

**BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA**

**Harrison Wisconsin Owner, LLC
4201 Garrison Street, NW
Lot 810 and a Portion of Lot 809 in Square 1666**

**Application for a Consolidated Planned Unit Development and
Related Zoning Map Amendment**

**Z.C. Case No. 24-12
Applicant's Supplemental Prehearing Statement
June 13, 2025**

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LIST OF EXHIBITS

- Exhibit A: Updated Architectural Plans and Elevations
- Exhibit B: Transportation Statement
- Exhibit C: Narrative on Anticipated Demographic Trends and Neighborhood Transformation
- Exhibit D: Memorandum of Understanding with Advisory Neighborhood Commission 3E
- Exhibit E: Resume of Tim Bragan, Landscape Architect and Expert Witness¹

¹ The Applicant's Prehearing Submission, filed on April 16, 2025, inadvertently omitted the resume of Tim Bragan, the Applicant's expert in landscape architecture. *See* Ex. 14C. While Mr. Bragan is not expected to testify during the Applicant's direct presentation, he will be available to respond to any questions regarding the Project's landscape elements.

EXECUTIVE SUMMARY

This Supplemental Prehearing Statement supports the application by Harrison Wisconsin Owner, LLC for a consolidated Planned Unit Development (PUD) and related zoning map amendment for 4201 Garrison Street NW. The proposed project will transform an underutilized site, currently occupied by a surface parking lot and a 705-foot television tower, into a mixed-income residential community with approximately 126 units, 33 percent of which will be affordable. The design features four modestly scaled buildings that reflect the surrounding neighborhood and thoughtful use of the PUD site boundary to ensure compatibility with the mixed-use character of the Wisconsin Avenue corridor to the west and the residential neighborhoods to the north, south, and east. This submission includes updated architectural and zoning plans, transportation and environmental strategies, and a refined package of public benefits, including park improvements and enhanced streetscape elements. These updates respond to feedback from the Zoning Commission and community stakeholders in advance of the public hearing scheduled for July 14, 2025.

A. INTRODUCTION

This Supplemental Prehearing Statement and the accompanying documents (the “Supplemental Prehearing Submission”) are submitted on behalf of Harrison Wisconsin Owner, LLC (the “Applicant”) in support of its application to the Zoning Commission for the District of Columbia (the “Commission”) for approval of a consolidated planned unit development (“PUD”) for the redevelopment of Lot 810 and a portion of Lot 809 in Square 1666 (the “PUD Site”).

The PUD Site consists of approximately 40,357 square feet of land area located within Square 1666, which is generally bounded by Wisconsin Avenue NW to the west, Harrison Street NW to the north, 42nd Street NW to the east, and Garrison Street NW to the south. The site is currently underutilized, improved only with a surface parking lot and a 705-foot television tower.

As detailed in the Applicant’s prior filings, the Applicant proposes to redevelop the PUD Site with a new mixed-income residential project (the “Project”) consisting of approximately 123,444 square feet of gross floor area (“GFA”),² **yielding approximately 126 residential units**. The Project will have a maximum building height of 50 feet, 3 inches and is designed to complement the surrounding neighborhood context. A key element of the Project’s contextual design is the configuration of the PUD Site boundary, which allows for optimal building placement and a balanced distribution of density across the PUD Site, even though the Project draws its density solely from the RA-3-zoned portion of the PUD Site. By dividing the massing into four modestly scaled buildings, the Project ensures a sensitive transition to adjacent residential areas. Although the proposed FAR is 4.31 when calculated over the RA-3-zoned area, the development achieves an **“apparent FAR” of 3.06** when measured across the full PUD Site, reflecting the Project’s thoughtful approach to scale and site integration.

Located in a highly desirable, transit-accessible area adjacent to the Wisconsin Avenue mixed-use corridor, the Project also meaningfully advances the District’s housing policy and racial equity goals. Notably, by leveraging the District’s HANTA program,³ the Project will reserve **33% of its residential units as affordable housing**. This level of affordability represents a significant public benefit and far exceeds what would otherwise be required under matter-of-right development.

The Applicant filed the original application on September 16, 2024, and the Zoning Commission voted to set the case down for a public hearing at its meeting on November 14, 2024 (the “Setdown Meeting”). The Applicant subsequently filed its Prehearing Submission on April 16, 2025. In accordance with Subtitle Z § 401.5 of the Zoning Regulations, this Supplemental Prehearing Submission is filed at least 30 days in advance of the scheduled public hearing on Monday, July 14, 2025, and is intended to provide the Commission with additional context, detail, and justification for the Applicant’s proposal in advance of the hearing.

