

Case No. 25-13, Wisconsin Avenue Upzone

Tenleytown Neighbors Association

**Statement of Chris Schumann, Vice President, for Inclusion in the Record May 14, 2026**

**RE:** Case 25-13 - OP's Supplemental Report II Regarding Proposed Zoning Text and Map Amendments to Create and Map a New Wisconsin Avenue Mixed Use Corridor

## **I. PUBLIC PARTICIPATION**

We are a great country slipping steadily into undemocratic norms and procedures. Public input should be encouraged, not discouraged. Community input by those impacted by proposed development projects should be cherished, not barred. Differing viewpoints should not be viewed as an inconvenience. They frequently make the final product better. The Administrative Procedure Act recognizes certain principles, including the right to appeal. These principles should be honored in all circumstances.

Development proposals should follow the regular contested case process that fully allows public participation. Design Review alone as part of a rulemaking process is far too narrow in scope.

As a general comment, Tenleytown Neighbors Association is concerned that the Office of Planning (OP), and by acquiescence the Zoning Commission, is increasingly seeking to curtail the public's right to participate in zoning processes. OP recommends rulemaking rather than contested case proceedings at the Zoning Commission for corridor rezonings that involve hundreds of lots.

**The rulemaking process denies the public the right to cross-examine witnesses, to present a case in chief without 3- or 5-minute time limits, and to respond to testimony in real time. By choosing to rezone corridors through rulemakings, OP is purposely curbing the opportunity for public input. And there are no actual development proposals on the table.**

Chairman Hood believes that public input occurs at the front end of a rezoning.

Chairman Anthony Hood in ZC 25-13 on April 30, 2026, said

*Chair Hood: I have a question for the Office of Planning. One of the things that I saw in the record... in .... the Chevy Chase case... that there were concerns across the city that their neighborhood is going to be like this... but the OP (was) working with the community for some time. Not just taking to the community and told this is what we are going to do.. You all worked with the community and the community helped create what we have before us. Is that a correct statement?*

*OP Brown – Roberts: That is a correct statement.*

*Chair Hood: And the reason that I'm saying that is I saw another ward where they were very concerned that this is going to infiltrate, this is going to be pushed into their neighborhood. No. The OP works with the neighbors, they will work with the community to develop if that is what the plan is. ...*

By its own admission, OP did not notify the owners of the 116 lots that were subject to zoning changes, and thus sought to officially waive the notification requirements.

From Case NO.25-13 - EX.2 - OP Setdown Report – Wisconsin Avenue Zoning Text and Map Amendment July 21, 2025, pp. 1 - 2.

*OP requests that the Zoning Commission waive the requirements of Subtitle Z § 502.1 (e) to post notices on properties regarding the proposal. The waiver is requested as the applicant in this case is OP and few of the properties to be rezoned are owned by the government and OP cannot post signs on private property. Similarly, OP is not permitted to post signs on electrical or light standards. OP has taken steps to notify the public through many meetings with the ANCs and other community organizations.*

So, the 116 owners were not notified or consulted. We know from talking with them that the businesses along the corridor were not notified. Many of our members live in the “study area” that OP describes, but none of them received notice.

OP seeks to discredit public participation by disparaging the motives of anyone who tries to have a say in the development of the neighborhood that they live in.

The Tenleytown Neighbors Association objects to this characterization of unspecified persons who will assertedly take advantage of the proposed Design Review for the sole purpose of using delay to thwart a development proposal.

The goal in zoning matters should be to achieve a good result, which is much more likely if there is an open conversation with the people who live there and the developers who want to build there. In Tenleytown there have been quite a few developers and large developments that fit very well in the neighborhood - Cityline and the renovation of the FNMA building in City Ridge, to name a few.

