March 25, 2026

Statement of Judy Chesser submitted to the Zoning Commission:

Re: Case No. 25-09 Connecticut Avenue upzone

The Zoning Commission must consider the impact of density increases on infrastructure. DC Council created Future Planning Analysis Areas on the Generalized Policy Map. Cleveland Park and Woodley Park were included in these areas where equitable development was the goal. The Council was specific that any guiding documents for development frameworks and future zoning proposals should evaluate current infrastructure and utility capacity against full build-out and projected population growth, and that this information should be reflected in rezoning proposals.

> *Policy IM-1.1.3: Relating Development to Infrastructure Capacity Align development with infrastructure capacity, with the intent of not exceeding capacity. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit, and other travel modes and the availability of water, sewer, drainage, solid waste, and other public services. 2502.8*

The 2nd Supplemental Report (Exhibit 250) filed by the Office of Planning ("OP") on March 2, 2026, regarding the Proposed Zoning Text and Map Amendments to Create and Map a New Cleveland Park Neighborhood Mixed Use Zone and a New Woodley Park Neighborhood Mixed Use Zone is non-responsive to the requests made by the Zoning Commission and is entirely inadequate.

The Infrastructure Report Provided By OP Is Entirely Inadequate.

The Supplemental is inadequate and non-response on many issues but I will concentrate on the Infrastructure Report or lack thereof. In the Supplemental Report, OP provides an infrastructure report for the first time by providing the following link: INFRASTRUCTURE ASSESSMENT. I have provided the report in its entirety below.

OP did not put the assessment in the Record and now only provides a link.

It is mandatory that the Zoning Commission take the infrastructure report into consideration when making decisions.

OP, in the Supplemental Report, states: "At this time, OP does not believe a second infrastructure study is necessary as it would result (sic) recommendations that are not different from those at the time of the CADG."

Despite facts to the contrary, OP gives no assurance that DC Water, for example, is equipped to handle the large increase in demand called for in the rezoning.

Water-relevant portions of the infrastructure report:

Capacity Assessment:

> ***DC Water*** *(sewer and water capacity): DC Water is unsure if the sewer and water systems have the capacity for the Theoretical Full Buildout and FLUM Build Out scenarios. This area's existing local sanitary sewer systems are running at full capacity. Wastewater generated by future developments may impact some local sanitary sewers. Additionally, the existing water system in this area is running at full capacity. For adequate future demand, DC Water recommends developers consider upgrading existing water mains, local sewers, and water lines in affected areas.*

Table 1: *Infrastructure demand by scenario. All estimates are rounded to the nearest hundreds place.*

Scenario	*Households*	*Population*	*Water (gal/day)*
Baseline	*5,600*	*7,600*	*1.53 M*
Theoretical Full Buildout	*9,100*	*12,000*	*2.42 M*
% Change from Baseline	*61%*	*58%*	*58%*
FLUM Buildout	*7,400*	*9,900*	*2.03 M*
% Change from Baseline	*31%*	*30%*	*32%*

OP has presented two very different impact projections. Given the intensity of the zoning proposal, the Theoretical Full Build Out Scenario is the one that the Zoning Commission should consider.

The 2021 FLUM Build Out Scenario is colored by OP's projections. No further information is provided to explain the basis for this scenario.

It seems on its face to be unreliable and non-transparent. OP should provide more information on the estimates of the facts and assumptions in both scenarios, such as what sites would be developed to what density (FAR and number of households) in each scenario, and what was included in the baseline estimate, so that the Commission can better evaluate the analysis.

What we do know from the utilities consulted is that water supply in the area is already at capacity and the sewer services are also at capacity. Sewer capacity already has been studied by DOEE because of flooding on Connecticut Avenue affecting the metro station and neighborhood residences.

OP has neglected to state the significance of water issues affecting this area.

Schools Overcrowded

The skimpy infrastructure report does not even mention the impact of the additional 12,000 residents, a portion of whom surely will be children and youths, who will want to attend the already overcrowded schools in Ward 3.

Conclusion

The required infrastructure study produced by OP is wholly inadequate in providing guidance to the Zoning Commission about how the proposed new development standards will impact existing infrastructure. OP has failed to complete the task directed by the Council that OP incorporate the infrastructure capacity report as a reason for its selection of a proposed zone.

