

Zoning Commission Case 25-09
Proposed Zoning Text and Map Amendments to create and
map a new Cleveland Park Neighborhood Mixed Use Zone - NMU-8A/CP
and a new Woodley Park Neighborhood Mixed Use Zone - NMU-9A/WP
Comments of Marilyn J. Simon
November 30, 2025

In these comments, I address two issues:

- (1) Affordable Housing: The language of the text amendment is not explicit in requiring the amount affordable housing outlined in the Office of Planning's description of the proposed amendments or the purpose and intent sections of the text amendment; and
- (2) Transportation Infrastructure: The DDOT Report fails to evaluate the adequacy of the transportation infrastructure to support, or be improved to support, the level of development associated with these proposed text and map amendments.

1. Affordable Housing

The text amendment includes language in the "purpose and intent" sections: H §500.1(b) for Cleveland Park (page 33 of the OP Hearing Report) and H §600.1(b) for Woodley Park (page 36 of the OP Hearing Report).

A statement in the purpose and intent section is not sufficient to incorporate IZ-Plus into the zoning map and require that developers follow the IZ-Plus set-aside requirements. The proposed text does not include sufficient explicit language to require IZ-Plus in future projects on the sites that are being upzoned.

There is a reference to IZ+ in Table H §504.1 and H §604.1, the maximum permitted FAR in these zones, but that falls far short of a statement that IZ+ is required in these zones.

The map amendment does not include specific language stating that IZ+ is required in these zones, and the text and map amendment doesn't include specific instructions on how the IZ+ set-aside requirement is to be calculated, i.e., that the set-aside requirement calculation in Table C §1003.4 should be based on the maximum permitted FAR (exclusive of the 20% IZ bonus) for MNU-4/CP, MNU-4/WP and MNU-5A/WP prior to adoption of this map amendment.

There should be explicit language requiring the mapping of the IZ+ requirement, and clarifying how the set-aside is calculated.

Without explicit language requiring mapping of the requirement and including detail on how to determine the "maximum permitted FAR in the existing zone" in the set-aside requirement calculation, the mapping and requirements are ambiguous. With ambiguous

language, the set-aside requirements might be interpreted to require only standard IZ, C§1003.2, at 8% of residential floor area, rather than the higher IZ-Plus set-aside requirement, C §1003.4, at 18% of residential floor area for Cleveland Park, and 14-18% of residential floor area for Woodley Park.

Or, if it is mapped as IZ-Plus, but the definition of the base for calculating the percent increase in total FAR utilized is not clear, it might be interpreted to have a set-aside requirement as low as 8.5%.

Even if the language is corrected and there is explicit language requiring IZ-Plus on the upzoned sites and clarifying how the set-aside requirement will be calculated, the amount of inclusionary zoned housing and the target incomes fall short of how the Office of Planning represents the upzoning will address affordable housing goals. Under IZ-Plus, IZ rental units will be affordable to households with incomes at 60% of MFI, and IZ ownership units will be affordable to households with incomes at 80% of MFI. For 2025, the income limit for 60% MFI for a two-person household is \$78,720 (US Dept. of Housing and Urban Development, June 1, 2025.) The Zoning Commission can require deeper affordable units or more affordable units for the large increase in allowable density with these map and text amendments.

2. The DDOT Report

The Transportation Analysis in DDOT Report (ZC 25-09, Exhibit 150, November 21, 2025) is fatally flawed and does not provide the Zoning Commission and the Office of Planning with the information they need to evaluate whether the existing infrastructure (with possible improvements) can support future development that would be matter-of-right if these amendments are approved.

The DDOT Report does not include: (1) an evaluation of existing conditions, which should include existing development in the area, traffic counts for critical intersections and a review of the level of service for critical intersections; (2) projections of additional trips (from existing conditions) and projected levels of service, assuming a full buildout in the area to current zoning limits; and (3) projections of additional trips (from existing conditions) and projected levels of service assuming a full buildout in the area if the proposed amendments are adopted.

The Report should also include sufficient detail, such as block-by-block data on assumed development, units, residents, employees, and trip generation, for each of these three scenarios so that the community can review the analysis. For the analysis of existing conditions, and calculating the additional development in the buildout scenarios, currently unoccupied buildings should be assumed to be generating no trips. For currently unoccupied buildings, additional trips for the other two scenarios would be the total number of trips generated with the full buildout of those sites.

Although this was done on Wisconsin rather than Connecticut Avenue, the same principles apply. In 2003 through 2005, at the request of Kathy Patterson, the Ward 3 Councilmember, DDOT conducted two transportation studies, the 2003 Friendship Heights Transportation Study, FHTS, (and 2005 FHTS Addendum) and the 2005 Wisconsin Avenue Corridor Transportation Study, WACTS, to evaluate the adequacy of the infrastructure to support the Office of Planning's recommended upzoning along Wisconsin Avenue. Those studies included an examination of existing conditions in the study area along with a projection of future conditions in several scenarios, including a full buildout of the corridor to the density limits under then existing zoning and a full buildout of the corridor to the density limits under the proposed zoning. They evaluated the current levels of service at critical intersections, along with the projected conditions under the two buildout scenarios.

The DDOT Report for the proposed Connecticut Avenue zoning changes does not evaluate current conditions, and does not look at the additional development (from the existing development) that could occur if the text and map amendments are adopted. Instead, it only gives information on the difference between potential development in the study area with current zoning and potential development in the study area with the proposed text and map amendment. This comparison does nothing to inform the Commission about whether the infrastructure can support the development that can occur with the proposed text and map amendments.

In the FHTS and the WACTS, DDOT also provided detailed information on the basis for their estimates, including their block-by-block assumptions about existing development and the potential development under current and proposed zoning. That information is essential so that the community can review the report. In the FHTS and WACTS, the detailed information allowed the community to comment on the report and correct serious inaccuracies in the original draft.

Conclusion

The proposed map and text amendments as submitted to the Zoning Commission are premature. The language for the treatment of the Inclusionary Zoning requirement is insufficient to require the set-aside anticipated in the various presentations on the map and text amendments. And even if the language is corrected, the amount of affordable housing and the depth of affordability is trivial compared with the value of the increase in the zoning envelope.

The DDOT Transportation Analysis is fatally flawed inasmuch as it fails to compare the proposed zoning envelope with existing conditions, but instead compares the maximum development that would be allowed with current zoning to the proposed zoning envelope. This comparison is of no use to the Zoning Commission in determining the likely impact of their decision.