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**WRITTEN TESTIMONY REGARDING TEXT AMENDMENT ZC 25-13**  
**SUBMITTED TO THE DC ZONING COMMISSION**  
**DECEMBER 12, 2025**

My name is Ann Mladinov. I have been designated to testify on behalf of ANC 3A. As an ANC Commissioner, I have worked on planning and zoning issues since 2014, building on my education in City and Regional Planning and my professional experience as an economist, including doing regulatory analysis and strategic planning for the U.S. Department of Transportation. The Advisory Neighborhood Commission on which I serve, ANC 3A, was formed in 2022<sup>1</sup> to serve a cluster of areas in the middle of Ward 3 along Wisconsin Avenue assembled from portions that were formerly in ANC 3B, ANC 3C, ANC 3D, ANC 3E and ANC 3F. Those areas include primarily large apartments on the Wisconsin Avenue corridor as well as Massachusetts Avenue and Cathedral Avenue, with some lower rise residential blocks, particularly on streets surrounding the arterial streets. The ANC area also includes several local commercial areas along Wisconsin Avenue as well as a number of new multi-level apartment buildings. Wisconsin Avenue is the most important commercial corridor in our ANC, and also in Ward 3 as a whole. That corridor has the only high frequency bus service available to residents and visitors to our ANC, in addition to the Metro service, and the public library, post office, Iona Senior Services, the largest DC Public School high school at Jackson-Reed, Deal Middle School, and many stores and services. Unlike Connecticut Avenue in Ward 3 which is almost solidly developed with apartment buildings, Wisconsin Avenue does not have as many large multi-family buildings, largely due to historical development and property ownership patterns, and there are still numerous blocks with low-rise residential and retail structures.

The corridor covered by the proposed text amendment is a total of about 1.6 miles long from Western Avenue to Rodman Street, of which 0.5 miles are within ANC 3A. The portion of the corridor within our ANC is on the west side of Wisconsin Avenue from Tenley Circle south to Rodman Street. It is a triangle between Wisconsin and Nebraska Avenues which includes the DC Fire Station, one-story commercial structures such as a gas station and the Tenley Market liquor store, the multi-story phone exchange building, and one 4-story building in the 4200 block of Wisconsin Avenue that is currently occupied by a restaurant, several street-level retail shops, a theatre and offices that are part of American University, and the inpatient and outpatient facilities of the Psychiatric Institute of Washington which serves the entire District. The area behind those buildings on Wisconsin Avenue is made up of 40 low-rise residences, either single family detached or semi-detached houses or row houses of up to three stories. Those blocks between Tenley Circle and Van Ness Street were part of ANC 3E until the 2022 redistricting, and residents generally identify with the blocks to their west in AU Park. Those residential blocks are zoned R-2. The adjoining commercial corridor is currently zoned MU-A south to Van Ness Street. Under the rezoning proposed in ZC 25-13, those blocks of Wisconsin would be zoned MU-8A/WA, allowing a maximum height of 75 feet and lot occupancy of 80%. The blocks within ANC 3A on both sides of Wisconsin Avenue from Van Ness Street south to Rodman Street is currently zoned MU-5A, including the properties in City Ridge and Upton Place. Those areas would also be rezoned to MU-8A/WA.

In our work, ANC 3A tries to consider the overall approach and principles of a proposal such as ZC 25-13, and also the potential effect on people and establishments, including people who live and work in our ANC area.

As one of the two ANCs affected by the proposed text amendment ZC 25-13 for rezoning upper Wisconsin Avenue, ANC 3A has tracked the DC Office of Planning proposals for Wisconsin Avenue development and hosted or co-hosted four OP presentations on its work on this project,<sup>2</sup> including two on OP's draft development guidelines and a presentation at the ANC 3A October public meeting on the proposed text amendment. The ANC invited public questions and comments, and approved a resolution on the proposal at the ANC 3A November public meeting (on file in the case record).