Don't ignore the strain on infrastructure until we exceed capacity.

Skipping all the articles where sewage ended up where it should not be, here are a few examples of many examples available, of taking that path in other jurisdictions:

CBS: Anne Arundel County (Maryland) halts new development in some areas due to sewer capacity, March 4, 2026 https://www.cbsnews.com/baltimore/news/anne-arundel-county-sewer-capacity-development-moratorium-maryland/

QAC: Queen Anne's County (Maryland) - Commissioners Approve Temporary Moratorium on Certain Residential Development. On August 12th, the Queen Anne's County Commissioners approved a 12-month moratorium on processing or approving certain new residential and mixed-use development projects in parts of the county. The measure applies to projects in Kent Narrows, Stevensville, Grasonville, Prospect Bay, Cloverfields, Bay City, and Southern Kent Island wastewater subdistricts when the project's anticipated sewerage allocation exceeds 1,750 gallons per day, the equivalent of seven single-family homes. The moratorium has no impact on any commercial projects, unless there is a residential component. (mixed use) The moratorium is designed to give the County time to address concerns about limited wastewater treatment capacity, traffic congestion, and overcrowded schools.
https://www.qac.org/m/newsflash/Home/Detail/3064

Opelika City (Alabama) Council to Consider one-year Planning Moratorium to Evaluate Growth and Infrastructure. Posted on January 27, 2026. The Opelika City Council will consider a proposed one-year Planning moratorium at its February 3, 2026, meeting as part of a proactive effort to evaluate the city's rapid residential growth and ensure infrastructure keeps pace with development. City officials emphasize the moratorium is intended to provide time for a comprehensive review of transportation networks, sewer and utility capacity, school impacts, public safety services, and other critical infrastructure. https://www.opelika-al.ghttps://www.opelika-al.gov/m/newsflash/home/detail/1221ov

District of Columbia Office of Planning

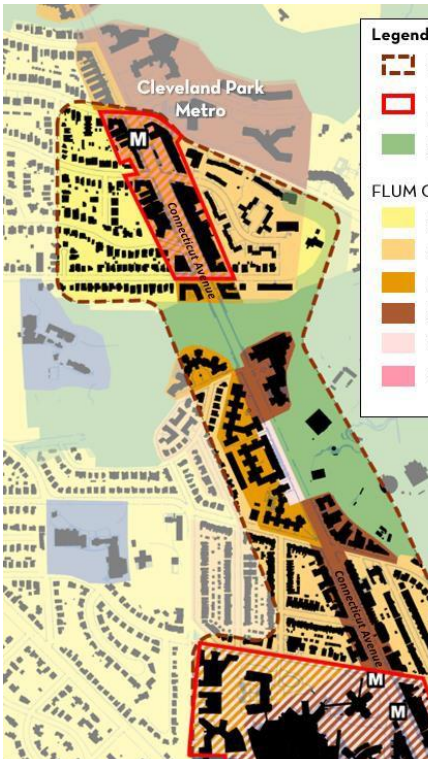
Connecticut Avenue Development Guidelines: Infrastructure Assessment

November 30, 2023

Executive Summary:

This infrastructure assessment[i], prepared in connection with the *Connecticut Avenue Development Guidelines,* evaluates infrastructure demand and capacity in the Upper Connecticut Future Planning Analysis Area.[ii] The Comp Plan future land use policy as detailed through the *Connecticut Avenue Development Guidelines* (figure 1) will likely lead to an increase in population, households, and jobs within the study area. These new residents and workers will likely increase the demand for electricity, water, multimodal transportation, and solid waste management.

Figure 1: *Map of Connecticut Avenue Development Guidelines Study Area and Future Land Use Policies.*



The increased demand for infrastructure systems identified in this assessment are not anticipated to occur within the next twenty-five years, the time horizon of the District's long-range population, households, and jobs forecast[iii]. Infrastructure is planned at a high level over the long term, which can range from ten years to more than fifty years depending on the system and is updated on an annual basis as needs evolve. In comparing future demand to existing infrastructure, it is important to note the following:

- Infrastructure planning occurs through well-established processes that the District and regional utilities use to ensure infrastructure systems are continually improved to meet demand.
- The District has a 5-year Capital Improvement Plan (CIP) that funds transportation improvements and waste management facilities. The CIP is updated annually.
- Regional utilities and authorities, including WMATA, Pepco, and DC Water, use long-range population and employment forecasts to ensure the District's current and future residents and businesses can access clean water, electricity, and public transportation.