² The Applicant’s Prehearing Statement (Ex. 14) stated the Project would include approximately 124,508 square feet. This initial number included residential GFA within the enclosed projections, which is not included in GFA but is included for IZ set-aside purposes. *See* Subtitle C § 1003.5.

³ HANTA refers to the High-Area Needs Tax Abatement program, a property tax incentive created to encourage affordable housing development in areas with the highest production goals, as identified in the Mayor’s Housing Equity Report.

B. UPDATES REGARDING THE APPLICATION

1. Updated Plans

Attached hereto as **Exhibit A** are the Applicant's updated architectural plans and elevations for the proposed PUD (the "Updated Plans"), which supersede the plans previously submitted at Exhibits 3A1–3A5. The Updated Plans include minor adjustments to the proposed design and revised floor plans for the Project. Additional information is also shown on the zoning diagram (Sheet G11), indicating that the projections along the 42nd Street and Garrison Street frontages comply with building code requirements. A LEED scorecard (Sheet G14) demonstrates that the Project will be designed to achieve LEED Silver certification under the LEED v4 BD+C: Multifamily Midrise rating system. The Updated Plans also include minor refinements to the building facades, which are reflected in the elevations (Sheets A11-A12). Finally, the updated landscape exhibits (Sheets L1–L5) feature the proposed improvements to the perimeter of the PUD Site and a variety of revised planting arrangements.

2. Updated Inclusionary Zoning Plan

Sheet G13 of the Updated Plans includes the Applicant's revised Inclusionary Zoning (IZ) plan, which replaces Exhibit 14A in the case record. As noted in the Prehearing Statement and further detailed in Section D.4 below, a portion of the Project's affordable units will satisfy the District's IZ requirements for rental housing. As part of the Applicant's commitment to dedicate 33% of the Project's units as affordable, the IZ set-aside amounts to 13,990 gross square feet, or 11.2% of the Project's total GFA.

The updated IZ plan reflects a revised unit mix—one studio, six one-bedroom units, four two-bedroom units, and two three-bedroom units—developed in response to ANC feedback. The inclusion of three-bedroom units qualifies as a specific housing benefit under Subtitle X § 305.5(f)(3). One of the three-bedroom units will be reserved at the 50% MFI level and will measure 1,028 square feet. In addition, although only 1,096 square feet of the IZ set-aside is required to be affordable to households at the 50% MFI level pursuant to Subtitle C § 1003.1(b), the Project will provide three units totaling 2,314 square feet at the 50% MFI level, which is more than twice the required amount. All IZ units meet the proportionality requirements of Subtitle C § 1005.1 and will comply with the design and amenity standards set forth in Subtitle C §§ 1005.2 and 1005.3.

3. Transportation Considerations

On May 15, 2025, the Applicant's traffic expert submitted the Transportation Statement for the Project to the District Department of Transportation ("DDOT"). A copy of the Transportation Statement is attached hereto as **Exhibit B** and is submitted to the public record no later than 30 days prior to the public hearing, in accordance with Subtitle Z § 401.8. The Transportation Statement concludes, among other findings, that the Project is well-served by multiple transportation options, including Metrobus, Metrorail, Capital Bikeshare, and a connected sidewalk network; that it is expected to generate only 15 AM and 17 PM peak hour vehicle trips; and that, with implementation of the transportation demand management (TDM) plan, the Project

is not anticipated to have an adverse impact on traffic or parking in the surrounding neighborhood. *See* Transportation Statement at p. 13.

Based on the proposed parking supply (82 spaces), DDOT recommended an enhanced Transportation Demand Management (TDM) plan, which includes unbundling parking costs from residential units, appointing a transportation coordinator, and providing 42 long-term and six short-term bicycle parking spaces, among other strategies. *See* Attachment C to the Applicant's Transportation Statement (Ex. B). The TDM plan also requires certain off-site improvements, such as the Applicant funding and installing a micromobility corral with appropriate racks on the north side of Garrison Street near 42nd Street, to deter illegal parking and reduce potential conflicts at the adjacent crosswalk. The final location may need to be adjusted in coordination with DDOT depending on the placement of the proposed bulb-out, which is being proffered as a transportation benefit of the PUD. The Applicant will also install differentiated crosswalks at the Project's Garrison Street ingress/egress point using varied paving materials or patterns. Additionally, an eight-foot pedestrian refuge is now shown as part of the loading curb cut (*see* Sheet CL02) to create a safer condition at the Project's access point along Garrison Street NW. All improvements are subject to DDOT approval. As noted in the Transportation Statement, the Applicant has committed to implementing all requirements of the TDM plan.

