

SDCA

THE SHAW-DUPONT CITIZENS ALLIANCE, INC.

September 24, 2015

Zoning Commission for the District of Columbia
441 4th Street, N.W., Suite 200 S
Washington, DC 20001

Re: ZRR

On September 17, 2015 the Shaw Dupont Citizens Alliance membership, by unanimous vote, has approved the following resolution:

RESOLUTION

Shaw Dupont Citizens Alliance (SDCA) Final Resolution on ZRR (Enrolling all prior resolutions)

- SDCA supports transparent decision-making and requests that all neighborhoods citywide receive the ANC-specific Development Standards Comparison Matrix (showing the heights, densities, lot occupancies, and required yard distances) of the current zoning districts versus the proposed districts in any given ANC district, and that these documents are publically available on the web site. We understand that not all neighborhoods have received such a “targeted” matrix, and in the effort of clearly explaining the ZRR, all neighborhoods should receive one in an effort of openness and transparent planning.
- To support efforts of openness and transparency for the residents of the District of Columbia, SDCA recommends that a redline document be developed showing how the language of the draft ZRR reviewed and voted on in December 2014 may have changed with the language published in the DC Register in May 2015. ¹ Further these documents should be publically available.
- SDCA requests that OP and the ZC ensure both the current and proposed zoning maps are made publically available to all residents, neighborhood civic groups and ANC's to determine a side-by-side comparison and verification. This will ensure that new zone districts are mapped correctly in the inter-related Zoning Case No. 08-06C (Map Amendment to Implement the Comprehensive Revisions to the Zoning Regulations, including New Zone Names). ²
- SDCA supports the call for more time to review the final language of the ZRR to help every DC neighborhood, ANC and civic groups that are seeking more time to review and respond to the record. Deficiencies in transparent information sharing, as well as normal turnover in civic group leadership and

1 DC Comprehensive Plan 10A-2507.6 – Policy IM-1.5.4: Transparency in Decision-Making
Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents and maintaining open lines of communication with the public as plans are developed.

2 DC Comprehensive Plan 10A-2504.8 – Action IM-1.3.A: Zone Map Revision
Undertake a comprehensive revision to the District's Zone Map to eliminate inconsistencies between zoning and the Comprehensive Plan Future Land Use Map and other Comprehensive Plan Maps, including those showing historic districts.

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ZONING COMMISSION
District of Columbia
CASE NO.08-06A
EXHIBIT NO.993

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ANC Commissions between the last round of ZRR discussions and the final language published in the DC Register make it essential to provide additional review time. We are directly requesting more time for fundamental City policy changes that will affect our residents and their neighborhoods for the next 100 years.

- SDCA advises that all DC neighborhoods seeking full engagement on the ZRR be served as such and that the proposed final language be translated and shared with all limited-English speaking residents who are interested in planning the future of our City together.³
- SDCA resolves to oppose any changes in any of the current zoning requirements regarding heights, densities, and lot occupancies and buffers as depicted in the ZRR for the any of the zone districts in the SDCA boundary area.
- If the Zoning Commission must compel changes onto the zone districts in our SDCA area, we request that the proposed zoning changes flow from actual, demonstrated findings that the current zoning regulations are “inconsistent”, or “potentially inconsistent” with the DC Comprehensive Plan Land Use Element, as to warrant these proposed changes pursuant to the Implementation Element of the DC Comprehensive Plan.^{4 5} We also want the ability to review the rationale used for determination, and to provide community input prior to any final document.
- SDCA opposes the dramatic shift away from community-input for projects that currently require special exceptions and variances, in that the ZRR now makes many of these projects matter-of-right. This reduction in community oversight is not supported by the DC Comprehensive Plan.^{6 7}

3 DC Comprehensive Plan 10A-2003.4 – African-Americans are the predominant racial group in the [Mid-City] Planning Area, at approximately 52 percent. A growing Latino population stands at 22 percent, approximately three times the City’s average. Between 1990 and 2000, the Latino population increased by about 30 percent. More than one quarter of the Mid-City’s residents are foreign-born, double the citywide average of 12.8 percent. About 27 percent of the population is non-Hispanic white, and about three percent are Asian or Pacific Islander.

4 DC Comprehensive Plan 10A-2504.9 – Action IM-1.3.B: Comprehensive Plan / Zoning Correspondence Table Prepare and publish general guidelines which indicate which zone districts are “clearly consistent”, “potentially consistent”, and “clearly inconsistent” with each Comprehensive Plan Land Use Category.

5 DC Comprehensive Plan 10A-105.1 – This Comprehensive Plan also includes a chapter on plan implementation. The Implementation Element describes how the plan’s recommended actions are to be carried out and by which government agencies. Timeframes for implementation are also provided so that the plan’s implementation steps can be measured and monitored. The addition of this element is a major departure from past Comprehensive Plans for the District. It represents an important step forward in assuring accountability.

6 DC Comprehensive Plan 10A-2502.2 – Of course, not all projects are subject to review. Much of the city’s development is permitted as a matter-of-right under existing zoning, affording few opportunities for the Office of Planning to determine Comprehensive Plan consistency. In the future, methods of *increasing the scrutiny of matter-of-right projects* may be needed, particularly with respect to urban design and environmental impacts. This could include adjustments to the thresholds for projects requiring “Large Tract Review”, implementation of a Site Plan Review process, changes to the city’s Environmental Impact Screening Forms, and additional standards to ensure that development sufficiently mitigates its effects on traffic, parking, infrastructure, and public service needs.

7 Under the ZRR, many projects currently requiring zoning review shifts to “matter-of-right” as shown in part here >> <http://dczoning.blogspot.com/2014/03/how-zrr-will-affect-public-input.html>

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- SDCA believes it is fundamentally unfair that the proposed Downtown zoning districts are nearly and/or completely exempt from true affordable housing requirements. This is also in direct opposition to the position that Mayor Bowser has publically articulated to provide more affordable (and low income) housing that is desperately needed. This policy of exclusion does not meet the DC Comprehensive Plan's main goal of developing an Inclusive City and can be considered discriminatory based on class.⁸ Further development of appropriate affordable housing requirements based **only** on District of Columbia data should be developed and applied. Current use of amalgamated data that includes Virginia and Maryland does not represent the financial realities of the residents of the District of Columbia.

J.E. Sterling

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8 DC Comprehensive Plan 10A-504.6 – Policy H-1.2.1: Affordable Housing Production as a Civic Priority
Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city.

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