From the OP Supplemental Report II - EXHIBIT 234:

*The information provided below is consolidation by topics to ease repetition and also to state that subsequent to the public hearing OP had meetings with concerned members of the public and representatives of community organizations. - Page 1*

*At the public hearing there was some testimony, that there would be an absence of provisions for public input on the design of major project. There was also testimony and in discussions with OP, several persons and organizations expressed concerns that further public review of individual projects could add time and financial constraints and could affect bringing projects to fruition in a timely manner, particularly at*

*this time when both public and private financing are scarce or limited. The reality is that there are also persons with intentions to delay projects through the appeal process. - Page 3  
(Underline supplied)*

In the Setdown Report, OP says that it held meetings with the ANC's, who do not have the resources to communicate with the entire community, and that it held meetings with the groups who OP knows are cheering sections for its proposals. With one exception, these were not public meetings.

OP Setdown Report – Exhibit 2 in 25 - 13, submitted 7/21/25 at pp 27-28.

*After the Framework's approval in February 2024, OP continued to engage with ANC 3E, ANC 3A and community organizations to discuss the process for developing the proposed amendments - (List summarized.)*

*ANC-3A, ANC-3E*

*4 meetings with Friendship Heights Alliance*

*3 meetings with Ward 3 Vision*

*2 meetings with WIN Ward 3*

*1 meeting with GGW*

*1 meeting with Planners for Bethesda, Montgomery Co.*

*1 meeting with reps of property owners. [but clearly a select number, see above re notice waived.]*

## **II. INFRASTRUCTURE**

Although the required infrastructure report was not submitted for the record by the Office of Planning, the March 2024 Infrastructure Assessment Report is publicly available on OP's website. [Infrastructure Assessment](#). Also, see the report below.

**The report acknowledges that the water and sewer systems are already operating at capacity.**

In the Second Supplemental, OP states that it saw no need to require a new infrastructure report. Once DC Water stated that it is at full capacity, the infrastructure issue is beyond dispute.

**Office of Planning: Second Supplemental, April 20, 2026, Exhibit 234 at page 7.**

12. **Infrastructure** As part of the WADF process a capacity and infrastructure assessment was done with input from several District agencies and utilities (PEPCO, DC WATER, DDOT, DPW). The study was based on the build out of the recommendations of the WADF. The assessment provided information to understand each infrastructure current system capacity and the process for capital improvement planning to meet future demand. The assessment is provided at [Infrastructure Assessment](#). The proposed zones are based on the WADF and therefore OP did not see the necessity to undergo a second study when not much has changed in the area. However, OP did request an update from DC Water but to date has received no response. OP will continue to engage DC Water to have a response prior to Final Action.

## **Water and Sewage**

OP anticipates 10,100 new residential units with a full build out of 13,100 households in an area that currently has 3,000 households – an increase of more than 330% in the number of households. The population increase expected is from 4,200 to 18,100 – an increase of 13,900 in the number of people. See Wisc Ave Development Framework: Infrastructure Assessment, Mar 2024, at p. 3.

[https://planning.dc.gov/sites/default/files/dc/sites/op/page\\_content/attachments/WADF\\_Infrastructure\\_Assessment\\_2024.pdf](https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/WADF_Infrastructure_Assessment_2024.pdf)

### **Capacity Assessment:**

*For the capacity assessment, OP requested input from District agencies and utilities to understand current system capacity for each infrastructure category and the process for capital improvement planning that can meet future demand....*

***DC Water** (sewer and water capacity): The Wisconsin Avenue Development Framework study area's existing local sanitary sewer systems are running at full capacity. The wastewater generated by future developments may impact some local sanitary sewers. The existing water system in this area is also running at full capacity. Developers should work with DC Water to ensure there is adequate capacity to serve new development. Currently, DC Water has one capital improvement planned for the area, which includes small diameter water main along Wisconsin Ave, NW from Fessenden St, NW to Western Ave, NW. (emphasis added.)*

See Wisc Ave Development Framework: Infrastructure Assessment, Mar 2024, at 4.

[https://planning.dc.gov/sites/default/files/dc/sites/op/page\\_content/attachments/WADF\\_Infrastructure\\_Assessment\\_2024.pdf](https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/WADF_Infrastructure_Assessment_2024.pdf)

## **Schools and Recreational Areas**

Again, OP anticipates 10,100 new residential units with a full build out of 13,100 households in an area that currently has 3,000 households – an increase of more than 330% in the number of households. The population increase expected is from 4,200 to 18,100 -- 13,900 more people.