4. Sustainability Features and Environmental Commitments

The Applicant has refined the Project's sustainability strategy to maximize green design and minimize environmental impact. The Project is designed to achieve LEED Silver certification under the LEED v4 BD+C: Multifamily Midrise rating system, as shown on Sheet G14 of the Updated Plans. The building will feature all-electric residential units, green roofs, rooftop solar panels, at least four EV charging spaces in the underground garage, and dedicated composting areas. Additional sustainability measures include high-efficiency water fixtures, low-emitting materials, and enhanced indoor air quality strategies to support resident health and comfort.

5. Further Responses to Zoning Commission Comments from Setdown Meeting

At the Setdown Meeting, the Commission requested additional information from the Applicant regarding: (i) the affordable housing proffer; (ii) design compatibility; (iii) the character of the Project's open spaces; (iv) proposed landscaping and streetscape improvements; and (v) potential neighborhood transformation and demographic impacts. The Applicant addressed the first two items in its Prehearing Statement and acknowledged that additional information would be provided as part of this Supplemental Prehearing Submission. *See* Ex. 14 at pp. 6–8.

In response to the Commission's request for additional information on landscape treatment and the character of the open spaces within the four buildings comprising the Project, the Applicant provides additional information herein. These courtyards are proposed to be modest in scale (approximately 28 feet wide) and reserved for private use by residents. The green spaces will be designed to complement the perimeter landscaping of the PUD Site, helping to soften the Project's visual impact and enhance the experience of pedestrians and neighbors. The three courtyards facing 42nd Street NW will also feature attractive, well-maintained landscaping visible from the public realm, and the scale and character of these spaces are proposed to be more consistent with

the yards typically found in nearby single-family homes. Rather than introducing oversized features, these green spaces reflect and respect the surrounding residential context. The result is a development that integrates seamlessly into the neighborhood and serves as a residential asset, not an out-of-scale intrusion.

Within the public space, perimeter plantings will expand the urban tree canopy, screen unit areaways with shrub buffers, and manage stormwater through rain garden features. The Applicant has also committed to enlarging the existing tree pits along public space frontages of the Project, where necessary and subject to DDOT approval, and to installing new street trees in coordination with DDOT's Urban Forestry Division ("UFD"). The Applicant has committed to plant trees, following completion of construction, in any gaps in the tree boxes per DDOT/UFD's specifications within Square 1666 as well as across the street from Square 1666 on all four sides, subject to approval of the abutting property owners and DDOT.

Finally, attached as **Exhibit C** is a supplemental narrative on demographic trends and neighborhood transformation, which outlines the anticipated positive impacts of the PUD in creating new housing opportunities for a diverse range of residents and contributing to the enhancement of the Friendship Heights neighborhood. As detailed in the narrative, the Project is expected to support a balanced mix of household types and age cohorts, advance sustainable design and environmental performance, and promote equitable development while catalyzing future reinvestment along the Wisconsin Avenue mixed-use corridor.

C. UPDATES ON COMMUNITY OUTREACH

The Applicant has continued its engagement with Advisory Neighborhood Commission ("ANC") 3E and other community stakeholders, including the Harrison Condominium Homeowners' Association, to discuss the Project and shape a meaningful, community-responsive benefits package.

Following the Commission's vote to set down the application in November 2024, the Applicant met with ANC 3E at its regularly scheduled public meeting on March 13, 2025. The Applicant then continued to work with the ANC to make refinements to the Project and incorporate additional commitments for project amenities and public benefits, as well as for construction management considerations. These commitments are set forth in the attached Memorandum of Understanding ("MOU"), a copy of which is attached hereto as **Exhibit D**. The commitments from this MOU have been incorporated in the Updated Plans and the proffered benefits and amenities, described below in Section D.

At its most recent regularly scheduled and duly noticed public meeting on June 12, 2025, the ANC reviewed the final language of the draft MOU and voted unanimously to support the application. The Applicant anticipates that the ANC will submit a letter or resolution documenting its support to the public record in advance of the public hearing.