This assessment does not account for the economic feasibility of construction or market conditions that would indicate when development might occur. Additionally, this assessment does not consider how changes in technology or consumer preference could impact future infrastructure demand. For these reasons, this assessment should not be interpreted as a development forecast but rather as an exercise to evaluate infrastructure improvements that could be needed over the long term.

Analysis Overview:

This assessment has two components:

- Demand Assessment – an evaluation of how new real estate development could impact infrastructure use. This assessment was conducted by OP.
- Capacity Assessment – an evaluation of existing infrastructure systems to determine if they can accommodate potential new demand. Utilities and District agencies provided OP with information about the capacity of the infrastructure they manage.

The assessment looks at three scenarios to understand how potential new development could impact infrastructure:

1. The Baseline Scenario evaluates the study area's existing conditions. OP estimated the current number of households, population, jobs, and infrastructure demand from the existing gross building area (GBA) of buildings within the study area. Using industry-standard factors, OP also used GBA to estimate current infrastructure demand based on area, density, and occupancy by each parcel's land use classification.

2. The Theoretical Full Buildout Scenario estimates households, populations, jobs, and infrastructure demand using the theoretical maximum GBA under the 2021 FLUM for every property with any additional building capacity within the study area. For this scenario, future GBA estimates are derived from OP's land use capacity analysis**.** This scenario is very unlikely to occur because many of these sites are unlikely to be financially beneficial to redevelop as this scenario envisions, and redevelopment of some sites are limited by factors that are not considered, such as challenging site conditions including steep slopes and irregular parcel shapes.

3. The 2021 FLUM Buildout Scenario estimates households, populations, jobs, and infrastructure demand generated by properties within the study area where FLUM land use designations were updated as part of the 2021 amendment to the Comp Plan. These are the areas where land use policy is most likely to result in changes in use and intensity. For this scenario, the future theoretical GBA estimates are derived from a massing model produced through the planning process, which reflects the most likely way these parcels might be developed.

Both scenarios two and three include large redevelopment projects currently planned or under construction within the study area, including the Marriott Wardman Park hotel to residential conversion in Woodley Park and the Macklin mixed-use infill development in Cleveland Park. The estimates generated for both future scenarios are greater than the District's long-range forecast, which covers a 30-year period (2020-2050). Based on the District's long-range forecast, the growth in population, households, jobs, and infrastructure demand would likely extend beyond 2050.

Demand Assessment:

OP estimated infrastructure demand for the *Connecticut Avenue Development Guidelines* study area. Metrics used to evaluate infrastructure demand include:

- Electricity Demand – *Kilowatts (KW)*[iv]
- Water Demand – *Gallons consumed per day (gal/day)*
- Waste Generation – *Pounds produced per day (lbs. /day)*
- Trip Generation and Attraction[v] – *Frequency of person trips per day*[vi]. Trips includes mode split during peak hours for trips made by transit (bus and metro), walking, biking, and vehicles.[vii]

Tables 1 and 2 provide of overview of the demand assessment results for the Baseline, Theoretical Full Buildout, and 2021 FLUM Buildout scenarios.

Table 1: *Infrastructure demand by scenario. All estimates are rounded to the nearest hundreds place.*

Scenario	Households	Population	Jobs	Electricity (KW)	Water (gal/day)	Waste (lbs./day)	Trip Gen (person trips/day)
1. Baseline	5,600	7,600	1,100	29,600	1.53 M	37,900	50,100
2. Theoretical Full Buildout	9,100	12,000	1,800	47,600	2.42 M	58,700	97,000
% Change from Baseline	61%	58%	55%	61%	58%	55%	94%
3. 2021 FLUM Buildout	7,400	9,900	1,300	38,400	2.03 M	48,600	69,000
% Change from Baseline	31%	30%	14%	30%	32%	28%	38%

Table 2: *Trip generation and attraction with mode split by scenario. All estimates are rounded to the nearest hundreds place.*

