

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Matt Jesick, Development Review Specialist  
*JL for* Jennifer Steingasser, Deputy Director, Development, Design & Preservation

**DATE:** July 5, 2024

**SUBJECT:** ZC #23-24 – Eckington Mews – Public Hearing Report for a Consolidated Planned Unit Development and Related Map Amendment

### **I. SUMMARY AND RECOMMENDATION**

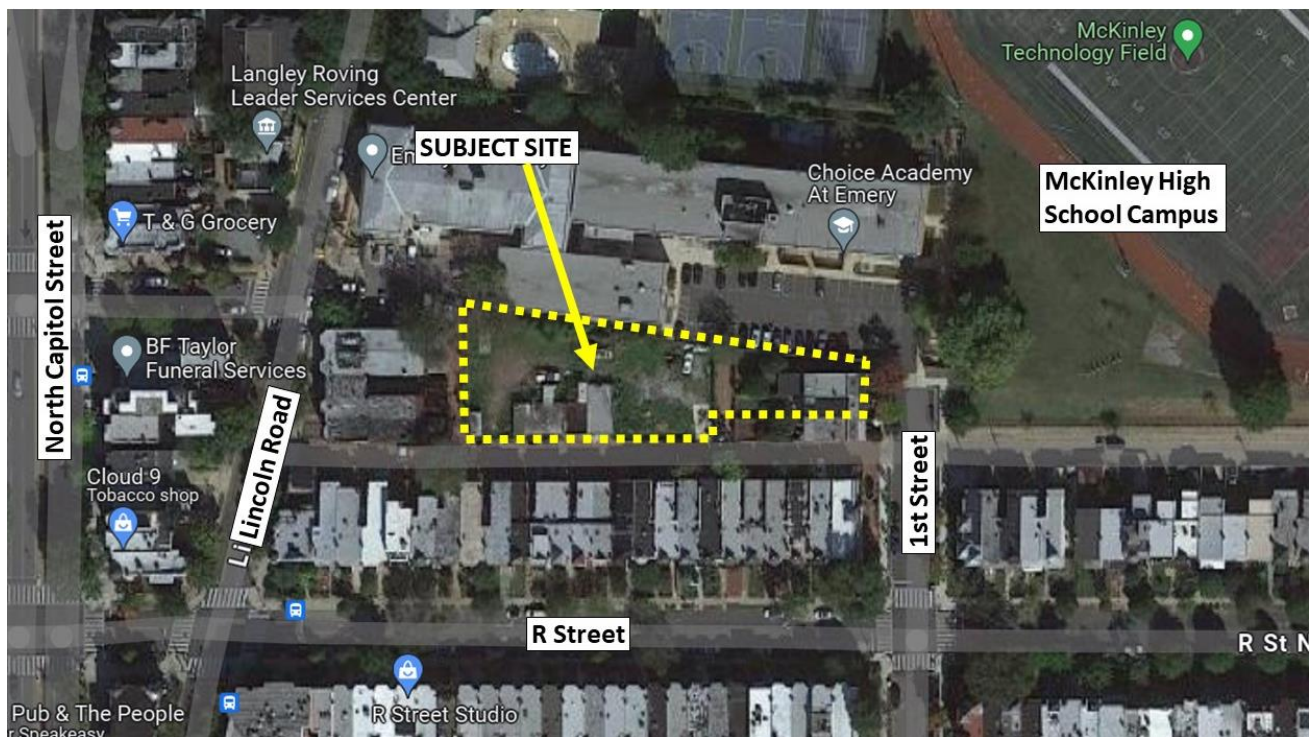
Eckington Mews, LLC requests a consolidated PUD and related map amendment from RF-1 to RA-2 to construct a rowhouse-style apartment building totaling 27 units. The development site consists of two existing rowhouses which would remain, vacant lots, and a portion of alley to be closed. The maximum height would be 34 feet tall and the FAR would be 1.86. The project would be not inconsistent with the maps and policies of the Comprehensive Plan, including when viewed through a racial equity lens.

The Office of Planning (OP), therefore, recommends that the Zoning Commission **approve** the application.

### **II. APPLICATION-IN-BRIEF**

<b>Applicant</b>	Eckington Mews, LLC	
<b>Location</b>	Square 3524, Lots 52, 53, 800, 802, 803 (1708 and 1710 1 <sup>st</sup> Street, NE, adjacent alley lots, and portion of an alley proposed for closure)	Ward 5, ANC 5F
<b>Current Zoning</b>	RF-1 – Moderate density rowhouses	
<b>Proposed PUD-Related Zoning</b>	RA-2 – Moderate density multifamily	
<b>Relief and Flexibility Requested</b>	<ul style="list-style-type: none"> <li>• PUD-related map amendment</li> <li>• PUD site area minimum</li> <li>• Ability to locate IZ units in one area</li> <li>• Multiple solar panel pergolas</li> <li>• Design flexibility</li> </ul>	

<b>Existing Development</b>	Two 2-story rowhouses at 1708 and 1710 1 <sup>st</sup> Street; Mostly vacant alley lots to the west of the 1 <sup>st</sup> Street rowhouses, with a cluster of garage buildings.
<b>Adjacent Development</b>	Rowhouses, typically 2 stories with cellar, to the west and south fronting on Lincoln Road and R Street, respectively; One similar rowhouse on 1 <sup>st</sup> Street at 1706, adjacent to the rowhouses on the subject property; District-owned properties to the north, including the McKinley High School campus to the northeast; Broader neighborhood is mostly rowhouses.
<b>Comprehensive Plan Generalized Policy Map</b>	Neighborhood Conservation Area
<b>Comprehensive Plan Future Land Use Map</b>	Local Public Facilities (Adjacent to Moderate Density Residential)
<b>Relevant Small Area Plans and Studies</b>	<ul style="list-style-type: none"> <li>• Mid-City East Small Area Plan</li> <li>• Mayor’s Order on Housing</li> </ul>