D. AMENDED AND RESTATED LIST OF PUBLIC BENEFITS AND AMENITIES

Pursuant to Subtitle X § 305.2, the proposed PUD includes superior features that will benefit the surrounding neighborhood and the public to a significantly greater extent than a matter-of-right development would. The Applicant included an initial list of public benefits in its original submission (*see* Ex. 3, pp. 18–20). Following its work with the ANC and other community stakeholders, the Applicant has developed a more comprehensive list of proffered benefits, as summarized below:⁴

1. Superior Urban Design and Architecture (Subtitle X § 305.5(a))

The Project is designed to achieve a high degree of compatibility with the surrounding context and to provide an aesthetically refined transition from the Wisconsin Avenue corridor. As shown in the Updated Plans and discussed in the Applicant’s prior filings, the Project is composed of four distinct “buildings” fronting 42nd Street NW, giving the appearance of a moderately-scaled, incremental residential development. This composition reflects a proven design approach successfully employed in other transitional zones throughout the District. While consistent in overall character and rhythm, each “pavilion” incorporates its own architectural expression and material palette.

Thoughtfully detailed bays, balconies, and private entry stoops reinforce the residential character of the development, while a mix of pitched roofs, cornices, and three- and four-story bay projections introduces visual variety and interest. Together, these elements help integrate the Project with the surrounding lower-density neighborhood to the north, east, and south of the PUD Site. Accordingly, the Project’s superior urban design and architectural quality constitute a significant benefit of the PUD, as demonstrated by its well-considered massing, human-scale articulation, traditional residential elements, and active engagement with the streetscape—all of which contribute to a context-sensitive and visually cohesive addition to the neighborhood.

2. Site Planning and Efficient and Economical Land Utilization (Subtitle X § 305.5(c))

As discussed in the Applicant’s prior filings, the Project will transform a significantly underutilized, transit-accessible site into a vibrant mixed-income residential community. It will introduce new housing—both market-rate and affordable—at a desirable location that currently lacks residential presence or sustained economic activity. The configuration of the PUD Site’s boundary allows the Project to be distributed across the entire Property as four separate buildings, even though none of the density is derived from the MU-4-zoned portion of the site. This design results in an apparent FAR of approximately 3.06, which remains well below the 4.32 FAR permitted under the proposed RA-3 zoning. By distributing the building mass across the site, the Project better reflects the scale and rhythm of the surrounding neighborhood and avoids the appearance of a singular multifamily structure that could be out of character with nearby residential uses. These strategies reflect efficient site planning and a thoughtful, context-sensitive approach to land use.

⁴ This list supersedes the original list of public benefits and amenities included in the Applicant’s Statement in Support. *See* Ex. 3, pp. 18–20.

3. Housing (Subtitle X § 305.5(f))

Subtitle X § 305.5(f)(1) identifies “[h]ousing that exceeds the amount that would have been required through matter-of-right development under existing zoning” as a public benefit. The Project will include approximately 123,444 square feet of residential gross floor area, resulting in 126 new units with a mix of one-, two-, and three-bedroom layouts incorporated at the ANC’s request. The inclusion of three-bedroom units is separately recognized as a PUD benefit under Subtitle X § 305.5(f)(3). This unit mix supports a range of household sizes and living needs, expanding access to housing in a high-opportunity, transit-accessible location. In total, the proposed residential density far exceeds what is permitted as a matter of right under the existing R-2 zoning, which allows only about 12 semi-detached or 8 detached units. See 11-F DCMR § 202.1. Accordingly, the Project’s housing component represents a substantial public benefit associated with the PUD.

4. Affordable Housing (Subtitle X § 305.5(g))

Subtitle X § 305.5(g)(1) provides that “[a]ffordable housing provided in compliance with the Inclusionary Zoning requirements of Subtitle C, Chapter [15], shall not be considered a public benefit *except to the extent it exceeds what would have been required through matter-of-right development under existing zoning.*” (Emphasis added.) The Applicant’s affordable housing proffer—equal to 33% of the total residential units generated by the Project—substantially exceeds the amount that would be required under a matter-of-right development in either the PUD Site’s existing R-2 zone or the proposed RA-3 zone. A detailed analysis demonstrating how the proposed affordable housing surpasses both matter-of-right scenarios, and constitutes a significant benefit to the community and the District, was included in the Applicant’s Comprehensive Plan Evaluation (Ex. 3F, pp. 11-12).

