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GREATER MT. CALVARY HOLY CHURCH

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Archbishop Alfred A. Owens, Jr., *Senior Pastor* • Dr. Susie C. Owens, *Co-Pastor* • Bishop T. Cedric Brown, *Associate Pastor*

October 13, 2020

DC Office of Zoning
Zoning Commission
441 4th Street, NW
Suite 200S
Washington, DC 20001

Re: Conditional Support for Proposed Changes to Inclusionary Zoning

Dear Chairman Hood and Members of the Commission:

On behalf of Greater Mount Calvary Holy Church ("GMCHC"), I am writing to you to express my conditional support for changes to Inclusionary Zoning ("IZ") as proposed by the Office of Planning in Case No. 20-02 ("Expanded IZ"). While I recognize the severe housing crisis in the region as documented by the Council of Governments report that by 2030 the region needs nearly 320,000 new units, the Zoning Commission must be very attentive to how we achieve the District's share of this laudable goal.

First, the Zoning Commission should be mindful of existing small area plans. In 2010, the Great Streets initiative engaged hundreds of property owners, residents, the ANCs, neighborhood and civic associations, seniors, and our development partners to discuss the future of the Rhode Island Avenue corridor. The result of this engagement was a vision and strategy for the corridor in the form of a small area plan called the "Diamond of the District." In 2011, the D.C. Council adopted the Rhode Island Avenue Small Area Action Plan (PR19-0019) ("RIA Small Area Plan"), which recommends rezoning the areas around the Rhode Island Avenue Metro to move any from industrial uses and instead allow medium- to high-density mixed use development. The RIA Small Area Plan is a key framing document to bringing much needed quality retail, jobs, and housing opportunities along the corridor, and to the residents of Ward 5. In particular, the RIA Small Area Plan recognizes the incompatibility of maintaining industrial uses in such close proximity to the Metro, and the area's great potential to provide more housing along Rhode Island Avenue, a use that is not permitted under the site's existing industrial zoning. In 2012, the recommendations of the RIA Small Area Plan were incorporated into the District Elements of the 2006 Comprehensive Plan, which included amending the Future Land Use Map ("FLUM") designation for several of our properties adjacent to the Metro to Mixed Use (High Density Residential / Medium Density Commercial) (PR19-611). Since then, various redevelopment plans for this area have stalled for a variety of reasons. However, after years of setbacks it appears momentum is building, and the corridor is getting the attention it greatly deserves. **This long overdue progress, made in reliance upon the recommendations of the 2011 RIA Small Area Plan and 2012 Comprehensive Plan amendments, should not be ignored, and frankly**

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should not be derailed, by Expanded IZ. As such, I strongly recommend that the Expanded IZ proposal only apply to areas where the FLUM is proposed to be changed as part of the current Comprehensive Plan amendment cycle.

Second, the Mayor's 2019 Housing Equity Report goal of producing 36,000 new units of housing will need multiple economic development tools to work in concert in order to be a success. This includes, but is not limited to, population growth, investment in infrastructure, and progressive land use policies. Unfortunately, population growth in the District has slowed significantly since 2017 as people migrate to the suburbs for economic reasons. This has only been exacerbated by COVID-19 as more people seek additional living space for reasons related to health and increased teleworking. Simultaneously, the demand for last mile distribution has increased and thus the Rhode Island Avenue corridor continues to teeter on the edge of remaining industrial for the foreseeable future, particularly those that are already zoned for industrial uses. **The proposed Expanded IZ provisions for PDR Zones are punitive to the point that the highest and best use for PDR properties along the Rhode Island Avenue corridor, including those adjacent to Metro, will remain industrially zoned.** The implication of a 20% Expanded IZ requirement when changing from a PDR zone to a mixed-use zone will be a significant disincentive to the production of new housing toward the larger 36,000 housing unit goal.

Third, **the Zoning Commission actions should not thwart pending plans and should be transparent of implementation dates.** In 2006, after years of debate, the Zoning Commission adopted the Inclusionary Zoning regulations, which took effect in 2009. So as not to thwart the efforts of development plans that have been years in the making, we would expect Expanded IZ to apply prospectively to proposed map amendments submitted, at minimum, after Expanded IZ takes effect.

As background, GMCHC was established in 1966 and has since grown to a congregation of almost 8,000 active and faithful members. GMCHC currently has over 60 ministries that are integral to serving the spiritual, cultural, social, and mental health needs of our congregation and the larger community. Starting in 1995, GMCHC invested in a number of properties in the neighborhood. In 2011, GMCHC actively participated in the RIA Small Area Plan. In 2013, following adoption of the RIA Small Area Plan and subsequent Comprehensive Plan amendments, GMCHC made the strategic decision to redevelop several assets in its real estate portfolio, including the properties on the south side of Rhode Island Avenue directly across from our sanctuary at 610 Rhode Island Avenue. This has required countless hours over the years, working internally with our membership, community, and neighboring land owners. This alignment of the property owners came together in 2019, and now GMCHC, Jair Lynch Real Estate Partners, and the Wilkes Company are proposing a Zoning Map amendment for nine parcels along the south side of the 600 block of Rhode Island Avenue encompassing over 122,631 square feet (2.8± acres) in Square 3623 (collectively, "South RIA"), of which GMCHC is the majority land owner. The proposed Zoning Map amendment was recently endorsed in June 2020 by the Eckington Civic Association and Advisory Neighborhood Commission 5E.

The proposed Zoning Map amendment presents GMCHC with an invaluable opportunity to advance its spiritual mission in the midst of significantly challenging economic and social times.

While our proposed Zoning Map Amendment should not be affected by a future change to Inclusionary Zoning in the form of Expanded IZ, I suggest the Zoning Commission also pay particular attention to all aspects of the Expanded IZ proposal to ensure other emerging neighborhoods have the chance to prosper and be part of the future vision of the District.

Thank you for your continued service to the community, and for the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Alfred A. Owens, Jr.", written in a cursive style.

Bishop Alfred A. Owens, Jr., Founder and Senior Pastor
Greater Mt. Calvary Holy Church