

Zoning Commission Case No. 24-07

SKYLAND PLACE

MAP AMENDMENT FROM RA-1 AND R-3 TO RA-2

DECEMBER 9, 2024

Holland & Knight

ZONING COMMISSION
District of Columbia
CASE NO.24-07
EXHIBIT NO.26



Home is Where Life Happens and Futures Begin

Enterprise Community Development



OUR APPROACH

THE CHALLENGE

Millions of families across the U.S. can't afford a place to call home.
The system doesn't work.

THE SOLUTION

Together with our partners, we focus on the greatest need – the massive shortage of affordable rental homes – to achieve three critical goals:



**Increase the Supply
of Affordable Housing**
to meet the urgent need .



**Advance
Racial Equity**
after decades of systematic
racism in housing.



**Build Resilience &
Upward Mobility**
to support residents, strengthen
communities to be resilient to
the unpredictable and make
upward mobility possible.

WHAT WE DO

Build, preserve and operate affordable homes

As #1 largest regional nonprofit owner and developer of affordable homes, we design, develop and manage communities with residents at the center.

23K+

PEOPLE CALL OUR COMMUNITIES HOME

116

COMMUNITIES PROVIDING 13K HOMES



**Unmatched breadth, scale and expertise across
the entire spectrum of affordable housing ...**



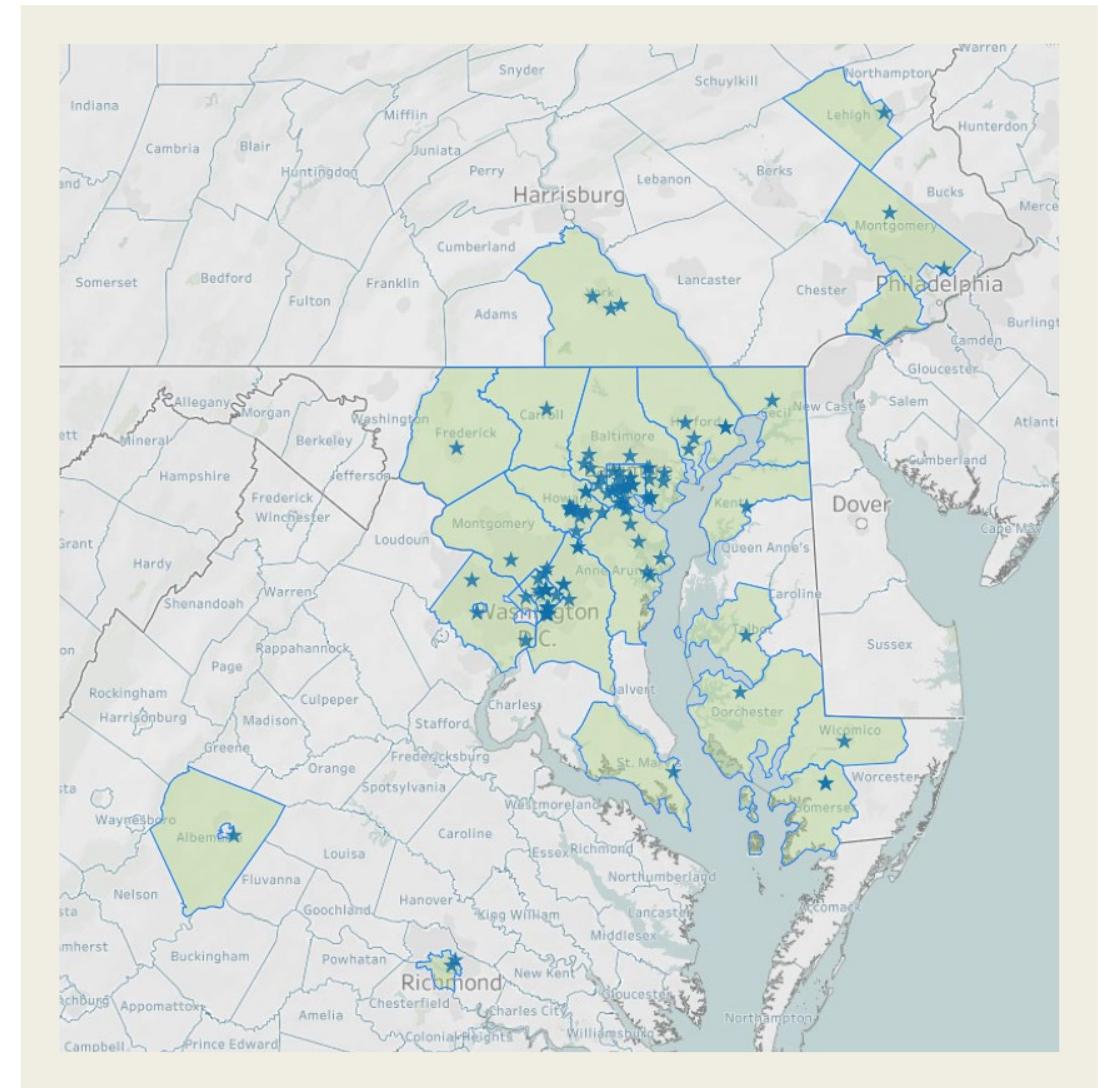
**... creating a positive feedback loop
that does it all under one Enterprise roof.**

WHERE WE SERVE

Grounded in local relationships

We're proud that more than 23,000 people call our communities home.

- 116 communities
- 50+ cities and towns
- 3 states and the District of Columbia
- Corporate offices in Baltimore and Silver Spring



Fully integrated focus areas

Our combination of capabilities as a vertically integrated organization is unique in the market.

Development	New construction and preservation tailored to each community's needs.
Asset Management	Charting the strategic direction of the portfolio while minimizing risk.
Property Management	Proven operating quality and exceptional living experiences.
Resident Services	Connect residents to tailored community programming and engagement opportunities.