We know that the schools are already overcrowded. Despite the population along the Wisconsin Avenue Corridor going from 4,200 to 18,100 according to OP itself, OP says that it does not expect many more school-aged children! Note that OP says that one of its goals is to produce 3-bedroom units for families. Although OP has not written this in as a requirement for a certain number or percent of units, it has y “encouraged” such units.

**Office of Planning: Second Supplemental, April 20, 2026, Exhibit 234 at page 7.**

In the Second Supplemental at page 7, OP says that it “encourages” family-sized units.

*10. The Commission requested that OP look at requiring 2- and 3-bedroom units in the proposed zones. The desire to provide larger family units is also encouraged in the WADF. However, the ability to provide larger units depends on a variety of factors such as the size of development and financing will vary between development proposals. Making this provision a requirement could negatively impact some development if they are unable to meet this standard. If the Commission opts for a design review process, each development could be assessed for this provision. OP encourages housing with units that are three (3) bedroom or more and is included **at Subtitle G § 800.1(f) in the Friendship Heights Metro Mixed Use Zone; § 900.1(f) in the Tenleytown Metro Mixed Use Zone; and §1000.1(d) in the Wisconsin Avenue Mixed Use Zone.***

OP must address the reality that there is already overcrowding at every school in the area. The Wisconsin Avenue Framework’s stated goal is to create family-sized units, which would bring more children.

Failure to set aside large lots for the building of public schools represents a squandered opportunity. The denser the District gets, the harder it will be to site new schools – even as the school-aged population grows.

For example, OP up-zones the St. Ann's Academy from institutional to mixed use institutional/medium density residential. St. Ann's no longer has a school and is currently renting the building and land to St. Alban's School. The increase in the value of the land caused by upzoning will make it much more difficult to preserve it as a site for a school.

Likewise, OP up-zones the Tenley-Friendship Library land that borders St. Ann’s Academy and Janney Elementary School from institutional to mixed-use institutional/medium residential. Anything built on that lot should be similarly educational, and an expansion to the library itself would be more beneficial to the expanding school population.

There are similar concerns in Friendship Heights. Even if WMATA possesses the Lord & Taylor site, there should still be an effort to dedicate land in that area for an elementary school. But could DC buy the land at the new market values based on upzoning?

There also is a current need for more recreation (parks, sports fields, etc.) and other community facilities in the area. The stress on existing facilities will increase unless space is specifically set aside for these purposes.

**Traffic:** OP has provided no plan to address traffic problems, and no study of the Metro or traffic patterns to accommodate the estimated 13,900 new people in the area, an estimated 2,700 additional transit riders, and almost an additional 3,000 cars on Wisconsin Avenue every day.

## **CONCLUSION**

Tenleytown Neighbors Association opposes proposals to curtail public participation and calls on the Zoning Commission to reject these anti-democratic maneuvers by the Office of Planning.

Chris Schumann, Vice-President, Tenleytown  
(Walter C. Schumann) Neighbors Association

