

30 May 2015

District of Columbia Zoning Commission
441 4th St NW, Suite 200-S
Washington, DC 20001

RE. Case No. ZC 14-11

Dear Zoning Commissioners:

Please accept my comments on the proposed rule to deal with pop-up developments in R-4 Districts. I commend the Zoning Commission for taking this important step to address concerns raised by District of Columbia residents

Matter-of-Right Conversions

I do not believe the proposed rule goes far enough to protect the supply of single-family homes in R-4 zones. Proposed new section 330 7 would permit conversions of existing residential buildings to apartment houses with up to four units as a matter-of-right. ***The decision to allow matter-of-right conversions of rowhouses in R-4 zones is a mistake.*** Family households with children need larger housing units with more bedrooms. The District's Comprehensive Plan states that of the city's existing housing stock, only one-third of the units have three bedrooms or more, and 80% of recent new construction has been apartments with fewer bedrooms. The Comprehensive Plan also states that the availability of single-family housing and housing with more rooms are two factors that are positively correlated with retaining family households

The Comprehensive Plan guides the District's development and provides overall guidance about the city's planning The Comprehensive Plan states

Policy H-1 3 1, Housing for Families: Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments

Action H-1 3 A, Review Residential Zoning Regulations: During the revision of the city's zoning regulations, review the residential zoning regulations, particularly the R-4 (row house) zone. Make necessary changes to preserve row houses as single-family units to conserve the city's inventory of housing for larger households As noted in the Land Use Element, this should include creating an R-4-A zone for one- and two-family row houses, and another zone for multi-family row house flats

Matter-of-right conversions of single-family rowhouses to apartment buildings goes against the Comprehensive Plan's goal of retaining single-family homes for families ***Matter-of-right conversions in R-4 should be limited to two-units.***

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Limitations on Conversions

Although I don't support matter-of-right conversions to apartment houses, I support the limitations on conversions in section 330.7. The language in sections 330.7(h) and 330.8(d) should be further clarified to prevent misinterpretation. The language in section 330.7(h) as written could suggest the addition could extend 10 feet past the furthest rear wall of any row house. ***It should be clear that an addition must not extend any more than 10 feet past the rear wall of any adjoining rowhouse.*** These conditions also must apply to conversions of a rowhouse to a two-unit. Flat conversions by developers is prevalent in R-4, and often include extensive rear additions. This obstructs the light/solar panels, air, and privacy of neighboring rowhouses and is out of character with these neighborhoods. Thus, protection for homeowners is needed for single-family home conversions to two-units.

Immediate Effective Date

I urge the Zoning Commission to act quickly on the changes to the zoning rules and to make the final rule effective immediately to protect rowhouse neighborhoods and adjoining properties. The first proposal from the Office of Planning is almost one year old. DC residents have been waiting a long time for these changes – and should not have to wait any longer.

Respectfully submitted,

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