Vicinity Map

SUMMARY OF PROPOSED DEVELOPMENT PARAMETERS	
<b>Site Area</b>	22,939 square feet
<b>Floor Area</b>	42,695 square feet
<b>FAR</b>	1.86
<b>Height</b>	34 feet; 3 stories plus cellar

<b>SUMMARY OF PROPOSED DEVELOPMENT PARAMETERS</b>				
<b>Dwelling Unit Breakdown</b>				
	Lots 1 – 10: 3BR plus 1BR rental unit = 20 units			
	Lots 11 – 14: 3BR = 4 units			
	Lot 15: 2BR = 1 unit			
	Lot 16: 4BR + 1 BR rental unit = 2 units			
	<b>Total = 27 units</b>			
<b>IZ Proffer</b>	12.03% of the residential floor area (10% required) = approx. 6,231 sf = 3 units			
	Unit #	12	13	15
	Bedrooms	3	3	2
	MFI	80%	60%	60%
	Flex. Requested – locate IZ units on eastern end			
<b>Vehicle Parking</b>	13 spaces			
<b>Bicycle Parking</b>	13 long term, 12 short term			

### III. SUMMARY OF COMMISSION AND OP COMMENTS AT SETDOWN

The following tables summarize the Commission’s and OP’s comments from the time of setdown, and updates on those comments. OP’s questions have been fully addressed.

	<b>Commission Comment</b>	<b>Applicant Response</b>
1	Provide analysis of traffic impacts.	A transportation study was submitted at Exhibit 20A. It concludes that the project would not have detrimental impact on the surrounding transportation network. OP anticipates that DDOT will provide an analysis for this application.
2	Provide summary of neighborhood engagement.	Exhibit 22 provides an update on the applicant’s community outreach.
3	Provide a more complete explanation of the IZ program, including location and tenure types.	The applicant’s supplemental written statements, Exhibits 13 and 22 provide further explanation of the IZ program. IZ information can also be found in the plan set, Exhibit 13A, p. 31, and the one-page summary, Exhibit 22A. OP analysis of the benefits and amenities package is provided later in this report.
4	Information about any current tenants and efforts for relocation or retention.	The record doesn’t appear to provide information about whether the existing rowhouses are occupied and, if so, what efforts have been made to assist in relocation. OP has advised the applicant to provide this information at the public hearing.

	OP Comment from Setdown	Updated Status
1	Examine design details.	OP’s Design Division has reviewed the architecture of the project and provided feedback that the applicant has incorporated into the updated plans at <a href="#">Exhibit 13A</a> . OP fully supports the revised design of the project.
2	Examine options for providing rooftop terraces and solar panels to all units, including IZ units.	The updated design includes solar panels and rooftop access for all units.
3	Provide section drawings showing the proposed development with adjacent rowhouses.	The most recent plans include the requested information.
4	Further analysis of requested IZ flexibility.	OP and DHCD discussed the IZ proposal at length with the applicant. As a result of those discussions, the applicant agreed to withdraw their request for flexibility in tenure type for the IZ units, and all IZ units will be for-sale. They also now propose a lower total IZ percentage, but with a lower MFI for 2 of the units. See additional discussion below in this report.

#### IV. PROJECT DESCRIPTION

The applicant proposes to construct one multifamily building that, in form and function, would appear as individual rowhouses. The subject property includes two existing rowhouses facing 1<sup>st</sup> Street, the alley lots to the west, as well as a portion of a stub alley that is proposed to be closed. The new development would include 27 total units – 16 for-sale units, 11 of which would have integrated lower-level accessory rental units, similar to traditional rowhouses in the District. Sizes range from 1-bedroom units for the accessory rental dwellings, to 2-, 3- and 4-bedroom principal units. The existing rowhouses would be renovated as part of the project. Other than those two units, primary access would be from the pedestrian walk on the north side of the development, with some units have garage access from the south. Total height would be 34 ft., and total FAR would be 1.86. Height would step down to two stories at the existing rowhouses on the east side.

The application proposes that about 12% of the floor area be dedicated to IZ units, more than the 10% required. Flexibility has been requested to locate the IZ units toward the eastern end of the project. However, the applicant has withdrawn the previous request for flexibility in the tenure type of the IZ units; Now all IZ units, as with the rest of the project, would be for-sale units. OP recommends approval of the locational flexibility, as the IZ program can not be used for units with their own accessory rental units. OP is very supportive of the dwellings with the accessory rental unit, as the proposed rental units would themselves provide more affordable housing, and the potential rental income could make the for-sale unit more affordable for the buyers.

OP supports the site plan, massing, and architecture of the project. The design includes brick for all façades of the building, in keeping with the predominant material used in the existing

neighborhood. Renderings show varied brick colors, including a darker base at the garage level. Since setdown, OP’s Design Division met with the applicant and provided feedback on the design. While the feedback was mostly positive, OP suggested some changes to add texture and detail to the façade, which the applicant has incorporated. Changes include a more prominent cornice and parapet cap, with differentiated brick courses, revised window patterns on the southern façade, and simplified brick colors at the garage level. At the roof level, since setdown the applicant has revised the design to include a solar canopy and a rooftop terrace for each of the rowhouses. In regard to massing, section drawings provided in the plan set (Exhibit 13A, p. 24), show that the proposed scale of the project would be compatible with its surroundings

## V. ZONING SUMMARY

The site is currently zoned RF-1, and the applicant is requesting a PUD-related map amendment to the RA-2 zone. RA-2 is not inconsistent with the Comprehensive Plan, including the combined guidance of the FLUM and the written text of the Plan, as discussed above. Below is a table comparing the existing and proposed zone to the proposal.

