. Low-income renters bear the burden of high cost because the region has not produced enough apartments affordable for them.

Regional Analysis of Need

Local housing markets are interconnected and produce imbalances and inequities at the regional level. Across the metropolitan region, barriers at the local level have created regional underproduction of housing, inequities in housing access, and a loss of naturally occurring affordable housing (NOAH), leading to the displacement of some protected classes. These are described below.

Underproduction has worsened housing affordability. According to COG's analysis, the region has underproduced housing since the Great Recession. Prior to 2006, regional housing production kept pace with growth, primarily as single-family housing in newer suburban jurisdictions. As the real estate market crashed, residential construction slowed between 2006 and 2011, then the market slowly recovered. Following 2011, the region added multifamily housing, but not at levels that matched the region's need. Today, the region will need to add at least 320,000 housing units by 2030 to make up for this underproduction. While the COG forecasts that the region will add 245,000 housing units under business as usual, the region will need an additional 75,000 units to make up for this deficit.



Source: MWCOG analysis of Census Bureau Building Permits Survey Data

Demand to live in the Washington region is high, but it is impossible to build multifamily or attached housing in many locations. Approximately 74% of the metropolitan Washington area is zoned exclusively for single-family housing.⁴ In Fairfax County, VA and Montgomery County, MD, for example, multifamily housing is not allowable on 77% and 82% of land respectively.⁵ As a result, as market preferences shifted towards multifamily housing in the 2010s, production in these locations fell.

Zoning restrictions also limit housing production within urban core jurisdictions. Between 2000 and 2020, 30 percent of new housing units in the District of Columbia were built in just five U.S.

⁴ Tracy Hadden Loh, “Where the Washington region is zoned for single-family homes: an update,” Greater Greater Washington, December 18, 2018, <https://ggwash.org/view/70232/washington-region-single-family-zoning-an-update>.

⁵ Eric Feldman, Deana Rhoadside, and Michael A. Spotts, “Increasing Housing Supply and Attainability – Improving Rules & Engagement to Build More Housing,” Urban Land Institute Washington, May 15, 2019, <https://washington.uli.org/release-increasing-housing-supply-and-attainability-improving-rules-engagement-to-build-more-housing/>

Census block groups, all areas close to downtown and zoned for high density housing.⁶ The District’s single-family neighborhoods, which have better schools and more parks and recreational opportunities, saw no net housing growth. The region needs more available land for multifamily development in urban and suburban jurisdictions, Otherwise, it will fall short of its goals to produce more housing, especially affordable housing and housing near transit. Because the region has not produced enough new housing, existing homes have become more expensive.⁷ Most of the region’s for-sale homes are unaffordable to a middle-income household. Just 27 percent of homes in Washington, 35 percent of homes in Montgomery County, and 20 percent of homes in Arlington County would cost a typical household less than 30 percent of their income.⁸ According to Redfin, a homebuyer in 2023 needs to earn \$150,005 to afford a typical home, up 23 percent from 2022.⁹ Renters have difficulty finding homes to buy. According to the Joint Center for Housing Studies, a median income renter can afford to purchase just 18 percent of properties across the Washington region.¹⁰

Lower-income households suffer the most from rising home prices. Across the region, 80 percent of moderate-income renters and 73 percent of moderate-income owners spend 30 percent or more of their income on housing.¹¹ Nearly one-half of renters were housing cost burdened in 2019. And according to the Census Bureau, 1 in 8 of the region’s renters are behind on rent.¹² Homeownership has also become more costly relative to income. Many low- and moderate-income households rent homes or “drive until they qualify” to buy homes in outlying, more affordable, communities.

Neighborhoods of concentrated poverty limit access to opportunity and are reinforced by the underproduction of housing. In the past, federal housing policies and local zoning restrictions fueled White flight from the District of Columbia to neighboring suburbs. White families could obtain mortgages in these communities and Black families could not and this created a pattern of demographic and geographic concentration of minority groups that persist today. Most of the region’s Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) are in the District of

⁶ Leah Brooks and Jenny Schuetz, “Where 20 years of new housing was built in Washington DC -- and where it wasn’t,” The Brookings Institution, September 18, 2023, <https://www.brookings.edu/articles/where-20-years-of-new-housing-was-built-in-washington-dc-and-where-it-wasnt/>.

⁷ David C. Blount, Katharine Elder, Samantha Fu, Kaela Girod, Jessica Perez, and Bill Pitkin, “Increasing Housing Supply”, The Urban Institute, 2023. <https://www.urban.org/apps/pursuing-housing-justice-interventions-impact/increasing-housing-supply>.

⁸ Feldman, Rhodeside, and Spotts, “Increasing Housing Supply and Attainability – Improving Rules & Engagement to Build More Housing”

⁹ Dana Anderson, “Homebuyers Must Earn \$115,000 To Afford The Typical U.S. Home,” Redfin, October 18, 2023. <https://www.redfin.com/news/homebuyer-income-afford-home-record-high/>

¹⁰ “Share of Homes Affordable to Potential Buyers Varies Widely,” Joint Center for Housing Studies of Harvard University.

¹¹ Feldman, Rhodeside, and Spotts, “Increasing Housing Supply and Attainability”

¹² U.S. Census Bureau, Household Pulse Survey, September 2023.

Columbia, and in primarily Black neighborhoods.¹³ Black people make up one-quarter of the region’s population but 80 percent of R/ECAP residents. Another five percent of residents are from El Salvador and other Central American countries.

These racial and ethnic groups also face the highest burdens in paying for their housing, regardless of where they live. Across the region, 57 percent of severely burdened households were non-White, and 47 percent were households who were born in other countries.

A lack of housing opportunities has reinforced other regional disparities. Black and Hispanic residents tend to live in communities with underperforming schools, especially in neighborhoods within the urban core jurisdictions.¹⁴ Most of the region’s high performing schools are in suburban communities in Loudoun County and Fairfax County, VA and Montgomery County, MD. These are priority geographies for PRO Housing activities. Most of them do not have enough affordable housing and many prohibit multifamily housing altogether.

Recent increases in home prices have worsened these disparities. Across the Washington region, housing within opportunity areas, defined as those communities with high performing schools, proximity to jobs, and other amenities, now sells at a significant cost premium. According to Redfin, a house for sale in 2022 in a high opportunity area was, on median, 54 percent more expensive than in a low opportunity area. A median home in an opportunity area is now \$695,000, nearly 7 times the regional Area Median Income.¹⁵

Underproduction has led to a loss of housing and displacement. Over the last decade, the region’s urban core jurisdictions of Washington, DC, Arlington, and Alexandria came to be seen as more desirable communities to rent or buy. These jurisdictions added some new multifamily housing, but it was not enough to meet increased market demand. As a result, all three of these priority communities experienced a net loss of their naturally occurring affordable housing (NOAH) between 2011 and 2021. In Washington DC, the overall number of rental units increased by 32,759 but the number of rentals that cost \$1,500 or below decreased by 27,007.¹⁶ Arlington, VA added 13,833 new rental units but saw rentals under \$1,500 fall by 11,070. Alexandria, VA added 6,928 new rental units but this did not offset the loss of 10,549 units lost at more affordable rents. The Washington region needs to produce more housing, particularly more affordable housing, to offset the loss of market rate rental that already occurred.

¹³ “Metropolitan Washington Regional Fair Housing Plan,” Metropolitan Washington Council of Governments, April 4, 2023, <https://www.mwcog.org/documents/2023/04/04/metropolitan-washington-regional-fair-housing-plan/>

¹⁴ “Metropolitan Washington Regional Fair Housing Plan,” Metropolitan Washington Council of Governments, April 4, 2023, <https://www.mwcog.org/documents/2023/04/04/metropolitan-washington-regional-fair-housing-plan/>

¹⁵ “Redfin Report: Homes Cost 38% More in Neighborhoods That Offer the Best Shot at Upward Mobility,” Redfin, August 14, 2023, <https://investors.redfin.com/news-events/press-releases/detail/958/redfin-report-homes-cost-38-more-in-neighborhoods-that>

¹⁶ U.S. Census Bureau, American Community Survey 5-Year Estimates, 2017-2021 and 2007-2011.

