

December 10, 2025

Via IZIS Only

Zoning Commission of the District of Columbia
441 4th Street, NW, Suite 200S
Washington, DC 20001



Re. Z.C. Case No. 25-13 – Comments re. WMATA’s Friendship Heights Properties (Sq. 1580, Lot 33 and Sq. 1657, Lot 24) (the **“WMATA Properties”**)

Dear Chairman Hood and members of the Zoning Commission:

The Washington Metropolitan Area Transit Authority (“**WMATA**” or “**Metro**”) submits this letter of support regarding the Proposed Amendments as applied to the WMATA Properties in Friendship Heights. WMATA encourages the Commission to adopt the new MU-10/FHM zone as set forth in the Proposed Amendments and appreciates the Office of Planning (“**OP**”) bringing forward the application.

WMATA Supports the Proposed Amendments

WMATA has reviewed the Proposed Amendments holistically. The Proposed Amendments advance WMATA’s transit-oriented development (“**TOD**”) policy goals. Specifically, the Proposed Amendments:

- Increase zoning density and heights near Red Line Metrorail stations and along an important bus corridor, which will have the effect of increasing ridership on Metro’s transit services;
- Increase zoning density and height on WMATA Properties and helps to maximize the development potential;
- Allow bus maintenance facility use as a matter-of-right on the WMATA Properties and permit flexibility for future improvements to provide the best service to District residents; and
- Allow for future matter-of-right development, which streamlines approvals and better positions us and the District to deliver new development with a best-in-class public private partnership.

Over the past several months, WMATA has had productive discussions with OP and ANC 3E regarding the Proposed Amendments, which as revised in OP’s December 1, 2025, report now reflect many of the comments that WMATA suggested to OP. WMATA appreciates that collaboration.

Background on WMATA’s Properties Subject to the Proposed Amendments

As background, the Proposed Amendments affect two WMATA Properties: (1) WMATA’s existing Western Bus Garage maintenance facility

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District of Columbia
CASE NO. 25-13
EXHIBIT NO. 210

between Wisconsin Avenue, NW and 44th Street, NW (Sq. 1657, Lot 24, “**WBG Site**”), and (2) the now-vacant former Lord & Taylor site along Western Avenue, NW (Sq. 1580, Lot 33, “**L&T Site**”), which WMATA acquired as a future replacement location for the maintenance facility currently housed at the WBG Site. Together, these sites exceed ten (10) acres.

WMATA acquired the L&T Site as part of a plan to relocate the bus maintenance facility operations from the WBG Site to the L&T Site.

WMATA’s Mission and Joint Development Program

WMATA’s primary mission is to provide accessible, reliable, and affordable public transportation throughout the District and the region more broadly. WMATA’s public transportation mission provides significant public benefits to the District and its residents. Those benefits include reduced traffic congestion, cleaner air, equitable access to transportation, and economic development. WMATA understands and appreciates the District’s goal of providing equitable access to affordable housing for a broad range of District residents. That goal aligns with WMATA’s mission in that WMATA provides affordable and reliable transit to District residents and serves as a primary mode of transportation for many of the residents for whom the District seeks to provide affordable housing. Affordable housing and reliable transit must work together to provide economic opportunity for all District residents.

Across the District and its service region, WMATA collaborates with private sector developers to build housing, office, retail, and other amenities on WMATA-owned property through its Joint Development program. WMATA’s Joint Development program generates new Metro ridership and revenue and adds new transit-accessible housing, jobs, and tax revenue for the District. WMATA’s Joint Development program leads the nation in terms of projects delivered and provides WMATA with revenue that supports its core transportation mission.

Joint Development spurs increased ridership, and thus fare revenue, by increasing density around Metro stations. Joint Development also generates new state and local taxes on formerly undeveloped tax-exempt land. In Friendship Heights, a future Joint Development could facilitate increased development near transit and the colocation of mixed-use development with improved maintenance infrastructure, a triple win for the District, residents, WMATA, and riders.

Future Transit-Oriented Development of the WMATA Properties in Friendship Heights

WMATA appreciates that the Proposed Amendments (1) better align the Zoning Regulations with general TOD principles and (2) support WMATA’s Joint Development objectives. WMATA encourages OP and the Commission to continue to improve the Zoning Regulations to leverage WMATA’s transit

infrastructure to lead to future development for the mutual benefit of the District and WMATA's riders.

WMATA has been working toward improvements to its bus maintenance infrastructure in Friendship Heights for nearly twenty-five years, and those planning efforts are still ongoing as WMATA seeks to solve multiple, sometimes competing issues. Among the issues that WMATA faces in Friendship Heights include: (1) the existing buildings on both the L&T Site and the WBG Site being nominated as historic landmarks, and the impact a landmark designation would have on the future development potential, complexity, and cost for the WMATA Properties; (2) the presence of substantial, vital underground infrastructure on the WBG Site related to the Friendship Heights Metrorail station; (3) cost for the construction of any new bus garage and maintenance facility; (4) the challenges and feasibility of integrating a bus garage and maintenance facility with upper level residential (or other) uses; and (5) other regulatory considerations necessary to redevelop the WBG Site with future non-garage uses.

Conclusion

The opportunities presented by the increased height and density, use flexibility, and matter-of-right process of the Proposed Amendments can help buffer some of these challenges. In order to meet the vision of the Proposed Amendment, along with the needs of providing best-in-class transit service, we look forward to partnering with the District on creative ways to realize the community's and District's goals for Friendship Heights.

Accordingly, WMATA encourages the Commission to adopt the Proposed Amendments.

Sincerely,



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