



NW Opportunity Partners CDC

Expanding affordable housing and economic opportunities in NW DC

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November 21, 2025

Mr. Anthony J. Hood, Chairman
DC Zoning Commission
One Judiciary Square
441 4th Street NW, 2nd Floor
Washington, DC 20001

ZC Case No. 23-08A
Wesley Seminary

Dear Chairman Hood and Members of the Commission:

The NW Opportunity Partners Community Development Corporation opposes the current proposal to fulfill Wesley Seminary's obligation for inclusionary zoning housing—Case 23-08A—for reasons outlined below.

This latest in a series of relief requests for the project would allow the provision of Inclusionary Zoning (IZ) units off site—something that has been specifically and consistently prohibited since it was earlier allowed. **The Zoning Commission's final decision must specifically state that this is not a precedent and should never be allowed to happen again.**

That said, there are some specific requirements and conditions that should pertain.

1. The alternative **IZ must be in Ward 3**. Ward 3 is “starving” for affordable housing, and the IZ should at least have some proximity to the project. Also of note, the community support for affordable housing demonstrated in this case and in recent planning for the areas along Wisconsin and Connecticut avenues should put to rest the NIMBY accusations too often attributed to Ward 3 residents.
2. The \$8 million Wesley proposes to set aside is woefully inadequate and should be increased. The calculations do not include the cost of land (which while free at Wesley Seminary will not be free off site; land costs are high in Ward 3) or soft costs (e.g., design, permitting,

insurance, and financing) which will also be required in a new project. The costs of construction in the \$8 million offer are grossly understated. The set aside figure should be the amount of square feet of IZ to be created times the actual cost (both hard and soft costs) of new construction. **The intent is to replace the amount of IZ that should be created in the Wesley Seminary project, therefore, the funds should be enough to pay for a like amount of housing off campus.** In fact, to “earn” (and justify) this relief and to discourage any future attempts to ask for similar relief, the amount of IZ should be increased from the 10% it would have been on site.

3. **We strongly oppose Department of Housing and Community Development (DHCD) administration of these funds and endorse the earlier proposal to transfer the funds to LISC (Local Initiatives Support Corporation).** The DHCD proposal would diffuse the money among several programs, not specifically require the creation of NEW affordable housing, make it hard to track and understand how it was used, and ensnare it in the usual bureaucratic delays that the processes for the various programs entail. The DHCD proposal would allow conversions and purchases of existing homes, not adding to the total housing supply. LISC has a very good track record. It is much more nimble and able to ensure that the affordable housing is timely produced. Of course, we would anticipate that DHCD would be involved in the LISC projects providing the public funding required to make the projects “work”. In fact, we would expect DHCD to give priority to such projects since the city and Zoning Commission are necessitating these projects to fulfill an IZ requirement. **The Zoning Commission ought to request a more detailed proposal from LISC.**
4. The relief should require that the funds be used to **create NEW affordable housing** in Ward 3. We oppose using these funds for conversions which do nothing to increase the overall housing supply in Ward 3, the only ward that has not yet met the Mayor’s affordable housing goals.
5. The funds should be **grants not loans** to the affordable housing developer(s) since the funding would otherwise have been used in the construction on the campus and will be needed for the new housing.
6. **Clear criteria** must govern LISC’s distribution of funds so that the process is transparent and fair. Project selection should include how well a developer consulted with the community on such things as the need for certain types of units, e.g., family sized, and design issues like stepbacks to respect adjoining areas. Also, whether the housing will be for deeper levels of affordability than the IZ requirement.
7. Further, there should be a **reporting requirement** and demonstration that the new affordable housing has been completed and is occupied.

Even after addressing all these issues, many questions remain. To identify just a few: Who will be responsible for maintaining the units as IZ units? Are they in perpetuity? How will new and future tenants be placed? Will ongoing reporting on income be required?

This clearly is a complex matter. Wesley and the developers are undoubtedly anxious to move on. But the Zoning Commission must make wise and prudent decisions. We seek a decision that addresses community concerns and achieves a clear and lasting public benefit of greater affordability and economic diversity in Ward 3.

In our view, accepting the inadequate \$8 million proffer and handing off the problems created by this relief to DHCD is neither wise nor prudent. This solution should be rejected by the Zoning Commission.

Meg Maguire
Chair
NW Opportunity Partners CDC