Key Barriers to Produce and Preserve More Affordable Accessible Housing

The Washington metropolitan region faces three key barriers to adding and preserving affordable housing in the region. First, land use and zoning barriers constrain the sites that could be developed as affordable housing, particularly at key sites near transit and in town centers. Second, access barriers have concentrated existing affordable housing in some jurisdictions while limiting homeownership opportunities for others, often with high performing schools and other amenities. Finally, given an underproduction of new housing, central jurisdictions have seen the loss of existing affordable housing, resulting in gentrification and displacement of low-income households. Each barrier is described below.

Land use and regulatory barriers make it difficult for the region to catch up on its housing production goals. COG and its jurisdictions have determined that the region possesses the land for infill housing, but local zoning restricts its development in too many places. As noted above, the Urban Land Institute found that local zoning bars multifamily residential land use in more than half of the land area of most jurisdictions.¹⁷ In Montgomery County, MD, and Fairfax County VA, these restrictions cover nearly three quarters of land. As a result, housing production in the region has often occurred in two forms: dense, large multifamily housing, or detached single family housing. At market rates, neither form of development typically results in new housing units affordable at middle incomes or below.

These restrictions reduce housing production regionally, but they are administered locally. The Washington, DC region is unique in that its inner, built out core spans two states and includes a federal district as well as an urbanized, independent county and city in Arlington and Alexandria, VA. Northern Virginia includes five independent cities, Maryland includes two counties with several urbanized town centers, and both states include numerous other jurisdictions that vary in size from tens of thousands of residents to just a few thousand.

As a result, zoning entitlements can vary dramatically from one jurisdiction to the next. Land use types allowed in one jurisdiction may not be allowed in another. The approach of municipal staff and appointed commissioners can vary significantly if a developer seeks a variance to build denser housing. For example, some jurisdictions clearly communicate allowable changes for projects, others may have latitude for negotiation but do not express it in local codes, and many others are not up for negotiation at all. Development tends to follow what is allowable by right, even if it does not match market demand in the area. In some communities, this leads to housing being built on larger lots with fewer units. In other communities, it leads to no new housing at all.

Uneven entitlement and permitting policies also add significantly to regional development costs. The ULI Housing Impact Survey indicated that more than half of respondents sought additional entitlements for at least 75 percent of their development projects. As with zoning, other entitlements are administered differently from one jurisdiction to the next and create risk and

¹⁷ Feldman, Rhodeside, and Spotts, “Increasing Housing Supply and Attainability – Improving Rules & Engagement to Build More Housing”

unpredictability for developers. At some infill sites, if the development is too risky for housing, developers may even seek to pursue commercial developments that are permissible by right, or avoid a project altogether, even if the site is in a desirable location near transit.

Fair housing and access barriers are worsened by the lack of housing production. The Washington region's high housing costs pose a persistent barrier for low-income residents wishing to live in areas with high-performing schools, proximity to jobs, and other amenities. The Metropolitan Washington Regional Fair Housing Plan determined that the barriers are getting worse. According to the Dissimilarity Index produced by the U.S. Census, White, Black, Hispanic, and Asian residents live separately from one another, and segregation has been increasing since 2010. Most White residents live in low poverty, high opportunity areas, many of which are also low density and exclusively zoned for single family dwellings. Black residents predominantly live in Washington, DC.¹⁸

Geographic patterns of affordable housing developments and rental assistance have reinforced households of different racial groups living separately. Project-based Section 8 units are concentrated in the eastern part of the region. Most of these units are located in majority Black areas in the District of Columbia or in Prince George's County, MD. The location of Housing Choice Vouchers follows the same pattern. Many of the region's higher cost jurisdictions, including those that qualify as priority communities as determined by HUD for PRO Housing activities, ban multifamily rental housing outright. When rental housing is not allowed, it is all but impossible for a developer to build an affordable building or for voucher holders to move there. Even when multifamily housing is allowed, landlords and property managers in these areas are often unwilling to accept vouchers.¹⁹

Low-income households also face significant difficulty finding affordable housing units across jurisdictional lines. The region's rental market crosses two states, one federal district, and multiple counties, and renters cannot easily look for assisted housing opportunities across these boundaries. A low-income household in Washington, DC may not even know where to learn about the availability of a rental unit in a Low-Income Housing Tax Credit (LIHTC) building just ten miles away in Fairfax County, Virginia. A comprehensive approach to affirmative marketing is needed to ensure that new affordable housing production can deconcentrate poverty and reduce segregation among all income and racial groups.

Finally, historic patterns of racially and ethnically concentrated areas of poverty have also led to an uneven distribution in who owns their own home. The Regional Fair Housing Plan found that White residents and Asian residents are more likely to own their homes than Black and Hispanic residents. In Prince George's County, MD, the region's largest majority minority jurisdiction and the nation's second most affluent majority Black county, the median home value was \$410,000.

¹⁸ Metropolitan Washington Regional Fair Housing Plan, 2023.

¹⁹ Alyse Oneto, Emily Peiffer, Claudia Aranda, and Martha M. Galvez, "Despite the law, landlords still reject voucher holders in Washington, DC"; the Urban Institute, September 20, 2018 <https://greaterdc.urban.org/blog/despite-law-landlords-still-reject-voucher-holders-dc>.

The County nonetheless experiences income and racial disparities in homeownership, because low-income Black and Hispanic households are less likely to possess wealth for downpayment savings, lack of access to credit, and other barriers.

A hot housing market has led to the loss of naturally occurring affordable housing (NOAH) and displacement in some jurisdictions. A lack of production and increasing land and material costs has contributed to the price of housing rising faster than incomes, resulting in many households experiencing housing cost burdens and/or being at risk of housing instability.²⁰ In the metropolitan Washington region, a person seeking a one-bedroom rental would need to earn over \$31 per hour to afford the Fair Market Rent of \$1615 per month.²¹ As noted previously, this sharp rise in housing costs has led to a net reduction to a reduction in NOAH in the urban core between 2011 and 2021. These jurisdictions added new market rate apartments, but most did not offer rents that low-income households could afford.

As the cost of housing has risen, so have levels of segregation. According to the U.S. Census Dissimilarity Index, levels of segregation in the metropolitan Washington region rose between 2010 and 2020. This means that as some communities in the urban core have lost their NOAH, the region as a whole has become more segregated. Today, White households live more separately from Black residents, and to a lesser extent Hispanic and Asian residents, than they did ten years ago.

Many of the communities have the properties to add affordable housing and to retain residents, but jurisdictions lack the tools to redevelop them. As one example, vacant commercial properties have become increasingly common as retail demand has declined. These properties could be repositioned as housing, but they face unique zoning code and adaptive reuse considerations. A few office-to-residential conversions are underway, but the region needs better standards before the market can take commercial and office conversions to scale. Under business as usual, the pace of conversion of retail, offices, and schools will be far too slow to meet the region's housing needs.

SOUNDNESS OF APPROACH

Vision

In metropolitan Washington, our collective vision is of a region where people of all incomes, ages, backgrounds, and abilities have access to and can choose the home and the community to live in that best meets their needs. COG, together with its local government members and partners, seeks to create a region that is integrated, inclusive, and resilient.

