

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
On the Office of Planning March 2, 2026 2nd Supplemental Report
March 26, 2026

In these comments, I address two areas where the Office of Planning failed to adequately address the concerns raised by the Commission and the public:

- (1) IZ Plus, lacking a clear evaluation of how much additional affordable housing might result from this major upzoning, as well as the level of affordability and unit sizes; and
- (2) the Infrastructure Assessment, lacking sufficient information on: (a) the buildout that is being evaluated, and (b) if and how the infrastructure (such as at sewer system) could be improved to accommodate the increased development, along with the cost and associated disruption of necessary improvements, as well as who will pay the cost of necessary infrastructure improvements.

IZ-Plus and Affordable Housing

With the recommended upzoning, OP is granting a substantial increase in development rights on the upzoned sites, and asserts that this upzoning and the application of IZ-Plus will advance the goal of increasing the amount of dedicated affordable housing in Ward 3.¹

While IZ-Plus increases the affordable housing requirement, the Zoning Commission is left in the dark on the question of how much additional dedicated affordable housing will be generated, and at what level of affordability.

The OP Supplemental Report did not provide sufficient information for the Commission to evaluate whether this substantial grant of increased development rights is effective in advancing the stated goals.

1. How much additional affordable housing might result from upzoning and IZ-Plus?

The OP Supplement Report reprints the tables for the maximum FAR that will be permitted in these two zones, states that it will “allow and encourage additional residential development to help meet the need for housing, by accommodating a greater range of resident diversity to

¹ Note that Ward 3 has a substantial amount of other affordable housing, including rent control units, other naturally affordable housing in older buildings, and vouchers.

advance the District's housing equity goals," and by mapping these zones as subject to IZ Plus. However, OP does not provide the Commission with estimates of the total amount of additional housing that might be expected and does not present a clear picture of how much or how little affordable housing would likely be included.

In Cleveland Park, the along Connecticut Avenue, current zoning allows an FAR of 2.0 (2.4 with IZ), of which at most 1.0 can be non-residential. The proposal is to increase that to 5.0 with IZ, of which at most 2.0 can be non-residential.

For Cleveland Park, OP should be providing the Commission:

- (1) for some of the larger sites:
 - a. estimates of the amount of housing and the amount of affordable housing that might be expected on those sites, if the sites were developed with current zoning,
 - b. estimates of the amount of housing and the amount of affordable housing that might be expected with the proposed zoning,
 - c. how much affordable housing would be provided if the developer elects to take a 20% reduction in the requirement as provided in C§1003.9 for the inclusion of a sufficient number of affordable and market rate three bedroom or more units. With that reduction, how many affordable units would be included and how many larger units (affordable and market rate) would be provided.
- (2) For the remaining upzoned areas, OP should provide block by block estimates of the amount of additional affordable housing and additional market rate housing for current zoning with IZ and for the proposed zoning with IZ-Plus

Separately, OP should be providing the same information for Woodley Park.

Using this more granular information, separately for Cleveland Park and Woodley Park, by adding up the estimates of market rate and affordable housing over the sites and blocks, OP can also state the total amount of additional affordable housing and market rate housing with the upzoning. By having the more granular information, the Commission can see where the additional affordable and market rate housing might occur, and weigh whether it justifies for example, a 150% increase in FAR. This information also would increase the public's confidence in the estimates.

The Office of Planning should be giving the Zoning Commission solid numbers on how much additional affordable housing would be provided with IZ-Plus in exchange for the massive increase in development rights being granted here.

With this information, the Commission will be better informed on the extent to which IZ+ moves the needle in reaching these affordability and diversity goals.

2. Does IZ-Plus provide affordable housing to the intended households where the stated goal is to accommodate a greater range of resident diversity to advance the District’s housing equity goals?

IZ-Plus provides some additional housing available at 60% AMI for rental units and 80% of AMI for ownership units. Both IZ and IZ-Plus have an affordable housing requirement at 50% of AMI based on habitable penthouse space. The required housing at 50% AMI is relatively small.

The following table shows the maximum income inclusionary units based on family size for 2026:



GOVERNMENT OF THE DISTRICT OF COLUMBIA
 DC Department of Housing and Community Development
 1909 Martin Luther King Jr. Avenue SE | Washington, DC 20020
 202-442-7200 | dhcd.dc.gov



**INCLUSIONARY ZONING PROGRAM
 2026 MAXIMUM INCOME, RENT AND PURCHASE PRICE SCHEDULE**

Effective: January 30, 2026

Household Size (number of people)	Maximum Annual Income (\$s)					
	30% of MFI	50% of MFI	60% of MFI	80% of MFI	100% of MFI	120% of MFI
1	\$34,400	\$57,350	\$68,850	\$91,800	\$114,750	\$137,700
2	\$39,350	\$65,550	\$78,650	\$104,900	\$131,100	\$157,350
3	\$44,250	\$73,750	\$88,500	\$118,000	\$147,500	\$177,000
4	\$49,150	\$81,950	\$98,340	\$131,000	\$163,900	\$196,700
5	\$53,100	\$88,550	\$106,260	\$141,600	\$180,300	\$212,400
6	\$57,050	\$95,100	\$114,120	\$152,100	\$196,700	\$228,150
7	\$60,950	\$101,650	\$121,980	\$162,600	\$213,050	\$243,900
8	\$64,900	\$108,200	\$129,840	\$173,100	\$229,450	\$259,600

Does providing dedicated rental affordable housing only to these income limits advance the stated goals?