As explained in the Applicant’s Prehearing Statement (*see* Ex. 14, pp. 6–7) and shown on the updated IZ plan (Sheet G13), the Applicant’s 33% affordable housing proffer consists of two components: IZ units and additional affordable units provided through the HANTA program. A portion of the affordable units will satisfy the District’s IZ requirements for rental housing. Specifically, 75% of the bonus density utilized will be set aside for households earning no more than 60% MFI, and at least 10% of the Project’s penthouse habitable space will be reserved for households earning no more than 50% of the MFI. *See* 11-C DCMR §§ 1003.1, 1003.7(a), and 1003.8. The IZ component, which again, forms part of the overall 33% affordable housing commitment, will comprise approximately 13,990 gross square feet, or 11.2% of the Project’s total GFA.

Moreover, in response to community input, one of the units reserved at the 50% MFI level will be a three-bedroom unit. Notably, although only 1,096 square feet of IZ set-aside is required pursuant to Subtitle C § 1003.1(b) based on the Project’s habitable penthouse space, the Project will provide three units totaling 2,314 square feet, all at the 50% MFI level. This is more than twice the minimum required and reflects the Project’s commitment to deeper and more inclusive affordability.

The balance of the units needed to meet the proffered 33% affordability threshold will be delivered as non-IZ affordable dwelling units through the HANTA program, which supports the creation of affordable housing in high-needs areas of the District. While the HANTA program permits affordability levels of up to 100% of MFI for a 40-year control period, the Applicant, through negotiations with DHCD, committed to a deeper level of affordability. Specifically, the Project's HANTA-designated units will be reserved for households earning no more than 80% of MFI. DHCD approved the Applicant's participation in the HANTA program in November 2024. By leveraging this program, the Applicant is able to provide more impactful affordability and advance the creation of an inclusive, mixed-income community at an advantageous location.

In conclusion, the Applicant's affordable housing proffer constitutes a significant public benefit and advances numerous Comprehensive Plan policies aimed at promoting accessible, affordable housing for residents of all income levels.

5. Environmental and Sustainable Benefits (Subtitle X § 305.5(k))

The Project integrates sustainable features that will benefit residents, the immediate community, and the District as a whole. The Project will feature an energy-efficient, all-electric design for the residential units, and it will incorporate green roofs, rooftop solar panels, electric vehicle (EV)-ready charging spaces in the underground parking garage, and dedicated areas for composting. The Project will also include high-efficiency water fixtures, low-emitting materials, and enhanced indoor air quality measures to promote resident health and comfort. This green building approach aligns with the Comprehensive Plan's Environmental Protection Element and exemplifies forward-looking, responsible urban development.

6. Streetscape Plans (Subtitle X § 305.5(l))

The Project will enhance the surrounding streetscape through a range of improvements designed to improve access, increase safety, and reinforce the PUD Site's connection to the Wisconsin Avenue corridor. Subject to DDOT approval, the Applicant will provide new plantings along the PUD Site's public frontages and include sidewalk paving and perimeter landscaping. *See Updated Plans, Sheets L1-L5.* These improvements will help accentuate the residential character of the Project and its compatibility with the lower-density residential context surrounding the PUD Site.

As set forth above and in the MOU, the Applicant has also committed to enlarging the existing tree pits along public space frontages of the Project, where necessary and subject to DDOT approval, and to installing new street trees in coordination with DDOT/UFD. The Applicant has committed to plant trees, following completion of construction, in any gaps in the tree boxes per DDOT/UFD's specifications within Square 1666 as well as across the street from Square 1666 on all four sides, subject to approval of the abutting property owners and DDOT.

7. Park Maintenance (Subtitle X § 305.5(n))

Subtitle X § 305.5(n) identifies park improvements as a public benefit. In response to community feedback, the Applicant has agreed to contribute a minimum of \$10,000 and up to

\$20,000 toward enhancements to Fessenden Park, located one block south of the PUD Site. Planned improvements include new bocce courts, park benches, and landscaping, all subject to approval by the Department of Parks and Recreation (“DPR”) and DDOT. The Applicant intends to donate the committed funds to DPR prior to the issuance of the final certificate of occupancy, in accordance with Subtitle X § 305.3(d). The Applicant will also consult with ANC 3E on the landscaping plans and present the proposed improvements upon request, and maintain the landscaping for three years after installation. The Applicant is working with DPR for issuance of a letter indicating its agreement to this commitment.