This PRO Housing Action Plan presents the COG philosophy that coordinated regional policy and practice presents the best opportunity to achieve shared local, regional, and national goals, increase the production of affordable housing, and reverse patterns of residential segregation by

²⁰ Jonathan Jones, "U.S. Cities With the Highest Home Price-to-Income Ratios in 2021," Construction Coverage, April 26, 2022, <https://constructioncoverage.com/research/cities-with-highest-home-price-to-income-ratios-2021>

²¹ "Out of Reach," National Low Income Housing Coalition, 2023, <https://nlihc.org/oor/state/dc>

race and income. For the first time in 25 years, eight local governments came together through COG to create a regional fair housing plan with shared goals and strategies designed to address our shared housing challenges in a coordinated and meaningful way. The approach outlined in this section builds on that recent work.

The most persistent and challenging barrier to fair housing choice in metropolitan Washington is the lack of sufficient affordable and accessible housing. The goals and strategies from the regional fair housing plan have been developed through a data-driven, multi-year, multi-jurisdictional planning process. The plan was approved in late 2023 by the elected officials who make up COG's Board of Directors and the eight local governments.²² Therefore, the coordinated and ambitious actions proposed that address the lack of affordable housing in the region will also further shared goals to reverse patterns of segregation and create more integrated and inclusive communities throughout the metropolitan Washington region.

The proposed activities build on COG's regional housing initiative, where the Board of Directors unanimously set 2030 housing production targets in September 2019. The three elements of the housing targets are: amount of housing needed (320,000 total units); accessibility of housing needed (75 percent created in activity centers)²³; and 75 percent affordable to low- and moderate-income households (defined as a monthly housing cost of \$2,500 or less).

The regional housing initiative is designed to balance the growth of housing and jobs, optimize the regional transportation system performance and support the COG Board's 10-year action plan to improve air and water quality. The catalyst for the adoption of these 10-year housing targets was the National Capital Region Transportation Planning Board's long-range plan, [Visualize 2045](#), which included as one of its aspirational initiatives developing more housing in closer proximity to jobs. In addition to its relationship with the long-range transportation plan, COG's regional housing initiative also supports its 10-year plan for the environment, for which COG received an award in 2019.

The local governments in the metropolitan Washington region are innovative and dynamic and seek ways to improve policy and strategies to increase housing production—and affordable housing in particular—to meet the region's significant unmet housing needs.

The actions proposed by COG and its member governments and partners will allow the region to both address its severe lack of affordable housing and improve residents' access to opportunity. The regional response will further HUD's goals of focusing on barriers to the production of housing for low- and moderate-income households and will leverage federal funds through shared learning and coordinated implementation across jurisdictions that share a transportation system and housing and jobs markets.

Actions proposed are organized by three shared regional goals from the Regional Fair Housing Plan that will further develop and implement housing policy plans, improve housing strategies,

²² The eight jurisdictions that participated in the regional fair housing planning process are the District of Columbia; in Maryland, Montgomery County and the City of Gaithersburg; and in Virginia, the City of Alexandria, Arlington County, Fairfax County, Loudoun County, and Prince William County.

²³ Activity centers are priority places designated by local governments for future growth with access to high-capacity transit, services, and job centers.

facilitate affordable housing production and preservation, and reverse patterns of segregation. This PRO Housing Action Plan includes regional and jurisdiction-specific activities as well because of the significant differences among jurisdictions in the nature of the barriers hindering achievement of these goals. Those goals and actions are organized into the following categories: reform of zoning and land use policies; increasing the supply of affordable housing; and preservation and anti-displacement policies.

Goal 1. Reform zoning and land use policies to expand access to affordable housing by increasing the development, geographic distribution, and supply of affordable housing.

The prevalence of single-family residential zoning in the region makes it challenging to develop committed affordable housing that could offer housing opportunities to members of protected classes and other low- and moderate-income households. More than three-quarters of the region's land area does not allow multifamily housing, which limits the number of sites available for market-rate or assisted housing. To address this barrier, COG proposes the following actions:

Goal 1 Task 1): *Work across jurisdictions to identify and align zoning ordinance reforms.*

The Washington region shares a single housing market, but it spans two states, one federal district, and numerous jurisdictions. Zoning standards differ from one community to the next, even in the shared WMATA system. To address this, COG, the Urban Institute, and the local jurisdictions will identify zoning ordinances that present the greatest opportunity for alignment and impact across county and state borders.

The Urban Institute, which was a key partner in developing the Regional Fair Housing Plan, will update its regional zoning atlas and dictionary to reflect the latest data from COG member jurisdictions; this dictionary is designed to allow for a comparison between the approaches that different jurisdictions are taking throughout the region. Urban and COG staff will work with each jurisdiction to ensure that the dictionary reflects their understanding of their by-right zoning code. Urban staff will then leverage its housing supply forecaster to estimate the number of potential new housing units that could be constructed throughout the region, including in each member jurisdiction. This task will enable us to compare different jurisdictional strategies and identify which are planning for housing supply most effectively, especially around activity centers and high-capacity transit, as specified in the Regional Housing Targets plan.

The Urban Institute will then work with COG and its partner local governments to identify a series of potential zoning reforms that we could “test” against Urban’s housing forecaster. These reforms will be designed to address different jurisdictions’ points of view and needs. The Urban Institute will estimate the degree to which these reforms may be likely to expand housing availability throughout the region. The final product will be a report that identifies what options are most likely to produce the expansion in housing availability that the region needs to keep up with demand.

The recommendations will be intended specifically for COG jurisdictions, but could be useful for large, jurisdiction-crossing metropolitan areas throughout the country seeking to plan for land use policy at the regional scale.

Estimated Period of Performance: 12 months

Goal 1 Task 2): *Test zoning reforms in individual jurisdictions and measure their potential for adoption across the region.*

In the Washington region, land use is local, and jurisdictions lead the way in developing reforms. In just the past five years, Arlington County has [allowed small multifamily housing in single family districts](#), Montgomery County has [strengthened regulatory incentives for transit-oriented development](#), and several other jurisdictions have allowed accessory dwelling units and co-living spaces. These reforms test which actions produce the most housing for low- and moderate-income households. For this grant, COG's jurisdictions will advance their reforms locally and share their lessons learned across the region.

Alexandria, VA proposes to use PRO Housing grant to implement its innovative [Zoning for Housing and Housing for All](#) initiatives. Zoning for Housing proposes zoning reforms to address regulatory barriers to housing production, and Housing for All is exploring how past discriminatory policies and practices continue to impact residents today, especially communities of color and low-income households. Working with COG, the City will advance targeted activities in its second phase of zoning reforms, which would also develop policies and programs to support access to opportunity within all proposed zoning reforms. On November 28, 2023, the City Council voted unanimously to adopt all Zoning for Housing proposed reforms.

COG and the city of Alexandria will use HUD PRO Housing funds for the following activities:

- (1) *Update to the Inclusionary Zoning Study*: A 2021 inclusionary zoning feasibility study, undertaken at the same time the city revised its housing contribution policy, concluded that Alexandria's practice of creating committed affordable units through the use of Section 7-700 (bonus height and density) coupled with city investment of Housing Trust Fund dollars plus developer contributions resulted in comparable levels of affordable housing developed in jurisdictions with inclusionary zoning policies. The study recommended that an update be conducted in a few years following implementation of the revised contribution policy. PRO Housing funds will allow the city to conduct an updated study to inform future strategies, tools, and recommendations to increase the production of affordable housing. This report will also be used to inform the city's Housing Master Plan update.

Period of performance: 12 months

- (2) *Research into Regulatory Reforms for Zoning for Housing Implementation*. This task will engage a consultant to assist city staff determine what additional regulatory changes may be needed to facilitate implementation of the Zoning for Housing / Housing for All approved reforms.