The ANC identified several elements of the text amendment that caused us to oppose approval of the proposed zoning language as it has been presented. We strongly recommend that those elements be reassessed and adjusted to address the major shortcomings, before the Zoning Commission proceeds with adopting a text amendment to rezone the Wisconsin Avenue corridor. Our concerns include:

- Insufficient provisions for affordable housing
- Absence of provisions for public input on design of major proposed projects
- Inadequate information and community engagement with ANCs and residents about the proposed changes

### 1. **Insufficient provisions for affordable housing**

#### a. Affordable housing proportionate to increased matter-of-right FAR

The proposal would apply IZ+ to properties along upper Wisconsin Avenue while also allowing a maximum Floor Area Ratio (FAR) several times higher than the FAR now allowed as a matter of right on the properties. In comparison, the District's current IZ+ program allows bonus density of up to 125% of the maximum FAR that is currently allowed, while the proposed language in ZC 25-13 would allow increased density of more than 200% or 300% beyond the FAR currently allowed on the property. The DC Office of Planning (OP) Setdown Report does not provide a quantitative basis for providing owners of the parcels on Wisconsin Avenue such a significant increase in the matter-of-right density without commensurate requirements for community benefits such as additional amount or type of affordable housing. [The OAG slide presentation on ZC 25-13 states "Added density triggers commensurate increase in affordable housing" but by the usual definition the proposed increases in affordable housing are not "commensurate" to the added density provided.]

#### b. Fuller Range of Affordable Housing Options

The IZ+ program that OP recommends applying to properties on Wisconsin Avenue provides for units to accommodate households with annual incomes of between 60% and 80% of Area Median Household Income (AMI). Most developers have been choosing to build units for households with 80% of AMI. And 80% of AMI currently corresponds to annual income of over \$100,000 for a family of four. An 80% income threshold would exclude the great majority of people eligible for affordable housing.<sup>3</sup> When a project is covered by requirements that a certain share of units must be affordable, many developers also choose to build affordable units that are studio or one-bedroom apartments rather than units to accommodate a family with more than one child.

Our ANC recognizes the importance of providing affordable housing in Ward 3 for individuals and households across a wider range, including larger size units as well as household incomes of 60% of AMI or 50% of AMI or below. The proposed text amendment does not include mechanisms to require new residential projects to respond to that broader range of needs for affordable housing.

It is important to recognize that there is very little publicly-owned land in Ward 3 that could potentially be used for affordable housing. If the zoning for all new residential projects does not provide for affordable housing beyond 80% of AMI, or beyond studios and one-bedroom apartments, on all the privately-owned land on the main commercial corridors, where will affordable units be built in the ward for households at 60%, 50%, or 30% of AMI or less, with enough bedrooms for families with children? The District's plans and programs have to take those factors into account.<sup>4</sup>

When housing affordable to lower income households is in such short supply, across the District and particularly in Ward 3, the proposed text amendment does not offer acceptable policy for the Wisconsin Avenue corridor, which is the major commercial street in our ANC and in the ward and has the greatest access to frequent bus and rail transit, jobs, high-quality public schools, and other essential services.

ANC 3A's November 2025 comments on ZC 25-13 recommend requiring property owners proposing residential projects along the Wisconsin Avenue corridor to provide affordable housing in proportion to the increased FAR requested for the project compared to the FAR currently allowed as a matter of right.

We suggest that this could involve one or more different options such as:

- an increased number of affordable units that would accommodate households at 80% of AMI
- a share of affordable units at 60% of AMI or lower (rather than units at 80% of AMI)
- a share of affordable units that would have 3 or 4 bedrooms, to accommodate families
- other community amenities (community meeting room, affordable day care center, etc.) to substitute for building additional affordable housing beyond the current IZ+ requirements

The calculation of how much additional housing or other amenities would be needed to achieve community benefits proportional to the proposed matter-of-right density on the Wisconsin Avenue corridor is not something it would be practical for ANCs to do; however, OP has the capacity to calculate the levels of each type of unit or other amenity that would be required to maintain the financial relationships that were the basis for the graduated scale adopted in the IZ+ program, balancing the cost of providing benefits such as affordable units against the revenues available from a particular level of bonus density/FAR. The calculation of the monthly rental payments associated with various AMI levels follows a simple mathematical equation, as do estimates of rental levels for a one-bedroom, two-bedroom, or three-bedroom unit.