8. Transportation Infrastructure Beyond That Needed to Mitigate Any Potential Adverse Impacts (Subtitle X § 305.5(o))

Subtitle X § 305.5(o) identifies transportation infrastructure that is not strictly necessary to mitigate potential adverse impacts as a public benefit. As summarized in the Applicant’s Transportation Statement and discussed above in Section B.3, the Applicant will implement an enhanced TDM plan to address potential impacts associated with the proposed parking supply and projected trip generation. However, the Applicant proposes transportation improvements that exceed standard mitigation requirements.

The Applicant will coordinate with DDOT to improve pedestrian safety at the intersection of Garrison and 42nd Streets. Specifically, the Applicant will make best efforts to ensure that bulb-outs with bioretention components, where feasible, are installed at all four corners of the intersection prior to issuance of the final certificate of occupancy. If DDOT has committed to constructing the bulb-outs but has not completed them by that time, the Applicant will, in coordination with DDOT, install temporary bulb-outs using bollards or other approved materials at all four corners and maintain them until permanent construction occurs. If DDOT funding or approval is not in place by the time of final certificate of occupancy issuance, the Applicant will expend up to \$14,000 to install permanent hardened bulb-outs on the northwest and southwest corners, subject to DDOT and ANC 3E approval.

Following installation, the Applicant will be responsible for keeping the bulb-outs free of trash and maintaining the landscaping in accordance with DDOT standards for the life of the Project

9. Uses of Special Value to the Neighborhood or the District of Columbia as a Whole (Subtitle X § 305.5(q))

The public benefits associated with the Project extend beyond those delivered at full build-out. One notable early benefit is the removal of the existing 705-foot television tower, which no longer serves any functional purpose following WTTG/Fox 5 DC’s relocation. The tower is an inactive and visibly intrusive structure that is out of scale with the surrounding neighborhood and detracts from the area’s visual character. Its removal will result in an immediate and noticeable improvement to the local streetscape, eliminate an obsolete piece of infrastructure, and help set the stage for the thoughtful redevelopment of the PUD Site.

10. Other Public Benefits and Project Amenities that Substantially Advance the Comprehensive Plan (Subtitle X § 305.5(r))

Pursuant to Subtitle X § 305.5(r), public benefits may include “other ways in which the proposed PUD substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan.” The Project substantially advances several of the Comprehensive Plan’s major themes, including expanding housing supply, increasing housing affordability, and encouraging growth in high-opportunity, transit-accessible locations, consistent with the Framework Element’s direction to focus new development around transit nodes and equity-driven growth. *See, e.g.*, 10-A DCMR §§ 213.7, 219.7.

The Rock Creek West (RCW) Area Element of the Comprehensive Plan identifies a “substantial unmet need for new affordable units and a need to preserve existing affordable and moderate-income options.” 10-A DCMR § 2300.9. Increasing the supply of such housing in RCW is an explicit policy priority. *Id.* The Project directly advances this objective by delivering new affordable housing in a part of the District where high land costs and limited development opportunities have historically constrained such production. By reserving 33% of the total residential units as affordable, the Project offers a measurable public benefit that promotes equity and inclusion in an area of persistent housing imbalance.

Beyond housing, the Project advances urban design and land use goals set forth in the Comprehensive Plan and the Wisconsin Avenue Development Framework (the “Framework”). Specifically, it supports RCW Area Element policies encouraging compatible infill and appropriate transitions in scale along Wisconsin Avenue, NW. *See* RCW-1.1.1 (Neighborhood Conservation), RCW-1.1.4 (Infill Development), and RCW-2.2.5 (Wisconsin Avenue Corridor). The Framework builds on these policies by calling for walkable blocks, new pedestrian connections, and activation of underutilized sites in Friendship Heights. *See* Framework, p. 22. The Project fulfills this vision through a high-quality, appropriately scaled infill development that enhances the urban fabric and activates a previously underused site.

Taken together, the Project’s housing contributions, land use compatibility, and urban design enhancements advance key policies of the Comprehensive Plan and the Framework. These elements, in combination, represent a significant public benefit under Subtitle X § 305.5(r).

