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VIA IZIS

District of Columbia Zoning Commission
441 4th Street, NW, Suite 210
Washington, D.C. 20001

**RE: Zoning Commission Case Number 22-01
Office of Planning's Proposed Text Amendment to Subtitle G, H & I to Permit
Matter-of-Right Residential Use of Non-Residential Building Built Prior to
01/01/2022 that Exceeds Development Standards for Residential Use.**

Dear Members of the Commission:

Holland & Knight LLP acknowledges the housing shortage in the District of Columbia and the District's latest efforts to encourage the conversion of existing non-residential buildings to residential use. Thus, we support the text amendments to Subtitle G, H & I of the Zoning Regulations proposed by the Office of Planning in Zoning Commission Case No. 22-01 as they align with the District's Housing Element policies regarding production incentives by providing suitable regulatory incentives such as zoning regulations (Comprehensive Plan, Policy H-1.1.2) and innovative tools and techniques.

We believe the proposed text amendments, once adopted, would have a positive impact on the District's housing supply, as property owners interested in residential conversions of non-residential buildings that exceed the residential development standards would no longer need additional zoning relief. The requirement for obtaining zoning relief creates an additional challenge in the conversion of nonresidential space to residential space, and removing this challenge assists in encouraging the residential conversions in strategic locations such as the Downtown zones.

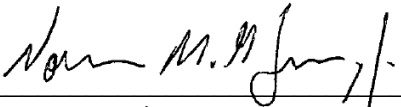
We encourage the Zoning Commission to approve the proposed text amendment as proposed by the Office of Planning in their report marked as Exhibit 8 in the case record. The text amendment

ZONING COMMISSION
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advances the District's housing goals and incentivizes the revitalization of underused properties in high-potential areas of the District in furtherance of the District's housing goals.

Sincerely,
HOLLAND & KNIGHT LLP



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