

May 14, 2026

VIA IZIS

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

Re: Z.C. Case No. 25-13: Comments Regarding Design Review

Dear Chairman Hood and Members of the Commission:

On behalf of Goulston & Storrs, we offer the following comments and recommendations regarding the issue of design review.

We agree with OP that the proposed zoning is already reflective of and has incorporated setbacks, step-backs, open space, ground-level design, and other specific design requirements that will implement the recommendations of the Wisconsin Avenue Development Framework. Design review, then, is an unnecessary additional hurdle to the implementation of the policies and goals of the Framework and the Comprehensive Plan. The process adds meaningful time, substantial financial cost, and significant risk that will deter development along the corridor.

We are also significantly concerned by the breadth of the design review requirement as proposed, which would apply to all new development and building additions along the entire 1.5-mile corridor, even on small parcels, for minor infill development, or to limited renovation with incidental additions to modernize existing structures. Design review is also an unnecessary requirement for parcels that are improved with historic resources and already subject to review under the District's historic preservation laws.

Should the Commission ultimately decide to require design review, we recommend it be limited to (a) only the FHM and TTM areas and (b) within those areas, only larger projects that fully utilize the additional height and density associated with the proposed amendments.

- This approach mirrors design review applicability in other zones, which is limited to development that achieves upper height limits and is located in certain special areas.
- This approach is also consistent with the Framework, which only recommended design review for the Friendship Heights and Tenleytown areas and otherwise expressly recommended that development along the balance of the corridor be allowed as a matter of right.

Projects subject to HPRB review should also be exempted from design review.

Finally, we propose that any Wisconsin Avenue design review be focused on the specific criteria for the FHM and TTM areas. The general design criteria in Subtitle X are duplicative of the zone-specific criteria and are thus unnecessary.

Proposed modifications to the text based on the above recommendations are included below.

MU-10/FHM Zone

Add a new Section 808.1 as follows:

808.1 Within the MU-10/FHM Zone, and except for a lot that is located within a historic district or containing a historic landmark, the following developments shall be subject to design review and approval by the Zoning Commission in accordance with the standards specified in Subtitle G § 808.2:

- (a) New building or enlargement of an existing building by 50% or more on a lot that has 15,000 square feet or more of land area; and
- (b) New building or enlargement of an existing building by 50% or more that exceeds a height of 90 feet, or 100 feet for development subject to the inclusionary zoning requirements of Subtitle C, Chapter 10.

Renumber Section 808.1 to 808.2 and revise as follows:

808.2 In addition to **compliance with** the provisions of Subtitle ~~KG~~ § 806 and 807 **and the special exception standards in Subtitle X, Chapter 9 and Subtitle X Chapter 6, an applicant for design review approval** in the MU-10/FHM Zone shall **prove that the proposed building or structure, including the siting, architectural design, site plan, landscaping, sidewalk treatment, and operation, will:**

[delete existing (a) and renumber (1) through (9) as (a) through (i)]

MU-10/TTM Zone

Add a new Section 908.1 as follows:

908.1 Within the MU-10/TTM Zone, and except for a lot that is located within a historic district or containing a historic landmark, the following developments shall be subject to design review and approval by the Zoning Commission in accordance with the standards specified in Subtitle G § 908.2:

- (a) New building or enlargement of an existing building by 50% or more on a lot that has 15,000 square feet or more of land area; and
- (b) New building or enlargement of an existing building by 50% or more that exceeds a height of 90 feet.

Renumber Section 908.1 to Section 908.2 and revise as follows:

In addition to **compliance with** the provisions of Subtitle ~~KG~~ § 906 and 907 **and the special exception standards in Subtitle X, Chapter 9 and Subtitle X Chapter 6, an applicant for design review approval** in the MU-10/TTM Zone shall **prove that the proposed building or structure, including the siting, architectural design, site plan, landscaping, sidewalk treatment, and operation, will:**

[delete existing (a) and renumber (1) through (9) as (a) through (i)]

MU-8A/WA Zone

Delete Section 1008 in its entirety.

Conclusion

Thank you for your careful consideration of these recommendations, which we think will strike a reasonable balance and avoid overburdening all stakeholders with unnecessary and extensive procedural obstacles that will stifle development of housing and affordable housing and investment in other neighborhood-serving uses along the Wisconsin Avenue corridor.

Sincerely,

_____/s/_____
David Avitabile

_____/s/_____
Shane Dettman, Urban Planner