May 14, 2024

## ATTACHMENT

District of Columbia Office of Planning



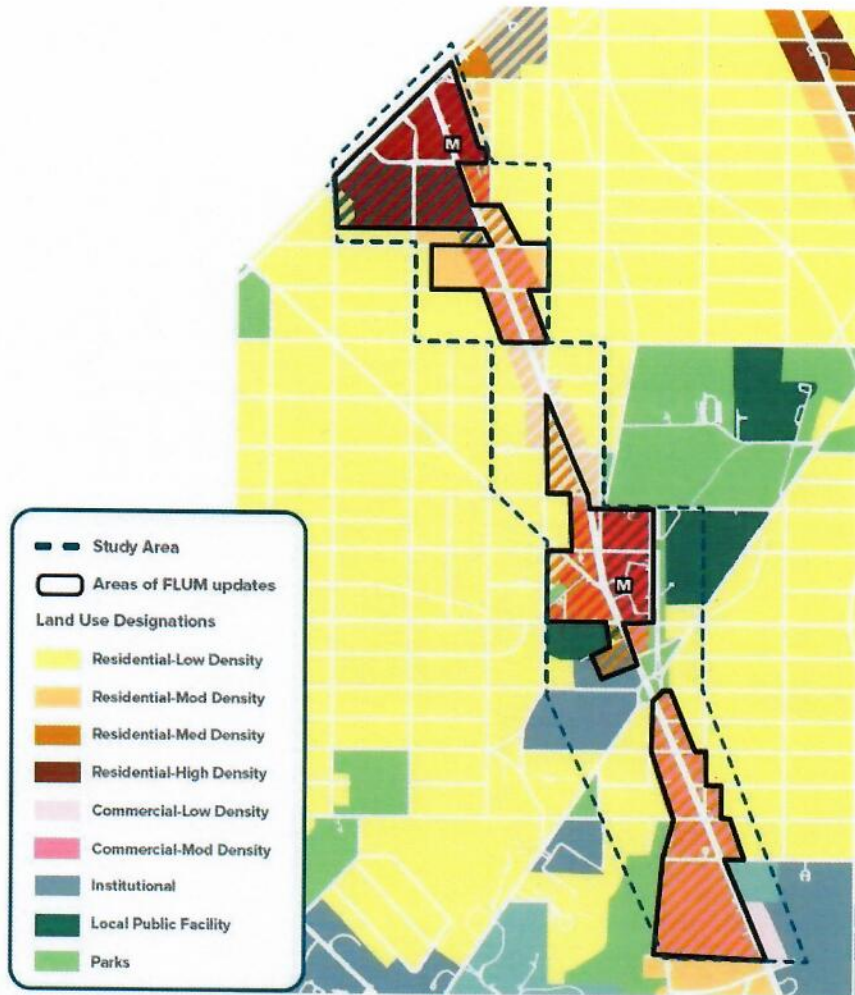
# Wisconsin Avenue Development Framework: Infrastructure Assessment

March 2024

### **Executive Summary:**

This infrastructure assessment,<sup>1</sup> prepared in connection with the *Wisconsin Avenue Development Framework*, evaluates infrastructure demand and capacity in the upper Wisconsin Ave NW Corridor. The Comprehensive Plan (Comp Plan) envisions an increase in population and households, and a decrease in jobs within the study area. These new residents will likely increase the demand for electricity, water, multimodal transportation, and solid waste management.

**Figure 1:** *Map of Wisconsin Avenue Development Framework study area and Future Land Use Policies.*



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The increased demand for infrastructure systems identified in this assessment is anticipated to occur within the next 25 years and beyond, the time horizon of the District's long-range population, households, and jobs forecast.<sup>2</sup> Infrastructure is planned over the long term (a period that ranges from ten years to more than fifty years depending on the system) and is updated on an annual basis as needs evolve.

When comparing future demand to existing infrastructure, it is important to note:

- Infrastructure planning occurs through well-established processes that the District and regional utilities use to ensure infrastructure systems are continually improved to meet demand.
- The District has a six-year Capital Improvement Plan (CIP) that funds transportation improvements and waste management facilities. The CIP is updated annually.
- Regional utilities and authorities, including WMATA, Pepco, and DC Water, use long-range population and employment forecasts to ensure the District's current and future residents and businesses can access clean water, electricity, and public transportation.

This assessment does not account for the economic feasibility of construction or market conditions that would indicate when development might occur. Additionally, this assessment does not consider how changes in technology or consumer preference could impact future infrastructure demand. For these reasons, this assessment should not be interpreted as a development forecast but rather as an exercise to evaluate infrastructure improvements that could be needed over the long term.

### **Analysis Overview:**

This assessment has two components:

- Demand Assessment – an evaluation of how new real estate development could impact infrastructure use. This assessment was conducted by the Office of Planning (OP).
- Capacity Assessment – an evaluation of existing infrastructure to determine if it can accommodate potential new demand. Utilities and District agencies provided OP with information about the capacity of the infrastructure they manage.

