



May 11, 2026

District of Columbia Zoning Commission
441 4th St NW #200
Washington, DC 20001

Supplemental Testimony – Case 25-13

Members of the Zoning Commission:

Please accept this written supplemental testimony for Case 25-13 on behalf of Somerset Development Company, a DC-based affordable housing developer located at 5101 Wisconsin Ave NW in Friendship Heights.

Somerset testified at the public hearing for this case in December in support of the proposed text and map amendments. We are still supportive of the amendments and appreciate the time that the Office of Planning and Zoning Commission have taken to respond to public input in order to adjust the proposal and move it toward approval.

However, we have three major concerns regarding the proposed design review process that has now been added as a feature of the new zoning.

First, this design review process will impose significant barriers specifically for affordable housing projects. Affordable housing projects suffer unique timing constraints, due to the complex layers of financing that must be assembled in order to cover project costs. This timing is a unique disadvantage in areas with high land costs such as Ward 3, because closing timelines for property acquisitions are shorter and interim acquisition financing is therefore required. DC does not have adequate public financing tools to address that interim acquisition period. This is one significant and underappreciated reason why so little affordable housing has been built in Ward 3, even in recent years.

By creating a new extended discretionary review process, this proposal will therefore render it nearly impossible for any affordable housing project to move forward along the Wisconsin Ave corridor. We understand this is not the intent, but it is the effect. This would be a bitterly ironic outcome, given the strong emphasis and prioritization of affordable housing in both public comments and from members of the Zoning Commission regarding this case.

To address this challenge, we recommend that the Office of Planning propose, and the Zoning Commission approve, a specific exemption from design review for projects with at least 33% of units dedicated as affordable housing. This exemption matches the existing exemption in Policy 2503.3 of the Comprehensive Plan Implementation Element, which created the "Future Planning Analysis Area"

in the Generalized Policy Map that was the precursor to the Wisconsin Avenue Development Framework. The DC Council specifically created this exemption in Policy 2503.3 recognizing the need for affordable housing along this corridor, and the timing and financing constraints that such projects face. It therefore is extremely logical that this same exemption be carried through to the underlying zoning as well.

Another option would be to provide a minimum lot size to trigger design review. The primary design elements highlighted in the Wisconsin Avenue Development Framework, such as pedestrian corridors and public spaces, are far more suited to large lots. Even the examples cited in the Wisconsin Avenue Development Framework, such as the DC Wharf, CityCenter DC, and Bethesda Row, are all large lot projects. It does not make sense to impose such requirements on small parcels that cannot accommodate such uses anyway. We would recommend limiting design review to lots greater than 15,000 square feet.

Second, we would also like to emphasize that design review should not become an open-ended discretionary process where opponents of more housing can simply delay projects until they die. Design review should not be an opportunity to relitigate the underlying zoning of the site, and debates about height, mass, parking requirements, and other features of the zoning code should not be considered up for discussion during such proceedings once the zoning itself has already been approved. Design review must be predictable and straightforward, based on a set of easily defined parameters that architects can easily design for. If we want more housing in Friendship Heights and Tenleytown, we need to make a straightforward, quick, transparent, and predictable process for builders to navigate.

Third, we think it is worth reminding the Zoning Commission that the Wisconsin Avenue corridor faces very different market conditions, lot configurations, and regulatory requirements than Downtown Bethesda did during the height of the low interest era of the 2010's. What worked well in one jurisdiction will not necessarily be replicable in this case, particularly given the major economic headwinds DC is now facing for the foreseeable future. Building a process that works for this corridor will require realistic expectations about the constraints facing development projects and how best to overcome those constraints while also achieving the best desirable public outcome.

We thank you for considering this testimony and are happy to make ourselves available to answer any questions you may have.

Sincerely,



Patrick McAnaney
Development Director, DC
Somerset Development Company