

December 10, 2025

Mr. Anthony Hood  
Chairman  
Zoning Commission of the District of Columbia  
441 4th Street, NW, Suite 210S  
Washington, DC 20001

RE: **Support** for Zoning Case No. 25-13 -- Proposed Zoning Text and Map Amendments to create and map - new Wisconsin Avenue Mixed Use zones for Friendship Heights and Tenleytown Metro station areas

Dear Chair Hood and Members of the Zoning Commission:

Please accept this testimony on behalf of the Coalition for Smarter Growth. We are a nonprofit organization advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the Washington, DC region to grow and provide opportunities for all.

We are pleased to testify in support of this rezoning proposal to increase housing opportunities along this important Metro corridor and high opportunity area. This proposal implements the Wisconsin Avenue Development Framework (WADF or "Development Framework") and offers the potential for thousands of new homes, and the benefit that comes with that -- attracting new shops, restaurants, and services around two Metro stations - Friendship Heights and Tenleytown, and the Wisconsin Avenue transit corridor. This significant upzoning advances the District's goals to create more housing, and more affordable housing, especially in high opportunity areas.

Opening up this corridor to thousands of new homes, people, and families benefits the entire city by creating new housing capacity beyond redeveloping areas like the Wharf, or H St. NE. Ward 3 should be growing too. There's no better place to add so many new housing opportunities than the upper Wisconsin transit corridor, which is one of three Rock Creek West Planning area priority sites identified in the Comp Plan.

We support the proposal's departure from the uncertainty of a Design Review process. Instead the zoning has enhanced guidance for how new and redeveloped buildings will foster a walkable public realm in the text itself. The proposed rezoning uses a more form-based approach to guiding development to realize the vision of the Development Framework and the Comprehensive Plan while creating a more predictable process.

However, we recommend that while still advancing this case, additional improvements be made to the building form and public space guidance to ensure that the changes realize the vision of

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the Development Framework. Our goal is to both encourage significant new housing opportunities, while also creating great public places -grand and intimate - for all kinds of people to enjoy and be drawn to.

We have worked with others, including Ward3Vision steering committee members, to propose some of these revisions which we have given to DC Office of Planning (see Ward3Vision submitted memo). While we appreciate OP meeting with us and responding to our recommendations in the hearing report, we believe that our suggestions are more feasible than OP's response. We believe that a small amount of outside expertise in form-based codes can build on all the work of the Development Framework and these zoning text amendments to refine the zoning changes to create the guidance needed. This can be accomplished in a matter of months as part of this case hearing process, and be implemented through the standard zoning administrator review process.

### **IZ Plus**

Regarding IZ+: we reiterate our support for IZ+ as a tool to create affordable housing, but recognize that since 2021, significant changes in cost and other market factors may require reassessment of IZ+ assumptions to produce affordable units while not discouraging the production of housing in general. We want to maximize the utility of this market-based zoning tool, but recognize its limitations, which could require additional subsidies, like 4% Low Income Housing Tax Credits, or other subsidies, to make work. Evaluation of IZ+ however, is a separate issue from this rezoning case. We encourage OP's further investigation and refinement of this affordable housing policy tool.

### **Next Steps for the Development Framework Text Amendments**

As we stated in our memo, given the current lull in financing and construction, we believe that OP could take the opportunity to strengthen this proposal during this case review process. We can move forward with this case, but also ask OP to provide a modest amount of additional analysis and revision to the proposed zoning text amendment to ensure that these zoning changes will enable the District to achieve the vision set out in the Development Framework. In our memo with Ward3Vision, we recommended the following steps to make changes over a few months as follow-on to the December 11, 2025 hearing. In summary we suggest:

- Step 1: Review form-based codes from other cities around the country.
- Step 2: Consult form-based codes experts.
- Step 3: Review the draft amendments with experts for minor revisions.
- Step 4: Test it out with developers who have a track record of successful projects that embody the type of development called for in the Development Framework.
- Step 5: Revise the draft amendments based on expert and practitioner feedback.

## Conclusion

We have the opportunity to improve the zoning text amendments to make the most of the Development Framework to guide walkable, mixed-use, human-scale development for this major high-opportunity transit corridor. Realizing the potential of this rezoning is important to the entire District. It ensures we gain the value, new homes, quality retail, inviting public spaces, affordable housing, equitable access, and the tax revenues we should expect. These zoning text amendments can foster more than new homes, they can create a sense of place and a more equitable community.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort

DC and Prince George's Policy Director