



## **ADVISORY NEIGHBORHOOD COMMISSION 3E**

**TENLEYTOWN    AMERICAN UNIVERSITY PARK    FRIENDSHIP HEIGHTS  
WAKEFIELD    CHEVY CHASE    FORT GAINES    SPRING VALLEY**

c/o Lisner Home 5425 Western Avenue, NW Washington, DC 20015

<https://anc3e.org>

### **ZC Case 25-13; Wisconsin Avenue Development Framework, ANC 3E Response to OP Supplemental Report II**

Dear Members of the Zoning Commission:

In its resolution passed on December 4, 2026 and in its subsequent testimony before the Zoning Commission at the December 11, 2025 hearing ANC 3E expressed concerns about a number of components of the Office of Planning proposal in case 25-13 which concerns the Wisconsin Avenue Development Framework.

This letter reflects our responses to the April 20, 2026 OP Supplemental Report II.

Responding in the same order as the OP Supplemental Report.

1. Proposed Zones

As before ANC 3E supports the proposed zones.

2/3. Form Based Zoning/Design Review

As before ANC 3E continues to believe that a form-based code would, after an iterative public process, create certainty for both the community and developers in what can be built and on what timelines. It is regrettable that after a public process that repeatedly identified the flaws and risks of a discretionary approval process that OP landed on a discretionary approval process focused on design review. ANC 3E did not advocate for a design review process in our testimony. Further compounding this misstep and misreading of both the identified problem and potential solution it appears to ANC 3E that OP is now proposing that all projects in the three zones (the Friendship Heights Metro Mixed Use Zone, the Tenleytown Metro Mixed Use Zone and the Wisconsin Avenue Mixed Use Zone) be subject to design review in essence eliminating any by-right development in the majority of the corridor. The most sensible way to ensure high-quality responsive design while minimizing obstacles to development is creation of a form-based code that embodies at the outset decisions that would otherwise be made on a case-by-case basis in design reviews.

4. IZ Plus

ANC 3E testified that we did not believe that IZ plus should be updated or modified through *this* planning process and support the OP recommendation to further study this issue. Although it is unclear in OP's response, it may be that OP is proposing that IZ plus

apply to all future development projects in the corridor rather than only projects that exceed the current matter of right zoning. ANC 3E does not understand if and how IZ plus would apply or make sense economically if it is no longer a version of bonus density. ANC 3E has sought clarification on this issue from OP and has not received a response.

#### 5. Lot Occupancy

ANC 3E expressed concerns that in the absence of a form-based code there would be no guarantee that a lower lot occupancy would accrue to the benefit of the public. Others at the December 11<sup>th</sup> hearing expressed similar concerns. OP's recommendation does not address this concern.

#### 7. Pedestrian Connection Square 1770

ANC 3E does not object to this proposal but believes that re-locating the proposed pedestrian connection to accommodate an alley for cars is not in and of itself a sound reason for this proposal and undermines the attempt to seek an optimal land use and pedestrian oriented design. ANC 3E repeats its suggestion that a form-based code would be the most appropriate means to come up with an optimal design for this lot.

#### 8. Pedestrian Connection 4800 Wisconsin Avenue

ANC 3E vigorously objects to this exception being made for a private school, Georgetown Day School (GDS), that previously went through an exhaustive planning process for this very site that *included* a pedestrian corridor -- proposed and indeed touted by GDS<sup>1</sup> -- that incorporated solutions to the grade change issue and ADA

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<sup>1</sup> See, e.g. references in applicant's Statement Of Support, Ex. 2, ZC 15-30:

GDS proposes two mixed-use buildings with ground floor retail and upper-level residential uses. In between the two buildings, GDS proposes that there will be a landscaped open space designed for pedestrian and community use (the "Davenport Steps") [.] [p. 2]

In between the two buildings on the Mixed Use Parcel, the Applicant proposes the Davenport Steps, a terraced walkway from Wisconsin Avenue to 42nd Street for public pedestrian use. The Davenport Steps will include green space and pedestrian-friendly streetscape to create a community gathering space [.] [p. 10]

Creating two separate retail/residential buildings with distinct architectural identities, and creating the public Davenport Steps on private property will profoundly change this area into a more lively, pedestrian friendly, urban area. [p. 18]

In addition, more retail is proposed in the 42nd Street base of the Southern Building, adjacent to the Davenport Steps to serve the neighborhood community. [p. 19]

issues.<sup>2</sup> GDS likewise stated that the pedestrian walkway complemented planned retail.<sup>3</sup> Indeed, GDS bragged that the “terraced pedestrian walk-way [with buildings on either side would give rise to] magnificent vistas to and from historic Fort Reno.”<sup>4</sup> The language OP uses in this report reads as if it were written by GDS and not OP staff and the zoning commission should strike this special dispensation.

