



MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: Karen Thomas, Development Review Specialist
JLS
Jennifer Steingasser, Deputy Director Development Review & Historic Preservation
DATE: January 13, 2025
SUBJECT: ZC #04-14H - **Hearing Report** - Modification with Hearing to 1st-Stage PUD and 2nd-Stage PUD (Phases III & IV)

I. SUMMARY RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the application by Florida Rock Properties Inc., (“Applicant”) for a Modification with a Hearing to the First Stage PUD under Order 04-14B (April 5, 2013) and a Second Stage PUD for Phases III and IV, for the development at the south-east corner of South Capitol Street (the Oval) and Potomac Avenue SE (across Potomac Avenue from the Ballpark).

The proposal remains consistent with the objectives of the approved Stage I PUD and the Comprehensive Plan including when viewed through a racial equity lens and remains consistent with the Future Land Use Map’s designation for mixed-use Medium Density Commercial and Medium Density Residential.

At setdown on October 24, 2024, the Commission commented and requested additional information on:

- Requested flexibility from the 75-foot waterfront setback.
- The status of prior and proposed benefits and amenities of the overall project.
- The proposed residential use; and
- The IZ offer of the proposed Phase II and IV.

The Applicant provided the responses in its prehearing statement at [Exhibit 10](#) of the record. OP responses are included in the analysis provided herein.

II. AREA DESCRIPTION

Applicant	Florida Rock Properties, Inc.
Location	<p>The PUD site at 25 Potomac Avenue, S.E is bounded by Potomac Avenue on the north, the Anacostia River on the south, South Capitol Street to the west and First Street to the east, between Nationals Park and the Anacostia River (“River.”) The site has 900 linear feet along the shoreline of the River.</p> <p>The PUD site when the original case was approved was located within the boundaries of ANC 6D. The site is now located within the boundaries of ANC 8F with ANC 6D situated across the South Capitol Street Oval and, therefore, also an “affected ANC.”</p> <p>Phases III and IV is bounded by Potomac Avenue, SE to the north, Phase Two of the PUD to the east, which is improved with a mixed-use building (Maren), the Anacostia River to the south, South Capitol Street Oval to the west, and south of the Nationals Park across Potomac Avenue, SE.</p>
Area Description	Potomac Avenue, which connects to First Street to the east and South Capitol Street to the west, provides the main vehicular access to the site. The Navy Yard Metro station is two blocks north at Half and M Street SE. The surrounding neighborhood includes the Nationals Ball Park and a mix of office buildings and recent apartment buildings. New mixed-use development is currently underway to the north and east of the site, including new residential and retail at the Yards in the Capitol Riverfront neighborhood.
Current Zone	As part of the original PUD, a PUD-related map amendment was approved to C-3-C under the 1958 Zoning Regulations, which is now the MU-9B Zone District under the 2016 Zoning Regulations. The underlying zone at the time of the original approval was CG/W-2, now CG-5.
PUD Project Area	253,500 square feet of land area for the full PUD site.
Phases III & IV	Square 708 Lot 16. The subject property contains 97,978 square feet of land area. The Property is currently improved with an interim dog park and surface parking, consistent with the interim uses approved for the Property.

III. BACKGROUND - PUD DEVELOPMENT

The background of this PUD development is fully outlined in the [OP Setdown Report of Exhibit 9](#).

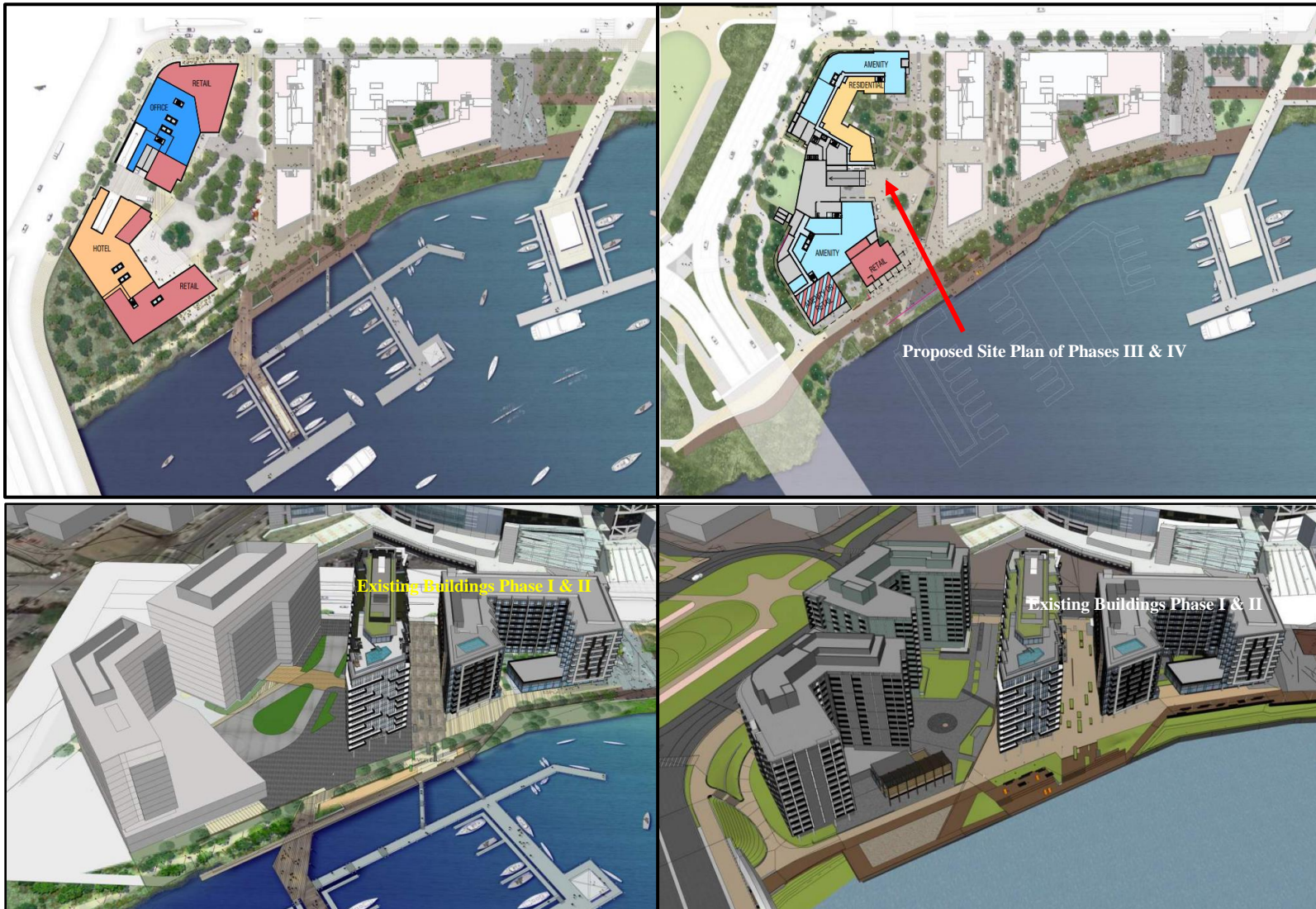
The original PUD was approved with a PUD-related map amendment to the C-3-C zone, which was subsequently renamed to the [MU-9B zone](#) under the 2016 Zoning Regulations. Therefore, all modifications are reviewed pursuant to the approved MU-9B zone requirements.

There have been PUD extensions since 2008, in part due to economic conditions, as well as due to delays in the construction of the new Fredrick Douglass Bridge and South Capitol Street Oval, and the condition of a land swap with DDOT prior to Phases III and IV moving forward. The Applicant subsequently donated 8,100 square feet of the needed land (without compensation) to the District for the South Capitol Street project for the Bridge and related open space. The Applicant has agreed to maintain this public space.

IV. PROJECT DESCRIPTION

Modification of Stage I and Second Stage PUD APPROVED PUD (04-14B)

CURRENT PROPOSAL (04-14H)



PUD footprints ([Exhibit 2B1 Sheet G008 and Sheet G011](#))

A. Modification

The request to modify the subject PUD meets the criteria of **Subtitle Z § 704** including but not limited to:

- a change in use
- change to proffered public benefits and amenities,
- change in required covenants, or
- additional relief or flexibility from the zoning regulations not previously approved.

Since the PUD was first approved, there have been significant changes:

- Phases I and II were completed with public use of open space including the Diamond Teague Park and continuation of the Riverfront Walk.

- Since the last Order, the Comprehensive Plan was amended with a particular focus on advancing racial equity and ensuring environmental resiliency. The amended Comprehensive Plan requires the Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis. (10-A DCMR § 2501.8.)
- Frederick Douglass Bridge and the Oval are now completed. (The Applicant dedicated 6,702 sq.ft. of the property in 2015 to the District for construction of the Bridge; and an additional 8,100 sq.ft. to open space to DDOT, which the Applicant will maintain.)

Overall, the comparison of the approved with the current development proposal for Phases III and IV include the following ([Exhibit 2B1 - Sheet – G006](#)):

Phase III			Phase IV		
	Approved	Current Proposal		Approved	Current Proposal
Use	Office	<i>Residential -309 units</i>	Use	Hotel	<i>Mixed-Use</i>
Height	130 feet	<i>130 feet</i>	Height	130 feet	<i>130 feet</i>
FAR	6.2	<i>3.08</i>	FAR	4.4	<i>3.06</i>
GFA	313,703 sq.ft. office	-	GFA	274,370 sq.ft. hotel	-
	11,470 sq.ft. retail	-		12,610 sq.ft. retail	<i>6,331 sq.ft.</i>
	0 sq.ft. residential	<i>302,050 sq.ft. (309 units)</i>		0 sq.ft. residential	<i>294,172 sq.ft. (281 units)</i>
Parking	186 spaces (u/g)	<i>146 spaces</i>	Parking	167 spaces (u/g)	<i>218 spaces (u/g)</i>

Modifications from the first stage approval for Phase III and IV include:

- Change from office and hotel uses to residential use of Phase III and mixed -use building at the Phase IV building;
- Improved design and siting of the two buildings;
- An increase in the open space square footage with preservation of views to the river;
- An increase in the number of residential units from none to 590 units, with related increase in affordable units (59) to the overall PUD;
- Underground parking and loading;

Phase III and IV collectively would include:

- 97,978 square feet of land area, total gross floor area of 602,553 square feet and FAR 6.14;
- Approximately 42,014 square feet of publicly accessible open space;
- An accessible riverfront esplanade;
- Underground parking and loading;
- Height and density generally consistent with the previous approval; and
- No changes to approved curb cuts.
- Curated and publicly accessible open spaces and dog park;
- Request for zoning relief, including flexibility to provide less than the required 75-foot waterfront setback for a portion of the Ph. IV building above grade and a portion of the below-grade parking which would reduce a small portion of the required setback.

Phase III & IV - Development Data (Comparison with approved Stage I)

	APPROVED STAGE I UNDER C-3-C		PROPOSED STAGE II UNDER MU-9B		MU-9B M-O-R STDs
	PHASE III	PHASE IV	PHASE III	PHASE IV	III OR IV
LOT SIZE (SF)	52,454	62,786	52,454	62,786	-
FAR	6.2	4.4	3.08	3.06	7.8 (IZ)
HEIGHT	130 ft.	130 ft	130 ft.	130 ft.	100 FT (IZ)
LOT OCCUPANCY	45.98%	42.46%	22.85%	30.59%	N/A
RESIDENTIAL (SE.)	-	-	302,050	294,172	-
RETAIL (SE.)	11,470	12,610	-	6,331	-
AMENITIES & SERVICES	-	-	-	6,331 (1st, 2nd fl.)	-
TOTAL GROSS (SE.)	325,175	274,370	302,050	300,503	-
NO. OF UNITS	-	400 Hotel units	309	281	-
NO. OF PARKING SPACES	341	339	167	218	C § 701
LOADING PROVISIONS	1 @ 40ft., 1 @ 20ft., 1 @ 200ft.	1 @ 40ft., 1 @ 20ft., 1 @ 200ft.	1 @ 30ft. 1 @ 20ft., 1 @ 100ft.	1 @ 30ft., 1 @ 20ft., 1 @ 100ft.	C § 702 As PROVIDED
AFFORDABLE HOUSING	-	-	10% @ 60% AMI	10% @ 60% AMI	C§ 1003.5 10% @ 60% AMI
PENTHOUSE SET ASIDE	-	-	(10%) 607 sf	(10%) 520 sf	10% @ 50% AMI
FLEXIBILITY					
WATERFRONT SETBACK C § 1102.1	75 feet		Approx. 65 feet	Relief requested	S.E Required
<u>DESIGN FLEXIBILITY</u> -Material and color selection	Vary final selection of the exterior materials within the types and color ranges that may be available at the time of construction and further project design		See exhibit 2A page 22 for complete list and comparison with first stage <u>PUD AT EXHIBIT 2J1</u>		

Data from plan set at [Exhibit 2B1 - Sheet – G006](#)

All modifications are reviewed pursuant to the approved MU-9B zone requirements.

Phasing ([See Flexibility](#))

The proposed timeline for second stage submissions for undeveloped Phases III & IV is as follows:

Phase III

- **Current:** An application for Second-Stage approval for Phase III shall be filed within two years after the later of completion of the Fredrick Douglass Bridge renovation or the completion of the construction of the South Capitol Street Oval or issuance of certificate of occupancy for Phase II.
- **Proposed:** Applicant files for Modification of First Stage and Second Stage PUD for Phases III and IV, with flexibility to utilize the site for staging, an interim dog park, pop-up retail and 30 parking spaces.

