

SUPPLEMENTAL REPORT

TO: District of Columbia Zoning Commission

FROM: Philip Bradford, AICP, Development Review Specialist
JS Jennifer Steingasser, Deputy Director, Development Design & Preservation

DATE: July 3, 2025

SUBJECT: ZC Case 24-12: Setdown Report for Consolidated PUD with Related Map Amendment at 4201 Garrison St. NW

I. RECOMMENDATION

The applicant, Harrison Wisconsin Owner, LLC requests a consolidated Planned Unit Development with a related map amendment on Square 1666, Lot 810 and a portion of Lot 809, located at 4201 Garrison St. NW from R-2 for the eastern portion to RA-3. On balance when viewed through a racial equity lens, the proposal would not be inconsistent with the Comprehensive Plan and the Wisconsin Avenue Development Framework Plan. In addition to other benefits and amenities, the PUD will provide new housing in direct proximity of public transit and critically needed affordable housing in the planning area that has only achieved 11.6% of the affordable housing target to date.

DDOT informed OP that they will file a report with conditions that the applicant implement the proposed TDM plan, and construct curb cut extensions at the Garrison and Harrison intersections of 42nd Street. DDOT also asked the applicant to explore a speed bump during public space permitting. DOEE informed OP that they are supportive of the application, but request the applicant explore electric options for whole building systems.

The Office of Planning (OP) recommends that the Zoning Commission **approve** the proposed Consolidated PUD and related Map Amendment subject to the DDOT conditions and additional detail being provided regarding their sustainability proffers.

II. COMMISSION COMMENTS FROM SET-DOWN MEETING

The proposed Consolidated PUD and Map Amendment was set down at the Zoning Commission's November 14, 2024 public meeting. The Commission asked questions regarding IZ income level requirements and whether the proposed units would be rental units or owner-occupied units. The applicant was asked to explore increasing the allocation of IZ units given the requested increase in density. Commissioners also asked questions regarding the building massing and the proposed courts and whether they would be publicly accessible and contain any active uses. The commission requested the applicant provided additional information regarding the demographic trends in the neighborhood and the potential impact of the project on the neighborhood.

The applicant has provided responses to the questions and broader discussion during set down in [Exhibit 14](#) and [Exhibit 23](#), and an IZ Plan in [Exhibit 14A](#). The minimum and maximum IZ income limits are published by the Department of Housing and Community Development and can be found

in the [price schedule](#). The proposed building is intended to be constructed as rental housing and based on information provided by the applicant, exceeds the IZ requirements and will contain High-Area Needs Tax Abatement (HANTA) ¹units to provide additional affordable units beyond the IZ requirements. The proposed courts are intended to be private and serve residents of the building. The applicant has also responded to the Commissions questions regarding demographic trends and neighborhood impact by providing a supplemental narrative on the topic in [Exhibit 23C](#).

