

September 28, 2017

Mr. Anthony Hood, Chairman  
DC Zoning Commission  
441 4<sup>th</sup> Street, NW  
Washington, DC 20002 via [zcsubmissions@dc.gov](mailto:zcsubmissions@dc.gov)

RE: Support for Zoning Case No. 16-26, 4620-4624 Wisconsin Ave. NW

Dear Chairman Hood and Members of the DC Zoning Commission:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, DC 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 are pleased to express our support for the Planned Unit Development (PUD) proposal Zoning Case No. 16-26, to reuse an office building to construct 146 rental homes and retail on Wisconsin Avenue in Tenleytown. The applicant offers a set of commendable benefits through this project that support community and citywide goals commensurate to the requirements for approval of a PUD. Of particular value is the substantial number of added rental homes, both market rate and affordable, within 0.2 miles of the Tenleytown Metro station. This site is also adjacent to numerous bus lines, a library, stores, services, parks, and amenities that make this neighborhood a sought-after and high-priced location on a major District corridor.

On top of creating more housing opportunities for the many people who would like to live in this desirable neighborhood, the applicant is offering to increase the number of affordable homes. Specifically, the PUD would increase from the required 8% to 10% of the overall square footage of the building, for a total of 15 Inclusionary Zoning (IZ) units all priced at 60% of median family income. At least one unit will be a 2-bedroom unit. We commend the ANC, community activists, and the applicant for agreeing to this proffer. This is the kind of affordable housing benefit we have hoped to achieve through PUDs, building from the baseline IZ requirements in matter of right development.

This PUD supports important housing and environmental goals established in the DC Comprehensive Plan and other official DC policies. Locating this mixed income housing in Ward 3 at the Tenleytown Metro station improves the equitable distribution of both market-rate and affordable housing production across the city. This project will be one of a few that are offering new affordable housing opportunities in a highly desirable location. Since 2015, only 0.6% of the city's new affordable housing units have been built in Ward 3 (see attached map), and all of these units are IZ units in market rate developments. In contrast, Ward 4, though very similar to Ward 3 in land use, has produced 13% of the city's affordable housing since 2015. These numbers reflect the larger context that shows that less than 2% of occupied

rental units in Ward 3 are subsidized affordable, compared to 7% for Ward 4, and 26% on average for the District as a whole (DHCD Housing Preservation Strike Force Final Report, 2016). Without more market rate residential developments west of Rock Creek Park, there will not be opportunities to utilize IZ and bonus densities to create greater access to these sought-after neighborhoods.

In addition to furthering the goals of the DC Comprehensive Plan to build a more inclusive city, this PUD also helps the city to comply with the requirement of the 1968 Fair Housing Act to “affirmatively further fair housing.” Affirmatively furthering fair housing is defined by the U.S. Department of Housing and Urban Development (HUD) as ‘taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics’ such as ‘addressing significant disparities in housing needs and access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.’”

In 2012, the District released an “Analysis of Impediments to Fair Housing Choice” and was critiqued in 2016 by HUD for failing to adequately address these impediments over the previous four years. The District relies on IZ as a leading tool to address impediments to fair housing, yet the District does not acknowledge one of the fundamental barriers to IZ’s utility as a source of fair housing opportunity – lack of new housing production in Ward 3 (See: DC FY 2016 CAPER). Building affordable housing units, like the 15 proposed in this project, in an amenity-rich, economically successful part of the city will help us to comply with this rule of the Fair Housing Act.

Finally, by encouraging more housing opportunities in a walkable, bikeable, transit-accessible neighborhood, this project will help the District meet its obligations under the Paris Climate Agreement, which calls for us to reduce our greenhouse gas emissions by promoting sustainable forms of transportation and reducing automobile dependency for our growing population. The mayor reaffirmed DC’s commitment to the Paris Climate Agreement when she signed Mayor’s Order 2017-142 on June 5, 2017, confirming that this is indeed an important citywide priority. Providing 146 more homes next to the Metro station, bus lines, by this major travel and commercial corridor will mean a larger share of DC residents can walk, bicycle, and take transit for more of their trips, significantly reducing the greenhouse gas emissions from a typical area household (See: CSG [Greenplace Certification Report](#), 2016). That’s an outstanding combination with LEED Gold certification, solar panels, and green roofs for the building.