Phase IV

- **Current:** An application for Second-Stage approval for Phase IV must be filed within two years of the issuance of a certificate of occupancy for Phase III.

- **Proposed:** Construction to occur before Phase III building beginning in 2026 with completion by 2028.

For the Marina: Under 04-14D, the Applicant would be required to file for a permit by 5/26/25 or request an extension.

V. PUD EVALUATION STANDARDS

The Zoning Regulations define a PUD as “*a plan for the development of residential, institutional, and commercial developments, industrial parks, urban renewal projects, or a combination of these, on land of a minimum area in one (1) or more zones irrespective of restrictions imposed by the general provisions of the Zoning Regulations, as more specifically set forth in Subtitle X, Chapter 3*” (Subtitle B § 100.1).

The purpose and general standards for a PUD are established in Subtitle X § 300:

300.1 The purpose of the planned unit development (PUD) process is to provide for higher quality development through flexibility in building controls, including building height and density, provided that the PUD:

- (a) Results in a project superior to what would result from the matter-of-right standards;*

OP supports the Applicant’s submission as an improved product from what could be developed as a matter-of-right. The present proposal has additional height that can be achieved through a PUD, as well as a slight increase in density beyond its matter-of-right MU-9B zoning designation. In addition, the offered benefits and amenities package overall would not otherwise be provided under a matter-of-right development. The benefits and amenities are discussed hereafter.

- (b) Offers a commendable number or quality of meaningful public benefits; and*

The current proposal would offer additional benefits to the neighborhood and District as a whole, including through the provision of new housing and the derived affordability through the application of IZ. The project offers an improved design compatible with recently developed waterfront properties, the new Frederick Douglass Bridge and the resulting open space around the site and the Riverwalk. This is further discussed hereafter.

- (c) Protects and advances the public health, safety, welfare, and convenience, and is not inconsistent with the Comprehensive Plan.*

As discussed further, and in the OP setdown report the modified PUD remains consistent with the essential elements of the approved PUD. It advances the District’s sustainability, environmental and transportation goals as a waterfront property which includes development and completion of important open space features and mobility access along the Anacostia waterfront. This advances many of the equity principles derived in the Comprehensive Plan Elements addressed in the racial equity analysis of [section VI of this report](#).

300.2 While providing for greater flexibility in planning and design than may be possible under conventional zoning procedures, the PUD process shall not be used to circumvent the intent and purposes of the Zoning Regulations, or to result in action that is inconsistent with the Comprehensive Plan.

Flexibility

Waterfront Setback - Subtitle C § 1102.1(a)

The waterfront setback shall be a minimum of seventy-five feet (75 ft.) in depth...

Flexibility from the waterfront setback requirement is requested to accommodate proposed below grade parking, which would be partially within the waterfront setback area as shown in the Floor Plans G1, G2 ([Sheets 005, 006 of Exhibit 2B3](#)); and for the third level and above in the Phase IV building. The below-grade space protrudes 8 feet, 4 inches – 16 feet into the required setback and floors three and above protrude 2 feet, 1 inch to 6 feet, 6 inches into the required setback.

The Applicant clarified in its prehearing statement that relief would not be required for conditions at grade.



Subtitle C § 1102.1(g)

- i. *The buildings, structures, and uses will enhance the visual and public recreational opportunities offered along the waterfront. (11- C DCMR*

The new buildings would complete the long-standing PUD project at the west end of the riverfront's edge at the Frederick Douglass Bridge. The design and siting of the structures along with the extensive open space culminating at the water's edge would satisfy the visual and recreational opportunities desired along the waterfront and would not be inconsistent with the relevant elements of the Comprehensive Plan.

- ii. *Buildings, structures, and uses on land will be located and designed to minimize adverse impacts on the river and riverbank areas*

The projections into the setback below grade at the parking level, shown in the reproduced drawing above should not adversely impact the river's edge and riverbank. Similar projection below grade exist at the Maren building to the east.

Design of the proposed structures would not adversely impact above grade pedestrian circulation patterns or the river and riverbank's frontage. Construction would meet the required engineering standards at permitting to protect the riverfront. Grant of relief for the third floor and above would also not adversely impact the river and river-bank areas. No relief is needed from the waterfront setback at grade.

- iii. *Buildings, structures, and uses on, under, or over water will be located and designed to minimize adverse impacts on the river and riverbank areas*

Buildings would not be located on, under or over the water.

- iv. *All structures and buildings will be located so as to not likely become objectionable to surrounding and nearby property because of noise, traffic, or parking, and so as not to limit public access along or to the waterfront, other than directly in front of the principal building or structure of a boathouse, marina, yacht club, or other water-dependent use.*

Parking entrances and traffic would occur north of the site – outside of the bulkhead. The modified PUD would improve public access to the waterfront over the original by incorporating several hardscaped pathways intended to encourage interaction with the waterfront.

- v. *Impervious surfaces will be minimized, and buildings and all other impervious surfaces will be designed and sited to prevent surface storm water run-off directly into the river.*

The design minimizes impervious surfaces through the extensive landscaping that would be provided and contemporary stormwater management that does not exist on this portion of the PUD site. Rehabilitation of a living shoreline consistent with the eastern parts of the shoreline along the Navy Yard is proposed as natural erosion control, while promoting habitat and biodiversity, along the Riverwalk.

- vi. *Accessory or non-accessory parking spaces, including the location of entrances and exits and any screening or fences, will be designed to minimize visual or physical impacts on adjacent parkland and the waterfront*

Temporary surface parking spaces for the existing and future interim uses would remain on the Phase 3 site and this is well outside of the bulkhead's setback to the north. Permanent parking would be located below grade across the Phase 3 and Phase 4 site and would not be visible at grade.

- vii. *Emergency access will be provided to any buildings, structures, or other space devoted to active public use.*

Emergency access is located north of the required setback. Fire control circulation is within the courtyard alongside the northern portion of the Phase 4 building.

SPECIAL EXCEPTION - X § 901.2

- i. *The requested relief will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.*

The below-grade parking and projections at the third floor and above would have limited encroachment into the required waterfront setback such that the relief requested would not harm the intent of the Regulations. The design and siting satisfy the criteria as discussed prior, to meet the intent of the regulations which is to protect the riverfront and shoreline.

- ii. *The requested relief will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.*

Grant of the relief would not adversely affect the use of neighboring property, as the adjacent building is part of the overall PUD and the below grade parking is also approximately 19 feet projected into the bulkhead, without affecting the shoreline or pedestrian circulation above grade.

Design Flexibility - The applicant also requests flexibility to modify design within the approved ranges that may be available at the time of construction and further project design for several features as listed on Page 22 and 23 of the Applicant's statement ([Exhibit 2](#)), including:

- Interior components: Exterior Materials color; Exterior Details, Number of Units, Parking Layout, Streetscape Design, Signage, Sustainable Features, Balconies, Courtyards and Rooftops, Mechanical Penthouse; Ground-floor Design; Retail Spaces; Interim Uses and Phasing.

Request for flexibility for the above as outlined in the Applicant's report appear consistent with Zoning Commission's established standards and is presented in full by the Applicant and its prehearing statement of [Exhibit 10](#).

However, OP highlights requested flexibility of the following since it is based on timing of the phases and issuance of a certificate of occupancy:

Interim Uses: To maintain temporary uses and structures on the site of Phase Three during construction of Phase Four, including staging, a dog park, pop-up retail or services uses, and a maximum of 30 surface parking spaces accessory to the on-site retail and park uses. The permanent dog park proposed will be constructed prior to the issuance of the Certificate of Occupancy for Phase Three.

OP supports the existing interim uses at the site of Phase III which will continue until Phase IV is completed.

Phasing. The Applicant shall file for a building permit for the construction of Phase IV within two years of the effective date of this Order and construction shall commence within three years of the effective date of this Order. The Applicant shall file for a building permit for the construction of Phase Three within two years of the issuance of the Certificate of Occupancy for Phase Four.

Change to the project's phasing is appropriate given approximate times for the issuances of final orders and construction permits combined.

As stated above, the requested flexibility is similar to prior PUD approvals along the waterfront, including this PUD and would not result in an action inconsistent with the Comprehensive Plan or materially change the facts upon which the original PUD was decided.

Public Benefits and Amenities:

Subtitle X § 305.2 states that *public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title.*

Subtitle X § 305.5 provides a summary of categories for PUD benefits and amenities.

- (a) Superior urban design and architecture*
- (b) Superior landscaping, or creation or preservation of open spaces*
- (c) Site planning and efficient and economical land utilization*
- (d) Housing*
- (e) Affordable housing*
- (f) Environmental and sustainable benefits,*
- (g) Uses of special value*
- (h) Transportation infrastructure beyond that needed to mitigate any potential adverse impacts of the application,*
- (i) Other public benefits and project amenities and other ways in which the proposed PUD substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan.*

The final benefits/amenities proffer is submitted as follows:

Benefits and Amenities: Benefits and amenities approved as part of the First Stage PUD and continued under the Stage II Consolidated PUD include:

- *Urban Design, Superior Architecture, Site Planning, Landscaping and Open Space*

The proposed buildings for Phases III and IV would complete the development program for Florida Rock, complementing the built Maren (Phase II) and Dock 79 (Phase I). The massing presents C-shaped footprints, and the siting of the buildings provides publicly accessible open space and visual permeability to preserve sight lines to the river. At 130 feet in height, the proposed buildings would complement the scale of the Frederick Douglass Bridge.

The first stage approval did not include residential units as part of the final phases; this application would include 590 units, which also increases the number of proffered affordable units from 0 to 59 units. Up to 6,518 square feet of communal space would be provided within the penthouse. The roof and penthouse plans show indoor amenity rooms, residential units, outdoor amenity terraces, pools and green roof systems. ([Exhibit 2B3 L017- L 023](#)). Phase IV would provide 6,331 square feet of retail use.

The shared driveway between the existing Maren building to the east and proposed buildings west to the Frederick Douglass Bridge is also intended to provide clear views to the waterfront from the north at Potomac Avenue. The addition of 24-foot wide balconies on the river façades emphasizes open space and create passive recreation opportunities for future residents

Circulation Infrastructure

The building separates at the base to form a shared north-south, open alley for the building's loading and parking circulation. This driveway would have access from Potomac Avenue to the below grade loading docks and parking and would also provide pedestrian and bike access to the recreation uses at the river's edge. ([See Exhibit 2B2 Sheets L003, 004](#))

The requested modification would provide two levels of below grade parking with 335 spaces allocated to residential use and 50 spaces to retail ([Exhibit 2B2 Sheets 005, 006](#)). The plan includes two curb cuts and remains efficient in terms of the proposed vehicular circulation, required to facilitate ingress, egress and loading for the residential and retail components of the building. The shared alleyway would provide pedestrian circulation between the buildings, which would be

enhanced with a variety of materials in the walkways, along with contemporary landscaping and lighting for a pleasant/safe pedestrian experience throughout the development.

A Comprehensive Transportation Review (as revised) – Phases 3 and 4 is included in the record at [Exhibit 21A](#). DDOT's comments on the overall traffic and circulation implications will be filed separately to the record.

Landscaping and Open Space

The project's open space is an important benefit which ties the final phases of this project to the overall open space pattern of the waterfront, forming a west bookend at the Fredrick Douglass Bridge. Open space to the west and east of the larger PUD would provide for:

- a. The shared circulation for pedestrians and bike access through this section of the waterfront;
- b. Improved pedestrian access to the Riverwalk
- c. Pronounced view sheds;
- d. Increased bio-filtration; and
- e. Improvement in the design and proposals for public gathering areas, including a dog park and usable open space throughout the site.

The open spaces of this project including Phases 3 & 4, form an important foundation of the site's design, given the riverfront location. The project would provide approximately 42,014 square feet of publicly accessible open space on Phases 3 and 4, and the buildings' footprints would include an approximate lot occupancy of 53.45%.

The Applicant transferred approximately 14,802 square feet of area that was formerly part of the PUD property to the District and also agreed to maintain those lands. According to the Applicant, this donation resulted in a loss of land value for the Applicant but its commitment to construction and maintenance would involve an annual financial commitment of approximately \$7.5 million in expenses, in addition to the public spaces that will be designed as a part of this PUD. Beyond this cost factor, the open space is an important aspect of bringing the community and wider District residents to a well-curated Central Plaza and Public Garden and dog-park, free to the public. Therefore, the visibility of the open spaces is considered an amenity of the PUD.

The proposal is not inconsistent with the massing and layout approved for the Stage 1 PUD. The proposed design is well improved after discussions with OP and other agencies and completes the visual gateway at this junction of the waterfront at the Oval and Frederick Douglass Bridge.

- *Housing and Affordable Housing* – OP is supportive of the continued provision of new housing along the Anacostia Riverfront. The original plan for these phases of the development did not include housing or affordable housing, as office and hotel with retail was originally approved. Under this modification up to 590 residential units would be provided, including 59 affordable IZ units for residents at 60% AMI. Although the existing apartments on the site predate IZ regulations, there are a total of 48 affordable units within Phases 1 and 2. All phases combined would provide up to 107 units of affordability, including through IZ and non-IZ programming.
- *Environmental Benefits* – LEED Gold certified, with up to 8,500 sq.ft. of green roof would be provided in Phase III, and 13,400 sq.ft. in Phase IV. Extensive landscaping, new trees and bioretention are also included as part of the project's sustainability.

