



Mr. Anthony Hood
Chairman, Zoning Commission of the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

RE: Comments regarding Z.C. Case No. 25-13

Dear Chairman Hood and Members of the Commission:

I am writing on behalf of Ward 3 Vision, a volunteer group of Ward 3 residents dedicated to smart growth, sustainable transportation, walkable streets, and affordable housing in our Ward and across the city. This submission has been approved by W3V's Steering Committee in response to the Zoning Commission's request for comments on the Office of Planning's June 2, 2026 report, which provides further analysis of issues raised at the Commission's April 30 hearing on Z.C. Case No. 25-13.

We commend OP's thoughtful and comprehensive analysis. As the Commission is aware, our prior comments expressed concern that applying design review to individual projects could invite appeals and slow needed development in the Wisconsin Avenue corridor because those reviews are contested cases. At the same time, we strongly support high-quality design for new development.

We still believe that contested case design review is not the best solution. We hope that, over time, the tension between good design, attractive public spaces, and streamlined development review will be reduced through a more form-based approach to planning and entitlements. The DC 2050 Comprehensive Plan's focus on Place Types rather than use in Future Land Use Map designations is a step in that direction. If the Commission is still committed to a contested case design review process, we support OP's conclusions on how best to balance the goals of development feasibility and design quality in the proposed text amendments now before the Commission.

Limiting Design Review to Proposed Metro Zones. We support OP's recommendation to follow the Wisconsin Avenue Development Framework (WADF) proposal that design review apply only in the Friendship Heights and Tenleytown Metro Zones. As OP observes, the higher densities planned for these zones increase the potential impact of development there and can justify closer review.

Development Size Thresholds. OP's analysis of potential development parcels in the proposed zoning districts makes a strong case for limiting design review to parcels over 15,000 square feet. Larger parcels are "where building scale and visibility have the greatest corridor-wide impact," while limiting review to those parcels makes better use of Commission and staff time. It also avoids imposing an outsized cost and delay on smaller-site developers. We also agree with OP that these larger parcels will produce more IZ+ units and that "design review at those sites is where we can most meaningfully shape public realm, access, and affordability outcomes."

Design Review Exemption for Affordable Housing. Ward 3 Vision also supports OP's conclusion that projects reserving at least 33% of units for extremely low- or very low-income households for the life of the building should be exempt from design review. These projects are critical to addressing our severe affordable housing shortage but are difficult to finance, and a lengthy review process could make them financially infeasible. Because projects with this level of affordability generally require city subsidies—and city regulations require that a project must be fully entitled before competing for limited subsidy funds—requiring design review would likely eliminate some important projects from consideration.

Design Review Exemptions for Historic Properties. Any development requiring Historic Preservation Review Board approval will already receive detailed design review from these experts in historic character and design, making Zoning Commission design review redundant and unnecessary.

Thank you for providing an opportunity for Ward 3 Vision to comment on the proposed revisions to 25-13. We are grateful to the Commission and the Office of Planning for their work on this detailed framework for such a major opportunity corridor, and for their past willingness to consider the comments from Ward 3 Vision, the Coalition for Smarter Growth and the Washington Interfaith Network Ward 3 Affordable Housing Task Force that we believe have helped shape this text amendment for the better in a very collaborative process.

Sincerely,

Ellen M. McCarthy

Steering Committee Member

Ward 3 Vision