The assessment looks at three scenarios to understand how potential new development could impact infrastructure:

1. The Baseline Scenario evaluates the study area's existing conditions. OP estimated the current population, and the number of households and jobs based on gross building area (GBA) within the study area. Using industry-standard factors, OP also used GBA to estimate current infrastructure demand based on area, density, and occupancy by each parcel's land use classification.
2. The Theoretical Full Buildout Scenario estimates households, populations, jobs, and infrastructure demand using the theoretical maximum GBA under the 2021 Comp Plan's Future Land Use Map (FLUM) for every property with any additional building capacity within the study area. For this scenario, future GBA estimates are derived from OP's land use capacity analysis. This scenario is very unlikely to occur because it will be financially infeasible for many of these sites to redevelop as this scenario envisions, and redevelopment of some sites will be limited by factors that are not considered, such as challenging site conditions including steep slopes and irregular parcel shapes.
3. The 2021 FLUM Buildout Scenario estimates households, populations, jobs, and infrastructure demand generated by properties within the study area where FLUM land use designations were

updated as part of the 2021 amendment to the Comp Plan (see figure 1). These are the areas where land use policy is most likely to result in changes in use and intensity. For this scenario, the future theoretical GBA estimates are derived from maximizing the development potential of zoning recommendations from the Wisconsin Avenue Development Framework.

All three scenarios include large redevelopment projects currently planned, under construction, or recently completed within the study area.<sup>3</sup> The estimates generated for both future scenarios are greater than the District's long-range forecast, which covers a 30-year period (2020-2050). Based on the District's long-range forecast, the growth in population and households and infrastructure demand would likely extend beyond 2050.

**Demand Assessment:**

OP estimated infrastructure demand for the *Wisconsin Ave Development Framework* study area. Metrics used to evaluate infrastructure demand include:

- Electricity Demand – *Kilowatts (KW)*<sup>4</sup>
- Water Demand – *Gallons consumed per day (gal/day)*
- Waste Generation – *Pounds produced per day (lbs. /day)*
- Trip Generation and Attraction<sup>5</sup> – *Frequency of person trips per day*<sup>6</sup>. Trips includes mode split during peak hours for trips made by transit (bus and metro), walking, biking, and vehicles.<sup>7</sup>

Tables 1 and 2 provide an overview of the demand assessment results for the Baseline, Theoretical Full Buildout, and 2021 FLUM Buildout scenarios.

**Table 1:** Infrastructure demand by scenario. All estimates are rounded to the nearest hundreds place.

Scenario	Households	Population	Jobs	Electricity (KW)	Water (gal/day)	Waste (lbs./day)	Trip Gen (person trips/day)
<b>1. Baseline</b>	3,000	4,200	10,300	42,000	1.4 M	55,000	168,900
<b>2. Theoretical Full Buildout</b>	13,100	18,100	6,300	90,600	3.5 M	129,900	176,800
% Change from Baseline	330%	333%	-54%	116%	146%	134%	4%
<b>3. 2021 FLUM Buildout</b>	11,800	16,400	4,700	87,900	3.3 M	127,100	176,400
% Change from Baseline	288%	294%	-39%	109%	128%	129%	3%

**Table 2:** Trip generation and attraction with mode split by scenario. All estimates are rounded to the nearest hundreds place.

Mode	Transit (people/day)	Walk (people/day)	Bike (people/day)	Vehicle (vehicles/day) <sup>8</sup>
Mode Split	35%	17%	3%	45%
Scenario				
1. Baseline	59,100 <sup>9</sup>	28,700	5,100	64,400
2. Theoretical Full Buildout	61,800	30,000	5,300	67,300
Net Increase from Baseline	2,700	1,300	200	2,900
3. 2021 FLUM Buildout	61,200	29,700	5,200	66,700
Net Increase from Baseline	2,100	1,000	100	2,300

### Capacity Assessment:

For the capacity assessment, OP requested input from District agencies and utilities to understand current system capacity for each infrastructure category and the process for capital improvement planning that can meet future demand.

