

## Cochran, Patricia (DCOZ)

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**From:** Jayme Epstein <jaymerepstein@gmail.com>  
**Sent:** Sunday, November 30, 2025 8:59 AM  
**To:** DCOZ - ZC Submissions (DCOZ)  
**Subject:** ZC 25-09 testimony: Connecticut Avenue text amendment

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### General Comments in case ZC 25-09

As a resident of Woodley Place, NW, in Woodley Park and a frequent customer of the businesses in Cleveland Park, I am writing in support of the upzoning along Connecticut Avenue (ZC 25-09). I urge the Commission, however, to modify the IZ+ included in the plan to ensure the construction of deeply affordable housing that will advance the goal of increasing the racial diversity of Woodley Park, as detailed below.

The city has explicitly named as a goal of the proposed upzoning the creation of more affordable housing, with a particular focus on advancing racial equity in the Woodley Park neighborhood. I am strongly in favor of all efforts to make it possible for all DC residents, and especially Black and other residents of color, to live and thrive in Woodley Park, creating a more vibrant neighborhood for all its residents and providing deeply affordable housing close to transportation, schools, grocery stores and other amenities that make this a great place to live.

It is imperative that the city do everything in its power to redress the long history of exclusionary zoning and other intentional displacement of Black residents, for example in Fort Reno, which has resulted in Ward 3 being overwhelmingly white and wealthy. I was among the Ward 3 residents who urged the city to purchase the former Wardman hotel and convert it to affordable, including deeply affordable, housing. Instead, we were ignored, and the city passed up an opportunity to meet its goals for racially equitable housing west of Rock Creek Park. The result: two "luxury" high rises with very few affordable units and rents out of reach for most.

The current plan, without modification to IZ+, will result in another failure to create housing affordable to the majority of Black DC residents. According to the OP set down report, the median income of Black households is only 36% of the median income of white households district-wide. This income gap renders so-called "affordable" units out of reach for many Black households. Without expanding IZ+ as detailed below, the racial makeup of the neighborhood is unlikely to change. I therefore urge the Zoning Commission to require the application of the following two IZ+ changes proposed by Ward 3 Housing Justice to zoning case 25-09:

**1. Increase the quantity of affordable housing proportional** to the full extent of the final density changes, with no ceiling at 125%.

- The proposals as written assume the current IZ+ ladder, which pairs each 25% increase in density with a 2% affordable housing requirement, **but now stops at 125% density increases without justifiable reason.**
- The Zoning Commission should use the existing ladder formula for incremental increases and **continue affordable housing set aside for the entire range of density increases.**

**2. Create lower income eligibility tiers for IZ+ renters in these Ward 3 zones targeting households below 50% DC MFI** to ensure more equitable access to new permanently affordable housing units.

- The zoning proposals purport to create opportunities for greater range of resident diversity; however, the current IZ+ income threshold of 60% or 80% MFI disproportionately denies Black households access to IZ units. In 2024 DC MFI was \$168,799, while MFI for Black households was approximately \$60,591, highlighting a persistent racial income gap that limits equitable access to “affordable” units under the current IZ+ framework
- The Zoning Commission should establish a custom tiered affordability structure for these two corridors to enable households with incomes at or below 50% MFI to rent IZ+ units in these zones.
- What might equitable access look like? Hold a lottery for 50% of the IZ housing for incomes up to 30% MFI and a second lottery for the other 50% of IZ housing set aside for incomes between 31% and 50% MFI.

Thank you for your consideration.

Sincerely,

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