Item	Existing Zone RF-1	Proposed Zone RA-2 PUD	Proposal	Flexibility
<b>Site Area</b>	n/a	1 acre for a PUD (X § 301)	0.53 ac. (22,939 sf)	Requested
<b>Height</b>	40 ft. 3 stories max.	60 ft. max.	34 ft.	None
<b>FAR: Residential</b>	1.8 effective FAR	2.59 max.	1.86	None
<b>IZ Set aside C § 1003</b>	10% min.	10% min.	12.03%	None
<b>Lot Occupancy</b>	60% max.	60% max.	60%	None
<b>Rear Yard</b>	20 ft. min.	15 ft. min.	15 ft.	None
<b>Penthouse:</b>				
<b>Height</b>	12 ft. max; 1 story	12 ft., 15 ft. for mech. max.	8’6”	None
<b>Enclosures</b>	1 enclosure for mechanical	1 enclosure for mechanical	Individual solar pergolas	Requested
<b>Setback</b>	1:1 min.	1:1 min.	Conforms	None
<b>Vehicle Parking</b>	1 per single d.u.; 1 per flat	1 per 3 units in excess of 4 units = 7 spaces min.	13 spaces	None
<b>Bicycle Parking</b>	None req’d for single d.u. or flat	Long term – 1 per 3 units Short term – 1 per 20 units	13 long term; 12 short term	None
<b>GAR</b>	No requirement	0.4 min.	0.533	None

## **VI. REQUESTED FLEXIBILITY**

In addition to the PUD-related map amendment, the applicant requests flexibility from the following provisions:

- PUD site area minimum;
- Ability to locate IZ units in one area;
- Multiple rooftop solar pergolas;
- Design flexibility.

The Regulations permit the Commission to waive up to 50% of the land area required for a PUD if, among other qualifications, “at least eighty percent (80%) of the gross floor area of the development shall be used exclusively for dwelling units and uses accessory thereto” (Subtitle X, § 301.2(c)). The subject site is 0.53 acres in size, more than half of the 1 acre standard requirement for the PUD in the RA-2 zone, and all of the floor area would be dedicated to residential uses. OP, therefore, recommends approval of this area of flexibility.

OP recommends approval of the IZ locational flexibility, as the IZ program is not intended to be used for units with their own accessory rental units. The proposed accessory rental units would themselves provide “affordable” housing, and the potential rental income could make the for-sale unit more affordable for the buyers. Visually the IZ units would be identical to the other units in the project, with the same exterior materials and detailing.

OP has no objection to the flexibility for multiple rooftop solar pergolas. The applicant states that separation of the pergolas is necessary because the rowhouses will be sold individually, and the solar panels will be the responsibility of each owner. While not literally connected to each other to form a single rooftop structure, a review of the plans shows that the solar panels appear to be nearly continuous across the multiple rowhouses. The design would meet the intent of the regulations by minimizing the visibility of the rooftop structures, including with a height lower than the maximum permitted, and with setbacks equal to or greater than the 1-to-1 requirement.

The requested design flexibility, detailed on p. 14 of Exhibit 3, appears to be standard flexibility sought through PUDs. Some may not be necessary as they are more applicable to larger projects, such as “Parking Layout”. The applicant should ensure that the flexibility request is tailored to this particular project.

## **VII. ZONING COMMISSION RACIAL EQUITY TOOL ANALYSIS**

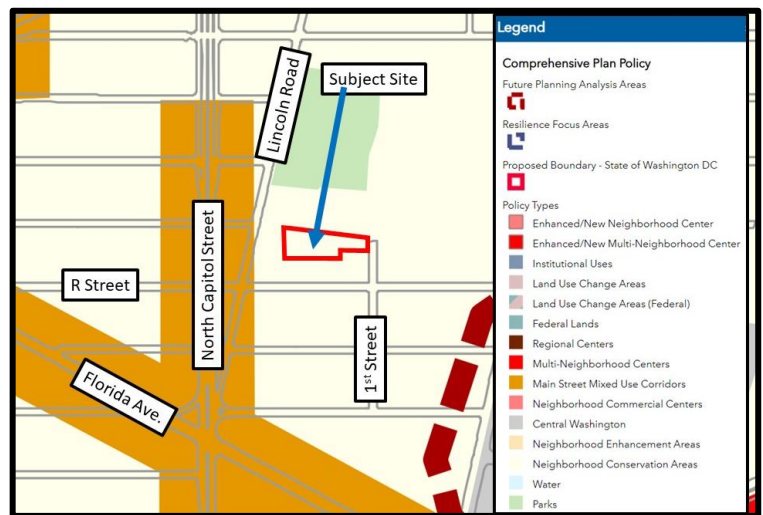
The Commission created a Racial Equity Tool to assist in its evaluation of zoning actions through a racial equity lens. The tool asks applicants and OP to provide analysis of the relevant policies from the Comprehensive Plan and other planning documents and provide analysis of factors related to equity. The applicant’s comprehensive racial equity analysis is at Exhibit 3F. OP analysis is provided in the OP Setdown Report at [Exhibit 12](#), and below.

### **Racial Equity Tool Part 1 – Comprehensive Plan Guidance**

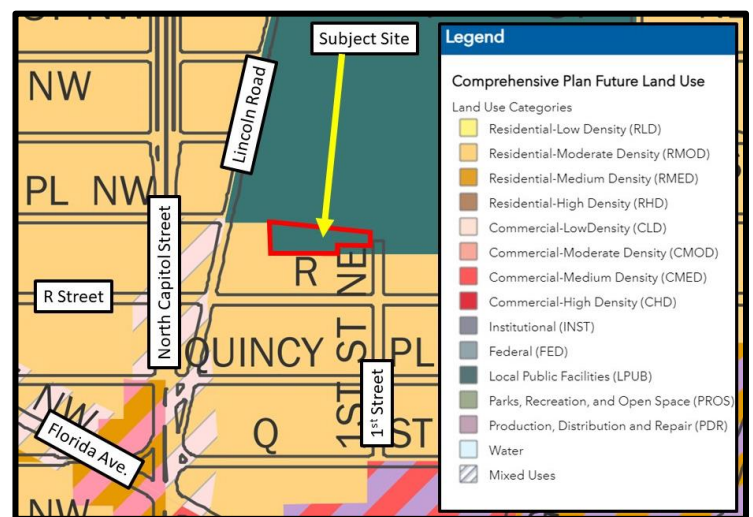


The Comprehensive Plan requires the Zoning Commission and staff to examine city policies through a racial equity lens. Racial equity is a broad and encompassing goal of the entire District government. Section 2501.8 of the Implementation Element calls for “*the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.*” That analysis is intended to be based on the policies of the Comprehensive Plan and whether a proposed zoning action is “not inconsistent” with the Comp Plan. Whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action.