III. APPLICATION-IN-BRIEF

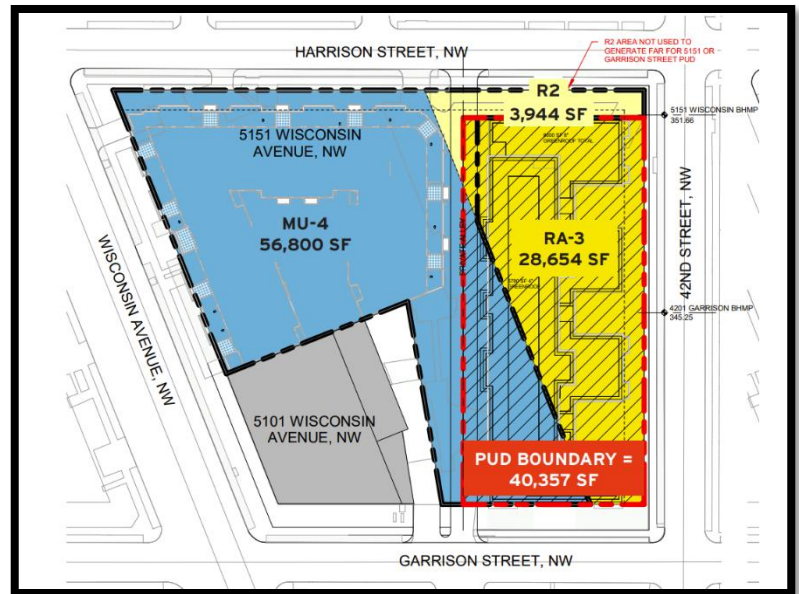
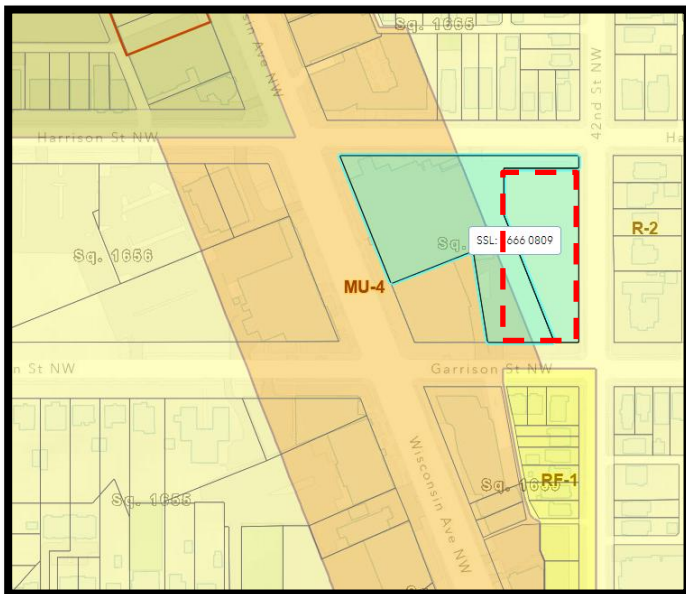
The Applicant proposes a redevelopment of the PUD site, currently improved by surface parking and a decommissioned 705-foot television tower. The proposed development comprises a new residential building with a gross floor area of approximately 123,444 square feet and a maximum height of 50 feet. This development is anticipated to yield 126 residential units, of which 33% will be designated as affordable housing. The affordable housing units will be allocated to households with incomes at 50%, 60%, and 80% of the Median Family Income (MFI). Proposed are 82 below grade parking spaces for vehicles and 42 long-term and six short-term bicycle parking spaces will also be provided. Additionally, the Project aims to enhance the surrounding streetscape with new trees and green features.

Applicant	Harrison Wisconsin Owner, LLC
Proposed Map Amendment	Consolidated PUD & Related Map Amendment from R-2 for the eastern portion to RA-3
Address	4201 Garrison St. NW
Ward and ANC	Ward 3 / ANC 3E
Legal Description	Square 1666, Lot 810 & portion of Lot 809
Property Size	Portion to be rezoned is 3,944 sq. ft.
Future Land Use Map Designation	Principally Residential-Moderated Density with the southeast portion designated as Mixed-Use Medium Residential / Moderate density Commercial.
Generalized Policy Map Designation	Principally Neighborhood Conservation Area with the southeast portion designated as Main Street Mixed Use Corridors Commercial.
Small Area Plan	The Wisconsin Ave. Development Framework, which recommends this area as a transition zone between higher density mixed use along Wisconsin Ave. NW and the low density residential to the north and east.
Historic District	None

¹ The HANTA Program is administered by the Department of Housing and Community Development and is a property tax abatement program intended to spur new affordable housing units in areas with the highest affordable housing goals such as Rock Creek West.

