

Comments from DC YIMBYs

Re: ZC 25-13

Who We are

These comments are being submitted by the DC YIMBYs. We are an organization with members across the city who want to make it easier to build all types of housing at all income levels to address our affordability crisis. This submission is in response to the Zoning Commission's (ZC) request for comments on the April 20, 2026 report from the Office of Planning (OP) and the ensuing discussion of ZC 25-13 at the April 30, 2026 meeting.

Our Argument

We are concerned about the preliminary decision by the ZC to require every future development project in virtually all proposed zones to obtain approval through a design review process by the ZC. It is our belief that this discretionary and subjective process will strongly discourage new housing developments for units of all kinds, market-rate, affordable, workforce, etc. The guidelines for design review are vague and general which invites appeals by opponents of housing. At this point in time, a design review process will delay and even deny housing to the many residents struggling to afford this city.

A Design Review Process Invites Costly Appeals

Fundamentally, we believe that a required design review process will make every new housing project a contested case and lead to more delays at a time when we must act urgently to substantially address our housing crisis. These types of appeals are going to make it even more costly to start, continue, and finish the necessary housing developments. As OP acknowledges in its own Supplemental Report dated April 20, 2026, "the reality is that there are also persons with intentions to delay projects through the appeal process." The fact of the matter is that the ZC should not appease misguided attempts to delay housing.

In fact, the ZC does not need to look far for concrete examples of how design review has substantially delayed housing projects. Just a few miles away, the Lady Bird project was delayed by **over 4 years** and even caused the first developer to completely abandon the project. The consequences of design review even cost this specific project a grocery store on the site, thus directly impacting the residents who will live there for the worse. Elsewhere on Wisconsin Avenue, the Cathedral Commons redevelopment was bogged down in various appeals for a whopping **15 years**. As a third example, the Mazza Galleria site in Friendship Heights settled for significantly less density that would have been permitted under the 2021 Future Land Use Map (FLUM) due to fears that a discretionary process would have exposed the project to appeal delays leading to financing concerns. This resulted in a notable decrease in the number of residential units on the site which is a shame given its extremely close proximity to the

Friendship Heights Metro station. We should be encouraging housing development of all kinds and at the maximum amount of density, especially when it is near public transit.

In fact, the Friendship Heights neighborhood currently has **three different projects stalled** and all of them are within close proximity to the Metro station. This is despite the fact that all of them have obtained the necessary zoning approvals. The main reason for this delay is the difficult development climate and the challenges of obtaining the necessary investment. This is yet another reason to reject a design review process or else developers will be saddled with **even more costs** at a time when they are already struggling with serious financial headwinds. Housing delayed is housing denied and we can ill afford to make financial conditions even worse than they already are.

To this end, we agree with the comments already submitted by Somerset Development which articulate why adding a mandatory review process for all affordable housing projects within the area would severely disadvantage these projects. Essentially, it will limit their ability to obtain housing subsidies from the DC government which are necessary in our current financial conditions as well as the fact that all entitlements must be in hand according to rules propagated by the Department of Housing and Community Development. Since design review must be completed before a provider can formally apply for subsidies and the application and design review process can cumulatively take months to complete, the design review process will seriously cripple the ability of providers to comply with the Notice of Funds Availability process. Therefore, the ZC should consider a revision that exempts projects which are 100% permanently affordable from the design review requirement completely.

Possible Remedies

We believe that the ZC must work tirelessly to encourage more housing in the District, especially along the Wisconsin Avenue corridor in Ward 3. As the ZC already knows, the entire Upper Northwest region objectively lagged behind housing production goals set by Mayor Bowser and its history is rife with exclusionary zoning. Therefore, the process for approving new housing projects must be safeguarded against manipulation leading to frequent delays. These are our recommendations:

1. Amend the Zoning Regulations to remove design review from the list of contested cases. Rather, we believe that Design Review should be provided for by the Zoning Administrator during permit review upon approval by the ZC of detailed design guidelines.
2. Approve the amended Tenleytown, Friendship Heights and Wisconsin Avenue proposed zones without requiring design review at this time.
3. Request that OP submit specific and clear design guidelines for these three zones.

Conclusion

Our organization hopes that the ZC will seriously consider the arguments laid out in our letter. We thank the ZC for its attention to this matter and we encourage the ZC to reject a design review process.

Sincerely,
DC YIMBYs