The **Generalized Policy Map (GPM)** shows the site within a **Neighborhood Conservation Area**, which are generally residential in character, and where infill development should “consist primarily of infill housing, public facilities, and institutional uses” (§ 225.4). Infill development on vacant or underutilized properties is anticipated, “particularly to address city-wide housing needs” (§§ 225.4 and 225.5). It also states that “new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies” (§ 225.5). The proposed infill development, designed to resemble and function like rowhouses, and similar in scale to it residential neighbors, would not be inconsistent with the GPM.



The **Future Land Use Map (FLUM)** designates the site for **Local Public Facilities (LPF)**, which includes land and facilities occupied and used by the District of Columbia government or other local government agencies, such as public schools including charter schools. It does not appear that the property was used in the past for local public uses, and that the subject site was given its designation only because it was adjacent to the educational campus to the north. The surrounding rowhouse neighborhood is designated for Moderate Density Residential uses.



The Plan says of the FLUM that it “is to be “interpreted broadly...in conjunction with the text of the Comprehensive Plan, including the Citywide Elements and the Area Elements” (§ 228.1). It

also states that when areas such as LPF are to be redeveloped, the new development should be compatible with its surrounding context (ibid). The redevelopment of the subject site, in the manner of a rowhouse development, would be compatible with the adjacent rowhouses, and would not be inconsistent with the intent of the FLUM to promote harmonious new development. The proposed zone, RA-2, would not be inconsistent with the FLUM; The Plan states that RA-2 is a zone compatible with the adjacent Moderate Density Residential designation.

### **Comprehensive Plan Policies**

The [OP setdown report](#) provides a detailed analysis of the proposal against the written Elements of the Comprehensive Plan, including a listing of Comp Plan policy statements that the proposal addresses, as does the applicant filing at [Exhibit 3F](#).

The proposed zoning map amendment would further policy objectives of the Comprehensive Plan Citywide Elements, including the Land Use, Transportation, Housing, Environmental Protection, Urban Design, and Historic Preservation elements, as well as the Mid-City Area Element. Among those policies, in addition to providing new market rate and affordable housing opportunities, the project would further goals aimed at conserving and reinforcing positive aspects of the rowhouse neighborhoods in Mid-City, utilizing vacant land near transit, and developing in an environmentally sensitive way.

When viewed through a racial equity lens, the proposal would not be inconsistent with the Comprehensive Plan. Equity is discussed throughout the Comprehensive Plan. In the context of zoning, certain priorities stand out. These include affordable housing, displacement, and access to opportunity. One of the main ways the Comprehensive Plan seeks to address equity is by supporting additional housing development, and the Plan particularly recognizes the potential for additional residential development on underutilized sites near transit. The Plan describes that without increased housing, the imbalance between supply and demand will drive up housing costs. The present proposal would help to achieve those housing goals related to equity by providing market rate and affordable housing on a site that is mostly undeveloped and is within walking distance of retail and services, recreation, employment opportunities, and mass transit, including a metro station. The project would also be consistent with goals related to non-displacement, as the site currently contains no housing, and the project would lessen housing-cost pressures related to indirect displacement. The project would also provide family-sized housing for-sale units.

### **Potential Inconsistencies**

OP did not identify policy statements with which the proposal would be inconsistent. The applicant identified LU-2.2.7: Alley Use as a potential inconsistency, as the proposal includes the closing of a small portion of dead-end alley to facilitate this proposal. OP agrees with the applicant that any potential inconsistency would be out-weighted by numerous other policy statements related to the provision of new housing, new affordable housing, increasing homeownership opportunities, and encouraging new infill development on vacant lots.



### **Other Plans and Initiatives:**

OP's setdown report, Exhibit 12, provided analysis of the Mid-City East Small Area Plan (SAP) and the 2019 Mayor's Order on Housing. The project would not be inconsistent with those documents, and would further four of the major goals of the SAP:

- Reinforce and support neighborhood identity;
- Encourage infill of privately-held vacant lots and increase site utilization to strengthen neighborhood fabric and create opportunities for new housing, unique retail offerings, and/or workplaces;
- Maintain or increase the number of affordable housing units throughout Mid City East to better serve all household types, including families;
- Improve the appearance, walkability, safety and cleanliness of Mid City East streets and public spaces.

The project would also help achieve the Mayor's housing goals through the production of market rate and affordable housing, and do so by providing family-sized units.

### **Racial Equity Tool Part 2 – Community Outreach and Engagement**

Exhibit 3, p. 16, Exhibit 3F, pp. 5-8, and Exhibit 22 summarize the applicant's outreach efforts to date. They indicate that outreach began almost two years ago, and included working closely with the ANC SMD, the Eckington Civic Association, and adjacent neighbors. The Eckington Civic Association has already submitted a letter in support of the project, at Exhibit 11. According to the applicant, the design has reached its present state by responding to neighbors' preference for a rowhouse-style development. The applicant has also committed to seeking DDOT approval for traffic calming measures in the alley to minimize vehicle speed in the alley. Exhibit 22 indicates that a presentation to the full ANC is anticipated on July 15, 2024.

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

The Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens. At the time of the OP setdown report, the State Data Center had not yet processed and formatted the most recent American Community Survey (ACS) data; this data is now available and used in this report. As such, the following tables compare the 2018-2022 American Community Survey data with data from the 2012-2016 period, available from OP's State Data Center. Each table below covers both 5-year periods and compares the data from the Mid-City planning area, in which the subject site is located, with District-wide data.