AFFORDABLE AND WORKFORCE DEVELOPMENTS

Like the communities we serve, each property is different



Lake Anne Reston, VA

240 units

Ground-Up New
Construction

Low-Income Housing Tax Credit
(LIHTC) financed

Mayfair Mansions Washington, DC

410 units

Affordable Acquisition /
Rehab

Tax Exempt Bonds/Tax Credit
financed

Naples Manor Silver Spring, MD

64 units

Naturally Occurring
Affordable Housing

Conventional Debt and Equity;
PILOT

Woodfall Greens Brooklyn Park, MD

239 units

Workforce

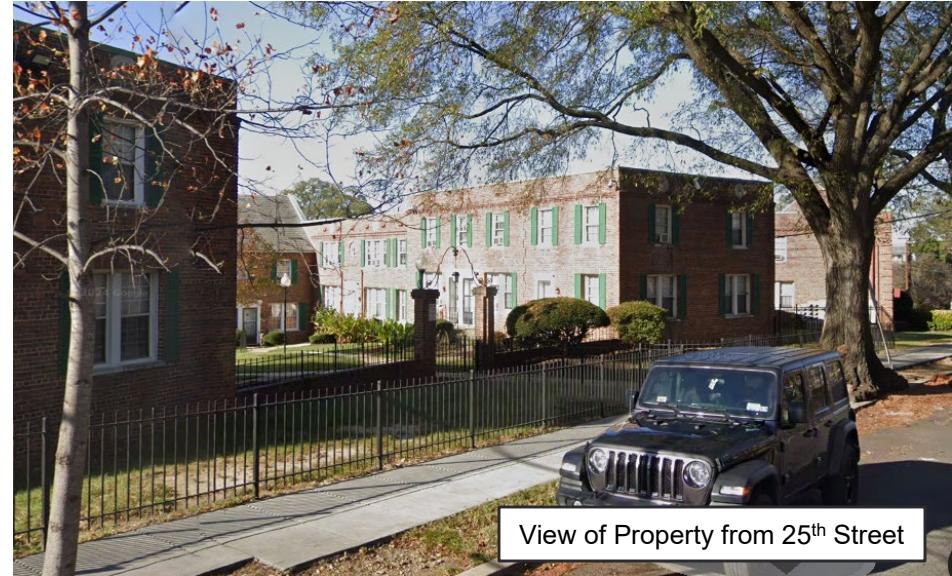
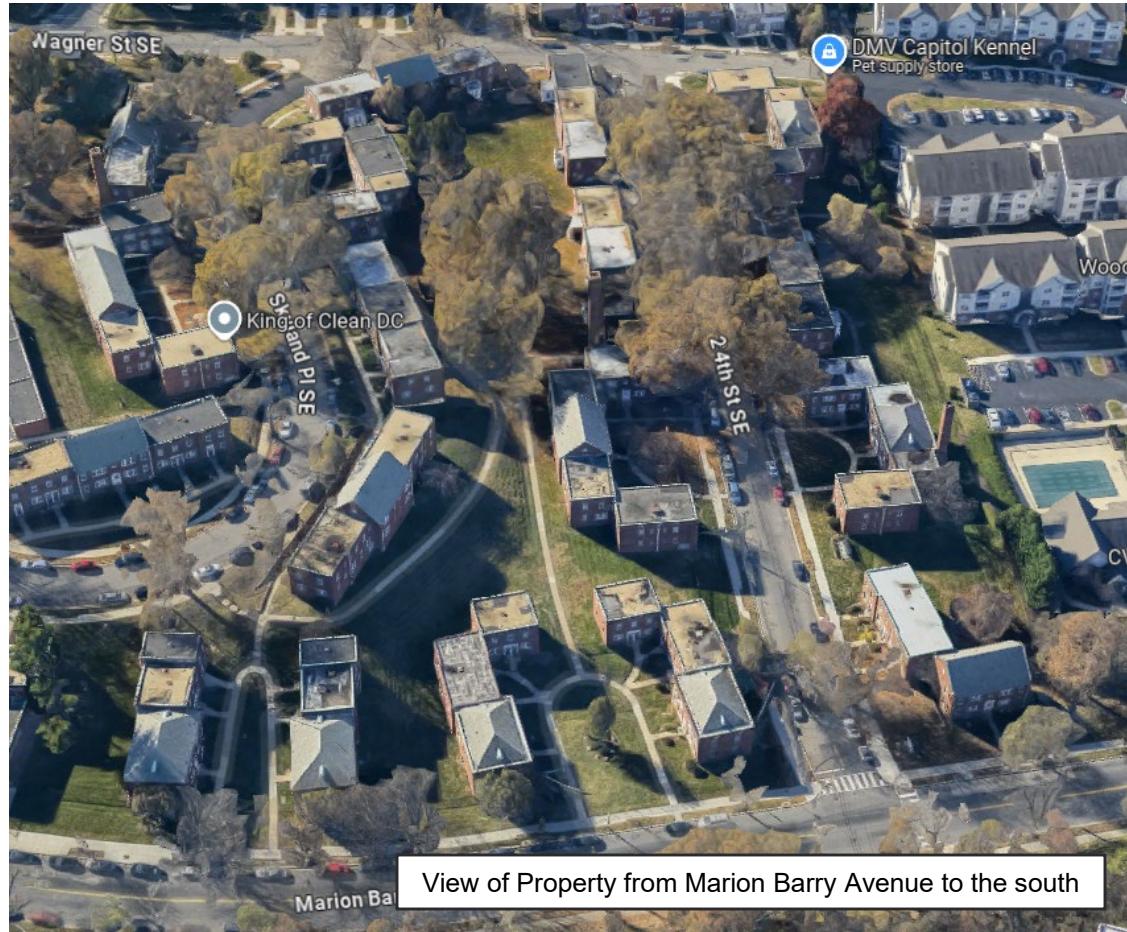
Conventional Debt & Equity
Financing; Impact Fee Waiver

SUBJECT PROPERTY

- Current Zones: **RA-1 and R-3**
- Proposed Zone: **RA-2**
- Land Area: 380,280 sq. ft.
(approx. 8.70 acres)
- Currently developed with a mix
of low- to mid-rise residential
uses.