**Pepco** (electricity capacity): Pepco anticipates that the current infrastructure along Wisconsin Avenue would have enough capacity to support the full buildout and 2021 FLUM buildout scenario for the Wisconsin Avenue Development Framework, based on the demand assessment developed by OP. Pepco does not anticipate including projects in their current capital improvement plan to absorb the new demand presented in this assessment because the current infrastructure along Wisconsin Avenue would have enough capacity. However, Pepco conducts an annual forecast of the distribution system by analyzing the predicted load versus capacity for each feeder and substation to identify any planning criteria violations within the next ten years and determines actions to mitigate the violations, if any. Some ways Pepco mitigates those violations are with the addition of new substations, transformers, feeders, and non-wired alternatives.

**DC Water** (sewer and water capacity): The Wisconsin Avenue Development Framework study area's existing local sanitary sewer systems are running at full capacity. The wastewater generated by future developments may impact some local sanitary sewers. The existing water system in this area is also running at full capacity. Developers should work with DC Water to ensure there is adequate capacity to serve new development. Currently, DC Water has one capital improvement planned for the area, which includes small diameter water main along Wisconsin Ave, NW from Fessenden St, NW to Western Ave, NW.

**District Department of Transportation (DDOT)** (transportation systems capacity): Land uses along Wisconsin Avenue are anticipated to continue transitioning from commercial (including office and retail) to residential, with additional residential density. Over the long-term, the District anticipates that this corridor will generate about as many overall trips as it does today because apartment buildings generate fewer trips than comparable office and retail buildings. Most future housing capacity along Wisconsin

Avenue is targeted within ¼-mile from a Metro station entrance, which may lead to an increase in local transit ridership over time. DDOT's Development Review Program will evaluate the impacts of land development actions and public use on the District's multimodal transportation network as specific properties develop in the future. Additionally, the District's public space permitting process ensures development actions improve the safety and experience for people walking and biking on public rights-of-way.

**DC Department of Public Works (DPW)** (waste management capacity): The new development considered in this analysis would not have a serious impact on current waste management capacity. DPW manages solid waste removal for residential structures with four or fewer units. New development would almost exclusively produce buildings with more than four units or buildings with commercial, industrial, and civic uses. Property owners for these new buildings would be responsible for procuring private waste management services, which are readily available.

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<sup>1</sup> The District's Comprehensive Plan (Comp Plan) calls for planning within Future Planning and Analysis Areas (FPAAs) to evaluate how changes to the Future Land Use Map (FLUM) could affect infrastructure at full buildout. For this analysis, "full buildout" refers to a property maximizing the available gross building area based on the lot size and floor-area ratio (FAR) allowed under existing or future land use designations. See Appendix A for the study area Geography and Future Land Use Policy Maps.

<sup>2</sup> OP prepares a [long-range \(30 year\) forecast](#) of job, household, and population growth approximately every two years for the Metropolitan Washington Council of Governments' (COG) regional transportation planning efforts.

<sup>3</sup> The development projects included in this assessment are the Friendship Center PUD, Former Mazza Gallerie, Former Fox5, Broadcast PUD, Dancing Crab PUD, Upton Place, and City Ridge.

<sup>4</sup> OP developed estimates for existing and future electricity demand, in kilowatts, using general electricity demand rates typically used in the Washington DC area.

<sup>5</sup> The demand assessment for transportation utilizes *trip generation* and *trip attraction*, which differs from *Annual Average Daily Traffic (AADT)*. AADT Takes in all vehicle trips on a segment of road or highway during a yearlong interval in both directions and then divides the total by 365 days to arrive at the average number of daily trips. On the other hand, *trip attraction* and *trip generation* predict the number of trips originating or destined for a particular area.

<sup>6</sup> DDOT's multi-modal approach to site-level development is to view trip generation in terms of person-trips rather than vehicle-trips. See [DDOT's Guidance for Comprehensive Transportation Review](#) for details.

<sup>7</sup> DDOT provided OP with estimations for mode split for the Wisconsin Avenue Corridor.

<sup>8</sup> Vehicle trips per day assume a vehicle occupancy rate of 1.18 passengers per vehicle based on DDOT's Guidance for Comprehensive Transportation Review.

<sup>9</sup> Baseline transit trips are not based on the WMATA ridership data from Metro or bus services. Additionally, these estimates do not account for the significantly reduced ridership in 2021 due to the COVID-19 pandemic.