

Janet Welsh Brown

1746 Q Street, NW  
Washington, DC 20009

September 8, 2005

Chairperson Carol Mitten and Zoning Commissioners  
Zoning Office of the District of Columbia  
441 4<sup>th</sup> Street NW  
Washington DC 20001

Case #04-33

Dear Commissioners,

The Campaign's inclusionary zoning proposal will produce more affordable units, at more modest income levels, and distribute them more widely about the city than the counterproposal offered by the DCOP. We urge the Zoning Commission to adopt the CMIZ proposal.

The Mayor's Comprehensive Housing Strategy Task Force's draft report (just released Sept 7, '05 for public comment) estimates the city's affordable housing need at 19,000 units (13,300 units for low-extremely low income households and 5,700 units for moderate-income households) and will require an estimated \$2-3 billion investment over the next ten years to meet that need. IZ can contribute a modest but significant number of units toward the CHS goal at very low cost if the Zoning Commission adopts the CMIZ proposal rather than the DCOP counter proposal.

**1 The length of affordability and control period must be 20 years for for-sale units.** The CHS draft report calls for *more* housing that is *affordable on a long-term basis*. Otherwise, the city will never catch up with the need for low-income housing. Also, longer terms of affordability can contribute to the stability of rapidly changing neighborhoods.

**2 Income eligibility for these prized affordable units created by IZ must be capped at 80% AMI,** the limit placed on other affordable housing programs in the city (\$68,320 p.a. for a family of four). 70% of DC residents live on incomes of roughly 70% AMI or less. All but 30% of our families will be eligible for an IZ eligibility that is cut off at 80% AMI. Awarding IZ affordable homes to households making \$69,000-107,000 annual income is not a good use of District resources.

**3 IZ must apply to substantial rehab.** Rehabilitation of older buildings – previously affordable, largely because of rent control – accounts for about 1/3 of the “new” units coming on line. Without including rehab projects in IZ built-out areas, Dupont Circle, Mt. Pleasant, and some neighborhoods in Ward 3 will see no additional affordable units; they will just continue to become more and more exclusive. The economics of total rehab are similar to new construction. We do not believe that developers will be able to prove undue economic hardship, though they may certainly try under the CMIZ proposal.

**4 Building off-site affordable units should not be allowed except in extreme circumstances, after the developer has proved undue economic hardship.** At the July 27, '05 hearing, CMIZ team

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District of Columbia

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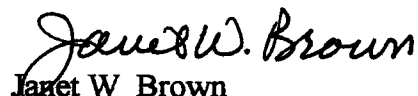
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ZONING COMMISSION  
District of Columbia  
CASE NO.04-33  
EXHIBIT NO.147

member and developer Jim Campbell, presented financial analysis demonstrating the feasibility of including 12% affordable units in high-rise buildings, including waterfront properties. To date the DCOP team has not successfully challenged those figures. Besides, the official DCOP's "Vision for Growing an Inclusive City" calls for *diversity and mixed neighborhoods throughout the city*. IZ, on the CMIZ model, is one way to help make that happen.

Please adopt the CMIZ proposal and give the District the strongest possible IZ program. We all depend on the Commission's leadership to bring to DC this policy that has been so successful across the country.

Thank you all for your patience and hard work throughout this process.

Sincerely,

A handwritten signature in black ink that reads "Janet W. Brown". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Janet W. Brown

Affordable Housing Advocate and member of  
the DC Campaign for Mandatory Inclusionary Zoning