SUBJECT PROPERTY CONTEXT



STANDARD OF REVIEW

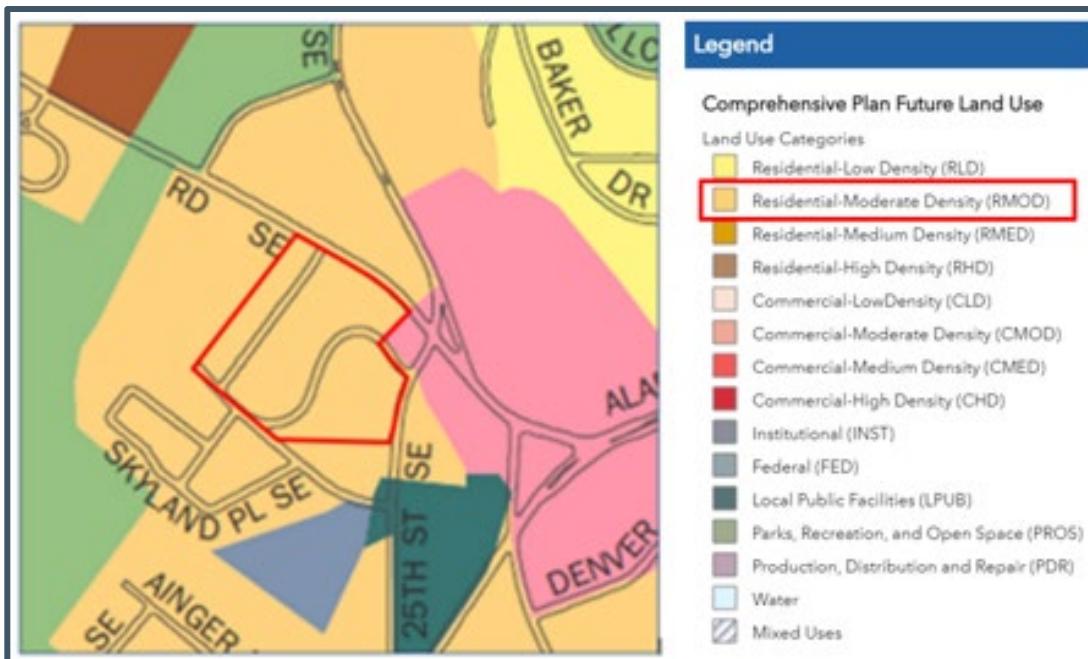
- Zoning Commission may approve a map amendment if the amendment is not inconsistent with the Comprehensive Plan and other adopted public policies and action programs related to the subject site.
- The proposed map amendment is not inconsistent with the Future Land Use Map designation, the Generalized Policy Map designation, or the intent of the Comprehensive Plan.

11-X DCMR § 500.3

FUTURE LAND USE MAP

Moderate Density Residential

- Neighborhoods generally suited for **row houses** and **low-rise garden apartment complexes**.
- May also include a **mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings**.
- In some neighborhoods, **existing multi-story apartments** may also be present, built under older zoning or unzoned conditions.
- Density is typically calculated either as the number of dwelling units minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with IZ.
- The **R-3, RF, and RA-2** zones are consistent with the Moderate Density Residential designation.
- **The RA-2 zone permits a density of 1.8 or 2.16 with IZ, consistent with the Moderate Density Residential designation.**

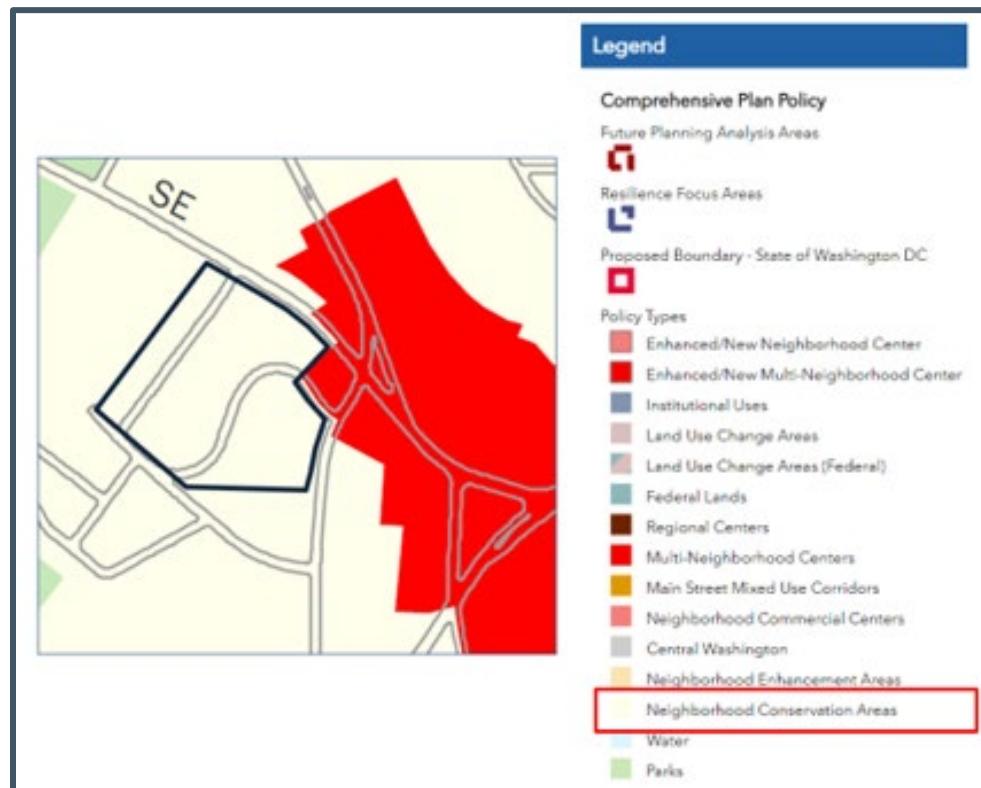


GENERALIZED POLICY MAP

Neighborhood Conservation Area

- Primarily residential in character with limited vacant or underutilized land.
- Changes are modest, including infill housing, public facilities, and institutional uses.
- Major changes in density are not expected, but some new development and reuse opportunities may arise.
- Conserve and enhance established neighborhoods while accommodating limited, context-sensitive development, but not intended to preclude development, particularly to address citywide housing needs.
- Redevelopment should align with the neighborhood's existing scale, natural features, and character.
- In areas with access to opportunities, services, and amenities, encourage more levels of housing affordability.
- In areas facing housing insecurity and displacement risks, prioritize preserving affordable housing and improving neighborhood services and amenities.
- The proposed RA-2 zone allows greater residential density that is consistent with the FLUM designation, permitting more housing consistent with the Housing Equity Report and other Comp Plan policies.

