



THE HOLLADAY
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February 16, 2017

Board of Zoning Adjustment
441 4th Street, NW, Suite 200S
Washington, DC 20001

Re: BZA Appeal 19374

Dear Members of the Board:

We want to strongly register our opposition to BZA Appeal No. 19374. In our view, accepting the Appellant's position is tantamount to further limiting the supply of affordable housing in the District of Columbia at a time when such housing is in critically short supply.

As a company, we specialize in developing high density urban housing. All of our recent projects have included cellar space as habitable units. The benefits are twofold. First, the extra density they add often enhances a project's feasibility because cellar units are not counted in the FAR calculation. Second, and more importantly, these units are typically the least expensive. This allows lower income residents the opportunity to live in neighborhoods they might otherwise be unable to afford.

The BZA would set an incorrect and confusing precedent by accepting the Appellant's argument. Effectively, it would overturn the Zoning Commission's recent regulations regarding Inclusionary Zoning units in cellars, reversing years of contrary interpretation.

In sum, the District has a critical affordable housing problem. It will only get worse if cellar space can no longer be used to provide lower cost housing. For the reasons noted above, we sincerely hope that you vote to reject the appeal.

Sincerely,

Rita J. Bamberger
Senior Vice President