



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Executive Office of the Mayor

Office of the Deputy Mayor for Planning and Economic Development



January 10, 2017

ATTN: Sharon Schellin
Zoning Commission for the District of Columbia
c/o District of Columbia Office of Zoning
441 4th Street NW, Suite 200-S
Washington, DC 20001

Re: Support for Density and Build-First in Park Morton Redevelopment Plan, Including Bruce Monroe

Dear Members of the Zoning Commission:

The proposed implementation of the redevelopment of Bruce Monroe, as an integral component of the Park Morton New Communities Initiative (“NCI”), is designed to fulfill all four “Guiding Principles” of NCI, including “Build-First,” which is the principle of developing new housing prior to the demolition of existing housing stock in order to minimize displacement and disruption of existing residents. Quite simply, it is the Bruce Monroe site which makes Build First feasible for the Park Morton redevelopment for three key reasons: 1) close proximity to the existing Park Morton site, which allows residents who choose a new housing option at Bruce Monroe to remain in the neighborhood in which they currently reside and maintain their existing networks and relationships; 2) size (3 acres) and condition (comparatively unimproved land) provides for the development of a large number of replacement units in the first phase, thus reducing the number of families who will have to wait for housing in Phases 2 or 3 at the Park Morton site and/or face temporary relocation to support such development; and 3) its location along Georgia Avenue, where the Comprehensive Plan supports a higher density zoning designation and thus, development at-scale, consistent with other completed and planned projects along the corridor. The Bruce Monroe site currently hosts a temporary park – a recent but valued neighborhood amenity. It is important to note that this site has always been slated for redevelopment since the Bruce Monroe School was demolished, and this message has been reiterated publicly in the community discussions around this project that have taken place over the last year. However, recognizing that the site allows for both the development of housing AND the opportunity to provide improved urban park land in perpetuity, the City has insisted, with full support of the development team, that this redevelopment effort will also include a first class urban park of approximately one acre.

Program Principles

The program for Park Morton revolves around the 147 replacement units originally prescribed in the DCHA RFP, and supported by NCI. Additionally, the NCI Guiding Principle of “Mixed-Income Housing” dictates an appropriate integration of housing types, tenures and price points so that replacement public housing, workforce, and market-rate residents each have appropriate emphasis within the redeveloped community. In this way, NCI leverages considerable industry

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data and learnings to create a program that will sustainably provide ladders of opportunity for former residents of public housing, deconcentrate poverty, and preserve affordable housing opportunities in a rapidly changing neighborhood, while simultaneously bolstering economic opportunities and community wealth building all along the lower Georgia Avenue corridor.

Phasing

As the initial, off-site (Build First) phase, our program for Bruce Monroe, achieves 273 new housing units in 3 building types (mixed-income apartment, senior apartment, and townhomes) which are split almost evenly between market rate, workforce, and public housing units. This unit count is achieved under a proposed C-2-B/R-5-A rezoning which would be obtained via the PUD process and is permitted in the Comprehensive Plan. Of the 273 units achieved at Bruce Monroe, 90 of those units are dedicated as public housing replacement units for Park Morton residents, and those 90 units are divided between the mixed-income apartment building, the senior apartment building, and the townhomes. The 90 units are dispersed throughout the 3 housing types in Bruce Monroe in order to preserve housing equity in the project AND to meet the diverse household sizes of Park Morton families. Bruce Monroe's unit mix allows us to accommodate everyone from single seniors to 2-person households and families with children who require 3-bedroom townhome units.

Our next phase is at the existing Park Morton site and consists of a 142 unit mixed-income apartment building along Park Road and 6 additional apartments in townhomes and stacked flats. Of these 148 housing units at this Park Morton site, 43 are designated as replacement units for Park Morton residents. To facilitate the construction of this component, 6 properties along Park Road and Morton Street have been identified as impacted buildings. Two of these buildings are vacant and boarded, and the remaining buildings are occupied and would need to be emptied before demolition. The goal is to have as many families who are interested and reside in a Park Morton building to move to Bruce Monroe (if they choose); otherwise, they would be provided with another suitable temporary housing option, possibly including within the Park Morton site.