We recommend that the Zoning Commission ask the OP staff to develop estimates of the level of each of the above options that could be required, based on the estimated costs/revenues, to correspond to various increases in proposed FAR compared to the FAR currently allowed as a matter of right. It seems likely that OP would have work products from the time the IZ+ program was adopted or would have the capacity to use the existing graduated scale in the IZ+ program (which currently goes up to a bonus density of 125%) to extend the formula to higher increases in FAR/density, up to the maximum proposed as matter-of-right in ZC 25-13. If that would require adjustments in the relative costs and revenues associated with taller or denser construction, OP has indicated it has some familiarity with those factors in the calculation.

If OP's proposed FAR and building height recommendations are adopted in ZC 25-13, the zoning language should incorporate the suggested adjustments to IZ+ requirements for the Wisconsin Avenue corridor.

We recognize there are fears among some stakeholders that no new residential projects would be built to meet IZ+ requirements along the Wisconsin Avenue corridor at the present level of costs and interest rates, or if IZ+ requirements were extended to match the proposed increases in matter-of-right density in ZC 25-13. The commercial real estate market is facing many challenges and it is not clear if this is a temporary trough or an indication of long-term challenges that may continue. It is not the ANC's objective to stifle development, but to stimulate development and also meet needs for affordable housing.

The Zoning Commission should take into account any OP data or analysis that show the adjustments to IZ+ requirements suggested above would make it difficult or impossible for developers to pursue residential projects on the Wisconsin Avenue corridor under the IZ+ program in current or expected market conditions.

Some comments on ZC 25-13 have expressed concern that market conditions in District real estate would not allow the requirements in the current IZ+ program to work effectively. If OP determines that would be the case in the time period when ZC 25-13 would be implemented, the Zoning Commission may also need to consider reassessing the current IZ+ requirements and making adjustments needed to suit the anticipated conditions, either for the District as a whole or for specific areas where there are particular difficulties in implementing the IZ+ requirements.<sup>5</sup> [Some of the testimony in this proceeding suggests updating the IZ+ equations annually, to adjust to changes in market conditions, though it is not clear if that would achieve the "clarity and consistency" that planners and developers have emphasized is important in regulations affecting commercial real estate.]

OP's Final Report on ZC 25-13 submitted to the Zoning Commission on December 1 noted that other options will be necessary to meet all the needs for affordable housing in the area, especially to accommodate households at lower levels of AMI.

The initial Wisconsin Avenue Development Framework mentions at p. 12 "Deeper affordability below 50% MFI can be supported through financial programs administered at the local and federal levels." Though the types of programs are not indicated, other sources such as the Urban Institute and the Urban Land Institute have highlighted tax incentives, housing vouchers, and government investment in or purchase of some affordable units to "buy down" the rental payments for lower income tenants. Experience in the District and elsewhere suggests that creating a development specifically for households needing deeply affordable housing can be effective in adding a large number of units, rather than relying on mixed income projects where affordable housing is cross-subsidized by market rate units. Projects of that type would presumably require different types of programs than are covered by zoning regulations proposed in ZC 25-13.

The 90 apartments at "The Louise" just opened next to the Lisner Home on Western Avenue at Friendship Heights provide attractive independent units available to residents 62 years old or over with income at the 50% AMI level. It is convenient to transit, shops, and medical offices, and provides a range of on-site amenities for residents, with Enterprise Green Communities Plus certification. Every ward would be fortunate to have a similar project, which took years of planning to achieve. It was built in an open area of a property already devoted to affordable housing for seniors, so that model is not always possible, but it is a positive example of creative planning, financing, and development.

Several other recent projects have been constructed through partnerships between builders, financial institutions, and investors beyond the conventional range, including health providers or hospitals recognizing the higher cost to institutions and the community in general for serving people who are unhoused or inadequately housed. It would seem wise for OP to ensure that these alternatives are possible under the proposed zoning changes and creative partnerships can pursue projects on the Wisconsin Avenue corridor that go beyond the usual IZ+ framework, without having to go through excessive regulatory proceedings that projects applying IZ+ do not face. Innovative programs such as subsidies, tax incentives, targeted public investments, and other special programs to support deeply affordable housing need to be in place as new zoning changes such as proposed in ZC 25-13 are being implemented, so the programs are effectively working together to meet affordable housing goals.

