



June 28, 2021

Mr. Anthony Hood, Chairman
DC Zoning Commission
441 4th Street, NW, Suite 200S
Washington, DC 20001

RE: Support for Zoning Case No. 21-05: Inclusionary Zoning, IZ-XL, Phase #2 – Applying Inclusionary Zoning to Conversions of Non-residential Buildings to Residential Use

Please accept this letter on behalf of the Coalition for Smarter Growth, the leading non-profit organization in the D.C. region advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

We want to thank the Zoning Commission again for pursuing new ways for IZ to create additional affordable homes. With close to 200 affordable IZ homes per year produced for the cost of program administration, this is a cost-effective effort. Perhaps equally important is the distribution of these affordable units. Production of these units is integrated into new market development as it occurs in the city. IZ has been one the city's only tools for addressing fair housing and racial segregation. While far more must be done, we appreciate the contributions of IZ as a zoning tool that does not require additional monetary subsidies.

We support the proposed changes to the IZ regulations in Zoning Case No. 21-05. These changes would require that when new residential space is created in a zone covered by IZ – even within the envelope of an existing non-residential building – this new residential space will be subject to IZ requirements. Given that hotel, institutional and office uses may be obsolete in some circumstances, this IZ rule helps create some mixed income housing opportunities. We are encouraged that OP found Rock Creek West to have potential for these kinds of conversions.

We also appreciate the commercial to residential assessment report conducted by Office of Planning. We ask that OP continue to monitor and evaluate the dynamics of conversions to track the creation of new housing and IZ units going forward. We want to ensure that this rule change achieves the intended balance of increased affordable units while minimizing discouragement of new housing construction and conversion of obsolete uses.

We concur with the staff's assessment, that, "There are non-residential buildings with the potential to be converted that are located in high-cost areas where affordable housing is limited, and the applicability of IZ to conversions will help increase the supply of affordable housing in these areas."

We reiterate that IZ is a zoning tool, which means that on its own, it can make meaningful but limited contributions to our city's affordable housing stock. We appreciate the Zoning Commission's effort to examine every potential application for IZ. Zoning tools are complementary to the critical effort by the Mayor and DC Council to increase funding for the Housing Production Trust Fund, Local Rent Supplement Program, and other funding sources to build and maintain deeply affordable housing.

Thank you for your consideration.

Sincerely,

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

Cheryl Cort
Policy Director