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D.C. OFFICE OF ZONING

**HARRIET TREGONING**

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RE: Case No. 14-11

I have been reluctant to weigh in on planning matters since leaving the Office of Planning, in deference to the interim Director(s) and to the highly competent and excellent staff of the Office of Planning, whose high quality work and professionalism I daily relied upon. However, I am compelled to comment on the current case, not because I have changed any of my opinions about the staff, but because I am afraid conclusions about development pipeline outcomes and impacts on single family housing costs (and subsequent recommendations for down zoning and other zoning changes) are being drawn from too narrow and recent a time period. Yet the consequences of Zoning Commission action may affect the city for decades to come.

I am writing to respectfully oppose the Office of Planning's proposal to downzone and otherwise add restrictions to rowhouse buildings in the R-4 district. At some point such restrictions may even be appropriate but I do not believe we know that now. What we do know now is that the demand for housing is outpacing supply and that prices are rising such that affordability is threatened not just for moderate income households but for middle income ones as well.

**Affordability**

I am somewhat puzzled by the proposition that we can increase affordability by decreasing the supply of potential housing units and/or requiring that additional discretionary approvals be sought beyond what is currently required. It is true that we have a significant supply of rowhouse stock, some of which may be offered for sale in a largely unimproved condition. I suggest that the competition for such housing will be fierce, whether a buyer plans to live there herself, renovate the building as a single family unit for sale, or renovate it as two or more units for sale. Restricting the number of units just limits the housing supply in some of the most central and transit-and amenity-supplied neighborhoods of the city.

**Aesthetics**

There have indeed been some awful additions built in R-4 and R-5

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neighborhoods. However, I don't believe that the builders of the additions aspire to horrify the neighbors and potentially devalue their own property; I think they are terribly uninformed about what makes for a compatible addition (e.g., size, scale, set back, materials, fenestration, etc). Much of the outcry about "pop-ups" has been over compatibility. However, many additions to rowhouses are so compatible that they are utterly unremarkable in terms of changes to the neighborhood. Why not pilot an advisory ANC panel of citizen architects or designers to advise builders of such additions to see if that can improve the outcomes? While appearing before such an advisory panel may be voluntary, it could be required at some future point if:

- . The design advice seems to be effective for those that seek it; and
- . Not enough of the conversions and additions are seeking the ANC Design Panel advice on compatibility.

#### **Mismatch between Household size and Building Stock**

I am rather dismayed by the talk of family-sized housing needing to be in single-family dwellings. All over the world families live in what we call multi-family housing (an ironic term given the representation that these units must not be for families) - apartments and condominiums. In DC we are enjoying a mini-baby boom, a product in part perhaps of the influx of young college graduates over the past 7 years and the incentive of free all-day daycare afforded by DC's universal pre-kindergarten for 3- and 4- year olds. But that just means that the City projects that we will have 23% of households with school-aged children in 2030 or so, up from our current level of around 21%. In other words, more than three-quarters of DC households will NOT have school-aged children at home. Yet roughly 1/3 of the housing supply is of the larger, often single family or semi-detached housing variety. We do have a mismatch - our current housing stock is sized too large for our households - that is why so much housing being built and anticipated in the development pipeline are for small units. Let's not overreact to that pipeline. Recall that we were a shrinking city until roughly 2007, and then we were in a recession. This flurry of building is an attempt to be responsive to demand for smaller units. Today, almost 44% of all DC households are single-person households. As we attain a closer match between the household size and our building stock, I am confident we will see a broader range of unit sizes be produced.

We already devote more than 54% of the total residentially zoned land to low density single-family detached and semi-detached housing in the R-1

thru R-3 zones. As we see the inevitable generational turnover of that housing stock, more of it will be available for households that want larger housing, including households with children.

However, if we act to restrict housing in the R-4 now, do we really think we can easily reverse that decision once the mismatch of households and building stock has come closer to equilibrium?

### **Equity**

Given the busy nature of people's everyday lives and the fact that a relatively small proportion of the city's property owners likely closely follow the movements of the Office of Planning and the (always fascinating of course) changes to the City's zoning code, it will certainly come as a rude shock to many that the addition they contemplated when they purchased their property - the one that might make it possible for them to retire in comfort and security with the additional income that new rental units might provide - is no longer theirs to build by right. In the few instances that I am aware of where very small and targeted downzonings have occurred in the past 8 years (mostly to address a block or two of houses where their coherent form and scale was in sharp distinction to the larger neighborhood zone that surrounded them - e.g., a block of rowhouses in an apartment zone), I recall that the support of each property owner was obtained before the downzoning proceeded. In contrast, this proposed action potentially affects a large number of property owners and if it occurs, it will largely be without their knowledge or consent. I think this raises real equity and fairness issues.

At the same time, I know the OP proposal has been supported by some ANCs around the city. If indeed there is broader support to limit the height of rowhouses in R-4 than I have perceived, I do not believe that there is anything that prevents individual property owners from putting a covenant on their own property that limits future development to 35 feet in height. Any limits on expansion or conversion would be knowingly undertaken and any loss in property value with the subsequent sale of the property would be knowingly borne. Perhaps to facilitate such actions, the Council or the Administration might move to waive the recordation fees that would otherwise have to be paid.

### **Future Housing Demand**

It seems that the appropriate context for this proposal is that of an analysis of the future demand for housing. The city's robust population

growth rate has slowed slightly per the most recent Census estimate but changing preferences and changing demographics including household size, age, and income suggest that we all need to have a better understanding of what housing, of what size, in what locations, the city will need to affordability meet the future demand. To curtail supply in what are very livable, walkable, low-rise neighborhoods of 1 to 4 housing units simply seems to be premature.

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As an aside, I just met with my former colleague, the current planning director of the City and County of San Francisco, where housing affordability is Topic A (like it has become for the District of Columbia), and where even and upper middle income households increasing find it difficult to find housing they can afford. He expressed astonishment that DC is considering a downzoning in the face of steeply rising housing costs. He thought it had been many decades since San Francisco had downzoned any residential land. To the contrary, the priority of the Mayor and all the relevant agencies was to try to increase the supply of housing and to everything possible to make San Francisco a more affordable place to live.

I respectfully request that the Zoning Commission retain the existing rules and decline to act on the proposed Text Amendments. In the alternative, the Zoning Commission could defer action until after other palliatives have been tried (e.g., optional Design Review at the ANC level) and further analysis on future housing demand has been completed.

With gratitude for your consideration,

A handwritten signature in black ink, appearing to read "Harriet Tregoning". The signature is fluid and cursive, with a large, stylized flourish at the end.

Harriet Tregoning  
Ward 1 Resident