



District of Columbia Government  
Advisory Neighborhood Commission 6A  
Box 75115  
Washington, DC 20013



November 21, 2020

Chairman Anthony Hood  
D.C. Zoning Commission  
441 Fourth Street NW, Suite 210S  
Washington, DC 20001

Re: Zoning Commission Case No. 20-02 (Expanded IZ Text Amendments)

Dear Chairman Hood,

At a regularly scheduled and properly noticed meeting<sup>1</sup> on November 12, 2020, our Commission voted 7-0-0 (with 5 Commissioners required for a quorum) to support the proposed amendment to expand available Inclusionary Zoning (IZ) units through the awarding of a Floor Area Ratio (FAR) bonus regulations. ANC6A believes wholeheartedly in the Amendments goal of expanding the number of IZ units available so that more working-class residents can afford to live in the city. We also believe that the Zoning Commission should look at changing the Average Median Income (AMI) thresholds to further expand the availability of IZ units so that a greater section of the population can access them.

ANC 6A's experience with development on and around H Street has led to several considerations that we believe the Zoning Commission should include in the final rule. These considerations are:

1. The IZ FAR bonus should be combined with the facade preservation bonus currently in place as part of the H Street Overlay (and other similar bonuses). These should be inclusive considerations, so that developers cannot seek FAR bonuses both for IZ units and for facade preservation. Rather, both facade preservation and IZ units must be present for any FAR bonus to be awarded.
2. The IZ FAR bonus should be subject to special exception relief, rather than being matter of right. This would allow the community to assess the FAR bonus and decide if the IZ units are worth the increased density.
3. Currently, the Amendment places IZ levels for PUD projects outside of the scope of the amendment, requiring them to be addressed in the Community Benefits Package that is part of the PUD process. This will likely result in inconsistent results, with different ANC's having different levels of knowledge and comfort with the PUD processes. Our ANC recommends that the Zoning Commission either require the Zoning Amendment to include standards for

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<sup>1</sup> ANC 6A meetings are advertised electronically on the [anc6a-announce@yahoogroups.com](mailto:anc6a-announce@yahoogroups.com), [anc6a@yahoogroups.com](mailto:anc6a@yahoogroups.com), and [newhilleast@groups.io](mailto:newhilleast@groups.io), at [www.anc6a.org](http://www.anc6a.org), on Twitter (@ANC6A) and through print advertisements in the Hill Rag.



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PUD projects to make use of the IZ FAR bonus, or establish standards that ANCs can use in discussing PUD projects with developers.

4. The FAR bonus be capped at a maximum of 2.0 for buildings under 85 feet. Currently, the Amendment allows for a FAR bonus in excess of 2.0, but the IZ rate is still 20% for any far bonus above 2.0. The result is that there is no additional community benefit to allow for increased density above 2.0. Because of this, ANC6A recommends that a maximum bonus of 2.0 be set for buildings under 85 feet in height.

Please be advised that Brad Greenfield and I are authorized to act on behalf of ANC 6A for the purposes of this case. I can be contacted at [amberanc6a@gmail.com](mailto:amberanc6a@gmail.com) and Mr. Greenfield can be contacted at [brad.greenfield@gmail.com](mailto:brad.greenfield@gmail.com).

On behalf of the Commission,

Amber Gove  
Chair, Advisory Neighborhood Commission 6A