10-A DCMR § 225.4 and § 225.5.



COMPARISON OF EXISTING AND PROPOSED ZONING

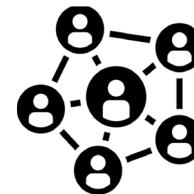
	Existing Zoning: R-3	Existing Zoning: RA-1	Proposed Zoning: RA-2
	Allowed / Required as Matter-of-Right	Allowed / Required as Matter-of-Right	Allowed / Required as Matter-of-Right
Density (FAR)	1 principal dwelling unit and 1 accessory apartment per record lot	0.9 (1.08 w/ IZ)	1.8 (2.16 w/ IZ)
Height	40 ft. (3 stories)	40 ft. (3 stories)	50 ft.
Penthouse Height	12 ft. and 1 story for residential uses	12 ft. and 1 story	12 ft. and 1 story, except 15 ft. and second story permitted for penthouse mechanical space
Lot Occupancy	60% (single household row building)	40%	60%
Front Setback	w/in the range of existing front setbacks on the same side of the street	N/A	N/A
Rear Yard	20 ft.	20 ft.	4 in. per 1 ft. of building height, but no less than 15 ft.
Side Yard	2 side yards, min. 8 ft. for all detached buildings 1 side yard, min. 6 ft. for all semi-detached buildings None required for row buildings	Min. 8 ft. for detached or semi-detached buildings containing 1 or 2 dwelling units 1 side yard unless building contains more than 3 dwelling units, if so, 2 side yards are required which are a min. 3 in. per 1 ft. of building height, but no less than 8 ft.	None required, but if provided, min. 4 ft., however, min. 8 ft. for detached or semi-detached buildings containing 1 or 2 dwelling units.
GAR	N/A	0.4	0.4
Pervious Surface	Min. 20%	N/A	N/A

ZONING COMMISSION RACIAL EQUITY TOOL



Part I: Guidance Regarding the
Comprehensive Plan

Part II: Community Outreach and
Engagement



Part III: Disaggregated Data

Part IV: Evaluate the Zoning Action
through a Racial Equity Lens



PART I: GUIDANCE REGARDING THE COMPREHENSIVE PLAN

Far Southeast and Southwest Area Element

- FSS-1.1.3: Rehabilitation of Multi-Family Housing
- FSS-1.1.4: Infill Housing Development
- FSS-1.1.14: Sustainable Development
- **FSS-1.1.15: Neighborhood Resilience**

Land Use Element

- LU-1.4.6: Development Along Corridors
- LU-1.5.1: Infill Development
- **LU-2.1.1: Variety of Neighborhood Types**
- **LU-2.1.2: Neighborhood Revitalization**
- LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- LU-2.1.5: Support Low-Density Neighborhoods
- LU-2.1.8: Explore Approaches to Additional Density in Low- and Moderate-Density Neighborhoods
- LU-2.2.4: Neighborhood Beautification

Transportation Element

- **T-1.1.7: Equitable Transportation Access**
- T-1.3.1: Transit-Accessible Employment
- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

Housing Element

- H-1.1.1: Private Sector Support
- H-1.1.3: Balanced Growth
- H-1.1.5: Housing Quality
- H-1.1.9: Housing for Families
- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- **H-1.2.2: Production Targets**
- **H-1.2.3: Affordable and Mixed-Income Housing**
- H-1.2.5: Moderate-Income Housing
- **H-1.2.9: Advancing Diversity and Equity of Planning Areas**
- H-1.2.1: Inclusive Mixed-Income Neighborhoods
- H-1.3.1: Housing for Larger Households
- H-1.3.2: Tenure Diversity
- H-1.4.2: Opportunities for Upward Mobility
- **H-2.1.4: Avoiding Displacement**
- **H-2.1.9: Redevelopment of Affordable Housing**
- H-4.3.2: Housing Choice for Older Adults

Environmental Protection

- **E-1.1.2: Urban Heat Island Mitigation**
- E-2.1.2: Tree Requirements in New Development
- E-2.1.3: Sustainable Landscaping Practices
- E-3.2.3: Renewable Energy
- E-3.2.7: Energy-Efficient Building and Site Planning
- E-4.1.1: Maximizing Permeable Surfaces
- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
- E-4.2.1: Support for Green Building

*Policies identified in OP's Equity Crosswalk as advancing equity.

PART I: GUIDANCE REGARDING THE COMPREHENSIVE PLAN NEIGHBORHOOD INVESTMENT FUND (NIF) – ANACOSTIA INVESTMENT PLAN

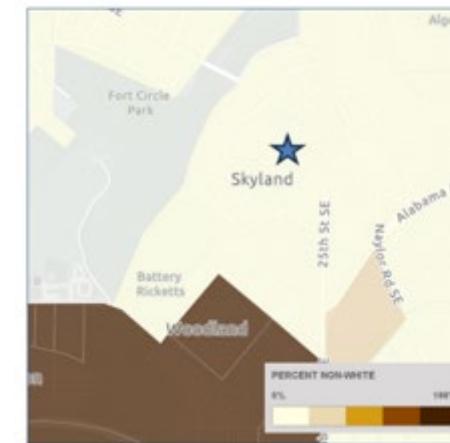
- Approved by DC Council on June 20, 2006 (Resolution R16-0685). The NIF was completed in 2008.
- Short-term financial plan targeting Historic Anacostia, Hillsdale, Fort Stanton, Garfield Heights, and Woodmont neighborhoods.
- Purpose was to address uneven growth in the District, as neighborhoods East of the River did not benefit from the rapid development seen in areas like Penn Quarter, Gallery Place, and Logan Circle.
- Establish ways to mitigate issues such as **rising housing costs, loss of affordable housing, and concentrated poverty** in distressed neighborhoods.
- Preserve historic housing and develop additional affordable housing units.
- **Enhance commercial areas to attract and retain neighborhood-serving retail and service businesses.**
- Though the plan's horizon was five years, its goals remain relevant and are echoed in the Comp Plan.
- **Proposed map amendment will support redevelopment aligned with NIF goals by:**
 - **Creating more housing and affordable housing.**
 - **Providing additional density near Skyland Town Center to attract businesses and customers.**
 - **Increasing economic activity and generating more revenue for the neighborhood.**