Period of performance: 12 months

Goal 2. Increase the supply of housing that is affordable to low- and moderate-income families in the region, particularly in areas that have historically lacked such housing.

The metropolitan Washington region has high and increasing housing costs and an unequal distribution of income-restricted affordable housing. As a result, there are significant fair housing challenges for members of protected classes in the region. Black residents, Hispanic residents, and persons with disabilities experience housing affordability and housing instability problems most acutely. Many households are rent burdened, and for racial and ethnic minorities, these burdens are more severe. For example, 25 percent of renters in the District of Columbia pay over 50 percent of their income on rent. In the region, 57 percent of severely burdened households were non-White, and 47 percent were households who were born outside the United States.

To increase affordable housing production, COG proposes the following five activities:

Goal 2 Task 1): Support a pilot project to develop income-restricted Accessory Dwelling Units (ADUs) with affordability restrictions on the property.

Approximately 74 percent of the metropolitan Washington region is zoned exclusively for single-family residential dwellings.²⁴ This restricts the amount of new affordable housing that can be developed in lower-density, single-family neighborhoods and is a key barrier to increased housing production. ADUs allow for the creation of additional housing in neighborhoods of single-family homes and can provide many benefits to homeowners. ADUs are now allowed in all participating jurisdictions, with varying restrictions.

To incentivize the development of more ADUs, COG will partner with the District of Columbia to support its [Rental Accessory Apartment Program](#) (RAAP). This pilot project assists homeowners with developing an accessory apartment on their property. In exchange for funding from the District and COG's PRO Housing grant funds, homeowners will agree to rent their new accessory apartment to individuals with incomes at or below 60% of AMI from the District government's waiting list for affordable inclusionary zoning units. PRO Housing funding will support pre-development soft costs only (architectural, engineering, permitting, etc.) District of Columbia staff in the Department of Housing and Community Development will income-certify residents of future RAAP units. District government staff and COG will provide fair housing training to homeowners to maintain records that facilitate audits of their compliance with non-discrimination laws. Lessons learned from the District of Columbia's pilot program will inform other jurisdictions in the region and in other regions across the country regarding strategies to support increased production of affordable ADUs regionwide.

Period of performance: 4 years

Goal 2 Task 2): Partner with the Purple Line Corridor Coalition to support equitable transit-oriented development in Montgomery County and Prince George's County, Maryland.

²⁴ Tracy Hadden Loh, "Where the Washington region is zoned for single-family homes: an update." Greater Greater Washington, December 18, 2018, <https://ggwash.org/view/70232/washington-region-single-family-zoning-an-update>

At a subregional level, COG and the Purple Line Corridor Coalition (PLCC) will accelerate the preservation and production of affordable housing along the Purple Line light rail corridor connecting Prince George's County and Montgomery County in Maryland.

The coalition will use the National Center for Smart Growth staff time and a housing development consultant to conduct three activities. First, the coalition will plan for mixed-use conversion of strip malls to affordable housing, culminating in policy and financing recommendations to maximize affordable housing on vacant strip mall sites. Second, the coalition will provide development technical assistance to small property owners, market rate developers, municipalities, and others. These entities can play a role in developing affordable housing but do not typically do so in the Washington region. Third, the coalition will host capacity building workshops for developers of affordable housing, emphasizing Black, Indigenous, and People of Color (BIPOC) developers, community-based organizations, and houses of worship along the Purple Line. PLCC will produce a case study of lessons learned for the region, for HUD, and for similar communities across the country. By sharing its lessons learned in cross-jurisdictional equitable development, PLCC will help break down barriers to affordable housing across the country.

Period of performance: 4 years

Goal 2 Task 3): Develop new tools to help jurisdictions prioritize effective housing policies and programs and create more affordable housing.

Housing & (formerly The Housing Association of Non-Profit Developers)'s [Housing Indicator Tool](#) (HIT) is a data platform that tracks local jurisdictions' housing production and preservation in the metropolitan Washington region to help stakeholders create paths for removing obstacles to opportunity and supporting housing stability. COG and Housing& will enhance the functionality of the HIT to accelerate the preservation and production of affordable housing across COG's and Housing&'s membership. Activities will include the following:

- a) Providing current regional data across the Capital Region with an expanded focus on zoning: To help establish benchmark data for the efficacy of the core grant strategy, Housing& will conduct comprehensive research and data analysis across the Capital Region to more clearly define where the opportunities for affordable housing remain and clearer data on those most impacted (i.e., disaggregated data).

In the next iteration of the HIT (HIT 6.0), the survey will include updated policy questions relating to each jurisdiction's zoning laws and policies. These new questions will provide a deeper understanding of the zoning practices in use in the Capital Region. This will allow stakeholders to more easily determine which zoning policies are the most supportive for the production and preservation of affordable housing. The additional questions include information about: the percentage of a jurisdiction's residential land zoned only for single-family housing, "missing middle" density, or high density; the maximum number of units that may be constructed per net acre; the amount of land near transit that is zoned for multi-family housing; the percentage of permits that required

special exemptions or mandatory hearings before approval; parking minimums; and permit timelines.

- b. Technical assistance training for Housing& members: Housing& will scale its capacity-building model to reach more members in understanding the tools at their disposal and the importance of approaching urban planning and housing development with a holistic, cross-sector framework.

Technical assistance will include jurisdiction-specific demonstrations of the HIT showing stakeholders across government how they can make use of the HIT to improve the production, preservation, and protection of affordable housing. The jurisdiction-specific demonstrations will also include comparisons of progress between multiple jurisdictions to provide stakeholders with more context on where they stand in the region.

- c. Cross-sector capacity-building: Housing&'s work allows it to understand how cross-sector collaboration leads to sustainability in affordable housing. Housing&'s membership includes representatives from over 20 community development sectors including real estate development, finance, and philanthropy. Housing& will scale its cross-sector building approach to support developers, the private sector, healthcare entities, community-based organizations and other key stakeholders as they advocate and invest in increased housing solutions.

Housing& will use the HIT as the backbone of its HIT Activations, in which staff provide policy-based programming to members and other stakeholders to further their understanding of the policy needs of the region. This includes activations designed to educate community members about the need for affordable housing and the obstacles affordable housing providers face when attempting to build affordable housing; policy explainers designed to deepen understanding of stakeholders on new pro-affordable housing policies; and in-depth policy deep dives designed to change the narrative on misunderstood policy issues relating to affordable housing.

HUD PRO Housing funding will support development of the HIT 6.0, 7.0, and 8.0.

Period of performance: 4 years

Goal 2 Task 4): *Implement local affordable housing initiatives and coordinate them to meet regional affordable housing goals.*

To meet regional housing production goals, jurisdictions will advance local reforms. Locally, each action has been proposed as the most effective market mechanism in that community. Collectively, the actions will be coordinated to meet COG 2030 production housing goals and promote shared learning. Each action is described below. Unless indicated otherwise, all production strategies target low- to moderate-income households.

Task 4a) City of Alexandria, Virginia:

Transform Research into Actionable Strategies. A consultant will provide additional capacity to transform historical research of inequities in Alexandria’s housing market into current-day goals, strategies, and metrics to ensure new housing programs under Zoning for Housing and Housing for All are developed using a lens informed by the city’s housing history. The city and COG will share these metrics that may be modified to fit the needs of other communities across the region.

Period of Performance: 18 months

Reimagining Single Family Neighborhoods with New Housing Typologies: This effort will include several related tasks as follows:

- a. Develop a pattern book for small multifamily housing typologies in predominantly single-family zoned districts. The city’s pattern book will illustrate buildings like duplexes, quads, and small apartment buildings and help residents and developers understand how they fit in city neighborhoods.
- b. An on-site, multi-day community event, featuring a discussion regarding how creating affordability, access, and availability can hold space for neighbors historically underserved due to discriminatory housing practices and patterns. The event will feature the pattern book, projection of images, facilitation, and discussion of how other communities in the United States are redressing impacts of housing discrimination.