- *Employment and Training Opportunities*- The Applicant has an executed Memorandum of Understanding with the DC Department of Small and Local Business Development and a First Source Agreement with the Department of Employment Services to achieve a goal of utilizing DC residents for at least 51% of new jobs created by the project, as approved and complied with in the earlier Phases under Order 04-14B/D. The Applicant provided an update of compliance with the DSLBD requirements of the Order in its prehearing submission of [Exhibit 10](#).

The project has complied with the approved PUD including abiding by the MOU with DSLBD to achieve target goal of 35% participation by CBE (Order No. 04- 14B/D). It is also a proposed condition of this PUD.

VI. RACIAL EQUITY ANALYSIS

The Comprehensive Plan states, *The District seeks to create and support an equitable and inclusive city...Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities.* 213.6

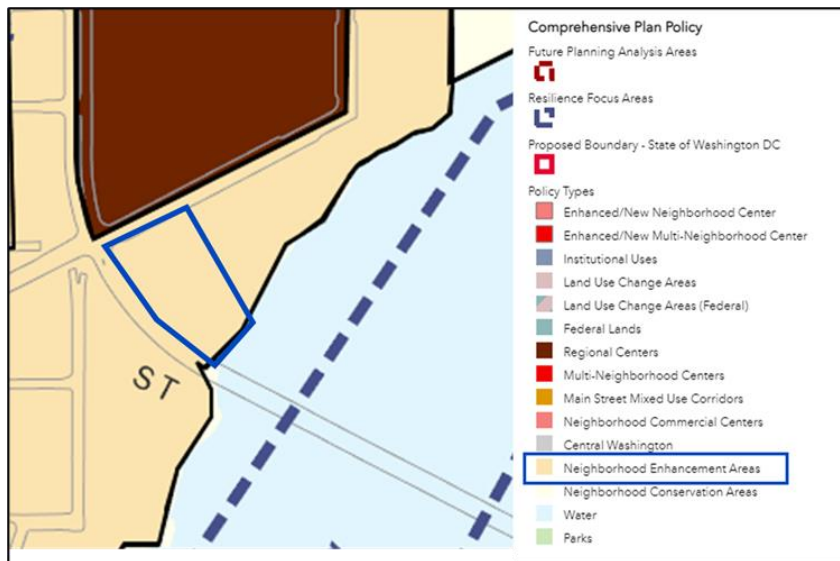
The Comprehensive Plan’s Implementation Element calls for “*the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis*”^{2501.8}. The scope of the review and Comp Plan policies that apply depend on the nature of the proposed zoning action. To assist in this analysis, the Commission created a **four-part Racial Equity Tool**.

Ultimately, a racial equity analysis is a tool for identifying and addressing structural inequalities and ensuring that all members of the community, regardless of race or ethnicity, can benefit. The Commission requires an analysis of the proposed zoning action through the equity lens, utilizing disaggregated race and ethnicity data. The applicant Racial Equity Analysis is provided at [Exhibit 2D](#).

Racial Equity Tool Part 1 – Comprehensive Plan Guidance

As detailed below, the proposed Second Stage PUD is, on balance, not inconsistent with the policies and goals of the Comp Plan or with the policy intent behind the original PUD approved by the Zoning Commission. Given the wide range of overlapping policy topics addressed in the Comprehensive Plan, many Citywide Element policy statements may have little to no applicability to this proposal or to this portion of the Lower Anacostia Waterfront area. For those Citywide Elements that are more directly applicable to the proposal, a narrative is provided below explaining the basis for the determination that the proposal is not inconsistent with that element.

A. LAND USE MAPS



The Comprehensive Plan's **Generalized Policy Map** describes the subject site as located within a Neighborhood Enhancement Area ("NEA") and Resilience Focus Area on the GPM. As described in the Framework Element, Neighborhood Enhancement Areas consist of "substantial amounts of vacant and underutilized land." (225.6) but also include residential, mixed-use, and industrial areas and offer opportunities for infill development, including mixed-use buildings.

The **Future Land Use Map** indicates that the site is appropriate for mixed *medium density residential* and *medium density commercial* use, and *open space* along the riverfront. The approved PUD for the site concluded that the project was not inconsistent with the Comprehensive Plan. The total 6.14 FAR would exceeds the 1.8 to 4.0 FAR range referenced in the Medium Density Residential category, but the Framework Element provides that greater density is possible through a PUD.

The current proposal would continue to reflect the density anticipated by the FLUM. The proposed 53.45% lot occupancy is intended to support substantial open space. The Phase Three building proposes a 3.08 FAR and the Phase Four would be at 3.06 FAR.

B. Comprehensive Plan Written Elements

Individual policies and actions for the Citywide Elements of *Land Use*, *Housing*, *Transportation*, *Parks and Recreation*, *Economic Development*, *Environmental Protection*, and *Urban Design* are referenced in [Appendix I](#) of this report for ease of reference.

Chapter 3 Land Use

- **Policy LU-1.4 Transit-Oriented and Corridor Development**
- **Policy LU-1.2.2: Mix of Uses on Large Sites**
- **Policy LU-1.2.4: Urban Mixed-Use Neighborhoods**
- **Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family housing Near Metrorail Stations**
- **Policy LU-1.4.6: Development Along Corridors**

- *Policy LU-2.1.1: Variety of Neighborhood Types*
- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods*
- *Policy LU-1.5.1: Infill Development*
- *Policy LU-1.5.2: Long-Term Vacant Sites*
- *Policy LU-2.1.10: Multi-Family Neighborhoods*

The proposed PUD modification and Stage 2 would further the Land Use Elements policies with the development of a mixed-use development consisting of ground floor retail and residential uses above, and an addition to the park system in the Riverfront/Navy Yard neighborhoods. The policies cited in Appendix I and discussed in the Citywide and Area Elements, work together to support the approved density to permit mixed-use development, including market rate and affordable housing, in proximity to transit on a large, underused parcel.

The infill project would be attractive, pedestrian-friendly, and transit accessible, with compatible commercial development, which could provide jobs for nearby residents, while providing new waterfront related recreation opportunities for neighborhood and District residents.

Chapter 4 Transportation

- *Policy T-1.1.1: Transportation Impact Assessment*
- *Policy T-1.1.3: Context-Sensitive Transportation*
- *Policy T-1.1.4: Transit-Oriented Development*
- *Policy T-1.1.7: Equitable Transportation Access*
- *Policy T-1.3.1: Transit-Accessible Employment*
- *Policy T-1.4.1: Street Design for Placemaking*
- *Policy T-2.2.2: Connecting District Neighborhoods*
- *Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning*
- *Policy T-2.4.1: Pedestrian Network*

The subject property is located within walking distance to the Navy Yard Metro station and is on a transit corridor with access to several Metrobus routes, while also extending the waterfront pedestrian and bicycle trail network. Indoor bicycle parking would be provided, as required by the Zoning Regulations, and pedestrian spaces would consist of wide curbless sidewalks and gathering spaces. The project would include charging stations for e-vehicles including e-bikes. The location is readily accessible to the bike path along the riverfront to other areas within the District and this project would extend the Anacostia Riverwalk Trail.

Chapter 5 Housing

1. *Policy H-1.1.1: Private Sector Support*
2. *Policy H-1.1.3: Balanced Growth*
3. *Policy H-1.1.4: Mixed-Use Development*
4. *Policy H-1.1.7: Large Sites*
5. *Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority*
6. *Policy H-1.2.2: Production Targets*
7. *Policy H-1.2.3: Affordable and Mixed-Income Housing*
8. *Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas*
9. *Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods*
10. *Policy H-1.4.6: Whole Neighborhood Approach*
- 11.

The proposed PUD modification would include the provision of approximately 590 dwelling units with 59 units set aside for affordable housing available to households earning up to 60 percent MFI. There would be three-bedroom units, both market and affordable, which would provide opportunities to families in this high-cost neighborhood. The additional dwelling units further the District's housing goals in the Planning Area. The proposed increase in the total supply of housing units

in the Planning Area, could help to alleviate pressure on housing costs. New housing in a transit-rich area, close to Metro entrances and along a well travelled transit corridor is desirable for new residents who seek easy access to everyday needs, services and employment. The Riverfront has emerged as a vibrant neighborhood among other nearby developed waterfront neighborhoods, with neighborhood services and needs including schools, library, shopping, and opportunities for recreation.

Chapter 6 Environmental Protection

- *Policy E-1.1.2: Urban Heat Island Mitigation*
- *Policy E-2.1.3: Sustainable Landscaping Practices*
- *Policy E-3.2.3: Renewable Energy*
- *Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff*

The site is in a Resilience Focus Area, which is an area that is intended to ensure resilience to flooding for new development and infrastructure projects. In these areas, the implementation of neighborhood-scale, as well as site-specific solutions, design guidelines and policies for a climate-adaptive and resilient city are encouraged and expected. The Applicant is committed to application of the guidelines under the Climate Ready DC Resilient Design Guidelines. The proposal includes site-specific resilient design including raising the elevation of the development sites and private roads such that they are above the 500- and 100-year floodplains. Both buildings are also being designed to comply with the District's proposed new floodplain regulations, which includes additional resilient design measures that anticipate climate change.

The proposed PUD would be certified LEED Gold v4, earning credits for heat island reduction, rainwater management, indoor and outdoor water use, energy use, heating and cooling distribution, access to transit, and construction waste management. The proposed use of vegetated land cover and appropriate plantings would be beneficial to the ecosystem services they provide to mitigate natural hazards.

Chapter 7. Economic Development

- *Policy ED-1.1.6 Competitive Edge*
- *Policy ED-1.1.7 Use of Large Sites*
- *Policy ED-2.2.3: Neighborhood Shopping*
- *Policy ED-2.3.3: Amenities Beyond the Mall*
- *Policy ED-2.3.10: Waterfront Destinations*

The site would benefit the local economy due its proximity to Metro, the waterfront, and several other amenities that have emerged in the Capitol Riverfront neighborhood. New residents would support local area business. The site is currently essentially vacant, with an interim dog park so businesses would not be displaced. The addition to the park area would add to the attractiveness of the waterfront as an urban park along a notable waterfront for tourists and local visitors alike.

Chapter 8 Parks Recreation and Open Space

- *Policy PROS-1.1.3: Park Diversity*
- *Policy PROS-1.3.6: Compatibility with Adjacent Development*
- *Policy PROS-1.3.7: Health and Wellness*
- *Policy PROS-1.4.1: Park Planning*
- *Policy PROS-1.4.4: Parks on Large Sites*
- *Policy PROS-1.4.7: Parks in Employment Growth Areas*
- *Policy PROS-4.3.3: Common Open Space in New Development*
- *Policy PROS-4.3.4: Preservation of Open Space in Multi-family Development*

The new development would further the environmental goals by application of the DC Climate Resiliency Guidelines and complying with stormwater and floodplain requirements. The modified PUD would include the expansion of the built park system with significant area to incorporate additional features that would be more accessible to a variety of users. The additional space would accommodate a variety of plantings to differentiate the open space and its uses, including the provision for active and passive recreation and inclusion of an accessible dog park. The provision of curbless areas would enhance the experience of the open space while functioning as green infrastructure as desired by the neighborhood and encouraged in the Comprehensive Plan overall. The proposed active and passive spaces are designed and planned to maximize the scenic and recreational value of the river as stated under the policies of this element. The PUD process promotes this space as public benefit as desired under E § 819.4. This would be a benefit of the PUD and to the District, as a whole.

Chapter 9 Urban Design

- *Policy UD-1.1.1: National Image*
- *Policy UD-1.1.3: Preeminent View*
- *Policy UD-1.1.6: Inclusive and Vibrant Civic Spaces*
- *Policy UD-1.2 Designing in Harmony with Natural Topography and Landforms*
- *Policy UD-1.2.4: Significant View Protection*
- *Policy UD-1.3.1: Diverse Waterfront Experiences along the Anacostia River*
- *Policy UD-1.3.2: Waterfront Public Space*
- *Policy UD-1.3.3: Innovative and Resilient Waterfront Development*
- *Policy UD-1.3.4: Resilient Waterfront*
- *Policy UD-1.4.1: Thoroughfares and Urban Form*
- *Policy UD-1.4.2: District Gateways*
- *Policy UD-1.4.3: Thoroughfare Vistas and View*
- *Policy UD-1.4.4: Priority Avenues and Gateway Corridors*
- *Policy UD-2.1.1: Streetscapes That Prioritize the Human Experience*
- *Policy UD-2.1.6: Minimize Mid-Block Vehicular Curb Cuts*
- *Policy UD-2.1.8: Special Streetscape Design Guidelines*
- *Action UD-2.1.A: Retail Ceiling Heights*
- *Policy UD-2.2.1: Neighborhood Character and Identity*
- *Policy UD-2.2.2: Areas of Strong Architectural Character*
- *Policy UD-2.2.3: Neighborhood Mixed-Use Centers*
- *Policy UD-2.2.7: Preservation of Neighborhood Open Space*
- *Policy UD-3.2.5: Safe and Active Public Spaces and Streets*
- *Policy UD-4.2.1: Scale and Massing of Large Buildings*
- *Policy UD-4.2.2: Engaging Ground Floors*
- *Policy UD 4.2.6: Active Facades*
- *Policy UD-4.3.3: Building Setbacks and Rooflines*

Policy UD-1.1.1 calls for the District to enhance its “image, character and outstanding physical qualities...in a manner that reflects its role as the national capital.” The Urban Design Element also calls for the general improvement of waterfront areas, including improving access and strengthening the civic identity as a waterfront city (Policies UD-1.3.1 and UD-1.3.2).