## 9. Plaza Requirements

Again in the absence of a form based code this plan provides no means to guarantee the design, location and usability of any public plazas and the design review requirements remain vague.

## 10. Three Bedroom Units

ANC 3E has long supported creation of 3-bedroom units, particularly affordable units, because it enables more families to live in our amenity-rich neighborhood, and we appreciate the need for flexibility in designing projects. However, relying on an undefined design review process that merely references superior design does not seem like a formula likely to yield 3 bedroom units.

### **Concerns not addressed in the OP Supplemental Report**

ANC 3E has heard from an affordable housing developer seeking to build two projects within the boundaries of ANC 3E that the new design review process, if applied to the projects, would make securing financing impossible.

We support the proposal from Somerset Development to exempt projects with 33% or more affordable housing units from the design review process. If the Zoning Commission believes this is too wide an exemption, it should at least exempt from design review residential or mixed-use residential projects in which all residential units are available at 50% AMI or less (as the Somerset projects would be).

As mentioned, ANC 3E made a number of specific requests for changes in our December resolution.

So we reiterate again these requests copied verbatim from our December resolution:

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The Davenport Steps will bring active open space to the site, with beautiful landscaping and retail entrances that can be enjoyed by the community. [p. 20]

<sup>2</sup> We note that it is odd to claim in the first place that eliminating a pedestrian connection and thus forcing all pedestrians to walk much further to get around a superblock somehow enhances accessibility.

<sup>3</sup> See *id.*

<sup>4</sup> *Id.* At 20.

ANC 3E requests that the following changes apply to all 4 zones:

- No Grade level parking spaces should be permitted
- Section 1000.1 encouraging sustainable well designed new development that is compatible with the built environment and contributes to the main street character shall apply to all 4 zones
- All developments must underground utility lines on all public frontages
- No curb cuts shall be permitted along Wisconsin Avenue
- Superior design should be defined or the relevant code referenced
- Superior publicly accessible spaces should be defined or the relevant code referenced and distinct or higher quality paving materials for pedestrian zones should be required
- Additional design requirements to break up massing should be required including chamfered corners.

ANC 3E requests these changes to specific zones:

Friendship Heights Metro Mixed-Use Zone:

- The pedestrian connection between Wisconsin Avenue and 44<sup>th</sup> Street (square 1657, Lot 24) shall align with the Ingomar Street viewshed
- If WMATA is unable to move forward with a mixed-use project at the Lord & Taylor site they should be required to include a significant public recreation amenity on the site

Tenleytown Metro Mixed-Use Zone:

- We reiterate our previously expressed concern about a lack of acknowledgement of Tenleytown as a significant hub for students from kindergarten to graduate school and the lack of any planning for recreational or public space uses for this significant population.

ANC 3E supports the additional height and density along Wisconsin Avenue contemplated in the WADF but believes that out of this lengthy and public process OP has landed on a zoning process that is only marginally less onerous than what existed before the WADF, because opponents can still file appeals that, although likely to fail, nonetheless result in lengthy delays to projects. As we have seen, the mere prospect of such delays deters some developers from undertaking more than matter of right projects.

Moreover, one reading of OP's recommendation is that *all* projects, including matter of right (MOR) projects, would be subject to Design Review.<sup>5</sup> To the extent this is true, we strenuously oppose it. No sound reason exists to subject smaller projects to Design Review, and doing so risks deterring *all* development at some sites.

Overall, the better solution remains to direct OP to work with the community to develop a form-based code and to then permit of-right development based on that code for all projects

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<sup>5</sup> As noted, OP has not responded to a question from the ANC seeking clarification on this point.

above current MOR but at a minimum this plan should not be approved without rescinding the (apparent) new design review requirement on what are currently matter of right projects.

This opinion from ANC 3E is being submitted as a letter because the OP supplemental report came out on April 20<sup>th</sup> which did not leave ANC 3E enough time to respond with a formal resolution. At the ANC 3E meeting on December 4<sup>th</sup> as part of its resolution ANC 3E authorized commissioners Jon Bender and Tom Quinn to submit any additional filings or responses in this case.

ANC 3E

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