

## MEMORANDUM

**TO:** District of Columbia Zoning Commission

**FROM:** *TL for* Jennifer Steingasser, Deputy Director Development Review & Historic Preservation

**DATE:** April 27, 2015

**SUBJECT:** **Supplemental** Report - ZC #14-18 (Brookland Manor)  
First Stage and PUD and Related Map Amendment

---

### I. APPLICATION AND RECOMMENDATION

The Office of Planning (OP) is supportive of the redevelopment of the Brookland Manor Apartments and Brentwood Village Shopping Center to provide a revitalized community with a mix of housing and unity types and better retail uses to serve the residents and the surrounding community, while replacing existing affordable housing on the site. The development would also incorporate more useable open spaces and provide better security for the residents and surrounding community.

At the March 16, 2015 public hearing, the Zoning Commission stated that they would not evaluate the proposal as the Applicant (Mid-City Financial Corporation) had not demonstrated that the zoning and in turn the density and heights on a portion of the development was not inconsistent with the Comprehensive Plan. The OP report dated March 13, 2015 also noted these concerns. The Applicant revised the submission and now proposes a First Stage PUD and a PUD-related map amendment from the R-5-A and C-2-A districts to the R-5-B and C-2-A districts. The proposed zones are consistent with the mixed use moderate density residential and moderate density commercial on the north and northeast portion of the site and moderate density residential on the remainder of the site.

Generally, the creation of a mixed income community with a variety of housing types including retention of existing subsidized units, improved urban design and connectivity, open/green spaces, and enhanced retail opportunities remain the same, consistent with a Stage 1 application. OP therefore recommends **approval** of the requested First Stage PUD and PUD-related map amendment from the R-5-A and C-2-A districts to the R-5-B and C-2-A districts.

### II. COMPREHENSIVE PLAN

#### Future Land Use Map

The Future Land Use Map identifies the majority of the site for moderate density residential, and identifies the area of the Brentwood Shopping Center (corner of Montana and Rhode Island Ave) for mixed –use moderate density commercial and moderate density residential.



**Moderate Density Residential areas are described as . . . :** District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 225.4

**Moderate Density Commercial areas are described as . . .** shopping and service areas that are somewhat more intense in scale and character than the low-density commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in low density commercial areas but generally do not exceed five stories in height. The corresponding Zone districts are generally C-2-A, C-2-B, and C-3-A, although other districts may apply. 225.9

**Generalized Policy Map**

The Generalized Policy Map designates the area as a Neighborhood Conservation Area and along a Main Street Mixed Use Corridor.



*Neighborhood Conservation areas have very little vacant or underutilized land. They are primarily residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will be modest in scale and will consist primarily of scattered site infill housing, public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated . . . 223.4*

The proposed C-2-A/PUD zoning has a density and height that is considered to be moderate density. The proposed C-2-A mixed use buildings within the PUD extend commercial uses into the residential designated areas, but the Comprehensive Plan maps are generalized and show general patterns of development appropriate for an area, not for individual property boundaries. In this case, the Future Land Use Map and Generalized Policy Map designations are reflective of the existing development, and the applicant has demonstrated that the buildings and the infrastructure are old and not optimally functional.

The proposed R-5-B/PUD on the remainder of the site which would be developed with a mixture of apartments, rowhouses and two over two units would not be inconsistent with the moderate density residential recommendation.

There is no specific land use supplemental guidance for this site, but the PUD would further many of the Comprehensive Plan goals for revitalizing neighborhoods, improving housing quality and transit oriented development. The scale of development allows for the retention of the Section 8 Housing as part of the development. In addition, the circulation through the site is cumbersome and unsafe because of its many blind spots, dead ends, and unused open spaces. To overcome these issues, the Applicant proposes buildings with floor plates that accommodate a new circulation pattern that connects to the adjacent neighborhood, provides through streets and alleys, allows for eyes on the street, and centralizes open spaces.

The Office of Planning is also supportive of the redevelopment of the site at a higher density. This would require amendments to the Comprehensive Plan, a process that would include a policy level public discussion regarding the appropriate vision and density for this site. As noted in the OP Report of March 13, 2015, OP is willing to work with the Applicant through the City-wide planning division of OP and the neighborhood on amendments to the Comprehensive Plan to accommodate their original proposal. If the Comprehensive Plan is amended to anticipate higher densities on this site, a modification to the PUD could be requested to reflect the new designations and densities.

