



April 22, 2021

Mr. Anthony Hood, Chairman  
DC Zoning Commission  
Submitted via [www.dcoz.gov](http://www.dcoz.gov)

RE: Support for Zoning Case No. 21-02: Inclusionary Zoning, IZ-XL, Phase #1 – Exempt Zones & Set-Aside Requirements by Construction Type

Please accept this letter on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working in the Washington, D.C. metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We appreciate that the Zoning Commission is pursuing new ways for IZ to create additional affordable homes. IZ is producing just shy of 200 affordable homes per year at a cost of only program administration. These IZ units are distributed throughout the city, including in exclusive Ward 3 where they are nearly the only new affordable homes built in decades. By providing lower priced IZ housing opportunities alongside new market rate homes, we are helping address a legacy of redlining, racial segregation and other discriminatory practices that have led to today's disparities in wealth, health and housing security for so many Black and Brown District residents.

We support the proposed changes to include specified historic and non-historic districts for IZ requirements. In each case, OP's report delineates increased lot area, height, FAR and/or lot occupancy that will be permitted under IZ density bonuses to provide an offset for the cost of the below market-rate IZ units included in a matter of right housing development. These zones include: R-3 in the Anacostia Historic District, MU-13 in the Georgetown Historic District, NC-6 in the Capitol Hill Historic District, and the non-historic districts: RA-5/RA-10, CG-1, MU-27.

We also support the proposed change to the set-aside requirement based on construction type. This proposal catches up the IZ program to current construction practices which now allow taller stick-built construction. We support OP's proposed change from 50' to 85' for non-type I construction (stick-built) for the set-aside requirement of 10% of residential GFA or 75% of the utilized bonus density (typically up to 12.5% set-aside).

We support the increased flexibility in zoning limits to give property owners offsetting value for the cost of the IZ units that will now be required. The goal is to get as much affordability that we can without significantly undermining the incentive to build more housing.

We thank the zoning commission for strengthening IZ regulations and expanding them to upzonings (ZC No. 20-02). As we consider all the ways zoning can better support affordability, we request that the Zoning Commission assess another option to use zoning to spur more affordable housing construction. We request a new option that provides PUD-level density of a zone as a matter-of-right for a qualified affordable housing project. The affordability set side could be 20 percent or more of FAR serving households at or below 60 percent MFI. The affordability term should be the life of the development. A tool like this is needed to advantage affordable housing developers so they can compete for land, and avoid the risks of delay, costs, and litigation currently associated with PUDs, and to a lesser extent, rezonings.

We need every tool to address the affordable housing crisis and provide quality housing affordable to low-income DC residents. We need strengthened IZ and we need a new matter-of-right affordable housing development option. We also need our elected leaders to greatly increase funding to subsidize critically important programs like Housing Production Trust Fund and Local Rent Supplement Program.

We thank the Zoning Commission and the Office of Planning for working to do its part to support more affordable housing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort  
Policy Director