The revitalized waterfront including recent development now form an integral part of the of the District’s local and national image. The proposed development would continue this improvement of its image in the revitalized Capitol Riverfront neighborhood to a state that it could not only be an amenity for residents but would also improve the city’s image as one with a variety of lively destinations.

Policy UD-1.3.5 also states that views toward the rivers should be protected and enhanced by shaping the design of buildings to frame views and by encouraging sensitive tree planting and landscaping that preserves an open sky and strong visual access to the water. The C-shape buildings and their placement on the site would support this policy allowing views from Potomac Avenue to the riverfront.

The PUD would be compatible in terms of height, FAR, and design, with existing surrounding development and would complete the corner of Potomac Avenue at the waterfront with its modern aesthetic and complement to the Diamond Teague Park at the west end. The ground floor areas would read as accessible retail spaces which would flow into the wide on-site curb-less sidewalks and open spaces towards the waterfront.

The open spaces would be an excellent addition to the existing park areas on the waterfront as it would include informal recreational spaces for an array of users, including a dog park, not provided in other areas of the park system.

Area Element: Lower Anacostia Waterfront and Near Southwest

- *Policy AW-1.1.2: New Waterfront Neighborhoods*
- *Policy AW-1.1.3: Lower Anacostia Waterfront Infrastructure for Flood Mitigation*
- *Policy AW-1.1.7: Waterfront Area Commercial Development*
- *Policy AW-1.1.8: Waterfront Development Amenities*
- *Policy AW-1.1.10: Pedestrian Orientation of Waterfront Uses*
- *Policy AW-1.2.3: Waterfront Sports and Recreation Destinations*
- *Policy AW-1.2.4: Anacostia River Parks*
- *Policy AW-2.3 Near Southeast/Capitol Riverfront (Policy Focus Area)*
- *Policy AW-2.3.1: Restoring the Urban Pattern of the Near Southeast/ Capitol Riverfront*
- *Policy AW-2.3.2: Near Southeast/Capitol Riverfront Shoreline Access*

The Lower Anacostia Waterfront / Near Southwest Area Element encourages the creation of new waterfront neighborhoods on vacant or underused lands (Policy AW-1.1.2). Policy AW-1.1.3 encourages the inclusion of parks, open space, and other improvements around denser development that preserve or enhance the natural function of floodplains. Commercial development in the waterfront area is also advanced by the modification in a manner that is consistent with the Future Land Use Map, as future development would bring more retail services and choices to the Anacostia waterfront as desired by Policy AW-1.1.7.

The PUD modification also follows the more specific guidance of the Capitol Riverfront Policy Focus Area. Revitalization of the Near Southeast/Capitol Riverfront has been one of the cornerstones of the Anacostia Waterfront Initiative (AWI). The proposal would continue to support the policy of improving shoreline access and movement to and through Near Southeast/ Capitol Riverfront by eliminating real and perceived barriers, improving public space and street corridors as stated in Policy AW-2.3.2.

In summary, the proposal would further important policies of the Lower Anacostia Waterfront / Near Southwest Area Element of the Comprehensive Plan, and, on balance, would be not inconsistent with the Comprehensive Plan.

C. Anacostia Waterfront Initiative

The AWI Framework Plan identifies five critical themes to guide waterfront development along the Anacostia River. These [five themes](#) are:

1. **A Clean and Active River** - The AWI charts the course for environmental healing and the rejuvenation of water-dependent activities on the Anacostia River. Pollution must be mitigated, run-off controlled, streams and wetlands restored and water activities promoted.
2. **Eliminating Barriers and Gaining Access** - The AWI reconsiders the design of transportation infrastructure to gain access to waterfront lands and better serve waterfront neighborhoods. The community must be able to get to the waterfront on beautiful streets and bridges that become gateways to the river's parks and amenities.
3. **A Great Urban Riverfront Park System** - The AWI creates a system of interconnected and continuous waterfront parks that will be linked by the Anacostia Riverwalk and Trail. The Anacostia River Parks system will rival the great waterfront parks of the world and provide open space for adjoining neighborhoods, the city and the nation.
4. **Cultural Destinations of Distinct Character** - The AWI enhances and protects the distinct character of regional destinations along the waterfront. This will help create a vibrant waterfront that celebrates the cultural heritage of the river's neighborhoods, the city and the nation.
5. **Building Strong Waterfront Neighborhoods** - The AWI promotes sustainable economic development and re-connects the city to the river through new neighborhoods and the waterfront park system by creating opportunities to live, work and play along the river.

At the top of the recreation and transportation agenda of the Anacostia Waterfront Initiative is the establishment of a continuous Riverwalk: a trail along the east and west banks of the river. The Riverwalk is both a recreational amenity and a transportation alternative for Washington-area commuters, connecting neighborhoods to each other and to the greater River Parks system. Many of the elements of the AWI, including the Riverwalk, have been implemented or initiated along other parts of the Anacostia waterfront. The proposed PUD modification and the character of development and open space, including the River Walk, would continue to further the principles developed under the themes of the AWI Plan.

D. Sustainable DC 2.0 and Clean Energy DC

Sustainable DC 2.0 (SDC) is the District's overarching environmental policy document. It was developed contemporaneously with the updates to the Comprehensive Plan, and many of its recommendations were incorporated in the Comprehensive Plan.

The proposed zoning text would help to implement the policy guidance of these plans by including LEED Gold, GAR, and renewable energy requirements. Enhanced walkability would encourage residents to utilize parks, trails and outdoor amenities, and potentially help to reduce auto usage.

Racial Equity Tool Part 2 – Community Outreach and Engagement

As part of [Exhibit 2D](#), the applicant outlines their community outreach, including a description of how community outreach informed the current PUD modification and Stage 2 filing.

Racial Equity Tool Part 3 – Disaggregated Data Regarding Race and Ethnicity

Analysis of data over time can yield insights into trends in the planning area. The following data compares the American Community Survey data described above with data from 2012-2016 to the 2018-2022 period, available from [OP's State Data Center](#). Each table below covers both 5-year

periods and compares the data from the Lower Anacostia Waterfront / Near Southwest (LANSW) planning area with District-wide data.

Population by Race/Ethnicity

Table 1: General Characteristics of the Lower Anacostia Waterfront / Near SW Planning Area and District

Race or Ethnicity	District 2012-2016	District 2018-2022	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Total Population	659,009 100%	670,587 100%	17,254 100%	25,994 100%
White	266,035 (40.3%)	265,663 (39.6%)	8,934 (51.8%)	15,236 (58.6%)
Black	318,598 (48.3%)	297,101 (44.3%)	6,741 (39.1%)	7,594 (29.2%)
Am. Indian and Al. Na.	2,174	2,209	119	58
Asian	24,036	27,067	804	1,123
Na. HI and Other Pacific Islander	271	420	22	0
Some other race	29,650	30,879	97	380
Two or more races	18,245	47,278	538	1,603
Hispanic	69,106	77,168	965	1,942

Table 1 above provides general characteristics of the planning area, which now has a total population of 25,994 residents (2022). The planning area has a higher percentage of residents who are White as compared to the Districtwide percentage. The planning area has a lower percentage of Black residents compared to the Districtwide average, and the percentage of Black residents declined during this period, although the total number of Black residents increased. As of 2017, just under 52 percent of the Lower Anacostia Waterfront/Near Southwest Planning Area's residents were white, which is a significant increase from 24 percent in 2000. In 2017 just under 40 percent of the Planning Area's residents were Black, which is a decrease from 67 percent. The number of residents who identify as Hispanic in the planning area rose but remained below the Districtwide average.

The Comprehensive Plan notes that *“As of 2017, just under 52 percent of the Lower Anacostia Waterfront/Near Southwest Planning Area's residents were white, which is a significant increase from 24 percent in 2000. In 2017 just under 40 percent of the Planning Area's residents were Black, which is a decrease from 67 percent in 2000. Some of this change in demographics can be attributed to the net gain in developable land and subsequent new construction of residential units attracting residents to the area. Additionally, most of the new residential buildings have primarily consisted of market rate one-bedroom units, attracting more young professionals to the area for the first time. Approximately six percent of the area's residents are of Hispanic/Latino origin, and 10 percent are foreign-born.”* 1903.2. This trend has continued to the present day.

Further, *“Based on land availability, planning policies, and regional growth and development trends, the Lower Anacostia Waterfront/Near Southwest Planning Area will experience significant growth in population, households, and jobs over the coming decades. The population, ..., is expected to grow to 40,200 in 2025, 48,997 in 2035, and 58,789 in 2045. The number of households is expected to increase from 10,083 to 33,915 in 2045.* 1903.4

Age & Vulnerable Population**Table 2. Age & Vulnerable Population**

Vulnerable Population	District 2012-2016	District 2018-2022	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Persons 65 and Older	11.4%	12.6%	13.4%	8.9%
Persons Under 18	17.4%	18.5%	10%	9.1%
Percent Disable	11.3%	10.98%	11.8%	17.04%

Table 2 shows that the percentage of persons 65 years or older in the planning area is lower than the Districtwide percentage, and the percentage has declined. The percentage of persons under 18 years in the planning area is also lower than the Districtwide percentage. The disability rate in the planning area is higher than the Districtwide rate and has increased.

Homeownership**Table 3. Housing Tenure**

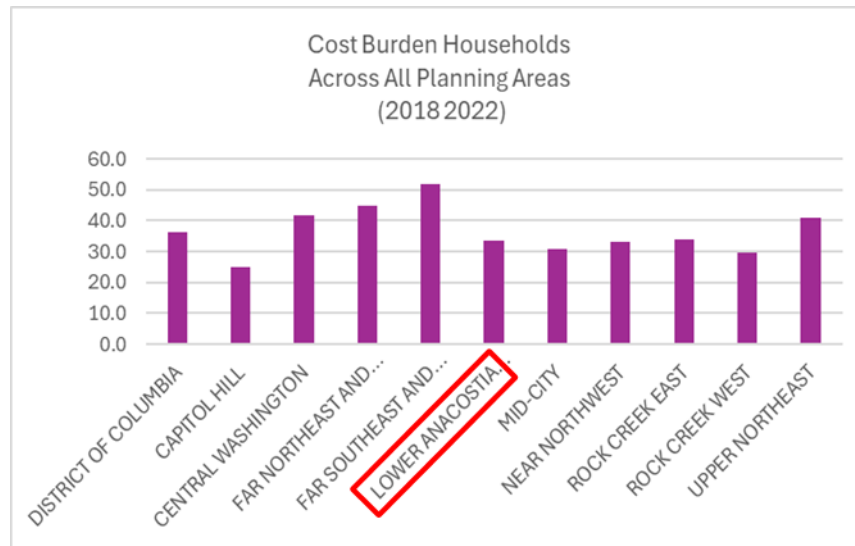
Owners/Renters		District 2012-2016	District 2018-2022	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Total	Owner Households	40.7%	41.4%	34.8%	24.4%
	Renter Households	59.3%	58.6%	65.2%	75.6%
White	Owner Households	47.8%	47.4%	40.4%	23.1%
	Renter Households	52.2%	52.6%	59.6%	76.9%
Black	Owner Households	46.6%	35.9%	25.7%	24.3%
	Renter Households	53.4%	64.1%	74.3%	75.8%
American Indian and Alaskan Native	Owner Households	32.8%	25.8%	28.3%	0
	Renter Households	67.2%	74.2%	71.7%	0
Asian	Owner Households	43.1%	42.4%	48.5%	38.1%
	Renter Households	56.9%	57.6%	51.5%	61.9%
Native Hawaiian and Other Pacific Islander	Owner Households	9.1%	64.2%	0.0%	0
	Renter Households	90.9%	35.8%	100%	0
Some Other Race	Owner Households	17.5%	26.6%	31.9%	20.7%
	Renter Households	82.5%	73.4%	68.1%	79.3%
Two or More Races	Owner Households	32.7%	43.9%	27.8%	28.5%
	Renter Households	67.3%	56.2%	72.2%	71.5%
Hispanic or Latino	Owner Households	30.9%	35.3%	25.2%	18.1%
	Renter Households	69.1%	64.7%	74.8%	81.9%

Table 3 shows that the percentage of owner households in the planning area is lower than that of renter households, and lower than the District percentage. This is the case for all groups.

Most of the housing stock in the Lower Anacostia Waterfront/Near Southwest Planning Area is contained in multi-family buildings. In 2017, about 71 percent of the housing stock was located in buildings with 20 or more units, which is more than twice the District-wide proportion of 35.4 percent.

Table 4. Cost Burdened Households

Cost Burdened Households	District 2012-2016	District 2018-2022	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Percent of Households spending 30% or more of their income on their housing	38.6%	36.1%	35.8%	33.6%



The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family and senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area, 28.1 percent, is dedicated to residential use (Framework Element § 205.3). The scarcity of land increases the cost of building new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households. As such, the opening of new housing opportunity sites, such as this site, is particularly important in meeting District housing and affordable housing goals.