### **III. PROPOSAL**

The Applicant, in the revised submission, proposes to transform this predominantly low income housing development into a mixed-income, mixed-use community with 1,760 units. The development would include a mixture of apartment, two-over-two, and rowhouse buildings ranging in height from 65 feet to 45 feet. The building heights transition down from Rhode Island Avenue towards the southern portion of the site which is adjacent to existing lower density residences.

The development includes 525 apartments, with 373 units having project-based Section 8 subsidies, over 124 units receiving DHCD Housing Choice Vouchers and approximately 20 tenants who receive no assistance. The Applicant states that as of January 1, 2015 there were 503 occupied units and projects that through natural attrition there would be 424 occupied units at the beginning of construction in 2018.

The 374 project-based Section 8 units would be retained in its entirety in the new development. In addition, the Applicant proposes eleven (11) townhouse units which would be dedicated as Inclusionary Zoning units of which six (6) would be for families at 50% of AMI and five (5) for families for up to 80% of AMI. Therefore, the proposal is for 384 or 22% of the units would be for affordable housing. The applicant should provide details of the gross square footage (gfa) of the units and the number of bedrooms for these units at the Second Stage reviews.

The Applicant has provided a relocation plan (ZC Exhibit 75A) which allows residents to remain on the site during construction and be relocated to their new homes through the phased development. The Applicant states that a final agreement with existing residents on a workable and effective Tenant Relocation and Replacement Plan have not been realized at the time of this report. The Brookland Manor/Brentwood Village Residents Association has filed as a party in opposition to this application

### Site Plan



The revised development plan continues to show the property being subdivided into eight blocks, in addition to a parcel which would be dedicated for a community green/open space.

In addition to the residences, the new Brookland Manor would include 181,844 square feet of retail space which may include a 56,000 square foot grocery store.

Further, a one acre community green and a one acre pedestrian walk are proposed as green open spaces for the residents and the greater community. 1,590 parking spaces would be provided across the site which is 466 above the 1,124 spaces required. The plans indicate that the rowhouses and flats would have integral garage parking



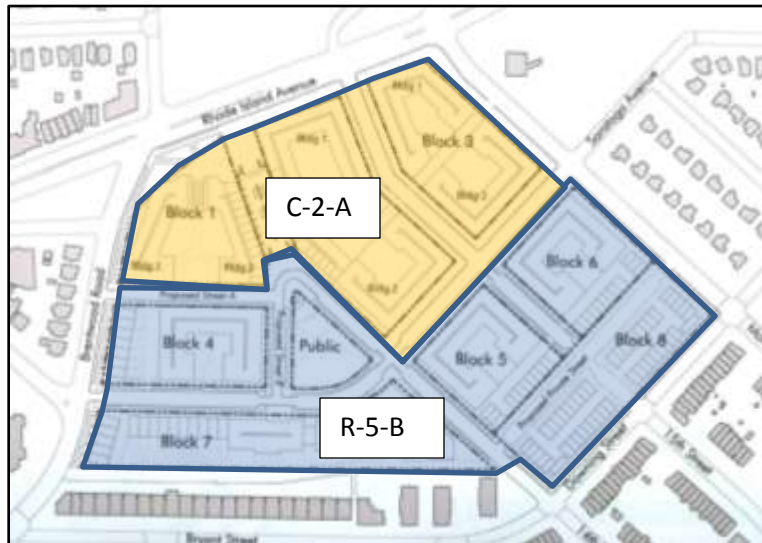
spaces for the residents and the greater community. 1,590 parking spaces would be provided across the site which is 466 above the 1,124 spaces required. The plans indicate that the rowhouses and flats would have integral garage parking

A First Stage PUD is evaluated on issues such as zoning, massing, overall site plan, and use mix for the entire Brookland Manor site. Detailed site and building design would be provided and reviewed by the Commission in subsequent Second Stage applications. The following is a breakdown of the proposed development parameters for each block, some of which may have multiple buildings;