### **Population by Race/Ethnicity**

In the 2018 to 2022 study period, the Mid-City planning area was almost evenly split between the White population and other populations. The percentage of both White and Black populations has decreased from the 2012-2016 study period, with other minority groups increasing their share of the total population. The White population decreased from 52% to 50.5%; The Black population

decreased from 32.6% to 26.1%, which is reflective of but more significant than the District-wide trend during this period.

The IZ units created by the development would provide increased opportunity for lower-income families to remain in the District and the planning area, and in particular would provide home-ownership opportunities for residents wishing to remain in the District. Given the income data by race, it can be inferred that the families benefiting the most from the IZ housing on the site would be Black or other minority groups, which could have some impact on the present trends of declining Black population in the planning area.

***Table 1: Population/Race or Ethnicity Districtwide and in the Planning Area***

<b>Race or Ethnicity</b>	<b>District 2012-16</b>	<b>District% 2012-16</b>	<b>District 2018-22</b>	<b>District% 2018-22</b>	<b>MC 2012-16</b>	<b>MC% 2012-16</b>	<b>MC 2018-22</b>	<b>MC% 2018-22</b>
<b>Total Population</b>	659,009	100%	<b>670,587</b>	<b>100%</b>	94,786	100%	<b>92,773</b>	<b>100.0%</b>
<b>Asian Alone</b>	24,036	4%	<b>27,067</b>	<b>4.0%</b>	4,183	4.4%	<b>5,466</b>	<b>5.9%</b>
<b>Black or African American</b>	318,598	48%	<b>297,101</b>	<b>44.3%</b>	30,940	32.6%	<b>24,201</b>	<b>26.1%</b>
<b>Hispanic or Latino</b>	69,106	10%	<b>77,168</b>	<b>11.5%</b>	17,148	18.1%	<b>16,724</b>	<b>18.0%</b>
<b>American Indian and Alaskan Native</b>	2,174	0%	<b>2,209</b>	<b>0.3%</b>	101	0.0%	<b>413</b>	<b>0.4%</b>
<b>Native Hawaiian and Other Pacific Islander</b>	271	0%	<b>420</b>	<b>0.1%</b>	116	0.0%	<b>79</b>	<b>0.1%</b>
<b>Some Other Race</b>	29,650	4%	<b>30,879</b>	<b>4.6%</b>	7,184	7.6%	<b>7,151</b>	<b>7.7%</b>
<b>Two or More Races</b>	18,245	3%	<b>47,278</b>	<b>7.1%</b>	2,986	3.2%	<b>8,587</b>	<b>9.3%</b>
<b>White Alone</b>	266,035	40%	<b>265,633</b>	<b>39.6%</b>	49,277	52.0%	<b>46,877</b>	<b>50.5%</b>

### **Age & Vulnerable Population**

The Mid-City planning area's median age decreased slightly between the two study periods. It was slightly younger than the District's median age in both study periods. When race is considered, the data shows that the Black residents were older than most of the other groups during the ten-year period. The Mid-City planning area had a similar or lower percentage of vulnerable residents than the District as a whole. Over the 10-year period, the number of residents 65 and older stayed nearly constant, as did the number of people who identified as disabled. In this planning area there are also fewer people over 65, and fewer people under 18, than District-wide.

**Table 2: Age/Vulnerable Populations in the District and the Planning Area**

Vulnerable Population	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
<b>Persons 65 and Older</b>	11.4%	<b>12.6%</b>	7.5%	<b>7.4%</b>
<b>Persons Under 18</b>	17.4%	<b>18.5%</b>	12.3%	<b>14.3%</b>
<b>Percent Disable</b>	11.3%	<b>11.0%</b>	8.0%	<b>7.9%</b>

**Table 3: Median Age**

Median Age	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
<b>Total Population</b>	37.7	<b>35.5</b>	36.8	<b>34.0</b>
<b>Asian Alone</b>	36.5	<b>35.6</b>	38.1	<b>34.7</b>
<b>Black or African American</b>	33.4	<b>38.1</b>	46.0	<b>39.9</b>
<b>Hispanic or Latino</b>	28.4	<b>32.2</b>	36.2	<b>32.0</b>
<b>American Indian and Alaskan Native</b>	32.2	<b>41.1</b>	36.6	<b>40.8</b>
<b>Native Hawaiian and Other Pacific Islander</b>	30.8	<b>n/a</b>	n/a	<b>n/a</b>
<b>Some Other Race</b>	28.0	<b>28.8</b>	35.3	<b>30.4</b>
<b>Two or More Races</b>	19.8	<b>30.8</b>	31.1	<b>31.0</b>
<b>White Alone</b>	40.4	<b>35.3</b>	35.5	<b>33.4</b>

### **Median Household Income**

The Mid-City planning area has a higher median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2018-2022 survey periods. The planning area median income, however, increased faster than the citywide median, but these gains were not distributed evenly across racial groups. The median income of some groups saw significant increases, while other groups saw more modest gains, or, in the case of those identifying as American Indian and Alaskan Native, a decrease.

