

November 15, 2024

**Comments of the Washington Interfaith Network Ward 3 Congregations
Affordable Housing Work Group
Re: Wesley Seminary Application for Text Amendment (Case 24-09)**

This note is to convey the views of the Washington Interfaith Network (WIN) Ward 3 Congregations Affordable Housing Work Group regarding the application of Wesley Seminary for a text amendment that would facilitate development of an apartment building on the seminary's campus. WIN Ward 3 is led by five Upper Northwest congregations: Adas Israel, Chevy Chase Presbyterian, National United Methodist, St. Columba's Episcopal, and Temple Sinai. Our combined congregations represent roughly 4,800 households, many of which live in Ward 3.

WIN Ward 3 supports Mayor Bowser's goal of creating 1,990 units of affordable housing in the Rock Creek West planning area by 2025. Reaching this goal will not be easy given the amount of progress to date. Thus, we have advocated for the inclusion of affordable housing on public lands, and to maximize the number of affordable units in privately owned projects.

Inclusionary zoning (IZ) is a modest but important tool for securing affordable units. That is why we were pleased when Federal Realty Investment Trust agreed to ensure that 15 percent of the units to be built as part of redevelopment of Friendship Center (5333 Wisconsin Avenue, NW) would be affordable. We now hope that other developers will follow FRIT's lead in growing the supply of affordable housing in Upper Northwest.

We previously urged Advisory Neighborhood Commission 3E (ANC3E) and Wesley to work together to ensure that the value to be contributed by the seminary approximates the cost of 15% IZ. We also requested transparency regarding the method by which IZ units foregone on the Wesley campus would be translated into dollars for IZ units at another location, and assurances that the IZ applied to off-site locations on behalf of Wesley provide meaningful, new IZ units.

WIN Ward 3's primary issue at this juncture is that the latest proposal from Wesley fails to address the concerns we previously raised—15% equivalency and enforceability—and actually appears to diminish the potential for affordable housing that would be permitted under matter of right conditions.

Given the Zoning Commission's past support for growing the supply of affordable units, we urge it to reject this proposed amendment and direct Wesley to pursue a course of action that, at the very least, ensures offsite construction of the base level of IZ. Ideally Wesley would show leadership and provide an exemplary commitment to affordable housing in Ward 3.