	Use (gfa)		Building Height (Maximum)		Parking	
	Residential	Retail	Feet	Stories	Residential	Retail
<b>Block 1</b>	312,909 gfa (347 units)	-	65 ft.	6	261	
<b>Block 2</b>	319,674 gsf (355 units)	97,518 gfa	65 ft.	5	267	127
<b>Block 3</b>	192,710 gsf (214 units)	84,326 gfa	65 ft.	5	161	109
<b>Block 4</b>	204,174 gsf (196 units)	-	60 ft.	5- apartments 4- 2 over 2	151	
<b>Block 5</b>	139,698 gsf (140 units)		65/45 ft.	4 apartments 3- rowhouse	108	
<b>Block 6</b>	145,179 gsf (146 units)		65/45 ft.	4- apartments 3- rowhouse	113	
<b>Block 7</b>	300,732 gsf (314 units)	-	60 ft.	5- apartments 4- 2 over 2	245	
<b>Block 8</b>	131,383 gsf (48 units)	-	45 ft.	3- rowhouses	48	
Total	1,746,459 gsf (1,760 units)	181,844 gsf	-	-	1,354	236
<b>TOTAL</b>	1,928,303 gfa				1,590 spaces	

#### IV. ZONING

The site is currently zoned R-5-A and C-2-A. The R-5-A zone permits matter-of-right development of single-family residential uses including detached, semi-detached, row dwellings, and flats at a low height and density. The C-2-A district permits low-moderate density shopping and business needs, housing, and mixed use development. The Applicant is requesting a PUD related map amendment to the R-5-B and C-2-A zones. The R-5-B zone provides for moderate height and density residential uses.



With the PUD-related map amendment Blocks 1, 2 and 3 would be in the C-2-A zone. Block 1 would be all residential while Blocks 2 and 3 would have a mixture of residential and ground floor retail uses. Blocks 4, 5, 6, 7, and 8 would have apartments, rowhouses and two over two units.

**Proposed Zoning**

The following tables show a comparison of the R-5-A, C-2-A and the R-5-B/C-2-A/PUD standards and the development proposal for the project. Some of the information for the proposal would normally be provided as part of subsequent Second Stage reviews, when building designs are finalized.

**Proposed C-2-A Portion (Blocks 1, 2, 3)**

	<b>R-5-A Standards (Existing)</b>	<b>C-2-A PUD Standards</b>	<b>Proposal</b>
Area	2 ac. min (87,120 sf).	15,000 sf minimum (43,560 sf)	7.69 acs. (335,059 sf)
Height	40 ft.	65 ft.	65 ft.
FAR	0.9	Residential – 3.0 Commercial – 2.5 Total – 3.0	<u>Block 1</u> Multifamily – 3.0  <u>Block 2</u> Retail – 0.7 Residential – 2.3  <u>Block 3</u> Retail – 0.9 Residential – 2.1
Lot Occupancy	40%	60% residential 100% commercial	<u>Block 1</u> – 43%.  <u>Block 2</u> – 81%  <u>Block 3</u> – 92%
Lot Width	40 ft.	None	None Required.
Rear Yard	20 ft.	15 ft.	Relief Required
Side Yard	3 ins./ft. of height of building but not less than 8 ft.	2 ins./ft. of height but not less than 6 ft.	Relief Required
Parking Spaces	Retail: In excess of 3,000 sf.; 1/750 sf of GFA Multifamily: 1 per 2 units  <u>Block 1</u> Multifamily: 174  <u>Block 2</u> Retail: 127 Multifamily: 178  <u>Block 3</u> Retail: 109 Multifamily: 107  <b>TOTAL = 695</b>	Retail: In excess of 3,000 sf.; 1/750 sf of GFA Multifamily: 1 per 2 units  <u>Block 1</u> Multifamily: 174  <u>Block 2</u> Retail: 127 Multifamily: 178  <u>Block 3</u> Retail: 109 Multifamily: 107  <b>TOTAL = 695</b>	Retail: In excess of 3,000 sf.; 1/750 sf of GFA Multifamily: 1 per 2 units  <u>Block 1</u> Multifamily: 261  <u>Block 2</u> Retail: 127 Multifamily: 267  <u>Block 3</u> Retail: 109 Multifamily: 161 <b>TOTAL = 925</b>
Loading	To be provided at Stage 2	To be provided at Stage 2	To be provided at Stage 2