Mode	Transit (people/day)	Walk (people/day)	Bike (people/day)	Vehicle (vehicles/day)
Mode Split	35%	22%	3%	40%
Scenario				
1. Baseline	17,500[viii]	11,000	1,500	16,900
2. Theoretical Full Buildout	34,000	21,300	2,900	32,900
Net Increase from Baseline	16,500	10,300	1,400	16,000
3. 2021 FLUM Buildout	24,200	15,200	2,100	23,400
Net Increase from Baseline	6,700	4,200	600	6,500

Capacity Assessment:

For the capacity assessment, OP requested input from District agencies and utilities to understand each infrastructure current system capacity and the process for capital improvement planning that can meet future demand.

Pepco (electricity capacity): Based on the demand assessment, Pepco anticipates that the current infrastructure in this area of Connecticut Avenue Development Guidelines study area will have adequate capacity to supply the load growth for both scenarios presented. Growth in surrounding areas may affect Pepco's existing facilities. Pepco conducts an annual forecast of the distribution system by analyzing the load versus capacity for each feeder and substation to identify any planning criteria violations in within the next ten years and determines actions to mitigate the violations, if any. Some ways Pepco mitigates those violations are with the addition of new substations, transformers, feeders, and non-wire alternatives.

DC Water (sewer and water capacity): DC Water is unsure if the sewer and water systems have the capacity for the Theoretical Full Buildout and FLUM Build Out scenarios. This area's existing local sanitary sewer systems are running at full capacity. Wastewater generated by future developments may impact some local sanitary sewers. Additionally, the existing water system in this area is running at full capacity. For adequate future demand, DC Water recommends developers consider upgrading existing water mains, local sewers, and water lines in affected areas.

District Department of Transportation (DDOT) (transportation systems capacity): These land use changes could require additional multimodal transportation capacity over the long-term. DDOT's Development Review Program will evaluate the impacts of land development actions on the District's multimodal transportation network as specific properties develop in the future.

DC Department of Public Works (DPW) (waste management capacity): The new development considered in this analysis would not have a serious impact on current waste management capacity. DPW manages solid waste removal for residential structures with four or fewer units. New development would almost exclusively produce buildings with more than four units. Property owners for these new buildings would be responsible for procuring private waste management services, which are readily available.

[i] The District's *Comprehensive Plan* (Comp Plan) calls for planning within Future Planning and Analysis Areas (FPAAs) to evaluate how changes to the Future Land Use Map (FLUM) could affect infrastructure at full buildout. For this analysis, "full buildout" refers to a property maximizing the available gross building area based on the lot size and floor-area ratio (FAR) allowed under existing or future land use designations. See Appendix A for the Study Area Geography and Future Land Use Policy Maps. See appendix A for the Study Area geography and future land use policy maps.

[ii] The District's Comprehensive Plan defines FPAAs as "large tracts and corridors where future analysis is anticipated to plan for inclusive, equitable growth and climate resilience." (Policy LU-1.1.1).

[iii] OP prepares a long-range (30 year) forecast of job, household, and population growth approximately every two years for the Metropolitan Washington Council of Governments' (COG) regional transportation planning efforts.

[iv] OP developed estimates for existing and future electricity demand, in kilowatts, using general electricity demand rates typically used in the Washington DC area.

[v] The demand assessment for transportation utilizes *trip generation* and *trip attraction*, which differs from *Annual Average Daily Traffic (AADT). AADT* Takes in all vehicle trips on a segment of road or highway during a yearlong interval in both directions and then divides the total by 365 days to arrive at the average number of daily trips. On the other hand, *trip attraction* and *trip generation* predict the number of trips originating or destined for a particular area.

[vi] *DDOT's multi-modal approach to site-level development is to view trip generation in terms of person-trips rather than vehicle-trips. See DDOT's Guidance for Comprehensive Transportation Review for details.*

[vii] DDOT provided OP with estimations for mode split for the Connecticut Avenue Corridor.

[viii] *Baseline transit trips are not based on the WMATA ridership data from Calvert Street to Cleveland Park Metro segments or local bus services. Additionally, these estimates do not account for the significantly reduced ridership in 2021 due to the COVID-19 pandemic.*