As the District and OP have recognized in previous reports related to potential residential construction, there is very little publicly-owned land in Ward 3 that could potentially be used for constructing affordable housing. That means that any planning for Wisconsin Avenue needs to include provisions to encourage and facilitate that development on private properties. If the proposed text amendment will apply to every private property on this major corridor, effective provisions need to be made for building affordable housing as the zoning changes are adopted. Changing zoning later in a way that would remove significant rights for private development would raise financial and legal challenges, so it is important to take anticipated needs into consideration now. We don't want to recommend a course that the District is very likely to want to take back in coming years, when there may be even fewer opportunities to build affordable housing and less latitude to adjust regulatory requirements. Instead of making sweeping changes in zoning before there are programs to assist in meeting affordable housing goals, we need to coordinate the planning efforts and take actions that move the District toward the desired objectives without needing to reverse course in coming years, with the attendant legal, social and economic blocks to removing rights and benefits that property holders have already received under zoning.

## **2. Absence of provisions for ANC or community input on design**

OP's Wisconsin Avenue Development Framework emphasized that development on Wisconsin Avenue should be vibrant, attractive, community-friendly, and sensitive to the scale and character of surrounding residential streets and blocks. The guidelines proposed to address those goals with local design review for key projects<sup>6</sup>

ANC 3A supported those proposals and included strong recommendations for effective design review in our comments on the draft Wisconsin Avenue Development Framework.<sup>7</sup> In OP presentations prior to setdown of ZC 25-13, ANCs and other stakeholders were assured that design review would be part of proposed development guidelines and regulations. Up to the month before the ANC November meetings, some constituents and ANC Commissioners in affected areas were still expecting that OP's proposal would provide some form of design review. But the final OP presentations made clear that the proposed text amendment had removed all provisions for design review. OP staff explained that they had not been able to include design review in the proposed rezoning, but they had added a series of design elements to the language that are measurable and observable such as rear stepdowns, number of public entrances, share of the front facade that is along the property line, and amount of window area.

OP's recommended approach would mean that if ZC 25-13 is approved as presented, development projects would be a matter of right up to the maximum possible height and density without any provision for public design review, through a zoning case or a Planned Unit Development (PUD). In recent years PUDs have been an effective and constructive way that ANCs and communities have been able to negotiate with property owners not only on issues of character and design but also on affordable housing and other important public amenities that would be part of a new development project, in exchange for additional density. As OP has acknowledged, there would be little incentive for a PUD in the Wisconsin Avenue corridor if ZC 25-13 is adopted, if the density proposed to be allowed as a matter of right would give developers the maximum that they could try to seek in that corridor, with no zoning hearing or negotiate over community amenities.

Some stakeholders maintain that negotiations over a PUD create a source of delay in pursuing development. That could be a reason for not providing for PUDs in the Wisconsin Avenue corridor. But PUDs have worked for developers and communities to achieve effective projects. As an ANC, we would like to be able to work with developers on a PUD when a large project is contemplated, especially if the project would have FARs several times greater than the density that would currently be allowed on the property (or, as ANC 3A suggested in its November 2023 comments to OP, if multiple parcels are being assembled or it is a very large and complex multi-use project involving major potential public features).

If no provisions for requiring design review by ANCs or the public are adopted as part of ZC 25-13 of proposed projects significantly beyond what is possible under current zoning on Wisconsin Avenue, the ANC would ask that property owners and developers voluntarily attend an ANC public meeting to describe their project and take questions and comments on design and other elements of the proposal. We have found that comments from ANC Commissioners and constituents can be helpful, whether they relate to design or other questions about what the project will involve.

### **3. Inadequate Communication and Community Engagement**

ANC 3A was also disappointed and troubled by the shortcomings in information sharing and community outreach by OP staff on the proposed text amendment ZC 25-13. ANC Commissioners did not get full, clear and timely information on the proposal to allow them to take in all the details and share them. To the best of my knowledge, notices of proposed zoning changes were not sent to property owners on or adjoining the Wisconsin Avenue corridor. (ANC 3A also was not sent the notice as an affected ANC, but we received the emails that went to all ANC Commissioners.) Most residents and other local stakeholders were not aware of what OP or the Zoning Commissioner were proposing, and did not have conveniently available ways to see what the proposed zoning changes would mean, ask questions, and discuss concerns. Though the process is now well along and it may be too late to go back and adjust the approach, the lessons could be important for future cases.