IV. SITE AND AREA

The subject property located in Square 1666, covers approximately 40,357 square feet and is bordered by Wisconsin Avenue, Harrison Street, 42nd Street, and Garrison Street. A private alley separates it from a commercial office building. To the west, the site adjoins the former WTTG/Fox 5 DC headquarters, which is also owned by the Applicant and is zoned for a new multifamily building with ground floor retail and 210 residential units. The PUD Site sits east of Wisconsin Avenue in Upper Northwest, surrounded by a mix of commercial and lower-density residential uses. Institutional buildings and moderate- and low-density housing are also located throughout the area. Public transportation is available with the Friendship Heights Metro station just north and Tenleytown Metro further south.



V. ZONING ANALYSIS

The PUD Site is divided into two zoning areas: the western portion is in the MU-4 zone, which allows for moderate-density mixed-use development, including shopping, business, housing, and mixed uses. The eastern portion is in the low-density Residential R-2 zone, which is predominantly detached and semi-detached houses on moderately sized lots.

The applicant proposes to change the zoning of a portion of the PUD Site from R-2 to RA-3. The RA-3 zone is a medium density residential zone, which allows multi-family dwellings. The MU-4 portion of the site would remain zoned MU-4.

The following table summarizes the effect of the proposed RA-3 zone in comparison to the existing R-2 zone.

	Existing R-2 Zone	Existing MU-4 Zone	Proposed Zone: RA-3 w/PUD	PUD Proposal
Permitted Uses	Low-density residential uses	Low to moderate density mixed use	Predominantly medium-density residential uses	Multiple-dwelling bldg. with 126 units
Height	40 ft. 3 stories	50 ft. max.	75 ft.	50 ft. 3 in.

	Existing R-2 Zone	Existing MU-4 Zone	Proposed Zone: RA-3 w/PUD	PUD Proposal
Floor Area Ratio	N/A	2.5 FAR max. 3.0 IZ	3.0 FAR, 3.6 IZ FAR 4.31 FAR (20% PUD Bonus)	3.06 for the site; 4.308 for the portion to be zoned RA-3
Penthouse Height	n/a	12 ft. habitable, 15 ft. mechanical	12 ft. habitable, 18.5 ft. mechanical	12 ft. habitable, 18 ft. mechanical
Lot Occupancy	40% max.	60% max.; 75% with IZ	75%	69.2%
Rear Yard	20 ft. min.	15 ft. min.	17 ft.	10.8 ft.
Side Yard	8 ft. min.	None required, 5 ft. min if provided	None, 4 ft. min. if provided	None proposed.
Vehicle Parking (& 50% metro reduction)	1 space per single family dwelling min.	1 space / 3 dwelling units over 4 units	1 space / 3 dwelling units over 4 units = 41 spaces	82 spaces
Bicycle Parking	N/A	Long term, 1 / 3 DU; Short term, 1 / 20 DU	6 short-term spaces 42 long-term spaces	Complies
Loading	N/A	1 Loading Berth 1 Service / Delivery space	1 Loading Berth 1 Service / Delivery space	Complies
GAR	N/A	0.3	0.3	Complies

Requested Flexibility

a. Zoning Flexibility

OP does not object to the applicant's requested zoning flexibility, analysis of which is provided below:

303.1 As part of the PUD process, the Zoning Commission may grant the following relief:

- (a) Relief from any development standards established in the corresponding zone, which shall be considered a type of development flexibility against which the Zoning Commission shall weigh the benefits of the PUD;*
- (b) The Commission may permit one or more specific uses within a PUD that are not otherwise permitted by the PUD-related zone after a determination by the Commission that the use(s) are compatible with the PUD, which shall be considered a type of development flexibility against which the Zoning Commission shall weigh the benefits of the PUD; and*
- (c) Housing credits and arts credits are not eligible for flexibility through the PUD process.*

The Applicant is seeking the following zoning flexibility for two areas of noncompliance:

Penthouse Side Setback – West Elevation

Pursuant to Subtitle C § 1504.1(c)(2), a penthouse must be set back from all roof edges a distance at least equal to the height of the penthouse itself, or in this instance 12 ft. minimum. The applicant would provide this setback from the east, north and south building facades but is proposing to not provide it on the west side, which faces a public alley and the rear of the existing structures at 5101

