
Response to OP Report, case 25-09

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To DCOZ - ZC Submissions (DCOZ) <DCOZ-ZCSubmissions@dc.gov>

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Chairman Hood and Members of the Zoning Commission,

I hope the Commission passes 25-09, as nothing in OP's supplemental report indicates any factual basis for altering the amendments before you.

As someone who testified in support of IZ+ back in 2020, I want to see the program work. We've seen examples of its success, such as the project at 3327 Wisconsin Ave NW. But we have also seen examples of IZ+ being skirted in favor of matter-of-right development, such as the project at Mazza Gallerie and the Wardman development in Woodley Park. I would like to see IZ+ work for the areas under consideration in this case in Cleveland park and Woodley Park, and in case 25-13 along upper Wisconsin Avenue. But I would also like to see housing built. A successfully calibrated IZ+ program incentivizes new housing creation that maximizes cross-subsidized affordable homes.

IZ+ is a program that this Commission adopted District-wide. That is why I believe it is appropriate that any changes to the IZ+ program be implemented District-wide and not as part of this case or case 25-13. If, after OP studies the IZ+ program, it decides to propose changes to the IZ+ program, the public will have an opportunity to engage in that case based on the evidence presented.

I would call the Commission's attention to the December 11, 2025 testimony of Patrick McAnnaney of affordable housing developer Somerset Development and his knowledgeable comments about the IZ+ program. The IZ program, ultimately, is about math. Calls for higher IZ set asides, in defiance of math, need to be viewed for what they are: calls for no new housing of any kind. Projects that don't pencil, don't get built. I've excerpted Mr. McAnnaney's testimony here:

"I would also like to note for the broader conversation on inclusionary zoning that we participated actively in the development of IZ-Plus in 2021, including providing feedback to the Office of Planning on their financial modeling analysis done at the time to assess the feasibility of the program. When it comes to inclusionary zoning, financial modeling is everything. The math has to actually work for the program to function in practice. The reality of financial modeling is that it changes over time as financial conditions such as rents, construction costs, and interest rates all fluctuate.

Unfortunately, financial conditions have changed drastically since the original IZ-Plus modeling was done in 2021. At the time, we were in the midst of a historic national apartment building boom

spurred by low interest rates and high demand. That boom has waned significantly both nationally and here in D.C., and we're now dealing with the hangover of high interest rates, enormous increases in construction costs, and weakening demand for rental housing as the District's economy softens. We've done many projects here in the District and in Baltimore that involve using market rate housing development to cross-subsidize affordable housing. We know this model can work, which is why we generally support the inclusionary zoning program, but we also know that this model works well during boom times and struggles during busts. The only way to resolve the challenge we are currently facing regarding the inclusionary zoning program is to base our analysis on empirical data using detailed and updated financial modeling to assess the viability of affordable housing requirements. Inclusionary zoning is not meant to be a static tool. It must be updated regularly to match current market conditions in order to be effective.

We strongly recommend that the proposed map amendments move forward, but also that the Office of Planning conduct an update of the 2021 IZ-Plus analysis based on more recent data. We are happy to assist in that effort by providing feedback similar to what we did with the 2021 analysis." ***Patrick McAnaney testimony 12/11/25, OZ transcripts pp 95-96.***

Thank you for the opportunity to submit these comments.

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