For several of the text amendments proposed earlier in 2025, OP held information sessions for ANC Commissioners (not members of the public). Those sessions allowed for questions and comments which have

been useful in providing more information to share with our community, as the ANC is committed to doing, and addressing concerns about the proposals, including ZC 25-11 Rear Additions and ZC 25-12 Omnibus.<sup>8</sup> But for ZC 25-13 -- which was considered to have only two affected ANCs (ANC 3A and ANC 3E) -- OP did not hold any information sessions for ANC Commissioners or any community forums to explain and illustrate what it was proposing for rezoning the Wisconsin Avenue corridor.

We have been told that OP has decided to rely on local ANCs for communicating with the public about plans and proposals of this kind. We believe ANCs have an important role to play but it is not sufficient to depend solely on ANCs for sharing information with the public. Many residents and other stakeholders do not look to ANCs for communicating District programs and proposals, and do not have close connections with ANCs. As a new ANC, ANC 3A does not have a long-standing network in the community, or even a civic association that serves the largest share of the ANC 3A area, so there are limited avenues for communicating quickly and effectively with constituents. All the local newspapers that once reported on issues like zoning and development along upper Wisconsin Avenue are no longer in operation, and even some of the early web news sites have closed. That makes it even more imperative that OP extend its outreach efforts to share information on proposals affecting our area.

Although ANC 3A was created in the 2022 redistricting and as a body does not have long experience with planning and zoning the ANC has paid close attention to plans for the Wisconsin Avenue corridor and OP's proposals related to development guidelines. OP did not contact ANC 3A about making a presentation on the proposed text amendment between July 2024 and September 2025, but ANC 3A was tracking OP actions and the setdown hearing for ZC 25-13. We wanted to be sure to have a public presentation and discussion about the proposal before the Zoning Commission hearing. That is why I invited OP to make a presentation at the regular ANC 3A public meeting in October 2025 on the rezoning proposed in ZC 25-13, and I also attended the similar presentation and discussion of the proposed text amendment at the ANC 3E regular public meeting in November 2025.

The presentations to each ANC were relatively brief, about 20 minutes long, followed by questions and answers. The graphics showing what new development would be allowed appeared to reflect what OP had presented in preliminary presentations, but did not provide clear updates about what OP's recent changes in proposed zoning language would mean to the appearance of projects, with illustrations. The presentation also did not provide specific graphics block by block showing the existing blocks south of Tenley Circle, within our ANC 3A, viewed from the corridor and also from the adjoining residential blocks, compared to the appearance today. As the ANC Commissioners noted at our meeting, the OP presentations did not answer some of the essential questions that the public would want to get answers to, in narrative or graphic form, such as what the proposed buildings would look like if they followed the maximum height and density recommended by OP. That type of information would be of greatest importance to our constituents but was not available or presented and we would like to see OP develop and share additional illustrations of that kind before a final decision in this proceeding.

The OP presentation about the proposed text amendment ZC 25-13 was included on the preliminary meeting agenda shared 7 days in advance of the ANC 3A October public meeting, with a brief description of the proposal, but we had only a handful of constituents participating in the discussion at that meeting. The OP presentation and discussion at the ANC 3E November meeting also seemed to draw a relatively small number of residents, though they had longer discussions at their October and December meetings. Most of the participants in the ANC meetings to hear the OP presentations and offer comments appeared to know about the issue because of their organizational affiliations. Some of them noted that OP had not met with local schools or other institutions, neighborhood associations, or groups advocating for housing. That indicated a large share of affected constituents were not participating in the ANC meetings and presentations and did not know about the proposed zoning changes.

Development on Wisconsin Avenue represents such significant changes and potential impacts for so many people and the entire region reaching several decades into the future, it deserves and demands a higher level of attention, illustration and explanation. The ANC appreciated the Zoning Commission's request to OP to conduct further outreach on ZC 25-08 on rear additions, when it was clear at setdown that so few people had participated in presentations or commented on the new proposal, in comparison to several hundred people who actively participated when the initial text amendment was adopted to regulate the size of rear additions on row houses and semi-detached houses in the District.

