



**Washington Metropolitan
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Via IZIS

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

Re. Z.C. Case No. 25-13 (“Wisconsin Avenue Rezoning”): Comments on Office of Planning (“OP”) Supplemental Report for Sq. 1580, Lot 33 and Sq. 1657, Lot 24 (the “WMATA Properties”)

Dear Chairman Hood and Members of the Zoning Commission:

The Washington Metropolitan Area Transit Authority (“WMATA” or “Metro”) respectfully submits these comments in response to OP’s supplemental report (the “OP Supplemental Report”) at Exhibit 234 of the record in Z.C. Case No. 25-13. WMATA strongly encourages the Commission not to impose mandatory design review on future developments along the Wisconsin Avenue corridor, including any future redevelopment of the WMATA Properties.

WMATA Previously Supported the Wisconsin Avenue Rezoning

On December 10, 2025, WMATA submitted comments in support of the proposed Wisconsin Avenue Rezoning, and specifically the proposed MU-10/FHM rezoning of the WMATA Properties. See Exhibit 210 of the record in Z.C. Case No. 25-13. WMATA supported the proposed Wisconsin Avenue Rezoning because the rezoning advances WMATA’s transit-oriented development goals by increasing permitted height and density near Metrorail stations and along the Wisconsin Avenue bus corridor and for the WMATA Properties specifically. With respect to the WMATA Properties, the proposed Wisconsin Avenue Rezoning helps WMATA leverage the value of its real estate assets using public-private partnerships to bring high-density housing, mixed-use development, amenities, services, and jobs with unparalleled access to transit.

The WMATA Properties Are Subject to Many Procedural Requirements

To realize this vision, offering more certainty, reducing risks, and streamlining the entitlements process is necessary to offset the development challenges facing the WMATA Properties. The WMATA Properties are subject to pending historic landmark nominations. As such, any future development of the two WMATA Properties is likely to require extensive formal review by the D.C. Historic Preservation Review Board (“HPRB”) and possibly require discretionary design review by HPRB and the Mayor’s Agent on historic preservation if designated historic landmarks fully or partially. If required, the procedural processes, both of which are subject to appeal, could reduce WMATA’s ability to maximize leverage of these two sites, by adding substantial time and risk to WMATA’s ability to find an interested development partner.



The HPRB process and the many other public processes applicable to development of all WMATA-owned properties provide sufficient protection for the public to remain engaged in the future redevelopment of the WMATA Properties. As the Commission has recognized in the ongoing Cleveland Park / Woodley Park rezoning case (Z.C. Case No. 25-09), the HPRB and Mayor's Agent review processes offer an effective mechanism for the public to review proposed developments and express comments without the need to layer additional administrative burden on a project by requiring design review under zoning. Moreover, the proposed rezoning is already reflective of the significant public input that was provided during the 2021 Comprehensive Plan update and OP's multi-year effort to develop the Wisconsin Avenue Development Framework ("WADF"). Requiring additional mandatory zoning design review for the WMATA Properties, and generally along the corridor, will add time, complexity, and risk to WMATA's ability to achieve its long-term transit service and operations goals, and the District's ability to properly address its dire housing needs.

Summary

WMATA is aligned with the City's efforts to add density near transit corridors, streamline processes, reduce risks and accelerate development. WMATA is focused on growing ridership through its joint development program, providing better service with a new bus garage, and generating revenue for a financially sustainable future. WMATA encourages the Commission to exempt from mandatory design review those properties also subject to review by HPRB or other public agencies. See [Exhibit A](#) for proposed changes to the language proposed in OP's Supplemental Report.

Sincerely,

Nia Rubin

Nia Rubin
Senior Vice President, Office of Real Estate and Development

CC: Radhika Mohan, DC Office of Planning
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Dave Lewis and Shane Dettman, Goulston & Storrs



Exhibit A

806.7 The requirements of Subtitle G §§ 806.1-806.6, 807.2, 808.1, and 808.2 shall not apply to any building or lot containing a historic landmark or undergoing a public design review process through a public agency with jurisdiction over buildings in the District of Columbia or pursuant to federal legislation.