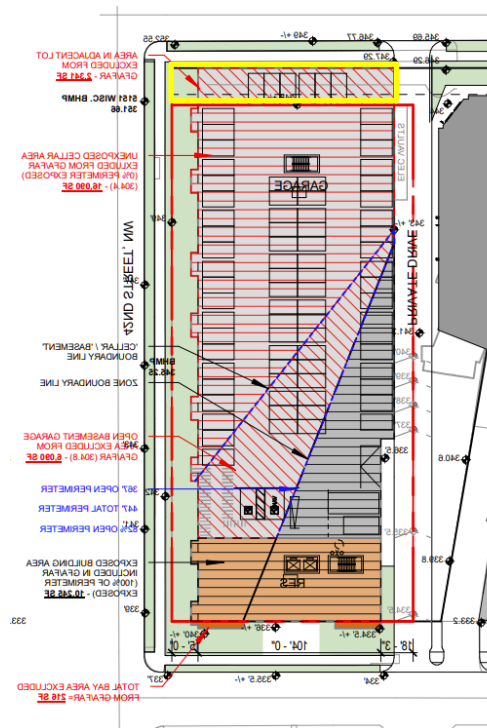
and 5151 Wisconsin Ave. NW. This is intended to maximize the setback on the sides facing the residential neighborhoods, to lessen visibility of the proposed penthouse, which OP supports.

Rear Yard – PUD Site Boundary

Pursuant to Subtitle D § 318.8, on a “corner lot abutting three (3) or more streets, the depth of rear yard may be measured from the center line of the street abutting the lot at the rear of the structure.” Based on this measurement, the applicant is able to provide 10.75 ft. of rear yard. The RA-3 zone requires 17 ft. based on the standard of 4 in. per 1 ft. in principal height. The proposed building is sufficiently separated from adjacent structures across the alley and granting this flexibility would cause no adverse impact.

Off Site Parking – Underground Parking outside PUD Boundary in R-2 Zone

Pursuant to Subtitle U § 203.1(k) the Commission may grant flexibility from accessory parking in the R-2 zoned portion of the site. The PUD site is zoned RA-3 and MU-4, however the underground parking structure extends, below grade, into the R-2 zone highlighted in yellow below, which is not permitted by right. The parking satisfies all conditions to allow granting the requested flexibility and is analyzed below.



(k) Parking as a principal use, or accessory parking elsewhere than on the same lot as the principal use, subject to the following conditions:

- (1) Parking garages shall not be permitted; parking spaces shall be in an open parking lot area or in an underground garage no portion of which, except for access, shall extend above the level of the adjacent finished grade;*

The applicant proposes six (6) accessory parking spaces in the underground parking garage that are located within the R-2 zoned portion of the subject property, except for the point of access, no portion of the parking spaces will extend beyond finished grade.

(2) All parking shall meet the conditions of Subtitle C, Chapter 7;

All six (6) parking spaces will meet the conditions of Subtitle C, Chapter 7.

(3) No commercial advertising signs shall be permitted outside a building, except a sign advertising the rates as required by Chapter 6 of Title 24 DCMR, Public Space and Safety;

The project is a residential building, all underground spaces are for residents and visitors, no commercial advertising is proposed and the applicant does not intend to include signage for the parking on the exterior of the building.

(4) At least eighty percent (80%) of the parking surface shall be of pervious pavement;

This condition is not applicable as it relates to surface parking, the proposed spaces are in an underground parking garage.

(5) Accessory parking shall not be accessory to "parking as a principal use";

The proposed parking spaces are accessory to the proposed multi-family building, this residential use is the principal use of the PUD site.