Regarding the vehicle parking provisions in this PUD, we don’t believe the Residential Parking Permit (RPP) restrictions are appropriate or needed. This is especially true in light of the applicant’s number of planned parking spaces, which is well above the required amount due to proximity to transit. The cost and space consumed by vehicle parking could have been used for more beneficial purposes. On the other hand, we appreciate that the project will provide more bicycle parking spaces than car parking spaces, exceeding minimum requirements.

Last, we concur with Office of Planning regarding the need for the applicant to address Employment and Training Opportunities typical of PUDs. This is a citywide benefit we expect from PUDs.

Thank you for your consideration.

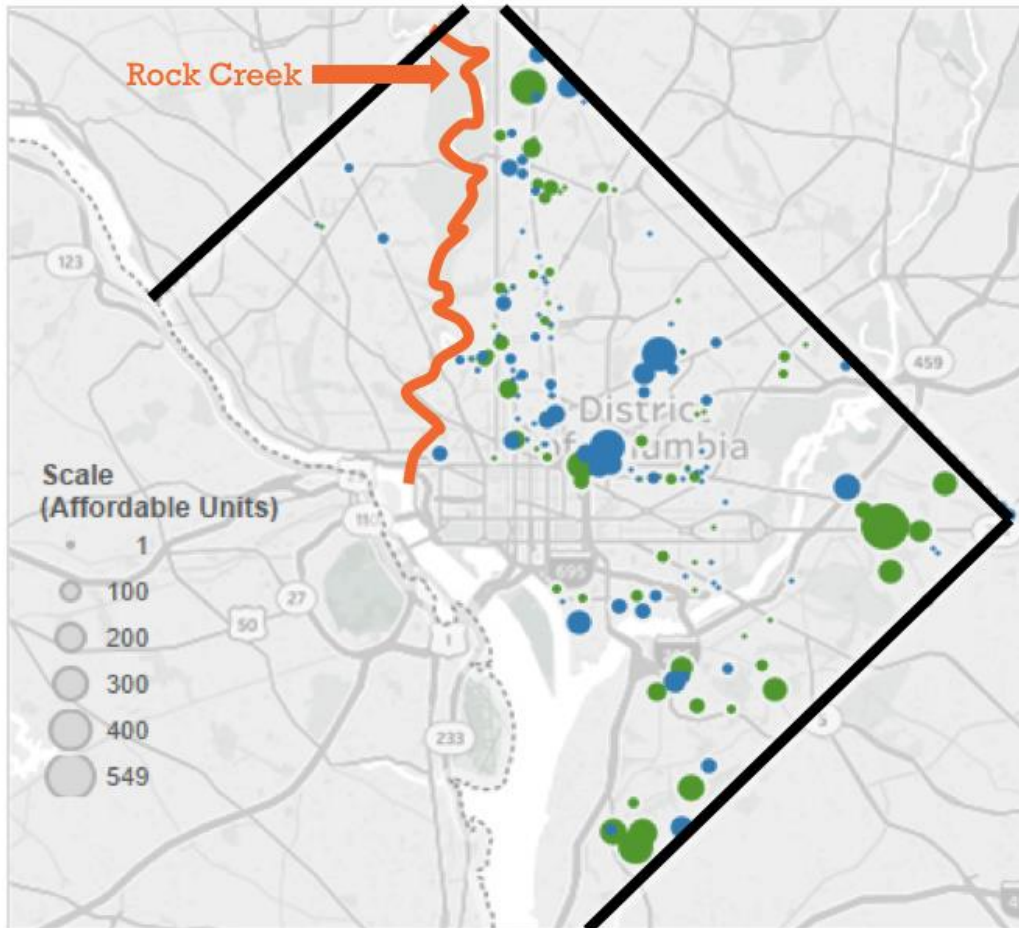
Sincerely,



Cheryl Cort  
Policy Director

Attachment

Affordable Housing Completed & Under Construction  
Through May 2017



**Project Status**

■ Completed 2015 to Date    ■ Under Construction

Source: DC DMPED Economic Intelligence Dashboard (Red Line Added)