PART II: COMMUNITY GUIDANCE AND ENGAGEMENT

- In the 1850s, a private effort created a planned community for white government workers in what is now Historic Anacostia.
- During and after the Civil War, the area attracted formerly enslaved individuals, leading to the establishment of Barry Farm by the Freedmen's Bureau, the first planned community for African Americans.
- In the 1950s, legal rulings against racial discrimination led to white flight and an influx of Black households relocating east of the river due to **urban renewal** and **affordable housing availability**.
- Government-funded housing developments became prominent, with many communities divided and isolated by infrastructure projects like the Suitland Parkway and I-295.
- The area transitioned to being predominantly Black by 1970, with mid-20th century buildings and government facilities dominating the landscape.
- Policies like redlining, zoning, and urban renewal projects displaced Black residents and concentrated public housing east of the river.
- Public and private disinvestment in Wards 7 and 8 stemmed from historic and present-day structural racism, marginalizing these communities.

The Legacy of Racial Covenants, 1950



The Legacy of Racial Covenants, 1970



PART II: COMMUNITY GUIDANCE AND ENGAGEMENT

COMMUNITY PRIORITIES / IMPACT ON ZONING ACTION (COMP PLAN)

- Improved **job training** and adult education are essential to alleviate unemployment, under-employment, and poverty, and additional facilities to house these services are needed.
- Greater **investment** in schools, libraries, childcare centers, recreation centers, parks, and health clinics would provide an important start toward improved public safety.
- Far Southeast/Southwest needs more high-quality **housing options** that are suitable for families and younger homeowners.
- Residents are concerned about **rising costs**—especially rising rents and property taxes. The demolition of much of the area's public housing has displaced some long-time residents and created concerns about future redevelopment.
- More **retail services** are needed in the community, especially supermarkets and sit-down restaurants. The community also needs basic services like full-service gas stations and hardware stores, so residents do not have to travel to Prince George's County to shop.

ANC 8B PRIORITIES

- Community **safety and cleanliness** by reporting vacant and blighted properties and addressing illegal dumping issues.
- Promoting apprenticeship **training programs** to create employment opportunities.
- Supporting **recreation** and **street improvement** projects.
- Providing input on the District's **annual budget** and policies affecting local residents.

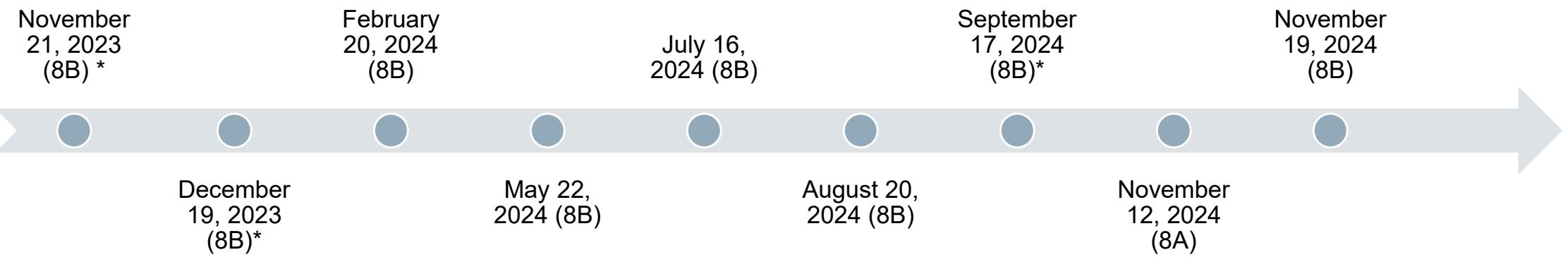
PART II: COMMUNITY GUIDANCE AND ENGAGEMENT

- Engagement between **October 2023** and **December 2024** and included **ANC 8B, Skyland Action Team and residents, neighboring homeowners and renters, and neighboring businesses and multifamily owners.**
 - Skyland Action Team Meetings – 11 meetings and supplemental outreach
 - Skyland Community Events – 6 in total
 - ANC Presentations – 9 in total
 - Virtual Quarterly Resident Meetings – 6 in total
 - Virtual Updates to Neighbors – 2 in total
 - Design-Focused Programming – 8 in total
 - Door-to-Door Outreach
 - Phone Call Outreach
 - Project Website



