

From: whj@melanet.com
To: [DCOZ - ZC Submissions \(DCOZ\)](#)
Subject: Zoning Commission for Zoning Case No. 23-02:
Date: Wednesday, January 17, 2024 12:02:43 PM
Attachments: [UI_HousingSupplyChallenges Copy.pdf](#)
[Housing Supply Bethel Cole Smith April 2020.pdf](#)

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Chairman Hood and Commissioners,

This email and attachment is an addendum to my previous testimony submitted on 1/8/24 urging you to vote against the map amendment requested by DC's Office of Planning (OP) and Deputy Mayor for Economic Development and Planning (DMPED), the Applicant, in Case ZC23-02 on the grounds that the Applicant has failed show that the requested amendment is Not Inconsistent with the Comprehensive Plan (Comp Plan) when view through a Racial Equity Lens for lack of adequately disaggregate data in its analysis around displacement of Ward 1's Black family population among other failures.

During the Commission's 1/8/24 in this matter the Commission requested OP provide additional analysis regarding NOAH (Naturally Occurring Affordable Housing) which OP referenced in its 1/8/24 presentation, but did not define. NOAH a market often occurs through a concept called "Filtering", the attached presentation provided by Freddie Mac at a program sponsored by the Urban Institute on 4/21/20 entitled, "Housing Supply Challenges and Solutions". I've also attached at DC CFO sponsored study on rents and housing supply, "The Impact of an Increasing Housing Supply on Housing Prices - The Case of the District of Columbia, 2000 -2018". I've attached these studies as an example of the level of effort the Commission should require from "the Applicant" in this case and other cases when OP and/or DMPED are the applicants when a Racial Equity Lens Analysis is required or concepts like NOAH are introduced. These reports show that the data required is ready available to "the Applicant".

The above reports illustrate the complexity of forces at play in the area impacted by Case No. 23-02 and obvious inadequacy of "the Applicants" Racial Equity Lens analysis; therefore, the "not consistency" with the Comprehensive Plan's requirements.

The Commission must either postponed further actions or vote "no" with regards to Case No. 23-02 until a proper analysis is provided. Given "the Applicant" after nearly

a years as failed to provide such a level of analysis, the Commission must seek an independent third party analysis in this and similar cases submitted by OP and DMPED.