

The Committee of 100

on the Federal City



April 10, 2020

Re: Committee of 100 Comments on ZC 20-02

The Committee of 100 on the Federal City regards the Inclusionary Zoning program as an important component of the City's toolbox for providing affordable housing for those who need it. As I assume you know, the Committee of 100 has been an advocate for this program since its beginning.

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Not surprisingly then, the Committee of 100 is very interested in the so-called IZ-Plus rule-making process (ZC 20-02) and hopeful that this initiative will fill some existing gaps and expand the program.

At the January 13 Zoning Commission consideration of the set-down report on IZ-Plus, we were very interested in the following points:

- The Office of Planning promised an economic analysis of the IZ proposal that would show the impact of changing the current 8-10% IZ requirement to 20%, addressing the question of whether or not this increase would be too burdensome. The 20% requirement will make the program a more meaningful contributor to the District's housing crisis: only 792 IZ units were produced from 2011 to 2018.
- Two Commissioners questioned why the rule-making proposal specifically excludes Planned Unit Developments. We can see why the higher affordable housing requirement should be a required part of a PUD amenities package.
- One Commissioner questioned whether the 80% AMI eligibility cut-off for IZ is the right cut-off, since 80% AMI is in actuality a market rate for homeownership units.
- Should the "bonus density" arm of the current IZ formula be eliminated for IZ PLUS?
- The point that IZ must recognize neighborhood character was mentioned without further elaboration. Retaining neighborhood character in any change to zoning is a very high priority for the Committee of 100.
- Importantly, Chairman Hood indicated, and Ms. Steingasser apparently agreed that, as OP did not plan any public outreach, a public roundtable should be held. We agree and wonder why the roundtable is now not planned so that there can be a more full discussion of how IZ can be improved in IZ-Plus.

Also, given the need for more affordable housing, isn't now the time to consider raising the bar for regular IZ. In any case, and to our disappointment, none of these points were addressed or explained in the Notice of Public Hearing for Case 20-02. We question why OP failed to address these issues, given the high expectations that we were left with on January 13th.

We greatly look forward to participating in Case 20-02 to help craft a better IZ program.

Thank you.

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Kirby Vining, C100 Chair

ZONING COMMISSION
District of Columbia
CASE NO.20-02
EXHIBIT NO.5