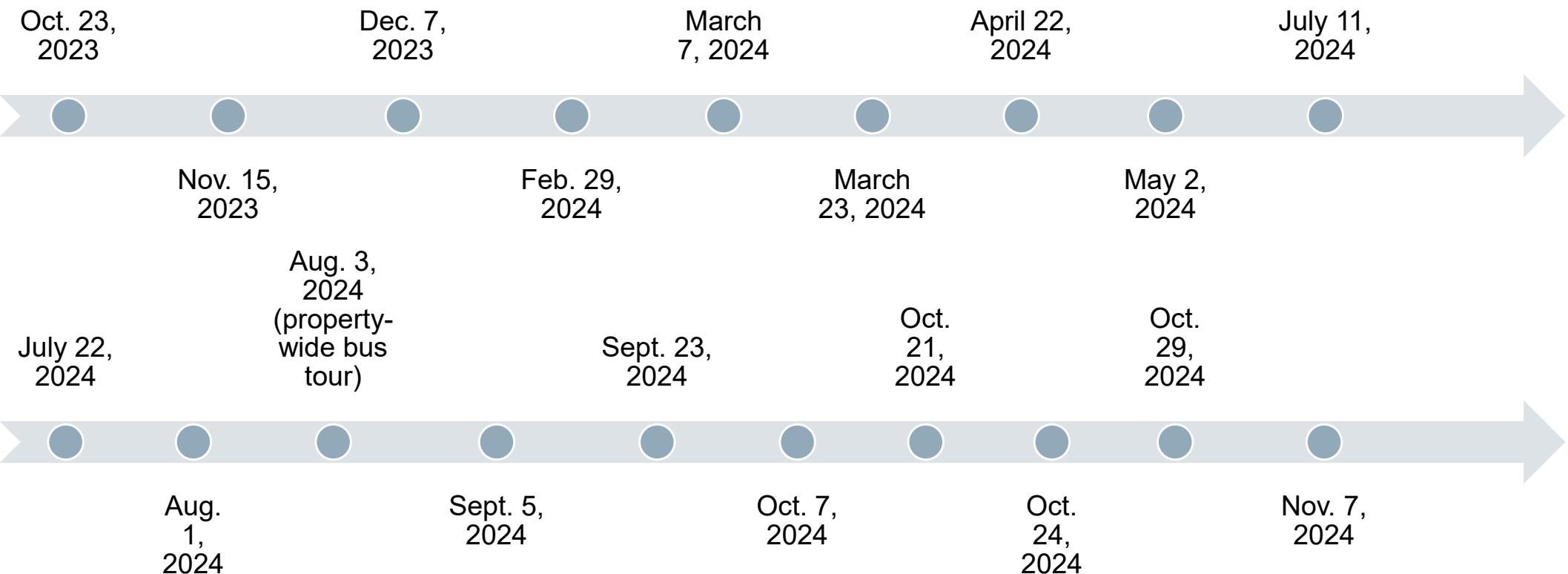
PART II: COMMUNITY GUIDANCE AND ENGAGEMENT

ANC 8A and 8B Engagement



PART II: COMMUNITY GUIDANCE AND ENGAGEMENT

Community / Tenant Meetings

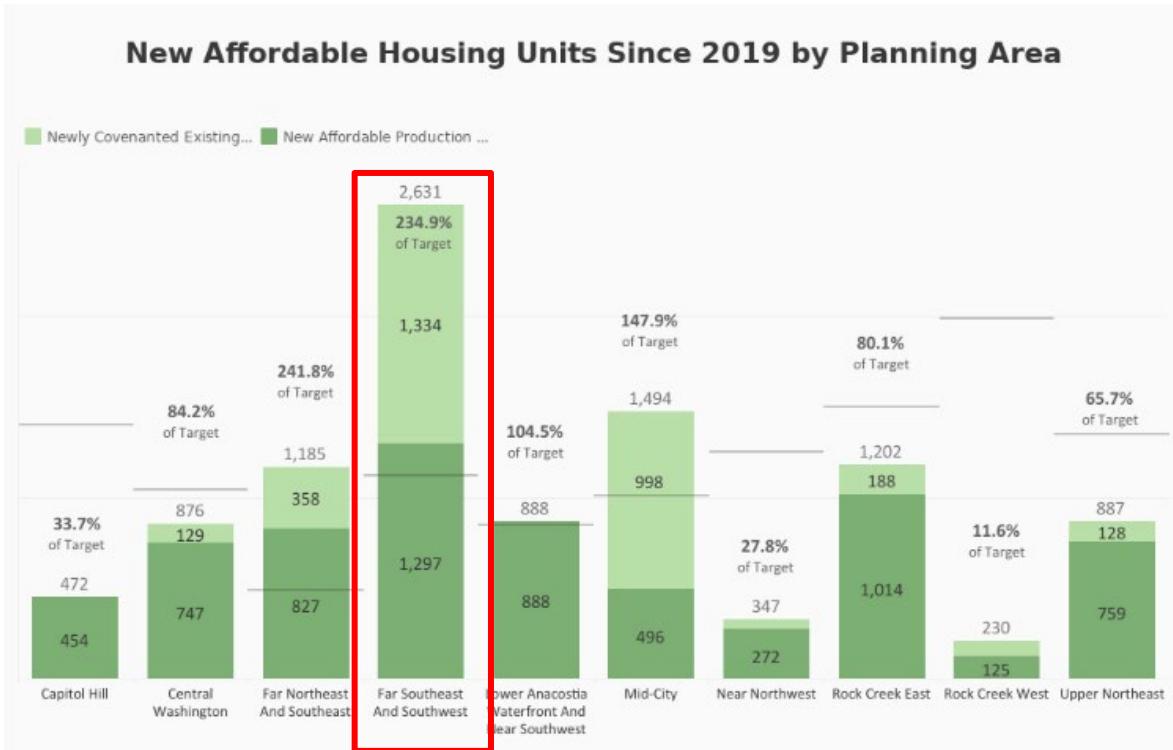


PART III: DISAGGREGATED DATA REGARDING RACE AND ETHNICITY

- The Far Southeast/Southwest Planning Area's **population decreased from 11.2% to 10.78%** of the District's population between 2012-2016 and 2018-2022.
- Black residents remain the largest demographic group, decreasing slightly from 91% to 87.7%, while diversity increased with growth in smaller population groups.
- Black or African American residents saw **incomes rise from \$29,425 to \$41,254**, while white and Hispanic incomes experienced sharper increases.
- Black and "Two or More Races" groups had **higher renter occupancy rates** (77.6% and 74%, respectively), correlating with lower income levels.
- **Housing cost burdens remained high**, affecting over 50% of households, despite a slight decline over the two periods.
- The Planning Area maintained higher percentages of both elderly residents and persons under 18 than District averages.
- The poverty rate in the Planning Area fell from 38% to 30%, but it remained 15-20 percentage points higher than the District average.
- **Rising housing costs and limited land availability exacerbate housing cost burdens, particularly for lower- and middle-income households.**
- **Residents of color disproportionately face housing insecurity and displacement due to historical and current structural inequities.**

HOUSING AND AFFORDABLE HOUSING GOALS

- The Housing Equity Report requires the production of **1,120** affordable housing units in the Planning Area by 2025.
- As of October 31, 2024, the Planning Area has met **234.9%** of its affordable housing goal.
- The Housing Equity Report sets a goal of 12,000 new affordable units Districtwide by 2025. 10,212 affordable units have been created, **85% of the target**.
- The proposed map amendment aims to increase housing and affordable housing in an area with significant challenges related to **housing affordability, displacement and security**.



