

November 21, 2025

Chairman Anthony Hood and Members of the DC Zoning Commission 441 4th St., NW Washington, DC 20001

Re: Wesley Theological Seminary Campus Plan Further Processing Zoning Commission Case Number 23-08A

As you prepare to consider Wesley Seminary's application for a new dormitory, the Washington Interfaith Network (WIN) Ward 3 Affordable Housing Work Group urges the Commission to steer clear of a further text amendment that would allow for satisfying Wesley's off-site requirements without new construction. We also encourage the Commission to spell out in further detail its intent regarding the "alternative means" for fulfilling Wesley's off-site IZ requirements.

Specifically, we ask the Commission to support five steps to improve the path forward proposed in the Office of Planning's Hearing Report:

- Retain the mandate for new construction of affordable units. While placing
  existing homes within financial reach of ownership by lower-income families is
  important, we believe that defaulting to purchase or conversions of existing homes –
  as DHCD has indicated it prefers would represent a lost opportunity to add to
  Ward 3's housing stock.
- 2. Maximize the number of affordable units and the depth of affordability. Although we strongly support the creation of affordable homeownership opportunities in DC, we prefer this opportunity be used to build rentals, which can deliver a greater number of units to even lower-income families than affordable homeownership can. As noted in the Mayor's Rock Creek West Roadmap, DC's lowest income residents

have fewer opportunities to live in amenity-rich Ward 3 than in any other part of the District – and families earning 60% MFI or less, who don't qualify for DHCD's Home Purchase Assistance Program (HPAP), need it the most. Delivering more units would be especially meaningful given Ward 3's lagging progress toward meeting the Mayor's goal of 1,990 dedicated new affordable housing by the end of this year.

- 3. **Prioritize projects in ANC3E.** Expanding the arena of potential projects to all of Ward 3, when there are concrete rental project proposals closer to Wesley that could be built, seems to defy the principle behind the IZ exemptions of keeping the alternative projects close to Wesley. WIN Ward 3 would like to see the funds used for a project in ANC3E, preferably along the Wisconsin Avenue corridor where increased density is already contemplated under the Wisconsin Avenue Development Framework.
- 4. Increase the dollar amount of Wesley's donation to closer to 12-15% of the IZ equivalent. OP's Hearing Report suggests that Wesley's proposed \$8 million payment is equivalent to a 10.97% IZ set-aside. WIN Ward 3 has consistently advocated for a Wesley donation that approaches the equivalent of 15% IZ, as has been achieved in other ANC3E projects in the last few years.
- 5. Establish protections to ensure that the housing is built and occupied in a timely manner, and that the process of awarding the grant is transparent. Whether the program is administered by DHCD or by LISC, WIN Ward 3 strongly urges the Commission to define the oversight that will be necessary for transparency and timeliness. If DHCD's involvement introduces trusted procedures to ensure smooth implementation, we applaud that but we would like to see those requirements spelled out.

The unique circumstances of this zoning exemption for Wesley's new student housing – and the immediate urgency of Ward 3's need to build more affordable housing – mean it's important to get this right. We hope you will carefully consider these recommendations, which we believe will help keep the execution of this program firmly aligned with the goals of the Mayor, of advocates for housing affordability, and of our community.

Respectfully,

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