**Table 4: Median Income Districtwide and in the Far Northeast/Far Southeast Planning Area**

Median Household Income	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
<b>Total Median</b>	\$72,935	<b>\$101,722</b>	\$85,848	<b>\$123,368</b>
<b>Asian Alone</b>	\$91,453	<b>\$123,660</b>	\$100,759	<b>\$114,726</b>
<b>Black or African American</b>	\$40,560	<b>\$57,076</b>	\$44,132	<b>\$58,755</b>
<b>Hispanic or Latino</b>	\$60,848	<b>\$94,203</b>	\$48,567	<b>\$87,105</b>
<b>American Indian and Alaskan Native</b>	\$51,306	<b>\$60,390</b>	\$59,277	<b>\$37,047</b>
<b>Native Hawaiian and Other Pacific Islander</b>	n/a	<b>n/a</b>	n/a	<b>n/a</b>
<b>Some Other Race</b>	\$48,047	\$61,851	\$42,385	\$62,944
<b>Two or More Races</b>	\$83,243	\$108,455	\$90,434	\$126,995
<b>White</b>	\$119,564	\$160,745	\$111,338	\$160,264

### **Owner and Renter Occupied Households**

Fewer residents in the Mid-City planning area own their home than in the District as a whole – 38.3% compared to 41.4%. The homeownership rate in the planning area increased slightly over the two survey periods, similar to the District-wide trend. The homeownership rate among White households went up, as opposed to citywide, where White ownership went down by a fraction of a percent. Black homeownership decreased in the planning area, although somewhat less than the citywide trend. Homeownership also went up among several other racial groups.

***Table 5: Owner Occupied and Rental Households Districtwide and in the Planning Area***

<b>Owners/ Renters</b>		<b>District 2012-2016</b>	<b>District 2018-2022</b>	<b>MC 2012-2016</b>	<b>MC 2018-2022</b>
<b>Total</b>	Owner Households	40.7%	<b>41.4%</b>	36.9%	<b>38.3%</b>
	Renter Households	59.3%	<b>58.6%</b>	63.1%	<b>61.8%</b>
<b>Asian Alone</b>	Owner Households	43.1%	<b>42.4%</b>	43.7%	<b>36.3%</b>
	Renter Households	56.9%	<b>57.6%</b>	56.3%	<b>63.7%</b>
<b>Black or African American</b>	Owner Households	46.6%	<b>35.9%</b>	37.1%	<b>30.5%</b>
	Renter Households	53.4%	<b>64.1%</b>	62.9%	<b>69.5%</b>
<b>Hispanic or Latino</b>	Owner Households	30.9%	<b>35.3%</b>	23.6%	<b>30.1%</b>
	Renter Households	69.1%	<b>64.7%</b>	76.4%	<b>69.9%</b>
<b>American Indian and Alaskan Native</b>	Owner Households	32.8%	<b>25.8%</b>	0.0%	<b>27.3%</b>
	Renter Households	67.2%	<b>74.2%</b>	100.0%	<b>72.7%</b>
<b>Native Hawaiian and Other Pacific Islander</b>	Owner Households	9.1%	<b>64.2%</b>	0%	<b>100.0%</b>
	Renter Households	90.9%	<b>35.8%</b>	0%	<b>0.0%</b>
<b>Some Other Race</b>	Owner Households	17.5%	<b>26.6%</b>	8.6%	<b>25.2%</b>
	Renter Households	82.5%	<b>73.4%</b>	91.4%	<b>74.8%</b>
<b>Two or More Races</b>	Owner Households	32.7%	<b>43.9%</b>	34.9%	<b>43.9%</b>
	Renter Households	67.3%	<b>56.2%</b>	65.1%	<b>56.1%</b>
<b>White Alone</b>	Owner Households	47.8%	<b>47.4%</b>	39.3%	<b>42.4%</b>
	Renter Households	52.2%	<b>52.6%</b>	60.7%	<b>57.6%</b>

The planning area's percentage of households that are housing-cost-burdened is lower than the citywide rate, and has decreased faster than the citywide rate between the study periods.

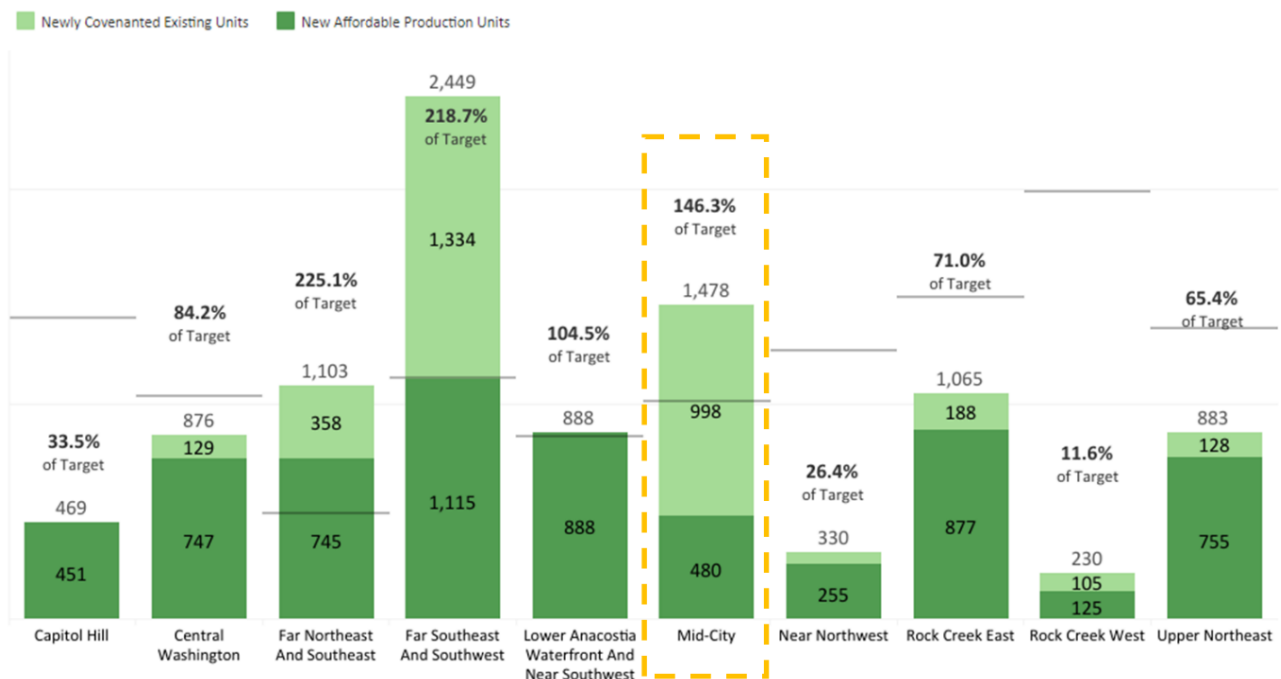
**Table 6: General Characteristics of the Planning Area and District**