**Proposed R-5-B Portion (Blocks 4, 5, 6, 7, 8)**

	<b>R-5-A Standards (Existing)</b>	<b>R-5-B/PUD Standards</b>	<b>Proposal</b>
Area	2 acres	1 ac. min. (43,560 sq. ft.)	385,611 sq. ft. (8.85 acs.)
Height	40 ft.	60 ft. max.	45 ft. - 60 ft.
FAR	0.9	3.0 max.	<u>Block 4</u> Multifamily – 3.0 Two over Two – 2.1  <u>Block 5</u> Multifamily – 3.0 Rowhouses – 1.6  <u>Block 6</u> Multifamily – 3.0 Rowhouses – 1.6  <u>Block 7</u> Multifamily – 3.0 Two over Two – 2.1  <u>Block 8</u> Rowhouses – 1.4
Lot Occupancy	40%	60% max.	Block 4 – 59% Block 5 – 87% Block 6 – 86% Block 7 – 61% Block 8 – 36%
Rear Yard	20 ft.	4 ins./ft. of height of building but not less than 15 ft.	15 ft.
Side Yard	3 ins./ft. of height of building but not less than 8 ft.	3 ins./ft. of height of building but not less than 8 ft.	Rowhouses: Flexibility requested.
Parking Spaces	Multifamily: 1 per 2 units Rowhouses/Two over Two: 1 per unit  <u>Block 4</u> Multifamily: 91 Two over Two: 14  <u>Block 5</u> Multifamily: 64 Rowhouses: 12  <u>Block 6</u> Multifamily: 67 Rowhouses: 12  <u>Block 7</u> Multifamily: 143 Two over Two: 28  <u>Block 8</u> Rowhouses: 48 <b>TOTAL = 478</b>	Multifamily: 1 per 2 units Rowhouses/Two over Two: 1 per unit  <u>Block 4</u> Multifamily: 91 Two over Two: 14  Block 5 Multifamily: 64 Rowhouses: 12  Block 6 Multifamily: 67 Rowhouses: 12  <u>Block 7</u> Multifamily: 143 Two over Two: 28  <u>Block 8</u> Rowhouses: 48 <b>TOTAL = 478</b>	Multifamily: 1 per 0.75 unit Rowhouses/Two over Two: 1 per unit  <u>Block 4</u> Multifamily: 137 Two over Two: 14  <u>Block 5</u> Multifamily: 96 Rowhouses: 12  <u>Block 6</u> Multifamily: 101 Rowhouses: 12  <u>Block 7</u> Multifamily: 215 Two over Two: 30  <u>Block 8</u> Rowhouses: 48 <b>TOTAL = 665</b>
Loading	To be provided at Stage 2	To be provided at Stage 2	To be provided at Stage 2

The overall FAR of the development including the private streets is 2.3 while the FAR less the private streets would be 2.8.

## **V. FLEXIBILITY**

The Applicant has requested flexibility from side and rear yard requirements on some of the buildings as part of this First Stage PUD. A Revised Zoning Tabulation sheet (ZC Exhibit 15B page 17 and March 2015, pages 10 and 11) outlines the basic parameters for the development of each block. However, more details analysis would be done for each block and lot at the Second Stage review. The applicant also requests an extended Stage 1 approval of three years.

## **VI. OP ANALYSIS OF OUTSTANDING ISSUES**

This section discusses issues raised at the time the case set down for a public hearing and in the March 13, 2015 OP Report. All of the below issues require specificity and resolution as part of the Stage 1 review, and then confirmation and implementation through subsequent Stage 2 applications. As will be noted in the OP analysis below, many of these issues continue to need additional information or detail.

### ***Detail of the phasing plan, including approximate scheduling and development priorities and justification for a three year time period for the Stage 1 approval.***

The Applicant has submitted a phasing plan (ZC Exhibit 75A) that incorporates the retention of the current residents on the site during construction and being moved into new units after construction. The development would be constructed over three phases (Phase 1, 2A, 2B and 3) with 200 housing units for seniors in Phase 1 to minimize the number of moves for those residents. The Applicant states that off-site relocation is not anticipated, but has indicated that if it is unavoidable they are committed to being responsible for the cost associated with the relocation and the cost to return after construction.

