



Ward 3 Housing Justice

ORGANIZING FOR EQUITABLE HOUSING IN WARD 3

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W3HJ Response to OP Supplemental Report
ZC Case 25-09
March 24, 2026

Ward 3 Housing Justice does not find the Supplemental Report filed by the Office of Planning (OP) to be a sufficient or satisfactory response to the serious inadequacies of their initial proposal, particularly in the following five key components.

OP contradicts itself on the limits of density

OP states that "... increases beyond 80% - 125% very quickly exceed theoretical limits of lot occupancy and stories within the District." OP argues against its own practice here: A theoretical limit on density is by definition arbitrary and is undermined by a proposal by the very same Office of Planning for over 300% density increases in a similar case for the Wisconsin Avenue Corridor (25-13). If there is a higher theoretical limit on density, there can be a higher commensurate theoretical increase in IZ+ set asides.

OP's report relies on a flip-flopping definition of IZ

OP says that "The IZ+ analysis stopped at an 80% - 125% increase in density and 18% - 20% affordability requirements [partly because]...the goal was to support projects until they could benefit from affordable housing financial subsidies and achieve deeper affordability."

This is a stunning claim. As far back as 2020, OP was describing IZ and IZ+ as stand-alone programs that could not be combined with subsidy to reach lower income households, both formally, as in case 20-02, and repeatedly in meetings between W3HJ and OP staff as well as in public discussions.

We urge the ZC to demand that OP clarify for once and for all if IZ is a stand-alone program or one that is to be combined with subsidy. If, in fact, OP's new definition is accurate, we urge that there be clearly delineated targets and commitments for additional subsidy attached to density bonuses above 125% in both this case and its Wisconsin Avenue counterpart.

The report fails to address the exclusionary nature of the original proposal

To avoid excluding low-income households, IZ+ set asides should include a portion reserved for households earning 30% and 40% MFI. When we research OP's claim that ZC decisions to

change the IZ+ requirement in these new zones is hampered by Council-created legislation, we see nothing saying that the Commission may not approve deeper IZ+ affordability levels and greater IZ+ set asides. Why not be bold and act for justice?

Other city agencies already countenance MFI levels that would further racial equity. For example, DHCD's handout at community informational sessions cites IZ eligibility income levels that include 30% MFI. This very Zoning Commission approved IZ units at 30% MFI in the PUD at 5333 Wisconsin Avenue.

OP cannot avoid simply addressing this stark reality: It has proposed and defended creating neighborhoods where there is no plan for housing for households earning before 50% MFI. That is exclusionary zoning.

The report fails to address the elephant in the room

Conveniently unaddressed in the report is the indisputable fact that the playing field for affordable housing is not level. There is massive public investment in affordable housing for some wards where and those wards exceed the mayor's affordable housing goals. Other wards like W3 are almost solely dependent on amassing affordable housing through IZ and IZ+ which supplies very little affordable housing per project, and our goals go unmet.

The supplemental report doubles down on the original proposal's failure – or refusal – to deliver the full promise of IZ+ as part of a plan to develop a diverse neighborhood

The Zoning Commission approved Expanded Inclusionary Zoning on March 21, 2021, and IZ+ was born. As reported in [Urban Turf](#) at the time, "OP continues to find new ways to meet Mayor Bowser's challenge to produce more affordable housing in a more equitable way across the District," OP Director Andrew Trueblood said in a statement. "IZ+ is an important tool to complement the changes in the proposed Comp Plan update and help get more affordable units, especially in high-cost areas."

Today, in the high-cost area of Woodley Park/Cleveland Park under discussion in this case, developers are set to gain significant windfalls, even if they do nothing but engage in land speculation and simply allow the density bonus to increase the value of their properties. **Wasn't the whole idea of IZ+ set asides increasing in step with density increases to require the developer to share their gains with the community?**

Now that density increases that exceed the original limit of 125% are being granted, it is time for OP and ZC to follow through on the promise of IZ+ and increase set asides commensurate with density. Instead, OP continues its track record of opposing the full realization of the promise of IZ, as evidenced by prior opposition to extending IZ in downtown and to office conversions, and its support for whittling away at what constitutes the FAR on which IZ set asides are based.

OP now adds to that history by applying for and securing a grant ostensibly to study IZ+. Since the DC auditor's report of November 2024 amply demonstrated failures in implementation of the IZ program, the study should be inclusive and complete. But OP doesn't see it that way.

The grantor, Council of Governments (COG), describes the purpose of the grant as follows (emphasis added):

*HAPP funds will be used for consultant assistance to evaluate the District's Inclusionary Zoning Plus (IZ+) program, **identify opportunities for improvement, strengthen program effectiveness, and increase the production of affordable housing.***

However, OP's announcement of the study in its [January 2026 newsletter](#), describes its purpose quite differently (emphasis added):

*We're excited to announce that OP received a \$75,000 grant from the Metropolitan Washington Council of Governments' Housing Affordability Planning Program. With this funding, we will evaluate the District's Inclusionary Zoning Plus (IZ+) program, which was introduced in 2021 to require a higher set-aside of affordable housing when there is an amendment to the zoning map. **We've received feedback that IZ+ may make it more difficult for housing projects to advance, especially in challenging market conditions. The District will use findings from this study to assess the program design of IZ+ and recommend market-sensitive adjustments to support more housing construction.***

W3HJ sees no good faith commitment to planning for racial and economic equity in this case, in this report, or in OP's other public actions and statements.

Conclusion

We in Ward 3 Housing Justice have heard many welcome calls for creating a more diverse and inclusive Ward 3, including from Chairman Hood and many elected officials.

We have also heard many promises from the Mayor's team that change was coming. Since 2021, W3HJ has met with staff of the Office of Planning, Department of Housing & Community Development, and Office of the Deputy Mayor for Planning and Economic Development to promote affordable housing in Ward 3. Initially, we were urging the city to seize the opportunity to purchase the Wardman Hotel in Woodley Park and redevelop it with non-profit partners to produce hundreds of units of affordable housing in a mixed-use, community-serving development. We were ultimately told that the District was going to pass on that opportunity, and that DMPED would negotiate with the new owners to create some affordable units through HANTA.

The California owners rejected HANTA and went forward with matter-of-right development with only the bare minimum of IZ. Today [the redeveloped Wardman Park](#) opened as "...a collection of exquisite new residences...with resort-inspired living...". Of the 867 exquisite new residences, only 69 are affordable to households with moderate incomes. The Wardman marketing materials point out that Langston Hughes once worked at the storied hotel. Neither he nor the majority of Black residents of DC, who earn less than is required to be eligible for IZ, could afford to live there now. Woodley Park is thus preserved as a wealthy, exclusive and disproportionately white neighborhood.

Over the following years, we welcomed assurances by OP that change would come with redevelopment of the major corridors in Ward 3, triggering generous IZ+ housing that would produce diverse neighborhoods at last. OP's proposals for up-zoning the Connecticut and Wisconsin Avenues are the last, best chance for creating significant amounts of truly affordable housing in Ward 3 in our lifetimes. Unfortunately, density is a tool, not a plan. The simple truth is that there is no plan, and certainly no plan for equitable access to housing.

Exclusion that is as thorough as proposed in OP's initial proposal and defended in its supplemental report is not an accident. It is policy. More specifically, it is bad policy. It is time to close a door – not on DC residents who are disproportionately Black and living on low incomes, but on systemically exclusionary practices that we thought were abandoned long ago. The Zoning Commission can change it, and our hopes that you will do so are profound.

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