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

May 26, 2015

Re: Case 14-11 (Text Amendment--11 DCMR)

Dear Commissioners:

I am writing to oppose the new § 330.7 set forth in the May 1, 2015 Notice of Proposed Rulemaking in this case.

Section 330.7 would permit, in R-4 zones, matter-of-right conversion of a residential building existing prior to May 12, 1958, to an apartment house (a building in which there are three or more dwelling units). By permitting such conversions, the Commission violates not only the primary purpose of the R-4 zone but also the District's Comprehensive Plan, which unambiguously mandates policies and actions intended to preserve row houses as single-family homes.

What's the use of the Comprehensive Plan if we ignore it when we disagree or it's inconvenient?

In addition, the proposed "conditions" for converting a single-family house to three or four units may be well intended, but realistically don't seem enforceable

Finally, the pressure to house more people by subdividing single-family homes can't even be rationalized as providing "affordable" housing At least not in my (Mt Pleasant) neighborhood.

In its June 2014 report to the Commission, the Office of Planning's recommendation No. 5--to remove the matter-of-right conversion authority for the R-4 zone, found in § 330.5(e) of the current regulations—was in accord with the purpose of both the R-4 zone and the Comprehensive Plan By now proposing to retain this conversion authority in § 330 7, the Commission is clearly in conflict with both Accordingly, I would strongly urge you to repeal § 330.5(e) and to reject the proposed § 330 7.

Respectfully,



Cynthia W. Pratt

ZONING COMMISSION
District of Columbia
CASE NO. 14-11
EXHIBIT NO. 302
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