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Federation of Citizens Associations of the District of Columbia

ORGANIZED MARCH 5, 1910 • INCORPORATED JUNE 3, 1940

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April 21, 2006

Sharon Schellin
Acting Secretary
Zoning Commission
441 4th Street, N.W.
Suite 210S
Washington, D.C. 20001

Re: No. 04-33, Inclusionary Zoning

To the Members of the Commission:

The Federation of Citizens Associations, through its Executive Board authorized to act on behalf of the Federation and its 45 member associations, supports the views on the Inclusionary Zoning proposal in No. 04-33 as set forth by the Committee of 100 on the Federal City and its Zoning Subcommittee. In addition we strongly endorse the views set forth in the April 19, 2006 filing by Ms. Marilyn Simon.

The Federation has long been concerned about planning and zoning in DC. While we join the Committee and others in advocating for increased affordable housing in DC, the current proposal is too vague and uncertain to stand as a workable zoning regulation. As we stated last September, the current proposal would leave the members of our associations completely in the dark as to whether it would apply to their neighborhoods and what standards would govern. And there is no provision for citizen access or notice on IZ projects. As such, the proposal deprives DC citizens of the basic fairness that is supposed to underlay the administrative process. Analogizing IZ to PUDs is simply wrong, because PUDs are governed by a very different public process based on exceptional circumstances, not what can become in effect matter-of-right exceptions.

The Comprehensive Plan is undergoing an extensive revision process. The Housing Element is being completely re-written and will impact on this IZ proposal. Now is also not the time to act with the City about to embark on a study of rewriting its zoning code for the first time in nearly 50 years.

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ZONING COMMISSION
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CASE NO. 04-33
ZONING COMMISSION
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EXHIBIT NO. 170
CASE NO. 04-33
EXHIBIT NO. 170

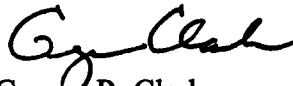
In addition, the IZ proposal gets as little "bang for the buck" as is possible, and completely disregards and in fact discourages rehabilitation and reconstruction, even though those are more cost effective ways of providing affordable housing.

As Ms Simon points out, the target population for the "affordable" units under this proposal is well above the median income of the District. That alone should cause this Commission to stop and ponder whether this proposal really is nothing more than a "feel good" regulation that will have little, if any, beneficial effect, other than to enable students and their parents to buy luxury condominiums at reduced prices. We did not think that was the target population of the regulation.

In addition, because developers can include units that are covered under other housing programs, they will receive substantial density bonuses without having to provide any additional affordable units. While this may explain the change of heart in the development community about this proposal, it does not move the City one inch towards providing more affordable units. And it disrupts long-established zoning solely for the benefit of developers at the expense of neighborhoods.

We expect OP (as a branch of the Mayor's economic development office) to promote development first and pray that they do not kill the goose that lays the golden eggs for the City's revenue coffers (our neighborhoods). We hope that this Commission has a broader vision of the City.

Respectfully submitted,



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