PART IV: EVALUATE THE ZONING ACTION THROUGH A RACIAL EQUITY LENS

Indicator	Outcome
Direct Displacement	<ul style="list-style-type: none">• Applicant has developed an on-site relocation plan to ensure that residents are not permanently displaced.• Increase in permitted amount of residential density that can increase the supply of housing units, therefore contributing to a decrease in the cost of housing overall.• Increased residential density provides an opportunity for residents to have open spaces within the development to meet and gather.
Indirect Displacement	<ul style="list-style-type: none">• Indirect displacement is not anticipated.
Housing	<ul style="list-style-type: none">• Increase in amount of housing permitted on Property.• Increase in amount of housing that can be provided to households earning no more than 60% (rental) or 80% (ownership) MFI.• 50% MFI units for any IZ set aside generated by penthouse habitable space.• Increased potential for larger units due to gain in overall permitted density.
Physical	<ul style="list-style-type: none">• Improved storm water infrastructure.• Future development will adhere to applicable Building Code requirements and energy-efficient building systems and technologies.

PART IV: EVALUATE THE ZONING ACTION THROUGH A RACIAL EQUITY LENS

Indicator	Outcome
Access to Opportunity	<ul style="list-style-type: none">• 1.5 mile walk to Naylor Road Metro station (30-minute walk).• Located near bus lines on Marion Barry Avenue (92, W8).• Improvement of pedestrian connectivity with streetscape enhancements.• Improved connectivity, walkability, and safety.• Increased residential density can result in jobs related to office management and maintenance.• Property is in close proximity to public transit, providing access to employment areas throughout the region, and is located near Skyland Town Center, offering job opportunities.• Proximity to St. Elizabeths and new medical center.• Proximity to retail and neighborhood services.• Map amendment will permit the development of increased residential density near Skyland Town Center, therefore granting residents more access to day-to-day needs.• Proximity to parks, open space, recreation, including Fort Circle Park and Anacostia Community Museum.
Community	<ul style="list-style-type: none">• Building amenities, such as exercise spaces, closet / storage, balconies, and mail / package collection.• Variety of unit types and design.• Concern about cost increase for water electricity.• Plans to improve security for the Property.

POTENTIAL COMPREHENSIVE PLAN INCONSISTENCIES

Potential Inconsistency	Outweighing Policy
<ul style="list-style-type: none">• LU-2.1.4: Rehabilitation Before Demolition• E-3.2.2: Net-Zero Buildings• E-3.2.3: Renewable Energy	<ul style="list-style-type: none">• FLUM• GPM• Policies in the Far Southeast and Southwest Planning Area, Land Use, Transportation, Housing, and Environmental Protection Elements• Housing Equity Report

CONCLUSION

- The map amendment is **not inconsistent** with the Comprehensive Plan as viewed through a racial equity lens.
- Any potential inconsistencies with individual Comprehensive Plan policies are far outweighed by:
 - Consistency with the FLUM and GPM
 - Consistency with other competing Comprehensive Plan priorities relating to Land Use, Transportation, Housing, Environmental Protection, and Far Southeast & Southwest Area Elements
 - Housing Equity Report

Engagement Goals, Timeline, and Milestones

GOAL 1:

Build community in partnership with Skyland Residents

GOAL 2:

Understand challenges with current property

GOAL 3:

