



NW Opportunity Partners CDC

Expanding affordable housing and economic opportunities in NW DC

WEB: www.nwopcdc.org • EMAIL: info@nwopcdc.org

Commentary to the DC Zoning Commission on the Supplemental Report by the Office of Planning, Case 25-09

Thank you for reopening the record for comment on additional information from the Office of Planning (OP). NW Opportunity Partners Community Development Corporation has reviewed the supplemental report from OP regarding Case 25-09—Cleveland Park and Woodley Park upzoning—and offers the following comments specifically addressing the Inclusionary Zoning (IZ) requirements and OP’s justifications.

OP fails to deal with 3 issues: 1) lower levels of affordability than the IZ 50-80% range; 2) greater percentages beyond IZ+ when granting significant upzoning for matter-or-right development; and 3) application of IZ requirements for increases in density beyond 125%. The Zoning Commission has the authority to and responsibility to correct this inequity.

Require Lower Levels of Affordability

For whom is IZ “affordable housing” affordable? IZ sets aside units for families making 50% to 80% of the Median Family Income (MFI) which is currently \$164k for a family of 4. The low IZ threshold of 50% MFI is \$82k. The MFI for DC’s Black families in 2024 was \$60,591. *Thus, the majority of Black families in DC aren’t eligible at even the lowest level of eligibility.*

OP argues that this very significant proportion of DC’s population should rely on other subsidy programs in concert with IZ. But the city has no mechanisms to make this pairing happen. The result is that OP is failing to plan truly affordable housing for those in greatest need, relying solely on increasing supply through greater density to bring down housing costs.

IZ requirements should be modified to address the most urgent housing needs, especially in places where the city is giving developers significant increases in buildable space as a matter-of-right. We urge the Zoning Commission to create a mix of affordability levels starting at 30% MFI or \$49,200.

Increase the IZ Requirement

Similarly, the Zoning Commission has the authority and responsibility to adjust IZ requirements in light of recent construction technology which has increased the heights for stick built (lower cost) construction.

Additionally, OP cites “theoretical maximums” that are demonstrably wrong in the present case. The amount of increased density (essentially air rights) should be treated the same way as public land (also buildable space) with standard IZ applying to the existing zoning and 30% IZ applying to additional density increases.

Apply IZ Beyond 125% Density Increase

The 125% cap on the maximum increase to which IZ would apply should be removed. What possible rationale could there be for not applying IZ to other increases beyond 125%? A free bonus for developers?

OP proposes to give away a significant asset—buildable space – without addressing the need for truly affordable housing for those who work in Ward 3 and cannot afford to live here. Even as OP repeats the language of racial equity, its policies are creating a new form of exclusionary zoning. The Zoning Commission has the authority and responsibility to make the changes to IZ discussed here if we are to achieve more just and equitable land use in our city.

Submitted by:

Carol Aten, Secretary/Treasurer, on behalf of the Board of Directors
carolaten10@gmail.com
202-276-7601