Period of performance: 6 months

Task 4b) Fairfax County, Virginia: *Analyze regulatory reforms that lower barriers to affordable housing production.* Fairfax County will examine whether entitlement reform, reduced fee waivers, and/or expedited approval for affordable housing can incentivize the production of more units.

This will include an evaluation of the regulatory environment for affordable housing development within Fairfax County and different scenarios for regulatory reform and process efficiencies; identify impacts of different reforms. The final deliverable will be a report that staff will use to inform which combination of approaches will result in the greatest production of affordable housing units.

Period of performance: Up to eight months

Task 4c) Loudoun County, Virginia: *Develop policies and incentives to increase equitable transit-oriented affordable housing production.* Loudoun County will undertake a comprehensive process to identify barriers to Transit Oriented Development (TOD) and evaluate adopting incentives to create more affordable housing near transit and in urban areas, such as building height increases, setback reductions, lot coverage increases, technical study waivers, buffer modifications, and parking reductions. The final deliverable will be a report with actionable results.

Period of performance: nine months

Task 4d) Montgomery County, Maryland: *Analyze and develop strategies to maximize the efficiency of the Moderately Priced Dwelling Unit (MPDU) Program to meet current, increasing needs.* The nation’s first mandatory inclusionary zoning program has proven successful over 50 years, but it has not been able to keep up with recent demand. The county maintains a waiting list of over 400 households, and most rental buildings see three times as many applicants as there are units available. PRO Housing grant funds will enable the county to find solutions to this disparity and revitalize the program for the future.

Period of performance: 12 months

Task 4e) Prince William County, Virginia: *Develop the county’s first ADU ordinance and establish a housing trust fund.* In collaboration with COG, Prince William is developing its first Affordable Dwelling Unit (ADU) ordinance and program policies. Both the rezoning process and the process of submitting site plans will give developers opportunities to voluntarily provide affordable housing, promoting diverse mixed-income housing communities to meet the needs of residents at all income levels. HUD PRO Housing funds will allow Prince William County to advance phase two, the next phase of its zoning reforms in support of affordable housing production and the expansion of housing choice. Prince William County will also work with COG to operationalize a newly-established housing trust fund.

Period of Performance: 18 months

Goal 3. Implement policies designed to preserve affordable housing and prevent displacement with a goal of no net loss of affordable rental units.

The region has lost a significant number of affordable housing units that new construction has not replaced. The region must prioritize the preservation of its existing affordable units in the supply of affordable housing.

Goal 3 Task 1): *Conduct a historic preservation tracking system workshop.*

To address the barrier of losing existing affordable housing, COG and the participating jurisdictions will build on existing practice in the region, such as the [DC Preservation Network](#), to develop an “early warning” system to track affordable housing buildings and stem further loss of units. Staff from the Urban Institute, which co-convenes the DC Preservation Network, will share their experience and provide guidance to the jurisdictions in the region during a workshop tailored to meet local jurisdictional preservation needs and capacity. Informed by the Urban Institute’s experience, local jurisdictions will develop the skills to create a methodology and database to track affordable housing developments with expiring use subsidies, particularly those that are in higher-opportunity or rapidly gentrifying areas. This will also include working with other local nonprofit housing developers and regional partners to identify properties for intervention and providing financial support for their acquisition and rehabilitation.

Period of performance: 6 months

Goal 3 Task 2): *Develop an Anti-Displacement Strategy in the District of Columbia.*

To meet this goal in the District of Columbia, COG and a consultant will support District staff to build toward an anti-displacement strategy called for by the District's 2021 Comprehensive Plan. Work will use the Office of Planning's analysis of factors affecting affordability, access to neighborhoods of opportunity, and resilience to understand displacement pressures and develop approaches to preserve naturally occurring affordable housing (NOAH) for low-income rental and homeownership opportunities. The work will also support the goals of the District's Black Homeownership Strike Force.

Period of performance: 18 months

Goal 3 Task 3) *Implement Recommendations of the Affordable Housing Preservation Task Force and the Manufactured Housing Task Force in Fairfax County, VA.*

Fairfax County, VA, will use PRO Housing funding to advance the recommendations of its Affordable Housing Preservation Task Force and Manufactured Housing Task Force. The Preservation Task Force developed strategies for the county's approximately 8,300 NOAH units affordable to low-income households. To implement the task force's recommendations, the county will identify affordable communities for preservation, expand its at-risk "early warning" system, and provide additional incentives to ensure preservation and minimize displacement of tenants. The Manufactured Housing Task Force provided recommendations for the preservation of the county's approximately 1,750 manufactured homes. To implement manufactured home recommendations, the county will modify land use policies and regulations to support preservation and neighborhood livability in manufactured home communities. Key tasks for implementation include the following:

- Develop and implement an engagement plan for preservation projects that will involve planning, rehabilitation, improvements, and/or redevelopment of multiple sites.
- Survey and address the regulatory and code compliance needs and environmental hazards for manufactured housing communities, such as Harmony Place and Audubon Estates.
 - Anticipated deliverables for the two main tasks include:
 - Engagement strategy and policy document;
 - General Engagement Framework Report;
 - Detailed community engagement plan;
 - Structure Assessment and Improvement Report to identify code compliance issues and evaluate options to address;
 - Engineered plans for Structural Improvements;
 - Permit acquisition;
 - Essential Resource Guide (that would reference regulatory and code requirements for manufactured homeowners, tenants, and park owners); and

- Floodplain Mitigation Study and Improvement Report.

Period of Performance: 24 months

Goal 3, Task 4): *Implement the Proactive Preservation Initiative in Prince George's County, MD.*

Prince George's County, MD, will use PRO Housing funding to implement the recommendations of a detailed market analysis and policy recommendations of a consulting study to preserve Naturally Occurring Affordable Housing (NOAH) along the Purple Line light rail and Blue Line Metro corridors as they undergo economic investment. Building on the success in engaging with sellers and purchasers of multifamily properties through the county's implementation of its Right of First Refusal Program, the **Proactive Preservation Initiative** will allow Prince George's County to gain early access to properties with the potential for redevelopment that could result in the loss of NOAH.

The Proactive Preservation Initiative will address the county's findings that there are a significant number of multifamily rental properties which will undergo redevelopment during the next five to ten years due to multiple economic factors. These factors include: 1) the natural lifecycle of older properties built in the 1950s-70s (of which there is a significant inventory in the county); 2) the enactment of a new county rent stabilization law in 2024 that will limit financial return for property owners and thereby incentivize redevelopment; 3) significant investment by the county and state of Maryland in targeted areas such as the Blue Line and Purple Line transit corridors that is driving incentives for redevelopment; and 4) the enactment and implementation of new zoning and land use incentives.

To gain access to these pipeline properties, the county must do more than just provide financial incentives and wait for property owners to seek support. Rather, the county recognizes that it needs to engage with property owners at the earliest opportunity as an owner starts along the path of redevelopment. This will involve close coordination with the county's planning office, the Maryland-National Capital Park and Planning Commission (M-NCPPC), as it becomes aware of redevelopment plans at an early stage.

Additionally, through the Right of First Refusal (ROFR) program, Prince George's will engage with owners of properties who have completed acquisitions in recent years and therefore may be more likely to pursue redevelopment opportunities. Additional market analysis and investigation will be a vital component in identifying potential opportunities.