The Comprehensive Plan states that residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement” (Framework Element § 206.4). Therefore, given the median income for African Americans and their lower population in the planning area compared to Whites, it may be inferred that they would make up a higher percentage of cost burdened households in this planning area.

Income and Employment

Table 5. Median Household Income

	District Total 2012-2016	District Total 2018-2022	LAW/NSW (2012-2016)	LAW/NSW 2018-2022
Total households	\$72,935	\$101,722	\$80,779	\$123,667
White alone	\$119,564	\$160,745	\$98,831	\$152,688
Black or African American	\$40,560	\$57,076	\$41,641	\$65,571
Am. Indian & Ala. Nat.	\$51,306	\$60,390	\$148,020	N/A
Asian alone	\$91,453	\$123,660	\$85,634	\$138,331

	District Total 2012-2016	District Total 2018-2022	LAW/NSW (2012-2016)	LAW/NSW 2018-2022
Hawaiian and Pacific Islander alone	\$NA	-	\$47,500	N/A
Some Other Race	\$48,047	\$61,851	\$103,796	\$122,732
Two or More Races	\$83,243	\$108,455	\$79,722	\$106,306
Hispanic or Latino	\$60,848	\$94,203	\$85,067	\$135,813

Table 5 above shows that the median household income in the planning area is higher than the District's median household income. Black residents have the lowest median income among all other ethnicities, although average income increased over this period. This also reflects a direct correlation to unemployment and poverty as shown in Table 6 below.

Table 6. Unemployment and Poverty (Population 16 years and over)

UNEMPLOYMENT	District Total 2012-2016	District Total (2018-2022)	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Total	8.7	7.1	6.3	4.0
White alone	3.1	2.6	3.4	3.2
Black or African American alone	16.8	14.0	14.0	7.2
American Indian and Alaska Native alone	9.8	2.8	0.0	0
Asian alone	2.3	2.7	0.0	5.0
Native Hawaiian and Other Pacific Islander alone	4.8	2.8	0.0	0
Some Other Race alone	6.8	8.0	0.0	5.1
Two or More Races	6.7	4.7	9.6	0.7
Hispanic or Latino	6.2	5.3	1.2	6.6

POVERTY STATUS	District 2012-2016	District 2018-2022	LAW/NSW 2012-2016	LAW/NSW 2018-2022
Total Population below poverty	112,060	98,029	2,645	2,898
Percent in poverty	17.9	15.1	15.6	11.23

The proposed introduction of housing to replace the proposed office and hotel uses on this undeveloped site could help to alleviate some degree of inequity, especially regarding housing costs and the number of families that are housing-cost-burdened. Data on the number of households burdened by housing costs is not disaggregated by race but given unemployment and income levels it can be inferred that additional affordable housing would help to further equitable outcomes.

Affordable Housing Goal: Mayor's January 2023 DC Comeback Plan

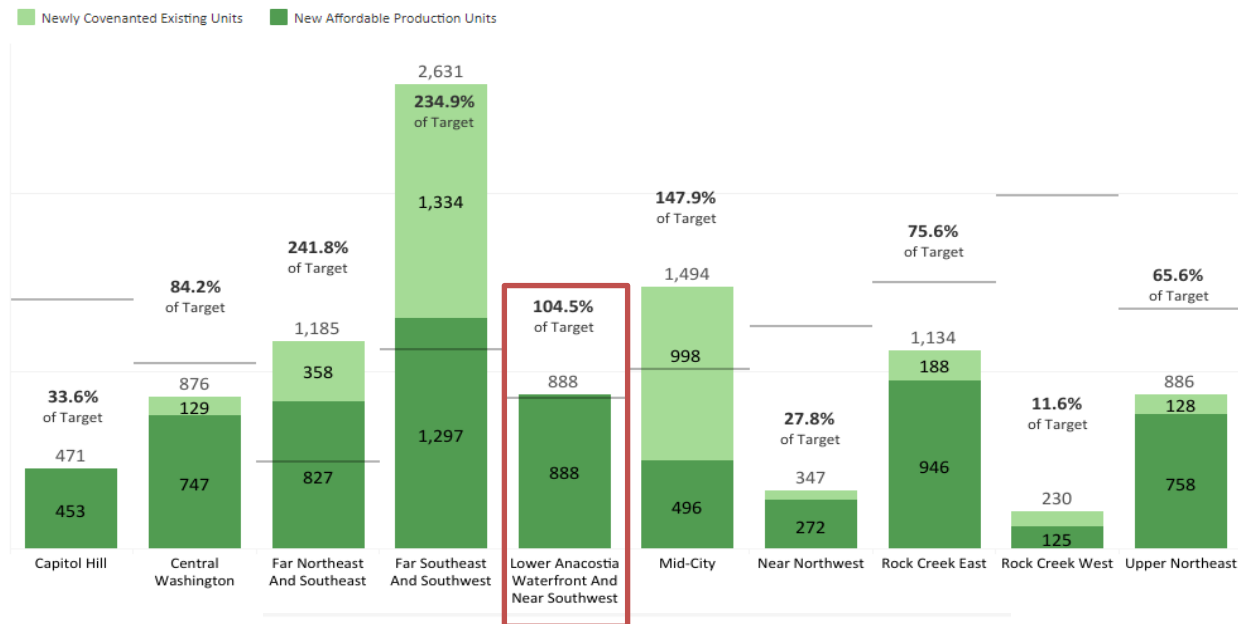
Part 3 of the Racial Equity tool also asks if the planning area is on track to meet the Mayor's 2025 affordable housing goal.

As can be seen in the chart below, the Planning Area has exceeded the housing target set for 2025. However, it is important to note that the goals established for 2025 are just that – goals, and the provision of additional housing and in particular additional affordable housing to exceed the

established goal will also be important in addressing the housing needs of the District.

Over 36,216 housing units have been delivered throughout the District since 2019. The Mayor’s housing goal also aims to produce 12,000 new affordable units to households earning below 80% of Median Family Income (MFI). As of July 29, 2024, the District has produced 9,845 affordable units, reaching 82% of this goal. With over 2,500 units currently under construction, the District expects to meet the Mayor’s affordable housing target by the end of 2025. ([DMPED 36,000 by 2025 Dashboard](#)).

New Affordable Housing Units Since 2019 by Planning Area



Planning Area: Lower Anacostia Waterfront And Near Southwest

New Affordable Production Units: 888

New Affordable Units: 888

New Affordable Target: 850

New Affordable Target Progress: 104.5%

The Comprehensive Plan states that the planning area represents about five percent of the District’s land area. *Commercial and mixed-uses constitute about 4.6 percent of the Planning Area. The industrial zones, primarily located at Buzzard Point, have begun to transition into higher-density, mixed-use neighborhood development, fulfilling the vision of the Anacostia Waterfront Framework. It is anticipated that residential land uses will continue to increase as more sites in Capitol Riverfront, Buzzard Point, and the Wharf are developed.* 1902.4

The current Order was approved for development of the site with office and hotel uses. This would limit the potential to provide a greater number of housing units available to DC residents of all income levels, including affordable units at a desirable waterfront neighborhood. The proposed PUD modification would permit apartment buildings that can provide substantially more housing units and affordable units to further alleviate the pressure on housing costs overall.

Racial Equity Tool Part 4 – Zoning Commission Evaluation Factors

As noted above, the Second Stage PUD would, on balance, be not inconsistent with the Comprehensive Plan maps and policies. Additional analysis of the proposal against Comprehensive Plan policy direction will be provided prior to a public hearing. The proposed modifications would provide new

residential and retail opportunities to neighborhood and District residents, including affordable units through IZ. The site is currently vacant, so there would be no displacement of existing residents, and OP would not anticipate indirect displacement, due to the location and history of the site. The development would also provide potential employment for residents. Development facilitated through the changes would result in environmental improvements to this section of the Anacostia Waterfront, improvements to open space such as the dog park, and improvements to the Riverwalk as important amenities to residents of the neighborhood and the District as a whole.

What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?

OP did not identify substantial inconsistencies with the Comprehensive Plan in this analysis. Any Plan policies not directly advanced by this modification – such as the reduction in long term employment opportunities through the modification to the PUD from hotel and office use to residential - would be outweighed by the furtherance of other important District priorities described above.

When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The proposed PUD modification and Stage 2 would not result in direct displacement of any tenants or residents because there are no District businesses or residents currently on this portion of the site.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate indirect displacement, due to the location and the PUD history of the site. The proposed modifications would include new housing and 10% affordability through IZ for the new mixed-use development. Thus, mixed-use development would add to the total number of affordable units in the planning area. This provides an opportunity to increase the housing supply, including both market-rate and IZ unit production that could potentially be used in conjunction with other District tools to accommodate low-income residents.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	The PUD modification and Stage 2 approval requested would provide the opportunity for more market rate and affordable units housing on a site that does not currently contain housing, and on which housing for DC residents would not have been provided if the hotel and office use were developed.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> ▪ Public Space Improvements 	This action will facilitate new development that would result in significant public space and accessibility improvement, continuation of the riverwalk, improved pedestrian and transportation access to and throughout the site, and new active and passive recreation through the creation of new and improved publicly accessible open spaces on the site. The new landscaping and

Factor	Question	OP Response
	<ul style="list-style-type: none"> ▪ Urban Design Improvements 	energy compliance strategies would also further the District’s sustainability and on-site energy generation requirements.
Access to Opportunity	<p>Is there a change in access to opportunity?</p> <ul style="list-style-type: none"> ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail / Access to New Services 	<p>Permitting development of the site based on the PUD modifications would help provide affordable housing and new amenities available to District residents.</p> <p>Development of the site will provide construction jobs, and permanent jobs in building maintenance. The project will provide new retail and / or service uses. The development will also result in new residents at a currently closed off portion of Florida Rock and will help complete the long-awaited development in this section of the Ball Park, including shops, and passive recreation through additional open space that the development hopes to provide.</p>

VII. PLANNING CONTEXT ANALYSIS

The Comprehensive Plan contains several policies about medium-density residential uses and zoning. *LU-2.1.10* describes the need to “*Maintain the multi-family residential character of the District’s medium- and high-density residential areas. Limit the encroachment of large-scale, incompatible commercial uses into these areas. Make these areas more attractive, pedestrian-friendly, and transit accessible, and explore opportunities for compatible commercial development which provides jobs for nearby residents.*”

LU-2.1.13 suggests that “*Planned unit developments (PUDs) in neighborhood commercial areas shall provide high-quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits, such as housing, affordable housing, and affordable commercial space.*”

The proposed PUD would be consistent with the scale of buildings in the neighborhood, including the existing Florida Rock development along Potomac Avenue. The approximately 590 new dwelling units, provided at market rate and below market rate, would be focused along a now prominent riverfront. The site is in a transit- and amenity-rich area, making the location desirable. The ground floor commercial use is intended to be neighborhood-serving appropriate for residents, and the site is close to areas of employment.

The proposed PUD, on balance, would not be inconsistent with the Comprehensive Plan, including when analyzed through a racial equity lens. The policies cited in the Citywide and Area Elements sections, work together to support the approved density and the proposed modifications to permit more mixed-use and housing, including affordable housing, in proximity to transit on a large infill parcel. Finally, the PUD would help the District towards attaining its affordable housing pipeline goals including 12,000 affordable units by 2025 as identified in the Housing Equity Report and the Upward Mobility DC data, which could help the Planning Area well exceed its affordable housing goal.

OP supports the proposed modification as compliant with the equity principles expressed through the relevant Plan Elements.

VIII. AGENCY COMMENTS

The Applicant coordinated with DDOT and DOEE during the development of the project phases. DDOT's report will be submitted under separate cover to the record.

IX. COMMUNITY ENGAGEMENT

The Applicant has provided a detailed description of its meetings and outreach with the community at [Exhibit 2B1 Page 24](#) (the Applicant's Statement) with further updates in its prehearing statement at Exhibit 10.

Appendix I: Relevant Comprehensive Plan Policies

Appendix II: Demographic Data (2018-2022)

Appendix I

Relevant Comprehensive Plan Policies

Chapter 3 Land Use Element

Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites Recognize the potential for large, government-owned properties to supply needed community services, create local housing and employment opportunities, remove barriers between neighborhoods, provide large and significant new parks, enhance waterfront access, and improve and stabilize the city's neighborhoods. 305.6

Policy LU-1.2.2: Mix of Uses on Large Sites Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses. 305.7

Policy LU-1.3.2: Development Around Metrorail Stations Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 306.11

Policy LU-1.4.6: Development Along Corridors Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. (10-A DCMR § 307.14.)

Policy LU-1.5.1: Infill Development Encourage infill development on vacant land within Washington, DC, particularly in areas where there are vacant lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. Such development should reflect high-quality design, complement the established character of the area and should not create sharp changes in the physical development pattern. (10-A DCMR § 308.6.)

Policy LU-1.5.2: Long-Term Vacant Sites Facilitate the reuse of vacant lots that have historically been difficult to develop due to infrastructure or access problems, inadequate lot dimensions, fragmented or absentee ownership, or other constraints. Explore lot consolidation, acquisition, and other measures that would address these constraints. (10-A DCMR § 308.7.)

