

TESTIMONY OF AIDAN JONES  
For DC Zoning Commission Hearing Dec. 11, 2025  
In ZC 25-13  
Statement in Opposition

There is a potentially dangerous precedent in the works that may affect public participation in development in every Ward. The Mayor's Office of Planning (OP) has embarked on a course to misuse the Development Framework authority the City Council granted with respect to the 2021 Comprehensive Plan. Nowhere did the Council say in the Comp Plan that upzoning before a developer application were filed was necessary—or even appropriate.

OP is asking the Zoning Commission to approve rules that would allow any new development to proceed as a Matter of Right (MOR). Once approved, there would be no opportunity for the affected community to comment on proposed heights, densities, setbacks, loading zones, etc.

Here is how OP is misusing the Comprehensive Plan:

- OP is interpreting the Comprehensive Plan's Future Land Use Map (FLUM) guidelines as authorizing development to the maximum height and density permitted.
- OP is asking the Zoning Commission to approve zoning map and text amendments as a Rulemaking which precludes affected individuals and neighborhood organizations from party status, thereby limiting presentation by neighborhood groups to five minutes and precluding presentation of witnesses, cross examination and the right to submit briefs, motions and proposed findings of fact and conclusions of law.
- Once approved, there would be no review by affected Advisory Neighborhood Commissions (ANCs) or the Zoning Commission of any future development in this area unless the developer wanted to exceed the already very expansive zoning changes--extremely unlikely given that in many areas the proposed upzoning extends to the maximum height and density allowed under the Comprehensive Plan.

For these reasons, any possibility of public participation through the zoning process would be foreclosed once the Zoning Commission adopts OP's proposals.

And considering the vast changes in DC's office, commercial and housing needs just in the last five years, Upper Wisconsin Avenue's needs are likely to be very different five years from now. To freeze upzoning at drastically higher height and density than today without a developer on record would impose a great injustice on residents and business owners--and wholly unnecessary at this time.

So I strongly urge you to tell OP that the City Council's intent in providing for the Development Framework here and the related FLUM guidelines in the 2021 Comprehensive Plan neither envisioned nor authorized OP to seek, nor the Zoning Commission to approve, such up-zonings in the absence of actual developer applications to the Zoning Commission.

For all the reasons mentioned above, OP's proposal is premature.

- In the years before developer plans will be concretized, there will be significant economic changes affecting upper Wisconsin Avenue real estate needs, which is a strong reason why public participation should be kept open, including ANC and Zoning Commission review
- Insufficient consideration has been given to surrounding neighborhoods and their needs
- OP could have but did not consider lower height and density
- OP has not adequately addressed important infrastructure concerns and provided a means to resolve them
- Design review was inadequately addressed and
- OP has inadequately assured that economic equity has been addressed by Inclusionary Zoning.