Key steps and milestones in the Proactive Preservation Initiative include:

1. Establishing and analyzing an inventory of targeted multifamily properties. This will include properties that exhibit affordability characteristics, are located in targeted geographic areas, have previously engaged with the county under the ROFR program or other identified factors. [Months 1-3]

2. Establishing a working group comprised of Prince George's County Department of Housing and Community Development and M-NCPPC planning officials to create a successful and enduring collaboration. [Months 1-3 and ongoing]
3. Seeking input in program design from other key stakeholders, including private sector participants in the real estate sector and relevant county agencies and authorities. [Ongoing]
4. Exploring and pursuing the development of additional financial, land use, and other incentives that will create an economic return opportunity for property owners to work cooperatively to preserve targeted properties. [Months 3-18].
5. Developing detailed program guidelines and implementation procedures which clearly illustrate the steps that county staff across the housing and planning agencies will take on an ongoing basis as preservation opportunities emerge and evolve over the long-term. [Months 18-24]

As described under Goal 2, these efforts align with the Purple Line Corridor Coalition's planned actions to mitigate potential displacement impacts related to light rail transit expansion. PLCC and COG will accelerate the preservation and production of affordable housing through development technical assistance to small property owners, market rate developers, municipalities, and others who might not otherwise pursue the development of affordable housing.

Period of Performance: 24 months

Final grant activity: Evaluation. During the period of performance through completion, Enterprise Community Partners will complete an evaluation of the regional effort. The evaluation will improve regional and local understanding about how interjurisdictional collaboration can effectively reverse segregation, reform land use, and improve housing production. Enterprise Community Partners provided technical assistance on behalf of HUD at the start of the regional fair housing planning process to support a robust community engagement process.

Prior to launching any of the above-described tasks, COG and Enterprise will select key indicators to measure progress throughout the course of the grant period. This will provide insights into whether the grant activities are likely to achieve their intended long-term impact. The evaluation will serve as a bookend to the fair housing planning effort and provide insights to COG, its partners, HUD, and communities across the country.

How this Action Plan Aligns with Existing Planning Initiatives

This Action Plan benefits from the efforts that have gone into multiple planning efforts led by COG and its member jurisdictions. COG's Regional Housing Initiative culminated in setting 10-year regional housing production targets in 2019. The catalyst for the adoption of these targets was the National Capital Region Transportation Planning Board's long-range plan, [Visualize 2045](#). These efforts, together with COG's 10-year environmental action plan form the pillars of a

united regional planning framework to improve quality of life for all residents so that they can thrive in the places that best meet their needs.

Numerous complimentary planning efforts abound among COG's member governments that have informed this Action Plan. The City of Alexandria's [Zoning for Housing / Housing for All Initiative](#), launched in 2020, is working to identify zoning changes that when implemented could increase the supply of housing overall. Montgomery County, MD is working on [setting local housing production targets](#) by planning area, taking COG's regional goal to the local level to inform future land use planning. The District of Columbia undertook a similar effort in response to the COG housing targets with its [Housing Framework for Equity and Growth](#). Arlington County, VA and Fairfax County, VA have conducted homeownership studies, and the District of Columbia is working to implement the recommendations from its [Black Homeownership Strikeforce](#). Prince George's County, MD's [Housing Opportunities for All Workgroup](#) is implementing the county's strategic plan which has led to significant changes in local programs and practice in recent years. Loudoun County, VA's [Unmet Needs Housing Strategic Plan](#) was approved in September 2021 and Fairfax County's [Communitywide Housing Strategic Plan](#) have both informed the regional fair housing plan as well as the proposed actions for this PRO Housing Action Plan. Complementary work in Fairfax County includes a policy updating the county's parking regulations passed by the Board of Supervisors in September 2023. Changes include reforms to development standards, such as the number of parking spaces required near transit.²⁵

Geographic Scope

COG's membership represents 169 priority geographies identified by HUD, which demonstrates an acute need for affordable housing as the result of 15 years of underproduction. Additionally, many area jurisdictions face other housing challenges that stem from a lack of supply of affordable and attainable housing.

The geographic scope of this plan includes the participating jurisdictions of the District of Columbia; in Maryland, Montgomery County, the City of Gaithersburg, and Prince George's County; and in Virginia, the City of Alexandria, Arlington County, Fairfax County, Loudoun County, and Prince William County. All meet the HUD definition of "priority geography" for PRO Housing grants. These priority geographies have committed together to reversing the combined impact of underproduction and segregation patterns.

The metropolitan region also contains 163 priority jurisdictions at the local level. Every COG county in this plan contains at least one priority jurisdiction. Across the region, jurisdictions qualify as priority across all three different metrics and reflect the area's acute housing need. The region's high number of priority jurisdictions reflect three growing housing needs. First, affordable housing production has not kept pace with the regional need. A combination of housing underproduction and price appreciation has worsened shortages in many communities,

²⁵ Margaret Barthel, "Fairfax Supervisors Approve Plan to Reduce Parking Requirements," DCist, September 27, 2023, <https://dcist.com/story/23/09/27/fairfax-supervisors-approve-plan-to-reduce-parking-requirements/>

especially those with access to jobs, schools, and amenities. For example, Washington, DC has a score of .23 under the Affordable Housing Not Keeping pace metric. The District added approximately 31,000 housing units between 2010 and 2020, but also lost naturally occurring affordable housing (NOAH) units, so it only experienced growth in units affordable to households earning wages above 100% of Area Median Income.²⁶

Fair Housing

This PRO Housing Action Plan is a direct outgrowth of COG’s Regional Fair Housing Plan, and its activities are designed to accelerate and enhance implementation of the affordable housing and zoning goals in the plan. The fair housing plan is a roadmap to increase affordable housing and reduce barriers to access for members of protected classes covered by Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601-19.

The activities in this Action Plan will remove barriers to the development of well-resourced areas of opportunities by increasing affordable housing options, decreasing land use barriers to developing affordable housing, and increasing fair access to existing housing. The goal is to ensure that members of protected classes, such as Black and Hispanic households and people with disabilities, are able to live in areas with high performing schools, good jobs, reliable public transit, and healthy communities.

The region’s demographic profile is 45.5 percent White, 24.8 percent Black, 15.8 percent Latino, and about 10 percent Asian American or Pacific Islander. Approximately ten percent of the population has a disability. The regional demographics of the Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) show that 80 percent of residents in the R/ECAPs are Black and 10 percent are Hispanic. The targeted program participants are members of protected classes, including people of color and people with disabilities, who would otherwise remain in substandard housing in areas with few opportunities.

Some of the activities in the Action Plan are expressly designed to reduce displacement, particularly around transit corridors. For example, the Purple Line Corridor Coalition’s work will support the capacity of Community-Based Organizations and houses of worship to engage in development along the Purple Line in suburban Maryland. The District of Columbia’s study will inform its anti-displacement efforts, address recommendations from the Black Homeownership Strikeforce, and will inform the District’s update to its comprehensive plan.

The eight jurisdictions that participated in the fair housing planning process through COG have approved a goal of no net loss of existing affordable rental units, a requirement of right of first

²⁶ U.S. Department of Housing and Urban Development, “Comprehensive Housing Affordability Strategy” Data, 2010 – 2020.

refusal to tenants, nonprofit organizations, and mechanisms to ensure affordability for projects with expiring subsidies and manufactured home parks.

GRANTEE AND PARTNER CAPACITY

Grantee Capacity

Grant implementation will be led by the Metropolitan Washington Council of Governments, a nonprofit association with a membership of 300 elected officials from [24 local governments](#), the Maryland and Virginia state legislatures, and U.S. Congress. COG receives funds from local, state, and federal governments annually to conduct its work activities and possesses the necessary capacity and fiscal management experience to serve as lead entity for the grant.