Develop a community-informed development program

OCT – DEC 2023

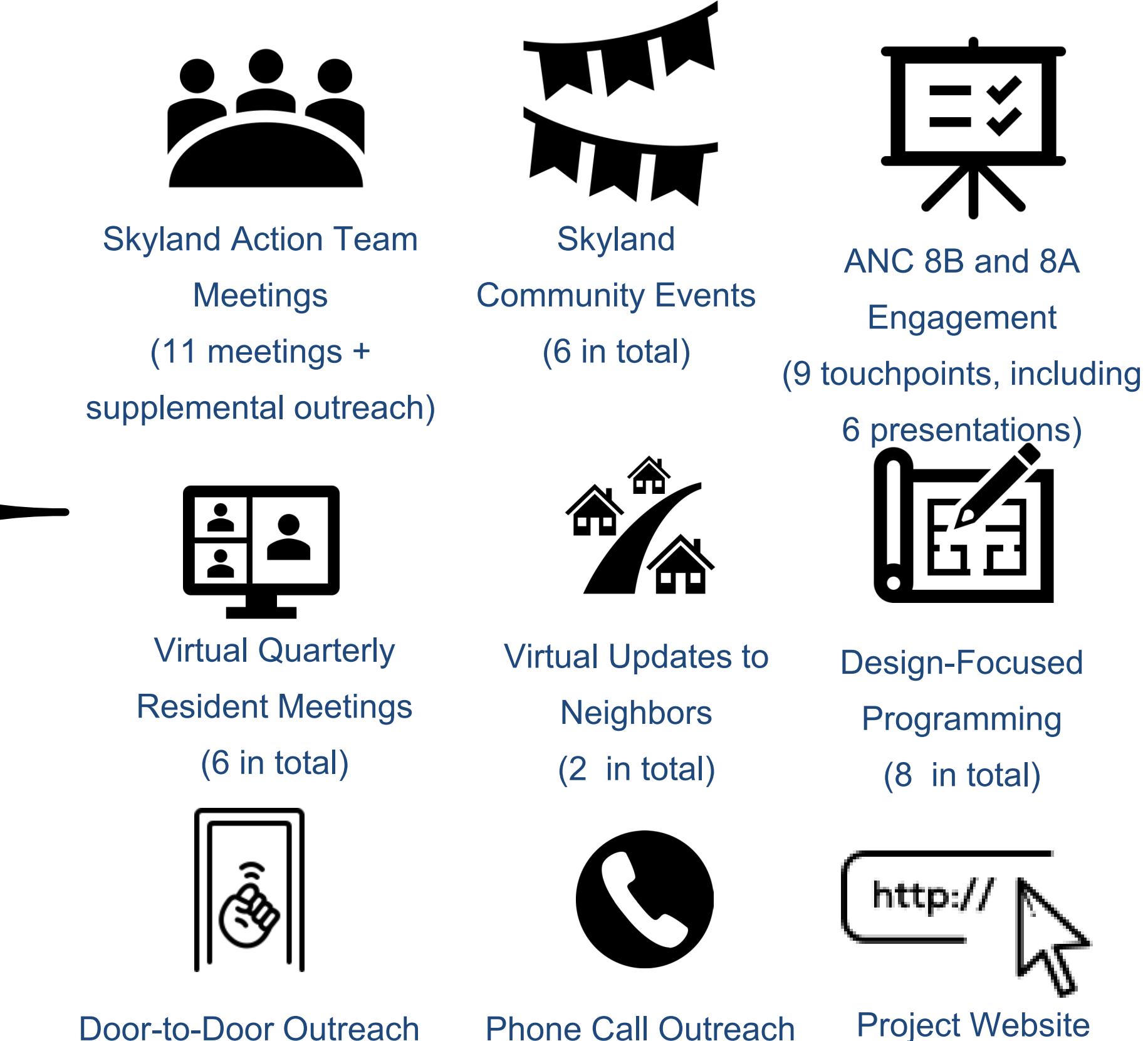
JAN – DEC 2024

- Community-building events
- Assessment of existing property challenges
- Initial ANC Outreach

- Property-Wide Survey
- Bus Tour of ECD Properties
- Skyland Action Team Formation
- Design-Focused Programming

- Quarterly All-Property Updates
- ANC Engagement

Stakeholder Ecosystem & Tools for Engagement



Resident Feedback - Most Common Topics Raised

- **Building Amenities**
 - Interest in exercise spaces, closet/storage, balconies, mail/package collection
- **Site Considerations**
 - Concerns about the location of the senior building due to crime on Good Hope Road
- **Unit Interiors:**
 - Concern about noise between units and potentially smaller unit sizes
- **Landscape:**
 - Interest in adding bungalow style units for rent with a walkout and garden area
- **Rent/Utility Expenses, Relocation, and Right To Return:**
 - Concern about water and electricity cost increases due to personal laundry and centralized A/C and heating
- **Security:**
 - Residents are interested to know what are the plans to improve overall security for the property

ANC Feedback and ECD Responses

- **Why go through a redevelopment? Can the property simply be renovated in its current form?**
 - Skyland is an older property, and many of its systems, particularly the boiler system, are outdated. Although property management has worked diligently to address maintenance concerns and maintain a certain level of quality, many issues are simply due to the property's age. After assessing the property's operational systems for over a year and conducting a property-wide survey, ECD decided that redeveloping Skyland is the best way to ensure the community continues to provide safe, healthy, affordable, and age-diverse homes for families of various sizes for years to come.
- **What are existing rents at Skyland, and will rents dramatically increase for existing residents after redevelopment so they will no longer be able to afford to live there?**
 - Monthly rents range from approximately \$1098 for a 1 BD/1BA to \$1659 for a 3BD/1BA. ECD plans to redevelop the property in a manner that not only improves the quality of the units, but creates permanent affordability for current Skyland residents and establishes rents that continue to remain affordable for existing and future households based on total household income and in accordance with HUD and DC DHCD standards.

ANC Feedback and ECD Responses

- **How will you support residents who may currently be in arrears so that they are eligible to obtain a new unit post-redevelopment?**
 - ECD and its property management company will continue to work with residents to access ERAP for emergency rental assistance, as well as other rent relief programs. Additionally, ECD is committed to working with any resident who is working to become current on their rent throughout the process so that they are eligible to obtain a new unit.
- **How are Skyland residents being engaged?**
 - ECD, along with B&S and Winn frequently engage with Skyland residents through quarterly community meetings, smaller focused working groups (the Skyland Action Team), webinars and demonstrations, community events, flyers, door-knocking, phone banking, direct text messages, and email communication.
- **Are Skyland residents responsible for relocation expenses?**
 - No, residents are not responsible for relocation expenses. ECD will cover all the costs to move and will also provide moving assistance on the day of each move to and from the temporary location.

ANC Feedback and ECD Responses

- **Will residents incur additional fees for items such as parking that may make the cost of remaining at Skyland post-redevelopment unaffordable?**
 - Currently, there are no anticipated charges for secured, garage parking for residents. However, there may be limitations on the number of parking spaces available per unit. The type of financing used for the redevelopment of Skyland will influence parking policies, particularly in terms of whether parking charges are necessary and how parking spaces are allocated.
- **Will the redevelopment of Skyland trigger TOPA?**
 - Skyland residents previously went through a TOPA process when W.C. Smith sold the property, and ECD was selected as the preferred developer by the Tenant Association. Although a full sale of the property might trigger TOPA, refinancing or transferring the property might only require a "notice of transfer" to tenants. The notice of transfer informs tenants that ownership or interest in the property is being transferred, but it is exempt from being considered a sale under TOPA.

OUR REDEVELOPMENT PLAN

Skyland Reimagined

GOALS AT SKYLAND:

- Retain long-term affordability for the property
Ensure long-term security and stability for the residents
- Provide accessible housing options and modernize systems and amenities
- Connect community with supportive development programs and resources
- Enhance the best attributes of the property (views, tree cover, community among long-term residents)

TIMELINE :

- 2023-2025: Map amendment and finalize the plan
- 2026-27: Apply for financing and submit for review and approval
- 2028-30: Secure financing and start redevelopment (Phase 1)



OUR REDEVELOPMENT PLAN

Skyland Reimagined

Phase 1

Existing Units	Proposed Units
68	240 (Apt.)
110	176 (Apts.) 11 (TH)
46	17 (TH)

Phase 2

Proposed Plan :

- 375 mixed-income units
- 41 senior units
- 28 homeownership townhomes