Characteristic	District 2012-2016	MC 2012-2016	District (2018-2022)	MC (2018-2022)
Unemployment Rate	8.70%	6.0%	7.11%	4.4%
Cost Burdened Households	38.60%	36.1%	36.12%	30.9%
Poverty Rate	17.90%	13.5%	15.10%	15.1%

***Is the area on track to meet the Mayor’s 2025 affordable housing goal?***

The chart below, below, from the [DMPED 36,000 by 2025 Dashboard](#), shows that the Mid-City Area is already at 146.3% of its 2025 affordable housing goal.

**New Affordable Housing Units Since 2019 by Planning Area**



- *What do available data sources show about the intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?*

The available data shows that a number of factors can be distinguished by race. For example, home ownership and home rental rates show a disparity between White and Black populations in the planning area. Similarly, the poverty level for Black residents in the planning area, 26.5%, is significantly higher than for White residents, at 3.6%. Median income also shows a high level of disparity between White and Black, and disability status and educational attainment also show significant differences.



The proposed development could help to alleviate inequity to a small degree, 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 provided by the project would help to further equitable outcomes for Black families. Another benefit of the project would be the provision of residential units, especially family-sized units, in close proximity to several transportation modes, which can help populations of any skill or educational level reach employment opportunities and services.

#### **Racial Equity Tool Part 4 – Zoning Commission Evaluation Factors**

<b>Factor</b>	<b>Question</b>	<b>OP Response</b>
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The zoning action should have minimal or no impact on direct residential displacement, as the majority of the site is currently undeveloped, or developed only with parking. However, the proposal does include two existing rowhouses facing the street, and the applicant has been advised to address the current status of those rowhouses and how any existing occupants will be assisted by the developer.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Indirect displacement as a result of this zoning action would not be expected. Rather, the provision of new market rate and affordable housing – including both IZ units, and units with accessory dwelling units - should help to ease upward pressure on housing costs in the vicinity.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> <li>▪ Market Rate Housing</li> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	Research shows that there is a positive relationship between the provision of more housing and the ability of Black residents to remain in a neighborhood. The PUD would include the provision of new homeownership opportunities, including more affordable housing, and at a lower MFI level, than required under IZ. This would have a positive impact on the quantity of housing and affordable housing, and would help to meet housing goals of the Comprehensive Plan as well as housing goals set by the Mayor. The PUD’s affordable housing proffer, which exceeds what would be required by IZ, has the potential to assist in narrowing the income disparity between White and Black populations in the planning area.

Factor	Question	OP Response
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Infrastructure Improvements</li> <li>▪ Arts and Culture</li> <li>▪ Environmental Changes</li> <li>▪ Streetscape Improvements</li> </ul>	The PUD would provide a more attractive use than the current vacant lot, providing a rowhouse typology that would relate to existing rowhouses across the alley in a manner not dissimilar from typical DC neighborhoods. The project would also generally be compatible with the rowhouse pattern of the area. New residents on the alley would add “eyes on the street”, and increase the amount of 24-hour activity around the site, improving safety in the neighborhood.
Employment Opportunity	Is there a change in access to opportunity? <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> </ul>	The proposed project has the potential to increase access to opportunity through the provision of new residential units close to retail, services, employment, and transportation options. New development consistent with the proposed zone would also result in construction and property management jobs.
Access to Services	<ul style="list-style-type: none"> <li>▪ Healthcare</li> <li>▪ Addition of Retail/Access to New Services</li> </ul>	The proposed development would not include non-residential uses, but would provide new residential home-ownership opportunities on a site that is close to services, retail, and transit options.
Community	How did community outreach and engagement inform/change the zoning action?	As noted above, the application indicates that outreach began almost two years ago, and included working closely with the ANC SMD, the Eckington Civic Association, and adjacent neighbors. According to the applicant, these conversations led to the proposed design by responding to neighbors’ preference for a rowhouse-style development.

## VIII. PUD EVALUATION STANDARDS

The purpose and evaluation standards for a Planned Unit Development are established in Subtitle X Chapter 3:

*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;*
- (b) Offers a commendable number or quality of meaningful public benefits; and*
- (c) Protects and advances the public health, safety, welfare, and convenience, and is not inconsistent with the Comprehensive Plan.*

- 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.*
- 304.3 *In deciding a PUD application, the Zoning Commission shall judge, balance, and reconcile the relative value of the public benefits and project amenities offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.*
- 304.4 *The Zoning Commission shall find that the proposed development:*
- (a) Is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site;*
  - (b) Does not result in unacceptable project impacts on the surrounding area or on the operation of city services and facilities but instead shall be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project; and*
  - (c) Includes specific public benefits and project amenities of the proposed development that are not inconsistent with the Comprehensive Plan or with other adopted public policies and active programs related to the subject site.*

The proposed PUD satisfies the above criteria for approval. As stated in this report, the project would not be inconsistent with the Comprehensive Plan, including when viewed through a Racial Equity lens. OP defers to any comments that may be entered into the record from other agencies, but based on the scale of the project it is not anticipated that it should result in unacceptable impacts to city services. The project is not expected to generate significant increases in vehicle traffic, but the applicant has nevertheless committed to install traffic-calming devices in the alley, to address the existing problem of cut-through traffic. Also, as discussed further below, the benefits of the project would be commensurate with the degree of flexibility sought through the application.