ANC 3A strongly recommended in its resolution that OP undertake additional outreach to local stakeholders and provide further information to residents and businesses and institutions about what OP has proposed for the Wisconsin Avenue corridor, even if it comes after the first vote.<sup>9</sup>

If the Zoning Commission decides to take a first vote on the proposed text amendment after this initial hearing on ZC 25-13, ANC 3A's resolution also urged the Zoning Commission to allow more than the minimum 30 days before a second vote, to provide enough time for community presentations, public discussions and comments. That is especially important when the proceedings are held at this time of year, when so many people are taking time off and do not have the usual opportunities for attending meetings, reading emails, or preparing comments.

We recognize the pressure to take action and not delay having regulations in place, so property owners will have clear guidelines about what will be allowed on their holdings on Wisconsin Avenue. At this time, however, the commercial real estate market is at a low point. Several residential developments on Wisconsin Avenue that opened in the past 5 years are not yet been fully subscribed, and others are just being completed and looking for residents to occupy those units. At the same time, some developers are pulling back their construction plans because estimated District population growth would not support the market demand their projects would need. A short delay in adopting a text amendment for Wisconsin Avenue would not seem likely to substantially disrupt real estate development over anything but potentially the very short term.

Experience has shown how difficult it can be to change the rules once a new regulatory framework has been adopted. Taking away what has been a matter of right affects the market value of property and the opportunities available to developers, many of whom would already have made an investment based on a different expectation of their options. When there are questions about whether the proposed zoning changes would work to meet objects on the Wisconsin Avenue corridor for affordable housing, it would seem wisest not to give every benefit you could possibly consider for increased matter-of-right development because financial and legal obstacles would make it much harder in future years to reduce allowed densities or increase requirements for affordable housing on the properties (unconstitutional "taking").

#### SUMMARY OF ANC 3A RECOMMENDATIONS FROM RESOLUTION APPROVED NOVEMBER 18, 2025

##### Additional Requirements for Affordable Housing

→ ZC 25-13 should require property owners proposing projects along the Wisconsin Avenue corridor to provide affordable housing in proportion to the increased FAR requested for the project compared to the FAR currently allowed as a matter of right, beyond what is currently required under the District's IZ+ program. We suggest this could involve a number of different options or a combination of options, such as:

- an increased number of units that would accommodate households with 80% of AMI
- a share of affordable units at 60% of AMI or lower (rather than units at 80% of AMI)
- a share of affordable units that would have 3 or 4 bedrooms, to accommodate families
- other community amenities (community meeting room, affordable day care center, etc.) to substitute for building additional affordable housing beyond the basic IZ+ requirements

→ The Zoning Commission should ask the OP staff to develop a table showing the level of each of the above options that could be required, based on the estimated costs/revenues, to correspond to various increases in proposed FAR compared to the FAR currently allowed as a matter of right. (OP could use the existing graduated scale in the IZ+ program that currently goes up to a bonus density of 125%, and extend it to higher increases in FAR/density, up to the maximum proposed as matter-of-right in ZC 25-13).

→ If OP's proposed FAR and building height recommendations are adopted in ZC 25-13, the zoning language should incorporate the suggested adjustments to IZ+ requirements for the Wisconsin Avenue corridor (and if OP presents data and analysis showing that the adjustments suggested above would make it difficult or impossible for developers to pursue residential projects on the Wisconsin Avenue corridor under the IZ+ program, with current market conditions, that should also be taken into account).

→ If market conditions do not allow the current IZ+ program to work effectively, the Zoning Commission should evaluate the current schedule and make adjustments needed to the IZ+ program to suit conditions anticipated for coming years, either for the District as a whole or for specific areas where there are particular difficulties in implementing the IZ+ requirements.

→ Any exemptions to inclusionary zoning requirements applicable to proposed residential projects along the Wisconsin Avenue corridor should have to be requested for the individual project, and should not be part of this text amendment.