Policy LU-2.1.10: Multi-Family Neighborhoods Maintain the multi-family residential character of the District's medium- and high-density residential areas. Limit the encroachment of large-scale, incompatible commercial uses into these areas. Make these areas more attractive, pedestrian-friendly, and transit accessible, and explore opportunities for compatible commercial development which provides jobs for nearby residents. (10-A DCMR § 310.17.)

Policy LU-1.3.8: Large Sites and the Waterfront Use the redevelopment of large sites to achieve related urban design, open space, environmental, resilience, equity, accessibility, and economic development objectives along the Anacostia Waterfront, as well as other shoreline areas. Large waterfront sites should be used for water-focused recreation, housing including affordable housing, commercial, and cultural development, with activities that are accessible to both sides of the river. Create opportunities for adjacent communities to benefit from site redevelopment. Large sites should further be used to enhance the physical and environmental quality of the rivers. 306.14

Policy LU-1.4.6: Development Along Corridors Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. 307.14

Policy LU-2.1.1: Variety of Neighborhood Types Maintain a variety of neighborhoods, ranging from low-density to high-density. The positive elements that create the identity and design character of each neighborhood should be preserved and enhanced while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability, racial equity, and opportunity. 310.7

Policy LU-2.1.10: Multi-Family Neighborhoods Maintain the multi-family residential character of the District's medium- and high-density residential areas. Limit the encroachment of large-scale, incompatible commercial uses into these areas.

Make these areas more attractive, pedestrian-friendly, and transit accessible, and explore opportunities for compatible commercial development which provides jobs for nearby residents. 310.17

Policy LU-1.2.4: Urban Mixed-Use Neighborhoods Encourage new mixed-use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas: • Mount Vernon Triangle; • NoMa; • Downtown East and Pennsylvania Avenue; • Buzzard Point/**National Park**/Audi Field; • Near Southeast/Navy Yard; • Capitol Crossing (neighborhood between Capitol Hill and Gallery Place); • Union Station air rights; and • Near Southwest/Wharf/L'Enfant Plaza Metro Area.

The location of these areas is shown in the Central Washington, and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should require that they are developed as attractive pedestrian-oriented neighborhoods, with high quality architecture and public spaces. Housing, especially affordable and deeply affordable housing, is particularly encouraged and must be a vital component of the future land use mix. As areas continue to redevelop, community engagement and actions shall be undertaken to retain existing residents, particularly communities of color and vulnerable populations, and enable them to share in the benefits of area redevelopment while addressing adverse short- and long-term impacts. 305.11

Chapter 4 Transportation Element

The Transportation Element provides policies and actions to maintain and improve the District's transportation system and enhance the travel choices of current and future residents, visitors, and workers.

Policy T-1.1.1: Transportation Impact Assessment Require appropriate environmental analysis for major transportation projects, including new roadways, bridges, transit systems, road design changes, and rerouting of traffic from roads classified as principal arterials or higher onto minor arterials or neighborhood streets with lesser volumes. 403.7

Policy T-1.1.3: Context-Sensitive Transportation Design transportation infrastructure to support current land uses as well as land use goals for mixed-use, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. Facilities should comply with the District's Complete Streets policy, adopted in October 2010, with an emphasis on pedestrian and bicycle-friendly design. 403.9

Policy T-1.1.4: Transit-Oriented Development Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. Encourage development projects to build or upgrade the pedestrian and bicycle infrastructure leading to the nearest transit stop to create last-mile connections. Pedestrian movements and safety should be prioritized around transit stations. 403.10

Policy T-1.1.7: Equitable Transportation Access Transportation within the District shall be accessible and serve all users. Residents, workers, and visitors should have access to safe, affordable and reliable transportation options regardless of age, race, income, geography or physical ability. Transportation should not be a barrier to economic, educational, or health opportunity for District residents. Transportation planning and development should be framed by a racial equity lens, to identify and address historic and current barriers and additional transportation burdens experienced by communities of color. 403.13

Policy T-1.3.1: Transit-Accessible Employment Support more efficient use of the region's transit infrastructure with land use strategies that encourage employment locations near underused transit stations. Work closely with the federal government and suburban jurisdictions to support transit-oriented and transit-accessible employment throughout the region. This would expand the use of major transit investments such as Metrorail. Encourage approaches that improve transit access to jobs for low-income residents. 405.7

Policy T-1.4.1: Street Design for Placemaking Design streets, sidewalks, and transportation infrastructure—such as bike racks and other public places in the right-of-way—to support public life, in addition to their transportation functions. This includes incorporating seating, plantings, and the design of spaces for gathering, lingering, and engaging in commerce and social or cultural activities. 406.2

Policy T-2.2.2: Connecting District Neighborhoods Improve connections among District neighborhoods by upgrading transit, auto, pedestrian, and bike connections, and by removing, ameliorating, mitigating, or minimizing existing physical barriers, such as railroads and highways. Recognize where transportation infrastructure has separated communities, particularly low-income residents and communities of color, and encourage strategies that rebuild connections. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan and that plan's approval by the District government. 409.7

Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and

parks such that residents of each of the District's wards have access to high-quality bicycling and pedestrian facilities. 410.9

Policy T-2.4.1: Pedestrian Network *Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. 411.5*

Chapter 5 Housing Element

The Housing Element of the Comprehensive Plan describes the importance of housing to neighborhood quality in Washington, DC and the importance of providing housing opportunities for all segments of the population throughout Washington, DC.

Policy H-1.1.1: Private Sector Support *Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 503.3*

Policy H-1.1.3: Balanced Growth *Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District to meet its long-term housing needs, including the need for low- and moderate- density single-family homes, as well as the need for higher-density housing. 503.5*

Policy H-1.1.4: Mixed-Use Development *Promote moderate to high-density, mixed-use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed-use corridors and high-capacity surface transit corridors, and around Metrorail stations. 503.6*

Policy H-1.1.7: Large Sites *Accommodate a significant share of the District's projected housing demand in new neighborhoods developed on large sites. Prioritize housing, particularly affordable housing preserved for long-term affordability. These neighborhoods should include or have access to well-planned retail, public schools, attractive parks, open space and recreation, as well as needed supportive services for older adults and persons with disabilities and enable resilient, innovative neighborhood- level energy systems. The new neighborhoods should include a variety of housing types, including housing for families, older adults, and other needed types, serving a diverse population and a variety of income levels. 503.9*

Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority *The production and preservation of affordable housing for low- and moderate-income households is a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all District neighborhoods. 504.8*

Policy H-1.2.2: Production Targets *Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in Washington, DC from 2018 to 2030, or approximately 20,000 units, should be affordable to persons earning 80 percent or less of the area-wide MFI. In aggregate, the supply of affordable units shall serve low-income households in proportions roughly equivalent to the proportions shown in Figure 5.8: 30 percent at 60 to 80 percent MFI, 30 percent at 30 to 60 percent MFI, and 40 percent at below 30 percent MFI. Set future housing production targets for market rate and affordable housing based on where gaps in supply by income occur and to reflect District goals. These targets shall acknowledge and address racial income disparities, including racially adjusted MFIs, in the District, use racially disaggregated data, and evaluate actual production of market rate and affordable housing at moderate, low, very-low, and extremely-low income levels. 504.9*

Policy H-1.2.3: Affordable and Mixed-Income Housing *Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. 504.10*

Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas *Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods. 504.17*

Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods *Support mixed-income housing by encouraging affordable housing in high-cost areas and market rate housing in low-income areas. Identify and implement measures that build in long-term affordability, preferably permanent or for the life of the project, to minimize displacement and achieve a balance of housing opportunities across the District. 504.19*

Policy H-1.4.6: Whole Neighborhood Approach Ensure that planning and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, childcare, services for older adults, food access, parks, libraries, community gardens, and open spaces, health care facilities, police and fire facilities, transportation, and emergency response capacity. 506.11

Chapter 6 Environmental Protection Element

The Environmental Protection Element of the Comprehensive Plan addresses the protection, conservation, and management of Washington, DC's land, air, water, energy, and biological resources.

Policy E-1.1.2: Urban Heat Island Mitigation Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives. 603.6

Policy E-2.1.3: Sustainable Landscaping Practices Encourage the use of sustainable landscaping practices to beautify the District, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. District government, private developers, and community institutions should coordinate to significantly increase the use of these practices, including planting and maintaining mostly native trees and other plants on District-owned land outside the right-of-ways in schools, parks, and housing authority lands. 605.7

Policy E-3.2.3: Renewable Energy Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption. 612.5

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large, paved surfaces. 615.4

Chapter 7 Economic Development Element

The Economic Development Element of the Comprehensive Plan addresses the future of Washington, DC's economy and the creation of economic opportunity for current and future District residents.

Policy ED-1.1.6 Competitive Edge Maintain and enhance the District's competitive edge relative to the metropolitan Washington, DC region and U.S. markets in fields such as federal government, professional services, health care, postsecondary education, media and communications, and hospitality and tourism. Enhancing the District's competitive edge may require continued government support and performance-based incentives for economic development programs; government participation in local economic development projects and initiatives; strengthened capacity among local economic development organizations, community development corporations, and workforce development groups; well-maintained business fundamentals, including transportation access; and support for and partnerships with communities of color. 703.17

Policy ED-1.1.7 Use of Large Sites Plan strategically for large development sites to ensure that their unique potential is fully realized both as a source of economic dynamism and equity building, maximizing the sites' utility to the District. View the sites as assets to further the District's goals to diversify its economy and provide inclusive, equitable job growth, for housing and affordable housing production, and to bring desired amenities and services to neighborhoods. Sites with Metro access and priority transit access should be used to advance growth in emerging industries that diversify the District's economy. 703.18

Policy ED-2.2.3: Neighborhood Shopping Create and support additional shopping opportunities in Washington, DC's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately scaled retail infill development on vacant and underused sites. Promote the creation and growth of existing locally owned, nonchain establishments because of their role in creating unique shopping experiences, as well as in generating stronger local supply chains that facilitate community wealth building. 708.8

Policy ED-2.3.3: Amenities Beyond the Mall Promote the development of cultural amenities beyond the Mall in an effort to more fully capitalize on and distribute the economic benefits of tourism. 709.7

Chapter 8 Parks, Recreation and Open Space Element

The Parks, Recreation and Open Space Element addresses the future of parks, recreation, and open space in Washington, DC.

Policy PROS-1.1.3: Park Diversity *Provide a diverse range of recreational experiences in parks within Washington, DC, including a balance between passive and active recreational uses, and a mix of local-serving, region-serving, and national recreational uses. 804.11*

Policy PROS-1.3.6: Compatibility with Adjacent Development *Design and manage park activities and facilities, including recreation centers, in a way that is compatible with nearby residential and commercial uses. 806.9*

Policy PROS-1.3.7: Health and Wellness *Use Washington, DC's parks, open space, and recreation spaces to help meet the District's health and wellness priorities, which are linked to physical activity, public safety, healthy food access, psychological health, air and water quality, and social equity. 806.10*

Policy PROS-1.4.1: Park Planning *Prioritize the creation of parks and recreation spaces through neighborhood planning and development review processes, particularly in areas where residents are not within a 10-minute walk of sufficient park space. 807.6*

Policy PROS-1.4.4: Parks on Large Sites *Include new neighborhood and/or community parks on large sites that are redeveloped for housing and other uses that generate a demand for recreational services. The potential for such parks to enhance the connectivity of parks and open spaces throughout the District should be an important planning and design consideration, particularly where multiple large adjacent sites are being redeveloped. 807.9*

Policy PROS-1.4.7: Parks in Employment Growth Areas *Provide new parks and open spaces in areas of expected employment growth. Small pocket parks, plazas, and other open spaces should be created in the vicinity of the NoMa-Gallaudet U Metro station, Buzzard Point, the east end of downtown/Mount Vernon Triangle, and the Near Northeast neighborhood to provide visual relief and space for active and passive recreation. 807.12*

Policy PROS-4.3.3: Common Open Space in New Development *Work with developers for new and rehabilitated buildings to include green roofs, rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. 819.5*

Policy PROS-4.3.4: Preservation of Open Space in Multi-family Development *Recognize the implicit value of the lawns, courtyards, gardens, and other open areas that surround many of the District's older high- and medium-density residential buildings. Discourage the practice of building on these areas if the historic proportions and character of the original buildings would be compromised. 819.6*

Chapter 9 Urban Design Element

The Urban Design Element of the Comprehensive Plan addresses the District's physical design and visual qualities.

