

# ANC 6B

Capitol Hill / Southeast

December 9, 2015

921 Pennsylvania Avenue SE  
Washington, DC 20003-2141  
6B@anc.dc.gov  
202-546-8542

Anthony J. Hood, Chairman  
Zoning Commission  
Office of Zoning  
441 4th Street NW, Room 220 South  
Washington, DC 20001

VIA EMAIL: zcsubmissions@dc.gov

RE: Comments and Recommendations on ZC 04-33G: Amendments to Chapter 26, Inclusionary Zoning

Dear Mr. Hood,

At a regularly scheduled and properly noticed meeting on December 8, 2015, with a quorum present, Advisory Neighborhood Commission 6B voted 9-0-0 to submit the following comments on the above case.

ANC 6B strongly supports the broad intent of the Inclusionary Zoning (IZ) amendments proposed by the Coalition for Smarter Growth (ZC 04-33G) to strengthen the District's commitment to housing affordability, recognizing that IZ is one of multiple tools the District should employ. In general, ANC 6B also supports the specific changes proposed by the Coalition for Smarter Growth (CSG). While ANC 6B acknowledges the expertise of the CSG, the Zoning Commission, and its advisory parties, including the Office of Planning (OP), we offer the following recommendations to the Zoning Commission as it assess the proposed amendments:

1. We strongly support increasing the amount of IZ housing and deepening the level of affordability below the current 80% MFI.
2. Correspondingly, we support offering increased bonus density to developers in return for providing more IZ housing.
3. We support modifying the lot occupancy restrictions in FAR-controlled zones and relaxing lot width restrictions in the R-4 district.
4. We support OP's proposed "voluntary compliance" program, which could increase total IZ housing.
5. We do not support OP's recommendation #4 for occupancy and administrative flexibility as proposed in OP's July 3, 2015 memo. While we appreciate the motivation behind this mechanism, OP's proposal risks setting up perverse incentives for developers to allow units to remain unoccupied.

## OFFICERS

Chair  
Kirsten Oldenburg  
Vice-Chair  
Brian Flahaven  
Secretary  
Daniel Chao  
Treasurer  
Diane Hoskins  
Parliamentarian  
Denise Krepp

## COMMISSIONERS

SMD 1 Jennifer Samolyk  
SMD 2 Diane Hoskins  
SMD 3 James Loots  
SMD 4 Kirsten Oldenburg  
SMD 5 Steve Hagedorn  
SMD 6 Nick Burger  
SMD 7 Daniel Chao  
SMD 8 Chander Jayaraman  
SMD 9 Brian Flahaven  
SMD 10 Denise Krepp

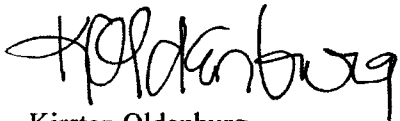
ZONING COMMISSION  
District of Columbia  
ZONING COMMISSION  
Continued Page 1 of 6  
CASE NO. 04-33G  
EXHIBIT NO. 28

Given IZ is still a relatively new program, we believe the city and developers should attempt to find other ways to fill vacant IZ units at mandated MFI levels and prices, such as allowing the city to acquire vacant units and provide them to low-income households (e.g., OP recommendation #5).

6. We do not support OP's recommendation #6 for off-site flexibility without further study and scrutiny to ensure this mechanism would achieve the level and form of neighbor diversity envisioned by IZ. We are concerned that this proposal could lead to clustering of low-income housing and/or reduce the chance that relatively higher and lower income neighbors will live in close proximity to one other.

We appreciate the Coalition for Smarter Growth's initiative to strengthen IZ, a program ANC 6B views as an important, positive tool in a broader toolkit to address housing affordability. And we encourage the Zoning Commission to take advantage of this opportunity to be ambitious in improving this relatively new but promising program.

Sincerely,



Kirsten Oldenburg  
Chair ANC 6B

cc: The Honorable Charles Allen, Ward 6 Councilmember  
Jennifer Steingasser, Office of Planning  
Cheryl Cort, Coalition for Smarter Growth