Infrastructure Analysis

The infrastructure assessment (which has not been submitted into the record by OP) resembles an executive summary rather than an infrastructure report.

Far more information is necessary in order for the Commission to evaluate whether the infrastructure in this area can support the proposed upzoning, and for the Commission to fully

consider the cost of upgrading the infrastructure if the map amendments are approved.

While this should have been done by the Office of Planning before proposing the FLUM changes, it wasn't done then. So, it must be examined now, before there is a substantial increase in matter-of-right development rights.

Without getting into the weeds, it is clear that Water and Sewer is an issue: Water and Sewer is currently at capacity.²

Water and sewer is critical infrastructure and costly to upgrade, an upgrade which can involve major disruptions. Upgrades are also lumpy, i.e., it cannot be done incrementally. According to the information OP submitted, water and sewer are at capacity. What upgrades will be necessary and what is the cost and disruption associated with the upgrades? Will neighboring homeowners be denied a permit to add a first-floor bathroom they desire so that they can age in place if large new developments used all available capacity, and new construction must wait for necessary infrastructure projects to be completed? Will the developers who are benefiting from the gifted increase in the allowable zoning envelope pay for those necessary infrastructure improvements or will the costs be borne by the DC ratepayers? Which interceptors do these sewers drain into, and what is the condition of those interceptors? Do they have the needed capacity to avoid polluting Rock Creek or other waterways.

OP does not provide sufficient information to support the numbers that they use in the other evaluations.

OP simply submits the following table, with no indication of what was included in the existing development numbers (5,600 households with a population of 7,600 and 1,100 jobs), or a clear description of how the Theoretical Full Buildout and the 2021 FLUM Buildout Scenario were calculated, except to mention several large projects that are currently planned or under construction.

For the Theoretical Full Buildout: How much non-residential development was assumed? What was the assumed residential unit sizes? Which sites were included? And, most importantly, what was the increase in households and population separately for Cleveland Park and in Woodley Park?

Similarly, for the 2021 FLUM Buildout Scenario, it is indicated that OP decided which sites were most likely to see changes in use or intensity. It is critical that OP show its work, and state which sites were not included. What did OP assume was the existing development and the likely development if the upzoning is approved?

² DC Water states: "This area's existing local sanitary sewer systems are running at full capacity." OP Infrastructure Analysis, p. 4.

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%

OP considers a baseline of 5,600 households (population 7,600) and a theoretical buildout of 9,100 households (population 12,000), with a change in jobs from 1,100 to 1,800.

OP does not provide any information on how they evaluated the existing conditions (and they do not have a very good track record on this, with serious errors in the analysis of the Upper Wisconsin Avenue Corridor Study, including vacant buildings and buildings under construction in existing conditions and calculating existing conditions with clearly erroneous data, such as basing existing conditions on an FAR of 5.8 for a four-story building, or assigning an FAR of 3.825 to a building that had two above grade levels of commercial use in part of the building, plus two and a half levels of above grade parking. These are mistakes that OP should have caught itself).

To evaluate the adequacy of the existing infrastructure, it is necessary to evaluate infrastructure at choke points. For example, total numbers of additional vehicles are not sufficient, but it is necessary to know whether the upzoning will result in additional traffic at choke points and the cost of addressing the additional congestion to reduce to impact to acceptable levels. Loading, delivery and passenger pick up and drop off must also be considered.

The transportation analysis is fatally flawed, based on a hypothetical full buildout with current zoning, rather than existing conditions.

OP has not provided additional information on the adequacy of the transportation infrastructure, but simply stated that the earlier analysis was sufficient.

As noted earlier, 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;³ (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.

Detailed analysis in considering massive upzoning has been done before: 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. DDOT evaluated the current levels of service at critical intersections, along with the projected conditions under the two buildout scenarios.

³ "To complete the analysis, DDOT first assessed the theoretical maximum development potential of the site based on current and proposed zoning." DDOT Report, p.3.

This was not existing development, but the amount of development that would be allowed with current zoning. The increased traffic that DDOT examine was less than the increase from existing development. By considering a full buildout at current zoning as the base rather than existing conditions, DDOT evaluates an increase of 864 housing units and 75,148 SF of retail in the combined Cleveland Park and Woodley Park areas. "It is estimated that a maximum of approximately 1,568 residential units and 333,965 square feet of retail could be constructed on-site if the rezoning to NMU-8A/CP and NMU-9A/WP is granted, as compared to approximately 704 dwellings and 258,817 square feet of retail under NMU-4A/CP, NMU-4/WP, and NMU-5A/WP." DDOT Report, p. 3.

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.

Has the Zoning Commission or OP relied on fatally flawed DDOT reports in other map amendment cases, where DDOT examined the difference between the maximum allowed in the existing zone and the current zone, rather than the difference between existing development and the proposed zoning limits?

Conclusion

The OP Supplemental Report does not adequately address the infrastructure issue or the affordable housing issue. The Commission should either reject the proposed map amendment or request that OP come back with another Supplemental Report to address these issues and other issues that might be raised in the comments.