The Applicant has requested flexibility from § 2407.10 to allow the First Stage PUD to be valid for a period of three years instead of the required one year, to allow the current HUD loan to mature in 2017 and for time to prepare for the submission for the Stage Two plans of this large development. The Applicant anticipates the construction would begin in 2018 but has not indicated a time line or scheduling for the remaining phases of the development.

As part of each Second Stage submission, the Applicant should provide additional information on phasing, which should include the approximate scheduling and development priorities at that time.

### ***1:1 replacement of deep subsidies.***

The proposal would have a total of 1,760 units and would retain the existing 373 Section 8 units. The Applicant projects that at the beginning of construction there will be 424 occupied units which would be considered the replacement units. The replacement units would consist of 373 Section 8 apartment units and 51 “market rate units” with rents paid using the DC Housing Voucher Program. Currently, there are approximately 124 units using DC Housing Vouchers and the Applicant proposes to significantly reduce the number of units available to residents with DC Housing Vouchers from 124 to 51 units. Further, of the 51 units and within the overall



development there would be only 11 Inclusionary Zoning units (half at 50% of AMI half at 80% of AMI).

OP recommends that additional units be provided to accommodate residents with DC Housing Vouchers as well as additional IZ units which would equate to, or be more in line with the 535 units that are within the current buildings. In addition, the Applicant should provide information regarding affordability deeper than 50% AMI should the development not retain the Section 8 subsidy.

***Options for funding if federal funds are not renewed.***

The Applicant states that if the commitment of HUD to retain the Section 8 contracts does not materialize, the option would be to reserve at least 20% of the proposed 1,760 units for affordable households at Inclusionary standards as follows:

- 165 units (10%) at up to 80% of Area Median Income (AMI);
- 164 units (10%) at up to 50% of AMI; and
- 11 for sale townhomes (10% of 114) for families at up to 80% of AMI.

This option does not include the replacement of any of the affordable housing that is currently on the site. OP is not supportive of any proposal that would lessen the level of affordability that currently exists.

***Provide a Table showing Existing and Proposed Unit Size by bedroom.***

At ZC Exhibit 75A, the Applicant provided a table showing the existing bedroom sizes and square footages for each unit type. However, a similar table was not provided for the proposed development within each phase. The Applicant states that the unit sizes are not available at this time but would be provided at each Stage 2 review as the buildings are designed in detail.

***Size of units, number of bedrooms and AMI.***

The current development contains four and five bedroom units but the proposal has not committed to providing any four or five bedroom units. The Applicant states that a study was recently conducted, and using the HUD guidelines of 2 persons per bedroom, there are 13 existing households which would require four bedrooms and no household would require 5 bedrooms. The building with the larger units would remain on the site until the later phases at which time they can be “right sized” to accommodate the larger families. The Applicant provided a table to demonstrate existing household size. The proposed unit sizes, number of bedrooms of each and the corresponding AMI level would be provided at each Stage 2 development.

***Clarify the number of Inclusionary Zoning units required and proposed.***

The Applicant proposes 424 apartment units 373 units would be replacement units under the Section 8 Program and 11 rowhouses would be IZ units, six (6) at up to 50% of AMI and five (5) at up to 80% of AMI. The Applicant should provide a breakdown of the gross floor area of the IZ units and their bedroom sizes.

***Provide reason behind not having active play fields or playgrounds within the development.***

At ZC Exhibit 15B, is a map showing the locations of recreation centers and park/fields in the neighborhood, most within a 10 minute walk from the property and are sufficient to serve the residents. However, in a recent study, conducted by OP and Department of Parks and Recreation these facilities were found to have inadequate services. The Applicant has stated that the influx of residents to Brookland Manor would have a positive impact and lead to improvements at these facilities, but has not committed to making these improvements or indicated who would. OP maintains that the Applicant should provide an analysis of existing facilities in the neighborhood and demonstrate that these would adequately serve the new residents.

JLS/mbr