COG managed over \$21 million in federal grants during Fiscal Year 2023 and has instituted strong fiscal controls. COG's Office of Finance and Administration (OFA) and its staff oversee all aspects of fiscal management, including procurement for all departments and programs within COG. COG's OFA executes federal grant agreements regularly and works with its member agencies, grantees, and/or sub-recipients to oversee implementation of each project or program. The US Federal Transit Administration serves as COG's cognizant agency for the purposes of Indirect Cost Allocation plan review and approvals. Additionally, OFA's Purchasing Manager oversees and conducts all procurements tasks as may be needed to execute the work elements of this grant award. These procurement and contracting practices are informed by the federal Title VI Plan and Program and its own set of DBE and WBE program goals.

COG also undergoes an annual single audit as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. A copy of the latest federal audit report is available upon request. COG's Department of Community Planning and Services will be responsible for implementing the PRO Housing grant activities. The department promotes regional cooperation on planning, the economy, and housing. COG's lead housing manager has over 20 years of experience in the field and leads all aspects of COG's housing programming, from homelessness to affordable homeownership, and will serve as Project Director. The Department of Community Planning and Services Director will support the lead housing manager and provide guidance, as necessary, for the duration of this effort. There are no vacancies or positions contingent upon PRO Housing grant funding.

Partner Capacity

COG's Action Plan includes partners who bring specific skills and capacity to be able to fully implement the plan, in addition to local government staff who will be dedicating a portion of their time to PRO Housing activities. COG's capacity to fully design, plan, and remove barriers will be augmented by consultants previously engaged in the regional fair housing plan: the Urban Institute and Enterprise Community Partners.

The Urban Institute (Urban) is a nonprofit corporation in Washington, D.C., established in 1968. Urban is nationally recognized as an objective and nonpartisan policy research organization with a mission to open minds, shape decisions, and offer solutions through economic and social policy research. Urban has deep experience producing detailed but accessible data-informed policy analysis, especially in the DC region.

Urban staff led the data collection and analysis for the Regional Fair Housing Plan and contributed to the plan's content. Urban will work with COG staff to develop zoning reform analysis and strategies, and to provide technical assistance based on its work co-managing the DC Preservation Network for other jurisdictions tracking properties with expiring use subsidies. A Senior Fellow and two Senior Research Associates will serve as primary staff persons for PRO Housing Activities.

Enterprise Community Partners is a national nonprofit organization with 43 years of experience that provides comprehensive solutions to address America's shortage of affordable homes through solutions, capital, and community development. Two researchers from the Enterprise Impact and Evaluation team will identify key indicators to track during the entire program's implementation to provide insights into whether the tasks, as designed, will achieve the outcomes as planned.

The Purple Line Corridor Coalition (PLCC) was formed in 2013 and is a multi-sector collaborative led and administered by the University of Maryland's National Center for Smart Growth in partnership with a coalition of community organizations, state and local governments, philanthropies and businesses. PLCC led the creation of the Community Development Agreement for the light rail Purple Line Corridor which articulates a collective vision for vibrant economic and community development along the 16-mile corridor. The PLCC is uniquely suited to advance anti-displacement and affordable housing creation across both Montgomery and Prince George's Counties in Maryland and will further the aims of this PRO Housing Action Plan through its efforts.

Housing& is a nonprofit association committed to intersectional solutions that advance housing solutions beyond bricks and mortar. Housing&'s online tool, the Housing Indicator Tool, provides critical data regarding housing production and preservation for the metropolitan Washington region. Supporting enhancements of this tool through PRO Housing will ensure that Housing& is able to collect accurate and timely housing data to inform policy makers and community leaders.

COG is an association of member governments and works in tandem collaboratively with its members. Tasks that are focused on a single jurisdiction will be primarily managed by local government partners may include consultants to add capacity to existing staff teams.

An organization chart for key staff engaged in implementing COG's PRO Housing activities is attached to this Action Plan.

STAKEHOLDER ENGAGEMENT AND PUBLIC PARTICIPATION SUMMARY

Public Participation Process (Application Phase)

During the application phase, COG gathered input to inform its proposal through continuing to convene the multi-jurisdictional local government team that created the regional fair housing plan and community leaders from non-governmental organizations which advised and guided the local governments during the fair housing planning process. An extensive community engagement process during the fair housing plan process provided rich and meaningful insights into the barriers residents in metropolitan Washington face trying to access affordable housing.

A regional public hearing was held using the District of Columbia's Public Input platform to allow for virtual participation across the metropolitan Washington region. The hearing was held at 6:30pm on October 23, 2023. Notices about the hearing were posted in *The Washington Post*, *Washington Hispanic*, and *Afro American* newspapers. They were also distributed widely to COG members and partners via email and social media platforms.

COG staff also gave a presentation to its regional board of elected officials during the proposal phase to gather their input. To augment efforts to notify the public about the public hearing and the public comment period, COG's partner Housing& (formerly known as HAND) surveyed its members about the application. The survey collected input from organizations and developers that build affordable housing across the region.

In addition, during COG's Regional Housing Initiative (2018-2019), which resulted in 10-year production targets, COG staff engaged in extensive discussions with real estate industry leaders such as the Urban Land Institute's Washington District Council, AOBA, the Associations of Realtors in Virginia, DC, and suburban Maryland, and other research and academic institutions engaged in studying and analyzing housing data. This past effort built strong relationships from which to solicit input and ensure a well-rounded, realistic, and balanced approach will be taken to remove barriers to the production of affordable housing as described in COG's proposal.

Key Stakeholders and Strategy for Continued Outreach during the Grant's Period of Performance

As an association of local governments, COG primarily serves government staff and elected officials with the goal of facilitating regional collaboration and cooperation. COG also works collaboratively with other regionally serving housing organizations such as the Purple Line Corridor Coalition (PLCC), Housing& (formerly the Housing Association of Non-profit Developers), ULI Washington, and consults with industry representatives such as AOBA (Apartment and Office Building Association), the Northern Virginia Association of Realtors, and other research organizations and universities. As part of the regional fair housing planning process, a Community Advisory Committee of organizations representing members of protected classes served as a bridge between local government and community members. The timing of the fair housing planning process and the PRO Housing funding opportunity allowed COG and its members to seamlessly transition from planning to implementation with community leaders in

place to weigh in effectively about the proposed plan as well as invite members of their respective communities to participate in developing this proposal.

During the period of grant performance, COG will work with local government Public Information Officers to provide regular updates and opportunities for residents to be involved in the work as well as evaluate its effectiveness. COG's Office of Communications will be the lead entity and provide information through blogs, newsletters, email updates and social media. Grant recipients of COG's Housing Affordability Planning Program, which provides predevelopment funding to affordable housing near transit, will also be a partner in sharing information. COG staff from the Transportation Planning Board will also share updates with the Access for All Advisory Committee. This body advises the Transportation Planning Board (TPB) on transportation issues, programs, policies, and services important to traditionally underserved communities, including low-income communities, underrepresented communities, people with Limited English Proficiency, people with disabilities, and older adults. COG will also share updates via partner organizations and the leadership of the members of the Fair Housing Community Advisory Committee.

Strategies to Encourage Public Participation, Building Support, and Engage Community Members, Including Those Most Likely to Benefit from your Proposed Activity(ies)

COG's plan to encourage public participation throughout the implementation process of this Action Plan builds upon the foundation created during COG's regional fair housing planning process. Community participation was a significant cornerstone of the plan's development, with over 1,200 agencies, groups, and individuals involved in the Regional Fair Housing Plan process between July 2021 and March 2022. In a survey of nearly 3,000 area residents, approximately 84 percent reported having difficulty accessing safe, affordable housing. The survey also found that 13 percent of respondents said they have faced discrimination; of them, 41 percent blamed landlords or property managers.

