



November 16, 2020

RE: ZC 20-02

Good afternoon Chairman Hood and Commissioners:

My name is Susan Kimmel and I am chair of the Steering Committee of Ward3Vision. We are a grassroots organization of residents of Ward 3 who support smart growth and advocate for socially and environmentally responsible development to make our neighborhoods more walkable, sustainable and inclusive. I am testifying today in favor of the Office of Planning's (OP) proposed changes to the Inclusionary Zoning regulations to expand the amount of IZ required using a sliding scale. In fact, this is the fourth time Ward3Vision has testified in support of Inclusionary Zoning dating back to 2006 when IZ was originally adopted by the DC Council. Despite that the IZ requirements are now 14 years old, only 53 IZ units have been delivered in all of Ward 3 and only .4% of the housing units in Ward 3 are considered income-restricted housing.

We strongly believe that the proposed amendments to the Comprehensive Plan and particularly the increased density allow under the proposed Future Land Use Map (FLUM) must go hand in hand with requirements to give back to the city in the form of more affordable housing units as provided by the inclusionary zoning statute. The requirement of up to 20% of gross floor area dedicated for IZ units in projects requiring a map amendment, with perhaps even more for PUDs, will dramatically increase the number of affordable units in Rock Creek West (RCW). Part of our optimism stems from a sense that developers will be incentivized to build to the maximum density and pursue the proffered map amendments.

Although we are not prepared to evaluate the technical details of the calculations, we appreciate the nature of the process undertaken by OP to obtain hard data from developers to make the numbers work as an incentive for greater density. We hope that there will be the ability to fine-tune the formulas so they will continue to operate as intended in the future and as economic conditions change.

One of the features that caught our attention is the allowance for the formula to vary depending on the cost of land and for projects with lower construction costs. Another provision estimates an allowance for additional time needed for a map amendment as taking one year. As an outside observer, it seems that this time variable may also differ across neighborhoods, with RCW requiring more time than other sections of town to enact a map amendment. We think the carrying costs may be higher here than elsewhere due to delay caused by local opposition challenging the up-zoning. Currently there is not much of a track record from Ward 3 on the number of applications for map amendments. (I am only aware of one in ANC 3E in the past 10 years.) The scarcity of applications, in and of itself, may be indicative of developers' anticipation of extended legal wrangling. Hopefully this will change with enactment of the proposed FLUM and density incentives. We suggest OP investigate the variability of the time factor when evaluating the financial incentive benefit of the IZ formula.

While we believe that expanded IZ is a necessary first step in providing more affordable housing in RCW, we look forward to other changes in the zoning code to encourage development of gentle density housing as well as creative financing mechanisms to enable the construction of more units at reduced cost and lower rents.

Thank you for your time and your consideration of these measures to bring greater equity to DC and begin to reverse the history of exclusionary zoning in Ward 3.