#### Options for Design Review

→ The ANC would like to be able to work with developers on a PUD when a large project is contemplated, especially if the project would have FARs more than twice the density that would currently be allowed on the property (or as suggested in our November 2023 comments to OP, if multiple parcels are being assembled or it is a very large and complex multi-use project involving major potential public features.)

→ If no provisions for requiring design review by ANCs or the public are adopted as part of ZC 25-13 for proposed projects significantly beyond what is possible under current zoning on Wisconsin Avenue, the ANC would ask that property owners and developers voluntarily attend an ANC public meeting to describe their project and take questions and comments on design and other elements of the proposal.

#### Additional Communication and Community Engagement

→ The Zoning Commission should ask OP to undertake additional outreach to local stakeholders and provide further information to residents and businesses and institutions about what OP is recommending in ZC 25-13 for changes in zoning regulations covering the Wisconsin Avenue corridor.

→ If the Zoning Commission decides to take a first vote on the text amendment after the initial hearing on ZC 25-13, the schedule should allow more than just 30 days before a second vote, to provide enough time for community presentations, public discussions and comments.

## FOOTNOTES

<sup>1</sup> Our ANC 3A was launched in January 2023. When ANCs were established in 1979, the map included an ANC 3A serving Georgetown and surrounding areas. After the Council voted to change ward boundaries to include Georgetown in Ward 2 in 1981, the original ANC 3A went out of existence. In the 2022 redistricting, a new ANC was formed in the middle of Ward 3, which was given the designation “ANC 3A.”

<sup>2</sup> The presentations that ANC 3A sponsored or co-sponsored about OP proposals for Wisconsin Avenue development were:

- a “virtual” forum with OP jointly sponsored by ANC 3A and ANC 3E on November 2, 2023, to share information with the community about OP’s draft Wisconsin Avenue Development Guidelines issued in October 2023;
- a presentation at the ANC 3A regular public meeting on July 16, 2024, about the Wisconsin Avenue Development Framework that OP issued in February 2024. (At that time, OP staff said they were anticipating setdown in fall 2024 of a proposed text amendment to change zoning on that section of Wisconsin Avenue.)
- a presentation at the ANC 3A regular public meeting on February 19, 2025, with an update on its plans for taking a proposal to the Zoning Commission for setdown as a text amendment implementing the Wisconsin Avenue Development Framework.
- a presentation at the ANC 3A regular public meeting on October 21, 2025, about OP’s proposed text amendment, scheduled for a Zoning Commission hearing on December 11.

The proposed text amendment was approved for setdown on July 31, 2025, which was after the ANC 3A July meeting and just before the regular annual recess through the ANC 3A meeting on September 15. The ANC anticipated that OP would contact the ANCs to schedule a presentation on the proposed text amendment, but OP was not in touch in August or September. When ANC 3E announced that OP had scheduled to make a presentation on ZC 25-13 at the ANC 3E public meeting in October, I contacted OP to ask for a similar presentation at the October public meeting of ANC 3A. The presentation to ANC 3E that was originally scheduled for October was postponed to its November public meeting, while ANC 3A went ahead with its scheduled presentation by OP on October 21.

<sup>3</sup> The median income of black households in the District in 2024 was estimated to be 54% of AMI (less than 60% of AMI, and only slightly above “very low income,” which is often defined as 50% of AMI or lower).

<sup>4</sup> OP’s Final Report on ZC 25-12, submitted to the Zoning Commission on December 1, set out several ways that Ward 3 could meet goals for more deeply affordable housing, mentioning subsidies or other incentives as well as special projects and programs. But the proposed zoning changes do not include provisions for pursuing those types of solutions along the Wisconsin Avenue corridor, and there is no formal plan identifying where deeply affordable projects could and should be developed. [[There has not been a Small Area Plan (SAP) for upper Wisconsin Avenue in recent years. Some other areas have SAPs, but OP’s map of nearby planning efforts shows only the Wisconsin Avenue Development Framework for upper Wisconsin, not an actual area plan. At the time amendments were being considered for the DC Comprehensive Plan in 2020-2021, ANC 3E voted to support proposed changes in future land use on Wisconsin Avenue if OP developed a SAP for the area.]]

