

**The Committee of 100 on the Federal City
Statement in Opposition - Zoning Commission Case 07-15**

The Committee of 100 on the Federal City asks that the Zoning Commission reject the rulemaking that was advertised as Case 07-15. We believe that it creates potential for substantially reducing open space in residential neighborhoods and creating significantly less attractive living conditions. It also undermines the intent and purpose of the zoning regulations.

The fact that the advertised rule would allow not just garages but all manner of accessory buildings to be added to existing structures covering a lot up to 70%, with full acceptance of their violation of side yard and rear yard provisions (among others) intended to protect neighboring properties.

Moreover, the blending of R3 and R4 zones violates the clear intent of the regulations to establish different standards regarding lot coverage. §330.2 notes that "Very little vacant land shall be included within the R4 District, since its primary purpose shall be the stabilization of remaining one-family dwellings." In contrast, §320.1 describes R3 districts as having both row dwellings and one-family detached and semi-detached dwellings and repeats the R1 use limitations "To maintain a family-life environment".

R4, on the other hand, permits a range of more intense uses beyond those permitted in R3, including of-right boarding houses and rooming houses not allowed in R3. Rulemakings that weaken protections for single-family zones do not further the intent and purpose of the zoning regulations. Using the 70% maximum lot coverage in both R3 and R4 misses the intended distinction in the regulations.

Many neighborhoods are already having difficulty constraining illegal residential use of pre-existing nonconforming garage structures and carriage houses; it is far more likely that free-standing garages or accessory buildings would be used for such purposes than would attached garages or additions.

Similarly, accessory structures are ill-defined and could include much highly impactful construction and activity. We ask the Commission to reconsider the basis on which this proposal is founded and reject it in its present formulation.

Barbara Zartman, Chair
Zoning Subcommittee
District of Columbia

CASE NO.

07-15

EXHIBIT NO.

8

ZONING COMMISSION
District of Columbia
CASE NO. 07-15
EXHIBIT NO. 8

Fax Memo

To: Carol Mitten, Chair
Zoning Commission

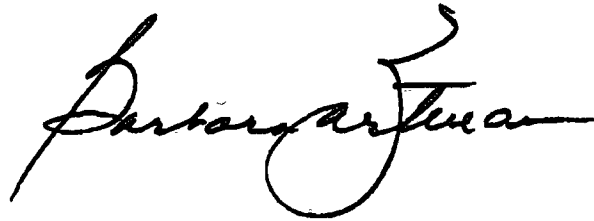
July 23, 2007

From: Barbara Zartman, Chair
Zoning Subcommittee
The Committee of 100 on the Federal City

Re: Z. C. 07-15

Attached is a statement from The Committee of 100 regarding the rulemaking case that will be heard tonight.

We appreciate your consideration.

A handwritten signature in cursive script, appearing to read "Barbara Zartman".

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D.C. OFFICE OF ZONING
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