In addition, a final, on-site phase of the Park Morton redevelopment achieves 41 units that include a mix of townhomes and flats and provide 2-BR, 3-BR, and 4-BR units. This phase is designed primarily for larger families. By this phase, no more than 14 families at Park Morton will be in need of their new replacement unit. This final component has been designed to enable a mix of both rental and homeownership opportunities.

The Need for Density at Bruce Monroe

As outlined in the phasing narrative above, the availability of a proximate, off-site, at-scale development parcel is essential to fulfilling NCI principles and ensuring timely completion of Park Morton revitalization. As such, Bruce Monroe is THE KEY component to delivering on the District's promise made to Park Morton residents a decade ago, by supporting the delivery of a critical mass of replacement units at Bruce Monroe within a mixed-income context consistent with overarching community development goals.

The development team has received pushback from some members of the community regarding the proposed density at Bruce Monroe, with some requesting a shorter, less dense building at Bruce Monroe, and shifting more the public housing replacement units to Park Morton.

However, the development program was informed by a broad cross section of the community and is meticulously designed to take into account the inter-connected relationship among 1:1 replacement, creating/maintaining true income integration, minimizing resident displacement, utilizing economies of scale, and staying within a reasonable development timeline, complying with the Comprehensive Plan policies regarding the need for additional affordable housing, among many other factors. If the building is made shorter or narrower in order to reduce the unit count, it will certainly precipitate a considerable delay in project completion and would only be feasible via: 1) control of an additional off-site parcel to absorb the loss (at significant expense, if such a proximate site were even available), or 2) less dense Bruce Monroe reprogrammed as 100% affordable, in conflict with NCI mixed-income principle (90 replacement units on a less dense Bruce Monroe site would cause investors to discount any market rate component at or below tax-credit rents, with a calamitous impact on financing structure, necessitating change which would maximize LIHTC equity). Among many other complications any of the above would trigger, the Park Morton residents would find themselves once again being told to “wait for their turn” while priorities of other neighbors are addressed to their satisfaction first.

Relatedly, there has been a question posed to the development team around the elimination of townhomes from the Bruce Monroe program. Of the 8 townhomes proposed, 3 are designated as public housing replacement units. Eliminating the townhome program entirely removes equitable housing options for larger families at Park Morton and is inconsistent with the very principles under which the New Communities program operates.

Why Density Cannot be Shifted to Park Morton

The development team has also received inquiries as to why more density (units) cannot be shifted to Park Morton in order to achieve the desired number of replacement units in the overall program.

Park Morton is a site that, unlike Bruce Monroe, sits off of Georgia Avenue within a residential neighborhood. Therefore, it is prescribed a lower-density zoning designation under a PUD than that of Bruce Monroe. A lower zoning designation results in a lower unit yield. The Height Act also creates limitations on the level of density that can be achieved at Park Morton with regards to building height/number of stories.

Another important point to re-emphasize is that Park Morton, like many other communities, includes a diverse mix of household types. There is diversity in both household size and composition, which results in a diverse mix of housing units that need to be programmed in this development. The Park Morton site, because of its lower density designation, and not being located directly on a major street such as Georgia Avenue, lends itself well to accommodate families who require larger (3- and 4-BR units) in the form of townhomes. As a matter of housing policy, the District and other affordable housing providers have recognized that large families, particularly those with children, are better served in a different housing type than individuals and smaller-sized families. As such, the combination of both an apartment building and a mix of townhouse types at Park Morton allows for the larger families to have an appropriately sized housing option since those families cannot all be accommodated at Bruce Monroe or in Phase 2 at Park Morton. In addition to incongruence with zoning, based on the District’s and our development partners experience, we believe that increasing the proposed density at Park Morton beyond what is currently proposed could result in some of the problems that have plagued Park Morton in the past such as the lack of rear yards and defensible spaces; the lack of homes (as opposed to apartment buildings) with direct entrances onto public streets;

and the lack of truly public spaces that help to integrate the development into the broader neighborhood. We believe that the current plan helps to achieve these goals, and would be frustrated, by incorporating more apartment buildings at the Park Morton site. Finally, any program which focuses less density at Bruce Monroe and more density on Park Morton could only be accomplished by considerable, additional relocation of existing residents since greater numbers of 1:1 replacement units would be dependent upon sites currently housing Park Morton residents as there would be the lost opportunity to build additional units at Bruce Monroe first.

Sincerely,



Angie Rodgers

Director, New Communities Initiative

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