Urban Design Goal - *The overarching goal for urban design in the District is to enhance the beauty, equity, and livability of Washington, DC by reinforcing its historic design legacy and the identity of its neighborhoods and centers, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and function of streets and public spaces. 901.1*

Policy UD-1.1.1: National Image *Strengthen and enhance the physical image, character and outstanding physical qualities of the District, its neighborhoods, and its open spaces, in a manner that reflects its role as the national capital and its distinctive identity as a thriving urban community. 903.9*

Policy UD-1.1.3: Preeminent View Corridors - *Reinforce the prominent role of views as a defining feature of the District's character through careful planning of streetscapes and public parks to preserve and frame views of existing landmarks and significant structures and through consideration of the various types of view corridors when designing and planning public projects and streetscapes. Such views could include preeminent views of nationally symbolic architecture, important views of nationally or locally significant civic structures, landmarks, and parks and open spaces. (see Figure 9.5). 903.11*

Policy UD-1.1.6: Inclusive and Vibrant Civic Spaces - *In coordination with federal and other stakeholders, enhance L'Enfant Plan reservations and other historic open spaces as key gathering and civic spaces of Washington, DC through appropriate redesign and programming compatible with historic qualities to attract a diversity of users, enhance user experience, and foster national and local identity. Design the visual qualities of the public spaces to reinforce the District's grand civic character, as well as its creative culture. 903.15*

UD-1.2 Designing in Harmony with Natural Topography and Landforms 904 The escarpments, ridges, hills, plateaus, rivers, and streams of Washington, DC's topography are major components of the District's identity. They shape neighborhoods and parks as well as essential elements of the District's skyline, as shown in Map 9.1. This is particularly true for framing views of iconic buildings in the L'Enfant City. Natural features are also important for neighborhoods located on the hills, slopes, and ridges beyond the L'Enfant City, where the natural features frame views of grand prospects toward the Capitol building, panoramic vistas of the District from high elevations like Fort Reno, and street-level views of forested parks and stream valleys in many neighborhoods in Wards 7 and 8 and in Northwest DC. 904.1

Policy UD-1.2.4: Significant View Protection- Recognize and protect significant views within the District, particularly characteristic views of landmarks and views from important vantage points (as shown in Figure 9.8). Recognize the importance of views to the quality of life in the District and the identity of Washington, DC and its neighborhoods. 904.6

Policy UD-1.3.1: Diverse Waterfront Experiences along the Anacostia River Strengthen Washington, DC's civic identity as a waterfront city by promoting public and private investment along the Anacostia River waterfront and creating equitable and publicly accessible amenities for existing and new residents. Design a mix of new public parks and other natural areas to provide diverse waterfront experiences and help residents use the water as a community asset through programming and recreational amenities.... 905.5

Policy UD-1.3.2: Waterfront Public Space Develop public gathering spaces along the Potomac and Anacostia waterfronts, including promenades, viewpoints, boating and swimming facilities, and parks ...905.6

Policy UD-1.3.3: Innovative and Resilient Waterfront Development The design of new waterfront development projects should respond to the unique opportunities and challenges of being on the water. Incorporate nature-based design and flood-resilient building and site design methods. New buildings should be carefully designed to consider their appearance from multiple public vantage points along the Anacostia and Potomac shorelines, including from the shoreline and from the water. 905.7

Policy UD-1.3.4: Resilient Waterfront The design of each waterfront site should respond to its natural context and work with the natural processes of tidal rivers to be resilient to flooding from storm surge, sea level rise, and other sources. Design all buildings, structures, infrastructure, outdoor spaces, and shorelines to accommodate and mitigate flooding and to restore ecological systems and natural shorelines. 905.8 9

Policy UD-1.4.1: Thoroughfares and Urban Form- Use Washington, DC's major thoroughfares to reinforce the form and identity of the District, connect its neighborhoods, and improve its aesthetic and visual character through context-sensitive landscaping, tree planting, and streetscape design. Special attention should be placed on how public space, building restriction areas, and adjacent buildings contribute to each thoroughfare's character. Focus improvement efforts on thoroughfares with limited amenities. 906.3

Policy UD-1.4.2: District Gateways - Create more distinctive and memorable gateways at points of entry to the District and in neighborhoods, parks and open spaces, and neighborhood centers. Gateways should provide a sense of transition, orientation, and arrival through improvements in the form of landscaping, art work, commemoration, and roadway design. They should be designed to make a strong and positive visual impact. 906.9

Policy UD-1.4.3: Thoroughfare Vistas and View Corridors - Protect picturesque views and view corridors along avenues, parkways, and other major corridors, particularly along streets that terminate, connect, and frame important neighborhood and national institutions, memorials, and parks. Vistas along such streets should be accentuated by street trees and include distinct facades of high architectural quality along well-defined street walls and, if appropriate, maintain a park-like character. 906.10

Policy UD-1.4.4: Priority Avenues and Gateway Corridors - Focus the District's avenue and gateway corridor design improvements on historically important or symbolic streets, including 16th Street, Rhode Island Avenue, North Capitol Street, Pennsylvania Avenue SE, and New York Avenue. Support federal efforts to preserve Constitution and Independence Avenues as major boulevards. Coordinate with NCPC to preserve and enhance the character of avenues and streets with shared federal and local interests that have important viewsheds and connections to federal and cultural structures and open spaces. 906.11

Policy UD-2.1.1: Streetscapes That Prioritize the Human Experience- Commercial streetscapes should be designed to be comfortable, safe, and interesting to pedestrians. At a minimum, commercial corridor sidewalks should be designed with clear, direct, accessible walking paths that accommodate a range of pedestrian users and facilitate a sense of connection to adjacent uses. Where width allows, corridors should have a generous presence of shade trees and café seating areas, as well as bicycle facilities. In areas with large pedestrian volumes, streetscapes should provide seating, drinking fountains, publicly accessible restrooms, and other infrastructure that supports increased frequency and duration of walking. 908.3

Policy UD-2.1.6: Minimize Mid-Block Vehicular Curb Cuts - Curb cuts should be avoided on streets with heavy pedestrian usage and minimized on all other streets. Where feasible, alleys should be used in lieu of curb cuts for parking and loading access to buildings. Curb cuts for individual residences should only be allowed if there is a predominant pattern of curb cuts and driveways on the block face. 908.8

Policy UD-2.1.8: Special Streetscape Design Guidelines- Create tailored streetscape guidelines for new neighborhoods or large sites undergoing redevelopment to promote interesting pedestrian experiences and a unique and consistent design for the public realm. 908.10

Action UD-2.1.A: Retail Ceiling Heights Develop zoning regulations to require higher first-floor ceiling heights in new buildings along main streets and other commercial/mixed-use areas. 908.11

Policy UD-2.2.1: Neighborhood Character and Identity- Strengthen the visual qualities of Washington, DC's neighborhoods as infill development and building renovations occur by encouraging the use of high-quality and high-performance architectural designs and materials. In neighborhoods with diverse housing types, or when introducing more diverse infill housing types, use design measures to create visual and spatial compatibility. 909.5

Policy UD-2.2.2: Areas of Strong Architectural Character - Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development, additions, and renovations within such areas do not need to replicate prevailing architectural styles exactly but should be complementary. 909.6

Policy UD-2.2.3: Neighborhood Mixed-Use Centers- Undertake strategic and coordinated efforts to create neighborhood mixed-use centers that reinforce community identity and form compact, walkable environments with a broad mix of housing types, employment opportunities, neighborhood shops and services, and civic uses and public spaces. New buildings and projects should support the compact development of neighborhood centers and increase the diversity of uses and creation of public spaces where needed. 909.8

Policy UD-2.2.7: Preservation of Neighborhood Open Space- Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to minimize the loss of sunlight and maximize the usability of neighborhood parks and plazas. Buildings adjacent to parks or natural areas should orient their entrances or other community-serving functions toward these shared resources. 909.13

Policy UD-3.2.5: Safe and Active Public Spaces and Streets- The design of the built environment should encourage public activity throughout the day and help minimize the potential for criminal activity. Design measures include active building frontages (such as windows, balconies, and frequently spaced entrances) adequate lighting that avoids glare and shadow, maintaining clear lines of sight and visual access, and avoiding dead-end streets. Where feasible consider closing streets to vehicular traffic to enhance pedestrian and cycling uses of streets. 914.7

Policy UD-4.2.1: Scale and Massing of Large Buildings- Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest. 918.3

Policy UD-4.2.2: Engaging Ground Floors- Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. 918.4

Policy UD 4.2.6: Active Facades- *Prioritize the placement of multiple entrances for new multi-family and mixed-use buildings across the length of a block rather than a single lobby entrance at one location. New residential developments should promote active facades with spaces for social activity, such as porches, stoops, or patios along public streets, to encourage more activity along the sidewalk and increase social interaction in a neighborhood. 918.9*

Policy UD-4.3.3: Building Setbacks and Rooflines- *Maintain uniform building setbacks and roof lines to establish a consistent pattern along avenues and priority view corridors. Setbacks should create a consistent street wall rather than have abrupt disruptions with facades that are set back or extend in front of an established pattern. The treatment of roof lines, such as recessed penthouses or variations created by bay windows and towers, should respond to the predominant character of a corridor. See Figure 9.22 for an example of building setbacks and rooflines. 919.8*

Area Elements: Lower Anacostia Waterfront / Near Southwest Area Element

Policy AW-1.1.2: New Waterfront Neighborhoods

Create new mixed-use, mixed-income neighborhoods on vacant or underused waterfront lands, particularly on large contiguous publicly owned waterfront sites. Within the Lower Anacostia Waterfront/Near Southwest Planning Area, new neighborhoods should continue to be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, and Navy Yard/Capitol Riverfront. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside via trails, additional water recreation opportunities, and improved park access points along the Anacostia shoreline. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Opportunities for grid interconnected neighborhood-scale energy utilities systems as part of the development of these areas should be evaluated, using renewable energy sources to provide greater environmental benefits for the community. The new waterfront neighborhoods should integrate new parks and amenities, enhance public access to the waterfront, and incorporate resilient design to mitigate flooding. 1907.3

Policy AW-1.1.7: Waterfront Area Commercial Development

Encourage commercial development in the waterfront area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia waterfront, as well as space for government and private sector activities, such as offices and hotels. A mix of high-density commercial and residential development should be focused along key corridors, particularly along Maine Avenue and M Street SE and SW, along South Capitol Street, and near the Waterfront and Navy Yard Metro stations. Maritime activities, such as cruise ship operations, should be maintained and supported as the waterfront redevelops. 1907.8

Policy AW-1.1.8: Waterfront Development Amenities

Leverage new development in the Waterfront Planning Area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements. 1907.9

Policy AW-1.2.3: Waterfront Sports and Recreation Destinations

Continue to develop new destinations for sports, recreation, and celebration on or near the Anacostia waterfront, including as part of future development at Buzzard Point, Poplar Point, and the 11th Street Bridge Park. These destinations should be served by adequate and efficient transportation systems and infrastructure. 1908.3

Policy AW-1.2.4: Anacostia River Parks

Create a connected network of waterfront parks from Hains Point to the Sousa Bridge and continuing through adjacent upriver Planning Areas to the Maryland border. These parks should be easily accessible to surrounding neighborhoods and accommodate the need for more local and regional recreational activities in Washington, DC. New parks should be an integral part of any new waterfront neighborhood and should showcase the remarkably diverse landscape along the Anacostia River. A variety of active and passive recreational settings should be provided. Parks should be designed to enhance resilience to flooding and incorporate natural shorelines where feasible. 1908.4

Policy AW-2.3.1: Restoring the Urban Pattern of the Near Southeast/ Capitol Riverfront

Facilitate redevelopment of Near Southeast/Capitol Riverfront by breaking down large contiguously owned government properties into individual development parcels in scale with the traditional urban street grid. Encourage high-density mixed-use development and open space on newly configured parcels, with new buildings designed and oriented to make the most of their waterfront or near-waterfront settings. 1912.7

Policy AW-2.3.2: Near Southeast/Capitol Riverfront Shoreline Access

Improve shoreline access and movement to and through Near Southeast/ Capitol Riverfront by eliminating real and perceived barriers, improving public space and street corridors, reducing the amount of land occupied by surface parking and industrial uses, and encouraging new land uses that maximize public activity near the waterfront. Encourage resilient shoreline design that is adaptive to flooding from storm surge and sea level rise and implement natural shorelines where possible. 1912.8

Policy AW-2.3.3: Near Southeast/Capitol Riverfront Housing Opportunities

Significantly increase residential land uses in Near Southeast/Capitol Riverfront, particularly in the Southeast Federal Center, Capper Carrollsburg, Canal Blocks, and South Capitol Gateway areas. Consistent with the existing zoning for these areas, mixed-use development that includes housing and commercial uses should be strongly encouraged. The mix of housing should accommodate residents of all incomes and household types. 1912.9

Appendix II

Demographic Data (2018-2022)

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	TOTAL POPULATION / SELECTED AGE GROUPS / MEDIAN AGE		
Total Population	Total	683,154	23,932
	Under 18 years	125,022	2,264
	Percent under 18 years	18.3	9.5
	65 years and over	83,199	2,313
	Percent 65 years and over	12.2	9.7
	Median age	34.3	39.4
White alone	Total	276,373	14,032
	Under 18 years	32,691	706
	Percent under 18 years	11.8	5.0
	65 years and over	30,623	1,029
	Percent 65 years and over	11.1	7.3
	Median age	34.1	38.4
Black or African American alone	Total	305,109	7,065
	Under 18 years	67,345	998
	Percent under 18 years	22.1	14.1
	65 years and over	46,357	1,190
	Percent 65 years and over	15.2	16.8
	Median age	36.5	45.4
American Indian and Alaska Native alone	Total	1,984	25
	Under 18 years	263	0
	Percent under 18 years	13.3	0.0
	65 years and over	552	0
	Percent 65 years and over	27.8	0.0
	Median age	48.2	48.2
Asian alone	Total	27,988	1,015
	Under 18 years	2,461	54
	Percent under 18 years	8.8	5.3
	65 years and over	2,171	5
	Percent 65 years and over	7.8	0.5
	Median age	34.1	48.6
Native Hawaiian and Other Pacific Islander alone	Total	359	14
	Under 18 years	0	0
	Percent under 18 years	0.0	0.0

