



Bethel Pentecostal Tabernacle Assemblies of God | 60th I Street, SW Washington D.C. 20024
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Rev. R. Fitzgerald Carter, Sr. Pastor

March 1, 2021

VIA IZIS

Zoning Commission for the
District of Columbia
441 4th Street, NW, Suite S200
Washington, DC 20002

**Re: ZC Case No. 21-02
Request for Vesting Provision for Projects Under DCRA Permit Review**

Dear Chairman Hood and Members of the Zoning Commission:

On behalf of Bethel Pentecostal Tabernacle ("Bethel"), we hereby submit this letter to respectfully request that a vesting provision is integrated into the "IZ-XL Phase I" text amendment proposed under Z.C. Case No. 21-02. For the reasons explained herein, we strongly believe that a vesting provision is needed to allow our long sought, ongoing effort to redevelop our property to proceed, and to ensure the continued presence of our church in the Southwest community.

Bethel is the owner of the property located at 60 I Street, SW (Lot 74 in Square 645) (the "Property"). Bethel Pentecostal Tabernacle has operated at 60 I Street SW for the past 60 years and has been part of the local community for a century; we are currently celebrating our centennial this year. Throughout this time, it has been a fixture of Southwest and has served as a community gathering place and provided charitable outreach to local residents. Even with the changing of programs and leadership over the many decades of service, our commitment as a community partner has been unwavering. Whether in times of prosperity or economic hardship, we remain committed to not just the Great Commission of Christ, but also to the core values of our ministry. For the values of "filling needs", "healing hurts", and "building dreams" have been instrumental in helping to meet individual as well as community needs. Potter's House, Angel Food, Camp J.A.M., Camp Crossfire, and Gladys' Pantry are just a few programs through which we have served our community over the years. We believe in not just giving a hand-out but giving a hand-up when at all possible. For we know to make a difference, you must first be the difference.

Over the last four years, we have been working closely with our development partner to redevelop the Property with a newly constructed sanctuary, related church facilities, and a mixed-income residential component that will help finance the overall project. The project will allow our church to continue its mission in the Southwest community, while at the same time providing approximately one hundred ninety-seven (197) new residential units, including approximately fourteen (14) critically important affordable dwelling units.

After several years of preparing a viable development program and construction plans, our development partner recently submitted an application to the D.C. Department of Consumer and Regulatory Affairs ("DCRA") for building permits, which we anticipate receiving by early summer or fall. Importantly, the plans submitted to DCRA are based upon a financial structure that is specifically tailored to support this project and to safeguard the financial health of our religious institution. However, as further discussed below, the absence of a vesting provision will completely erase years of time, effort, and resources invested and significantly impact our ability to carry this project forward.

The Property is currently zoned MU-7, which has a by-right height limit of 65 feet. As submitted to DCRA, our project will not employ Type I construction for the majority of dwelling units. As such, under the current Inclusionary Zoning ("IZ") regulations the IZ set aside requirement for the project is the greater of 8% of residential square footage or 50% of bonus density utilized. Based on the building program depicted in our construction drawings, this amounts to an IZ set aside of more than 12,000 square feet of gross floor area. The IZ-XL text amendment proposes to increase the zoning height threshold as it relates to construction type and the set-aside requirement to 85 feet. Should this text amendment take effect prior to issuance of our building permit, our IZ set aside requirement would increase to 10% of residential square footage or 75% of bonus density used, which is not currently included as part of our overall program or financial structure. Given the Commission's understandable interest in advancing IZ-XL and normal delays in the DCRA review process, especially during the current public health emergency, it is very possible that the building permit will not be issued in time for this project to be vested under the standard vesting provisions. Such an unexpected increase at this late stage of our development process would have severe impacts on our project.

We are supportive of the District's efforts to increase opportunities for affordable housing. However, an increased set-aside requirement for this project at this late stage would require a restructuring of our agreement with our development partner, an agreement that has been in the making for several years. In light of the foregoing, we respectfully request the Commission to include a vesting provision in the proposed IZ XL text amendments. Specifically, we propose a vesting provision that would have the effect of vesting projects under the IZ regulations currently in effect where an application for a building permit has been submitted and accepted as complete by DCRA prior to the effective date of any text amendments made as part of this case.

We appreciate the Commission's recent acknowledgement of the value religious institutions have in serving the needs of District residents, while simultaneously facing significant fiscal constraints that make it difficult to remain in these communities. Bethel finds itself in a similar situation. Fortunately, through years of hard work between Bethel leadership and our development partner, the redevelopment project we currently have under review by DCRA will not only allow us to remain a part of the Southwest community but will allow us to make a great contribution toward addressing the community's housing needs and thus affording us another opportunity to help fill a need, heal a hurt and build a dream. Accordingly, we respectfully ask the Commission to exercise the same type of consideration for Bethel as it has for other religious institutions.

We appreciate your consideration of this letter.

A handwritten signature in black ink, appearing to read "Rev. R. Fitzgerald Carter". The signature is fluid and cursive, with "Rev." written above the main name.

Rev. R. Fitzgerald Carter
Senior Pastor