The Community Advisory Committee created during the fair housing planning process served as a bridge between residents in underserved communities and local governments. COG will continue to engage the Community Advisory Committee throughout the implementation process to provide opportunities for grassroots organizations to inform and shape many of the planned tasks described in this Action Plan. COG is also working collaboratively with the Equal Rights Center (ERC) to support ongoing engagement of the Community Advisory Committee. The ERC (a Fair Housing Initiatives Program recipient in the metropolitan Washington region) is providing a forum for groups impacted by fair housing choice to continue to be involved in the implementation of the Regional Fair Housing Plan.

Some of the tasks in this Action Plan will involve their own extensive community engagement processes led by partner governments; for example, in the District of Columbia, aspects of their PRO Housing funded work will complement the city's comprehensive plan update with many planned engagement forums. In Prince William, Virginia, the county will use PRO Housing funds to advance zoning reform and design of the county's first-ever Affordable Dwelling

Ordinance. This process will provide many opportunities for residents to engage in providing input on land use reforms and inform future growth to meet the county's increasing needs for affordable housing.

Overall, the effort to encourage public participation will be a multi-agency, multi-jurisdictional effort, involving COG staff, local government, and partner organizations.

Process for Following Public Participation Requirements for any Substantial Amendments, including Compliance with Web Posting Requirements

COG will follow the lead of its local government members, and their Citizen Participation Plans as described in 24 CFR Part 91 to ensure that any substantial amendments to this Action Plan will be communicated with all residents of COG member jurisdictions in the metropolitan Washington region. COG will provide a 30-day public comment period for any substantial amendments to allow more time for the public to submit their input.

COG will provide notice of a public hearing through multiple media: printed notices in local newspapers, email, through our website, and on social media. COG will also work with its member government Public Information Officers to share the notice of any substantial amendments and the opportunity to attend a hearing and submit comments. COG will host a public hearing and provide an opportunity for public comments through its webpage (www.mwco.org), a dedicated email address, and a phone with a TTY number for those with accessibility needs. COG will follow all HUD requirements for website accessibility for those with disabilities and individuals with Limited English Proficiency.

LONG-TERM EFFECT

Describe the Anticipated Permanent, Long-term Effects Your Plan Will Have

The activities in this Action Plan are designed to reduce exclusionary zoning and increase affordable housing production in areas of high opportunity in a variety of ways. The long-term impact will include greater opportunities to develop affordable housing in high opportunity communities because of land use and zoning changes, streamlined development processes, and financial incentives.

This Action Plan will support a pilot project in the District of Columbia to help homeowners build Accessory Dwelling Units (ADUs) as income-restricted units, thus providing an additional way to provide affordable homes citywide without requiring land use changes or public approval of new affordable developments. This effort will provide a case study to inform surrounding jurisdictions regarding their own ADU programs and how they can be leveraged to increase affordable housing opportunities.

By the end of the engagement, the grant will have additionally produced new work products and tools that local jurisdictions can use to reduce land use barriers and increase their local supply. These include online tools to help jurisdictions prioritize the local land use actions; a planning

guide for redeveloping local commercial properties developed for the WMATA Purple Line but applicable regionwide; an Accessory Dwelling Unit and “gentle density” pattern book, developed for the City of Alexandria; and an update to the nation’s oldest mandatory inclusionary zoning program in Montgomery County that will inform other high cost, high opportunity jurisdictions across the region.

Finally, these grant funds will allow for the development of proven local approaches to housing supply for their adoption across metropolitan Washington including: the co-location of affordable housing and school redevelopment in Alexandria, VA; implementation of preservation strategies in Prince George’s County, MD; a region-wide preservation workshop; and a transit corridor zoning reform in Loudoun County, complementing the work of the Purple Line Corridor Coalition in suburban Maryland.

Collectively, these programs, tools, and case studies provide the foundation for a community of practice between jurisdictions. The region experiences several interrelated local and regional barriers to a balanced, fair, and affordable housing market. There is no “one size fits all” pathway to reform them. Successful examples demonstrate proof of concept and inspire other jurisdictions to implement reforms.

An evaluation team will assess the impact of the proposed activities and help determine which of these actions most effectively achieved COG goals. This cross-cutting evaluation by Enterprise Community Partners’ Impact and Evaluation Team will inform COG’s understanding about how to improve housing outcomes in metropolitan Washington and will contribute to the national body of knowledge about the value of regional collaboration in increasing affordable housing supply.

Describe How Your Plan Seeks to Permanently Remove Key Barriers to Producing and Preserving Affordable Housing and the Measurable Outcomes You Expect to Achieve

This Action Plan implements the recommendations of the Regional Fair Housing plan, a historic interjurisdictional commitment to increase access to opportunity and reverse regional patterns of segregation by race and income. Today, White residents are much more likely to live in areas with high quality schools, housing, and amenities than Black and Hispanic/Latino residents. Because of home prices, the regional economy is suffering, and the number of individuals struggling to make ends meet is getting worse. This proposal seeks to reverse this trend through three approaches.

The Plan’s activities will encourage more multifamily development, the most significant vehicle to increase housing production. Right now, 74 percent of the region’s land area is zoned for single family housing. This grant’s collective reforms, which include Accessory Dwelling Units, zoning and land use reforms, and TOD, will result in more multifamily development and more apartments where a Housing Choice Voucher holder may choose to live.

In addition, this program will create new mechanisms to add affordable housing within opportunity areas. Jurisdictions like Loudoun County, Prince William County, and Montgomery

County will use grant support to develop new tools and policies to boost affordable housing for low- and moderate-income households. These tools will significantly boost the affordable housing production in these jurisdictions.

To evaluate the long-term effect of the planned actions, COG will engage the Impact and Evaluation Team at Enterprise Community Partners to select key metrics to monitor and evaluate on an annual basis, culminating in a final report at the end of the grant period. The results of this evaluation will inform not only COG and its partners about the effectiveness of the strategies selected for implementation but will contribute to a growing national body of knowledge about how regional collaboration can support and amplify local efforts to meet the region's housing needs.

Measurable outcomes include (at least) the following proposed metrics:

Housing production of 32,000 units per year. By the end of the grant period, the Washington region would meet COG's regional housing production target. Seventy-five percent of these units would be affordable to low-and-moderate income households, and 75 percent of these units would be located near high-capacity transit. This would be made possible by the collective impact of new policies and incentives to site, finance, and build affordable housing, conversions of commercial properties facilitated by PLCC, implementation of new preservation policies and TOD reforms, and other tools.

An additional 10% of regional land is made available for multifamily housing. By the end of the grant period, COG jurisdictions will have identified and advanced efforts to modify local land use regulations and opened more opportunities for multifamily housing in high opportunity areas. In some jurisdictions, this may mean increased TOD. Others may allow "gentle density" through production of ADUs within single family areas. It is anticipated that as zoning reforms are tested in pilot communities, others will adopt them as the outcomes and lessons learned are disseminated through COG.

The region experiences no net loss in affordable housing. In the region's urban core, all affordable housing production has been offset by a loss in market-rate housing, or NOAH. This grant aims to reverse that trend. This grant seeks to slow housing prices and rent appreciation to reduce pressure on the region's remaining NOAH stock. This grant additionally funds a workshop to assist local governments in developing an "early warning" system to preserve at-risk NOAH and rental buildings. By the end of the grant period, these will have successfully stemmed the rate of NOAH loss, so that new affordable housing development will result in a regional net gain in units.

The region's score in the HUD Dissimilarity Index plateaus and begins to decrease. According to this U.S. Census measure, the region is experiencing high and increasing levels of segregation between Black and White populations, as well as moderate levels between White and Hispanic and Asian residents. This grant aims to reverse that trend and increase access to the region's areas of opportunity. It is anticipated that grant activities will increase multifamily housing in

areas of opportunity, accelerate affordable housing production regionwide, and affirmatively market the units so disadvantaged residents know how to find them.