E. SUMMARY OF PUD REQUIREMENTS AND FLEXIBILITY REQUESTED

The PUD Site comprises approximately 40,357 square feet of land and meets the minimum land area requirement for a PUD in both the MU-4 and RA-3 zones. The Project complies with the development standards for a PUD in the RA-3 zone, which permits up to 4.32 FAR and a maximum height of 75 feet pursuant to the PUD provisions of Subtitle X § 303.

With respect to PUD flexibility, the Applicant is seeking a **PUD-related map amendment** to rezone the portion of the PUD Site currently zoned R-2 to the RA-3 zone, which is the only portion of the Site being used to generate the Project’s density. The Applicant is also requesting flexibility for two areas of noncompliance: **(1) the penthouse side setback** along the west elevation of the Project and **(2) out of an abundance of caution, the required rear yard** along

the PUD Site boundary, rather than as measured from the Record Lot (Lot 3 in Square 1666), where the Project complies. Pursuant to Subtitle U § 203.1(k) and Subtitle X § 901.2, the Applicant further requests **special exception relief to allow off-site parking** within the R-2-zoned portion of the PUD Site that lies beneath the Project’s underground parking garage. Although this area falls outside the PUD Site boundary, it is located within the Record Lot on which the PUD Site sits. Detailed explanations of the requested zoning flexibility and special exception relief are provided in the Applicant’s Statement in Support and will be presented to the Commission at the public hearing. *See* Ex. 3, pp. 9–15.

F. COMPLIANCE WITH PUD EVALUATION CRITERIA

The Commission is responsible for evaluating and deciding a PUD application under the standards set forth in Subtitle X § 304. *See* 11-X DCMR § 304.1. In doing so, the Commission must “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.” 11-X DCMR § 304.3. **In this case, the public benefits proffered significantly outweigh the relatively modest development incentives requested and any potential adverse impacts.** Justifications supporting the findings required of the Commission are included in the Applicant’s Statement in Support. *See* Ex. 3, pp. 15–20. A brief summary of those justifications is provided below and will also be presented to the Commission at the public hearing:

- ***Not Inconsistent with the Comprehensive Plan.*** The Applicant’s Comprehensive Plan analysis, provided at [Ex. 3F](#), concludes that the proposed development is, on balance and when evaluated through a racial equity lens, not inconsistent with the PUD Site’s designation on the Future Land Use Map (Moderate Density Residential and Mixed Use – Medium Density Residential / Moderate Density Commercial),⁵ the Generalized Policy Map (Neighborhood Conservation Area), and numerous policies of the Rock Creek West Area Element and the Citywide Elements.
- ***No Unacceptable Impacts.*** Based on input from its team of expert consultants, including architects, engineers, and a land use planner, the Applicant has assessed a broad range of potential effects, including land use, urban design, housing, transportation, environmental considerations, and economic development. At bottom, any impacts are either favorable, capable of being mitigated, or acceptable given the Project’s proposed public benefits package. Overall, the Project will transform an underutilized, transit-accessible site into a residential community that complements the existing neighborhood.

⁵ The portion of the PUD Site designated as Moderate Density Residential is proposed to be rezoned from R-2 to RA-3. Although the RA-3 zone permits a matter-of-right density of 3.0 FAR—higher than the 1.8 FAR referenced in the Framework Element—the Moderate Density Residential designation contemplates higher-density zones in appropriate contexts, such as through a PUD or when providing IZ units. Here, the proposed PUD is not inconsistent with the FLUM, particularly when considered alongside other relevant planning documents, including the Wisconsin Avenue Development Framework, which supports increased residential density at this location.

- ***Public Benefits and Project Amenities.*** The amended and restated public benefits and amenities summarized above in Section D are not inconsistent with the Comprehensive Plan and represent tangible, realizable outcomes resulting from the redevelopment of the PUD Site. These public benefits, particularly the affordable housing component with a 33% set-aside, will enhance the surrounding neighborhood to a significantly greater extent than would likely result from a matter-of-right development.

G. CONCLUSION

In light of the foregoing and the Applicant's prior submissions, the Applicant respectfully submits that the application satisfies the PUD evaluation criteria and warrants approval by the Commission. The Project will deliver substantial new housing, including a meaningful affordable housing set-aside, and support a mixed-income, diverse residential community in a highly desirable, transit-accessible location. It also provides significant public benefits, including removal of a 705-foot obsolete television tower that detracts from the character of the Friendship Heights neighborhood. Designed with sensitivity to its context, the Project will enhance the built environment in Friendship Heights and advance the District's housing and equity goals.