<sup>5</sup> In discussions of the proposed text amendment, OP staff expressed the sense that developers would not be able to afford to build any more than the currently required 12% to 18% or 20% of total units in the project as affordable housing, as called for in the IZ+ program. The indication was that no one would build a project if IZ+ applied and the project had to provide units for households making less than 80% of AMI. When the Zoning Commission adopted the IZ+ program in 2021, it appears that the determination was the program would be workable in the District if the affordable housing made up between 12% and 18% or 20% of the total residential units, at 80% AMI or potentially 60% or 50% of AMI, would be affordable if the project could be up to 125% of the FAR allowed under current zoning. A bonus density of 125% considerably below the maximum increase in density that would become matter of right if the proposed language in ZC 25-13 were adopted. If a

developer could build a project with up to 250% of the FAR currently allowed under the applicable zoning, that amount of additional square footage should make it possible to afford adding more than the current maximum of 18% to as much 20% of units at 80% of AMI, as is currently required under IZ+, or possibly building some units at 60% of AMI or less and/or adding larger units for families or including other community amenities, and still be able cover costs with a reasonable profit. If market conditions would not allow the current IZ+ program to work effectively, the Zoning Commission should evaluate the current schedule and make adjustments needed to the IZ+ program, either for the District as a whole or for specific areas. That reevaluation could also include assessing what proportion of affordable housing at particular AMI levels would be practical if the maximum allowed density were 2 or 3 times as much as the FAR allowed under current zoning.

<sup>6</sup> The Wisconsin Avenue Development Framework issued by the DC Office of Planning in February 2024 at [https://planning.dc.gov/sites/default/files/dc/sites/op/page\\_content/attachments/Wisconsin%20Ave%20Development%20Framework\\_web.pdf](https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Wisconsin%20Ave%20Development%20Framework_web.pdf) states on p. 42: “To achieve the urban design vision of this Development Framework, OP will work with property owners and developers whenever possible. It is recommended that Design Review, as currently described in the zoning regulations, be applied to the high-density mixed-use areas covered by the proposed Friendship Heights Metro Zone and Tenleytown Metro Zone. The purpose of Design Review is to promote high-quality, contextual design, by allowing for review against specified criteria as identified in this Development Framework. The process entails a public hearing with review and approval by the Zoning Commission. The proposed Mixed-Use Corridor Zone and Friendship Heights Transition Zone could be developed as a matter of right. A PUD would also be an available option in all four zones.”

<sup>7</sup> ANC 3A’s November 14, 2023, comments submitted to OP on OP’s Draft Wisconsin Avenue Development Guidelines recommended:

- zoning and design criteria that incorporate features proposed in the Draft Development Guidelines such as massing, step downs to provide a transition to adjoining low-rise residential areas, and open spaces;
- incorporation of streetscaping, shared streets and plazas and other amenities in the guidelines as part of Public Space Committee permitting process;
- encouragement for property owners, ANCs and community members to participate in effective Design Review processes for projects where the proposed density would be significantly higher than currently allowed, including mandatory Design Review for the areas around Metro station as OP proposes;
- avenues for the public and ANCs to submit comments on proposed projects as part of such a review;
- clear mechanisms for having the results of a Design Review incorporated in the plans for a proposed project, which would be enforceable under zoning orders and run with the land; and
- a means for encouraging property owners to go through a PUD process when they are assembling multiple parcels or otherwise participate in a planning process with the community for very large and complex multi-use projects involving major potential public features.

<sup>8</sup> OP has proposed numerous text amendments during 2025 that affect the ANC 3A area, and has held information sessions for ANC Commissioners on those other text amendments. That has been helpful in providing information and opportunities for questions and comments, and in some cases discussion with the ANC Commissioners about potential improvements in the language of the text amendments. In some cases, OP staff has made significant adjustments as a result of the points made by ANC Commissioners in those sessions, notably in ZC 25-11 for rear additions.

<sup>9</sup> Several ANCs in Ward 3 including ANC 3A have contracted for use of community engagement software that can be very helpful in presenting information and graphics and gathering public comments and questions. We would be happy to assist with further efforts to communicate with the community about the proposed changes on the Wisconsin Avenue corridor.