### **Public Benefits and Amenities**

The proposed PUD would not result in significant increases in height and density over the matter-of-right zone. In fact, the proposed height would be less than that permitted in the RF-1. Please refer to the table below. The main benefit gained through the PUD process and map amendment to RA-2 is the ability to construct a multi family building generally in the form of rowhouses – extending back from the property’s frontage on 1<sup>st</sup> Street. This is the form of development preferred by the neighborhood. The RF-1 zone would not readily permit the construction of rowhouses in the manner proposed, leaving the property underutilized.

	<b><u>RF-1</u></b>	<b><u>Proposed Project (RA-2 PUD)</u></b>	<b><u>Difference</u></b>
FAR	1.80 (effective FAR)	1.86	<b>0.06</b>
Square Feet	41,292 sq.ft.	42,695 sq.ft. (FAR floor area)	<b>1,403 sq.ft.</b>
Height	40 ft. (for 3 rowhouses built together) 3 stories	34 ft. 3 stories plus cellar	<b>-6 ft.</b>
Use	Rowhouse and flat	Apartment building in the form of rowhouses and flats	<b>PUD would allow the building form</b>

Subtitle X of the Regulations describe PUD benefits and amenities, and the Commission's evaluation of them, as follows.

- 305.2 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.*
- 305.10 A project amenity is one (1) type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors.*
- 305.11 The Zoning Commission may not compel an applicant to add to proffered public benefits, but shall deny a PUD application if the proffered benefits do not justify the degree of development incentives requested (including any requested map amendment). Nevertheless, the Zoning Commission may at any time note the insufficiency of the public benefits and suggest how the benefits may be improved.*
- 305.12 A project may qualify for approval by being particularly strong in only one (1) or a few of the categories in this section, but must be acceptable in all proffered categories and superior in many.*

The Comprehensive Plan Framework Element also speaks to how PUD benefits should be viewed by the Commission, and puts a particular emphasis on affordable housing:

*Specific public benefits are determined through each PUD application and should respond to critical issues facing the District as identified in the Comprehensive Plan and through the PUD process itself. In light of the acute need to preserve and build affordable housing, described in Section 206, and to prevent displacement of on-site residents, the following should be considered as high-priority public benefits in the evaluation of residential PUDs:*

- The production of new affordable housing units above and beyond existing legal requirements or a net increase in the number of affordable units that exist on-site; ... (224.9)*

### **Analysis of Benefits and Amenities**

The applicant provides their summary of the project benefits at [Exhibit 3](#), pp. 36-37, supplemented, particularly with respect affordable housing, as part of the Supplemental Statement at [Exhibit 22](#). They identify different categories of benefits from Subtitle X § 305.5 which would apply to the project. OP's analysis of those proposed benefits is below. All references are from X § 305.5. In total, the benefits and amenities would be commensurate with the amount of flexibility sought through the PUD process, and the proffers would be acceptable in all the proffered categories, as required by X § 305.12.

- (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;*

The project would make efficient use of long-vacant land. The development would have superior site planning and urban design by creating a new rowhouse development that mimics the existing urban fabric and sits comfortably within its surroundings. The design also uses the angled shape of the site to create outdoor open spaces for the individual rowhouses. The architecture of the

project, with appropriately-detailed brick on all sides would also help the development match the surrounding neighborhood.

(f) *Housing that:*

- (1) *Exceeds the amount that would have been required through matter-of-right development under existing zoning;*
- (2) *Includes senior housing; or*
- (3) *Provides units with three (3) or more bedrooms;*

(g) *Affordable housing;*

This for-sale housing project would be particularly strong in the housing and affordable housing categories. The development would provide 27 residential units where none exist and few are permissible under the present zoning. It would also include 12% of the floor area dedicated to IZ units, where normally 10% would be required in a matter of right development. All of the principal units would be “family-sized”, with most having three bedrooms. The project also includes accessory, one-bedroom apartments that, while not part of the IZ program, would provide affordable housing in their own right, and also make more affordable the purchase of the principal units that house them. Finally, of the three anticipated IZ units, the applicant has proffered that two of them would be sold at 60% MFI, less than the 80% MFI required under IZ.

(k) *Environmental and sustainable benefits to the extent they exceed the standards required by zoning or other regulations...;*

The project would include a solar array on the roof of each rowhouse, and each unit with a garage would be pre-wired to accept an electric vehicle charging station. The design also proposes a GAR in excess of that required for the RA-2 zone.

(o) *Transportation infrastructure beyond that needed to mitigate any potential adverse impacts of the application...*

At the request of neighbors, the applicant has committed to the installation of traffic calming improvements in the east-west public alley abutting the site. The proposed speed bumps would serve to slow and deter alley traffic. Although the development itself is not anticipated to generate any negative traffic impacts, neighbors have expressed that the alley is used for high speed cut-through traffic. Please also refer to [Exhibit 20A](#), the transportation statement.

(r) *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.*

As noted in this report, the project would further many of the policies of the Comprehensive Plan. It would further goals related to infill development, environmental sustainability, and compatible design, among others.

In summary, this application provides benefits that are both commensurate with the degree of flexibility that is being requested and superior to the benefit that could be derived from a matter of right (MOR) development on the site. The project requires very little flexibility from the height



and bulk development standards of the RF-1 zone. The proposed height is less than the MOR height, and the development would have only 1,403 square feet more than the effective FAR in the RF-1 zone would allow. Some of the other requested flexibility – PUD site area and multiple solar pergolas –allow the project to reflect the rowhouse fabric and function of the existing neighborhood.

## **IX. AGENCY COMMENTS**

OP referred the application to relevant government agencies for comment. As of this writing no agency comments have been received or entered into the record. OP also held an inter-agency meeting to provide an opportunity for the applicant to present the project to government agencies, and for agencies to ask questions of or provide feedback to the applicant. The meeting was attended by DHCD, DOEE, FEMS, DC Water, DPR, and DDOT.

## **X. ANC COMMENTS**

As of this writing there are no comments from the ANC in the record.

## **XI. COMMUNITY COMMENTS**

Exhibits 21 and 23 are letters in support from the community.

Exhibit 11 is a letter in support from the Eckington Civic Association.