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	65 years and over	43	0
	Percent 65 years and over	12.0	0.0
	Median age	35.5	NA
Some Other Race alone	Total	32,484	303
	Under 18 years	10,786	55
	Percent under 18 years	33.2	18.0
	65 years and over	1,117	0
	Percent 65 years and over	3.4	0.0
	Median age	29.8	34.3
Two or More Races	Total	38,857	1,478
	Under 18 years	11,476	452
	Percent under 18 years	29.5	30.6
	65 years and over	2,336	88
	Percent 65 years and over	6.0	6.0
	Median age	29.9	33.5
Hispanic or Latino (Hispanics can be of any race and are included in race categories above)	Total	76,982	1,739
	Under 18 years	21,094	140
	Percent under 18 years	27.4	8.1
	65 years and over	4,653	37
	Percent 65 years and over	6.0	2.1
	Median age	31.1	35.3
	EDUCATIONAL ATTAINMENT (Population 25 Years and Over)		
Total	Total	487,726	20,429
	Less than high school diploma	37,934	1,131
	Percent	7.8	5.5
	High school graduate (includes equivalency)	75,562	1,328
	Percent	15.5	6.5
	Some college or associate's degree	74,761	2,216
	Percent	15.3	10.8
	Bachelor's degree or higher	299,469	15,755
	Percent	61.4	77.1
White alone	Total	212,961	12,719
	Less than high school diploma	3,037	73
	Percent	1.4	0.6
	High school graduate (includes equivalency)	5,258	374
	Percent	2.5	2.9
	Some college or associate's degree	11,296	754
	Percent	5.3	5.9
	Bachelor's degree or higher	193,370	11,517
	Percent	90.8	90.6

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
Black or African American alone	Total	208,500	5,590
	Less than high school diploma	24,923	910
	Percent	12.0	16.3
	High school graduate (includes equivalency)	63,139	865
	Percent	30.3	15.5
	Some college or associate's degree	55,618	1,228
	Percent	26.7	22.0
	Bachelor's degree or higher	64,820	2,588
	Percent	31.1	46.3
American Indian and Alaska Native alone	Total	1,471	16
	Less than high school diploma	260	0
	Percent	17.7	0.0
	High school graduate (includes equivalency)	215	0
	Percent	14.6	0.0
	Some college or associate's degree	515	0
	Percent	35.0	0.0
	Bachelor's degree or higher	481	16
	Percent	32.7	100.0
Asian alone	Total	21,651	911
	Less than high school diploma	1,203	7
	Percent	5.6	0.8
	High school graduate (includes equivalency)	1,028	11
	Percent	4.7	1.2
	Some college or associate's degree	1,579	103
	Percent	7.3	11.3
	Bachelor's degree or higher	17,841	790
	Percent	82	87
Native Hawaiian and Other Pacific Islander alone	Total	314	14
	Less than high school diploma	0	0
	Percent	0.0	0.0
	High school graduate (includes equivalency)	58	0
	Percent	18.5	0.0
	Some college or associate's degree	49	0
	Percent	15.6	0.0
	Bachelor's degree or higher	207	14
	Percent	65.9	100.0
Some Other Race alone	Total	19,077	247
	Less than high school diploma	6,997	71
	Percent	36.7	28.8
	High school graduate (includes equivalency)	3,697	17
	Percent	19.4	6.8
	Some college or associate's degree	2,321	13

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	Percent	12.2	5.1
	Bachelor's degree or higher	6,062	147
	Percent	31.8	59.4
Two or More Races	Total	23,752	932
	Less than high school diploma	1,514	70
	Percent	6.4	7.5
	High school graduate (includes equivalency)	2,167	62
	Percent	9.1	6.6
	Some college or associate's degree	3,383	118
	Percent	14.2	12.7
	Bachelor's degree or higher	16,688	682
	Percent	70.3	73.2
Hispanic or Latino (Hispanics can be of any race and are included in race categories above)	Total	48,638	1,528
	Less than high school diploma	10,420	46
	Percent	21.4	3.0
	High school graduate (includes equivalency)	6,752	289
	Percent	13.9	18.9
	Some college or associate's degree	5,798	72
	Percent	11.9	4.7
	Bachelor's degree or higher	25,668	1,121
	Percent	52.8	73.4
	DISABILITY STATUS (Civilian noninstitutionalized population)		
Total	Total	673,717	23,389
	Total population with a disability	75,752	2,250
	Percent with a disability	11.2	9.6
	Under 18 years	124,847	2,264
	With a disability	5,522	76
	Percent with a disability	4.4	3.4
	18 to 64 years	467,824	18,813
	With a disability	42,917	1,231
	Percent with a disability	9.2	6.5
	65 years and over	81,046	2,313
	With a disability	27,313	943
	Percent with a disability	33.7	40.8
White alone	Total	273,195	13,597
	Total population with a disability	15,339	647
	Percent with a disability	5.6	4.8
	Under 18 years	32,585	706
	With a disability	628	12
	Percent with a disability	1.9	1.7

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	18 to 64 years	210,375	11,862
	With a disability	8,213	294
	Percent with a disability	3.9	2.5
	65 years and over	30,235	1,029
	With a disability	6,498	341
	Percent with a disability	21.5	33.1
Black or African American alone	Total	299,848	7,033
	Total population with a disability	51,925	1,374
	Percent with a disability	17.3	19.5
	Under 18 years	67,297	998
	With a disability	3,707	56
	Percent with a disability	5.5	5.6
	18 to 64 years	187,906	4,845
	With a disability	29,130	747
	Percent with a disability	15.5	15.4
	65 years and over	44,645	1,190
	With a disability	19,088	572
	Percent with a disability	42.8	48.0
American Indiana and Alaska Native alone	Total	1,951	24
	Total population with a disability	385	0
	Percent with a disability	19.7	0.0
	Under 18 years	263	0
	With a disability	42	0
	Percent with a disability	16.0	0.0
	18 to 64 years	1,136	24
	With a disability	295	0
	Percent with a disability	26.0	0.0
	65 years and over	552	0
	With a disability	48	0
	Percent with a disability	8.7	0.0
Asian alone	Total	27,676	972
	Total population with a disability	1,567	47
	Percent with a disability	5.7	4.8
	Under 18 years	2,461	54
	With a disability	62	0
	Percent with a disability	2.5	0.0
	18 to 64 years	23,050	913
	With a disability	945	47
	Percent with a disability	4.1	5.1
	65 years and over	2,165	5
	With a disability	560	0
	Percent with a disability	25.9	0.0

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
Native Hawaiian and Other Pacific Islander alone	Total	356	14
	Total population with a disability	11	0
	Percent with a disability	3.1	0.0
	Under 18 years	0	0
	With a disability	0	0
	Percent with a disability	0.0	0.0
	18 to 64 years	313	14
	With a disability	11	0
	Percent with a disability	3.5	0.0
	65 years and over	43	0
	With a disability	0	0
	Percent with a disability	0.0	0.0
Some Other Race alone	Total	32,212	301
	Total population with a disability	2,463	11
	Percent with a disability	7.6	3.7
	Under 18 years	10,777	55
	With a disability	675	0
	Percent with a disability	6.3	0.0
	18 to 64 years	20,359	246
	With a disability	1,594	11
	Percent with a disability	7.8	4.5
	65 years and over	1,076	0
	With a disability	194	0
	Percent with a disability	18.0	0.0
Two or More Races	Total	38,479	1,449
	Total population with a disability	4,062	172
	Percent with a disability	10.6	11.8
	Under 18 years	11,464	452
	With a disability	408	8
	Percent with a disability	3.6	1.8
	18 to 64 years	24,685	908
	With a disability	2,729	133
	Percent with a disability	11.1	14.6
	65 years and over	2,330	88
	With a disability	925	31
	Percent with a disability	39.7	35.1
Hispanic or Latino (Hispanics can be of any race and are included in race categories above)	Total	76,233	1,693
	Total population with a disability	5,903	67
	Percent with a disability	7.7	3.9
	Under 18 years	21,066	140

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	With a disability	1,135	0
	Percent with a disability	5.4	0.0
	18 to 64 years	50,570	1,516
	With a disability	3,351	47
	Percent with a disability	6.6	3.1
	65 years and over	4,597	37
	With a disability	1,417	20
	Percent with a disability	30.8	54.1
	UNEMPLOYMENT RATE (Population 16 years and over)		
Total	Unemployment rate	7.1	3.9
White alone	Unemployment rate	2.6	2.9
Black or African American alone	Unemployment rate	13.8	7.1
American Indian and Alaska Native alone	Unemployment rate	7.2	0.0
Asian alone	Unemployment rate	5.3	4.4
Native Hawaiian and Other Pacific Islander alone	Unemployment rate	6.2	0.0
Some Other Race alone	Unemployment rate	6.6	4.5
Two or More Races	Unemployment rate	5.2	1.6
Hispanic or Latino	Unemployment rate	4.8	5.5
	POVERTY STATUS		
Total population	Population for whom poverty status is determined	651,618	23,736
	Income in the past 12 months below poverty level	100,618	2,593
	Percent in poverty	15.4	10.9
White alone	Population for whom poverty status is determined	260,575	13,980
	Income in the past 12 months below poverty level	14,190	429
	Percent in poverty	5.4	3.1
Black or African American alone	Population for whom poverty status is determined	294,532	6,980
	Income in the past 12 months below poverty level	72,900	1,904
	Percent in poverty	24.8	27.3
American Indian and Alaska Native alone	Population for whom poverty status is determined	1,855	24
	Income in the past 12 months below poverty level	585	0
	Percent in poverty	31.5	0.0

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
Asian alone	Population for whom poverty status is determined	25,504	1,003
	Income in the past 12 months below poverty level	3,446	63
	Percent in poverty	13.5	6.3
Native Hawaiian and Other Pacific Islander alone	Population for whom poverty status is determined	332	14
	Income in the past 12 months below poverty level	18	0
	Percent in poverty	5.4	0.0
Some Other Race alone	Population for whom poverty status is determined	31,667	302
	Income in the past 12 months below poverty level	4,968	11
	Percent in poverty	15.7	3.6
Two or More Races	Population for whom poverty status is determined	37,153	1,432
	Income in the past 12 months below poverty level	4,511	186
	Percent in poverty	12.1	13.0
Hispanic or Latino (Hispanics can be of any race and are included in race categories above)	Population for whom poverty status is determined	73,323	1,712
	Income in the past 12 months below poverty level	8,495	40
	Percent in poverty	11.6	2.4
	MEDIAN HOUSEHOLD INCOME		
Total households	Median household income (dollars)	93,547	112,318
White alone	Median household income (dollars)	150,563	137,681
Black or African American alone	Median household income (dollars)	51,562	55,128
American Indian and Alaska Native alone	Median household income (dollars)	58,164	N/A
Asian alone	Median household income (dollars)	112,776	126,623
Native Hawaiian and Other Pacific Islander alone	Median household income (dollars)	132,054	137,500
Some Other Race alone	Median household income (dollars)	65,202	91,117
Two or More Races	Median household income (dollars)	96,003	79,166

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
Hispanic or Latino	Median household income (dollars)	89,480	130,846
	TENURE		
Total householder	Total	310,104	14,521
	Owner occupied	128,720	3,894
	% owner occupied	41.5%	26.8%
	Renter occupied	181,384	10,627
	% renter occupied	58.5%	73.2%
White alone	Total	138,443	8,591
	Owner occupied	66,450	2,381
	% owner occupied	48.0%	27.7%
	Renter occupied	71,993	6,210
	% renter occupied	52.0%	72.3%
Black or African American alone	Total	132,384	4,322
	Owner occupied	47,665	961
	% owner occupied	36.0%	22.2%
	Renter occupied	84,719	3,361
	% renter occupied	64.0%	77.8%
American Indian and Alaska Native alone	Total	1,198	0
	Owner occupied	356	0
	% owner occupied	29.7%	0.0%
	Renter occupied	842	0
	% renter occupied	70.3%	0.0%
Asian alone householder	Total	13,048	673
	Owner occupied	5,373	299
	% owner occupied	41.2%	44.5%
	Renter occupied	7,675	373
	% renter occupied	58.8%	55.5%
Native Hawaiian and Other Pacific Islander alone	Total	33	14
	Owner occupied	32	14
	% owner occupied	97.0%	100.0%
	Renter occupied	1	0
	% renter occupied	3.0%	0.0%
Some Other Race alone	Total	9,978	146
	Owner occupied	2,416	40
	% owner occupied	24.2%	27.7%
	Renter occupied	7,562	106
	% renter occupied	75.8%	72.3%
Two or More Races householder	Total	15,020	775

RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	LAW / NEAR SW
	Owner occupied	6,428	198
	% owner occupied	42.8%	25.5%
	Renter occupied	8,592	577
	% renter occupied	57.2%	74.5%
Hispanic or Latino	Total	27,098	1,031
(Hispanics can be of any race and are included in race categories above)	Owner occupied		
	% owner occupied	9,440	236
	Renter occupied	34.8%	22.9%
	% renter occupied	17,658	794
		65.2%	77.1%
	HOUSING COST BURDEN		
Total	Total Households	310,104	14,521
	Cost Burdened Households	108,129	4,547
	Not Computed	10,882	350
	Percent of households spending 30% or more of their income on housing	36.1	32.1

Notes: Housing cost burden by race is not available; Hispanics can be of any race and are included in race categories above;