



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



September 15, 2004

Zoning Commission  
441 4th Street, NW  
Suite 210S  
Washington, DC 20001

**Re: Roundtable on Expanding the Uses Permitted in the CM Districts**

Dear Commission Members,

On September 9, 2004, ANC 6A voted unanimously to provide these comments for the upcoming roundtable on expanding the uses permitted in the CM (Commercial-Light Manufacturing) Districts.

ANC 6A asks that that full consideration be given to the recommendations of the DC Community Corrections Facility Sitting Advisory Commission with respect to the placement of new Emergency Shelters, Adult Rehabilitation Homes, and Community Correction Facilities (Halfway Houses) in the CM Districts. Of particular importance are the following recommendations:

1. The city should ensure an equitable distribution of these facilities among and within Wards. The Zoning Commission must be aware that CM Districts themselves are not equally distributed throughout the city. Many of the areas with this zoning are located in Northeast and east of the Anacostia River. "Matter of right" treatment for these types of facilities in CM districts could easily lead to less equity in the distribution of these facilities.
2. Zoning regulations should limit the size of facilities to no more than 20-30 residents, even in CM districts. Facilities above this size primarily benefit the builder and operator in terms of economies of scale in construction and operation. It is questionable whether larger facilities meet the need of residents for individualized supervision and treatment.
3. The city should strive to make optimal use of existing facilities. Before easing the way for construction of new facilities, the Zoning Commission should document the demand for these types of services and whether existing facilities can meet the demand.
4. The Zoning Commission should establish a process for siting new facilities that involves the community through the ANCs. Although city agencies should involve communities in planning through the ANCs when these facilities are under consideration as a matter of courtesy and law, the practice is to start building and see if anyone notices. This has occurred in our ANC with a Youth Rehabilitation Home (called a "Residential Dwelling for Handicap") on Kramer Street NE, and will likely continue unless notice to the ANCs is required and/or a special exception must be obtained from BZA.

Respectfully yours,

Joseph Fengler  
Chair, Advisory Neighborhood Commission 6A