(6) The applicant shall demonstrate the following:

(A) The parking spaces shall be so located, and facilities in relation to the parking lot shall be so designed, that they are not likely to become objectionable to adjoining or nearby property because of noise, traffic, or other objectionable conditions;

(B) The present character and future development of the neighborhood will not be affected adversely; and

(C) The parking is reasonably necessary and convenient to other uses in the vicinity;

The proposed parking spaces are located within an underground parking garage for the building and not visible from any adjacent properties, therefore they should not become objectionable to any adjoining or nearby properties. The character and future development of the neighborhood should not be adversely affected. The spaces are necessary to the use of the site and while located conveniently to other nearby uses the spaces are intended to serve residents of the proposed multi-family development.

(7) Parking as a principal use shall be subject to the following conditions:

(A) All parking shall be located in its entirety within two hundred feet (200 ft.) of an existing MU, NMU, D, or PDR zone;

(B) The lot shall be contiguous to or separated only by an alley from a MU, NNU, D, or PDR zone; and

(C) A majority of the parking spaces shall serve residential uses or short-term parking needs of retail, service, and public facility uses in the vicinity;

This section is not applicable, parking as a principal use is not proposed by the applicant.

(8) Accessory parking shall be subject to the following condition:

(A) All parking spaces shall be located in their entirety within two hundred feet (200 ft.) of the area to which they are accessory; and

(B) All parking spaces shall be contiguous to or separated only by an alley from the use to which they are accessory;

The proposed six (6) spaces are located within 200 feet and are contiguous to the use to which they are accessory.

(9) The Board of Zoning Adjustment may require that all or a portion of the parking spaces be reserved for the following:

(A) Residential parking;

(B) Unrestricted commercial parking;

(C) Accessory parking for uses within eight hundred feet (800 ft.); and

(D) Shared parking for different uses by time of day; conditioned on lighting to reduce impacts on adjoining properties;

OP does not recommend the commission reserve the parking for any other use as the accessory spaces are intended to serve the residences within the multi-family building proposed for the subject property.

(10) In the R-1B/GT and R-3/GT zones, no commercial parking lots shall be permitted; and

This section is not applicable as the subject property is not located within either of the zoning districts noted above.

(11) The application shall be referred to the District Department of Transportation for review and report;

The application has been referred to the District Department of Transportation for review and report.

b. Design Flexibility

OP does not object to the following Design Flexibility items:

Interior Components- To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, atria, and mechanical rooms, provided that the variations do not change the exterior configuration of the building as shown on the plans approved by the order.

Exterior Materials- Color: To vary the final selection of the colors of the exterior materials based on availability at the time of construction, provided such colors are within the color ranges shown on the plans approved by the order.

Exterior Details- Location and Dimension: To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior configuration of the building or design shown on the plans approved by the order. Examples of exterior details would include, but are not limited to, doorways, canopies, railings, and skylights.

Number of Units- To provide a range in the approved number of residential dwelling units of plus or minus ten percent (10%), except that (1) the total square footage of the residential dwelling units shall not be reduced, and (2) the number of units and the square footage reserved for affordable housing shall not be reduced.

Parking Layout- To make refinements to the approved parking configuration, including layout and number of parking space plus or minus ten percent (10%), so long as the number of parking spaces is at least the minimum number of spaces required by the Zoning Regulations.

Streetscape Design- To vary the location, attributes, and general design of the approved streetscape to comply with the requirements of, and the approval by, the DDOT Public Space Division.

Signage- To vary the font, message, logo, and color of the approved signage, provided that the maximum overall dimensions and signage materials are consistent with the signage on the plans approved by the order and are compliant with the DC signage regulations.

OP does not support the requested flexibility for sustainable features. The item is listed as a benefit of the PUD with little detail or commitment. There are references to green roof and solar panels and stormwater management features that slightly exceed the baseline regulatory requirements, but there are no details on how much or the benefits either would generate. Thus, any flexibility could easily result in no benefit.

Sustainable Features- To vary the approved sustainable features of the project.

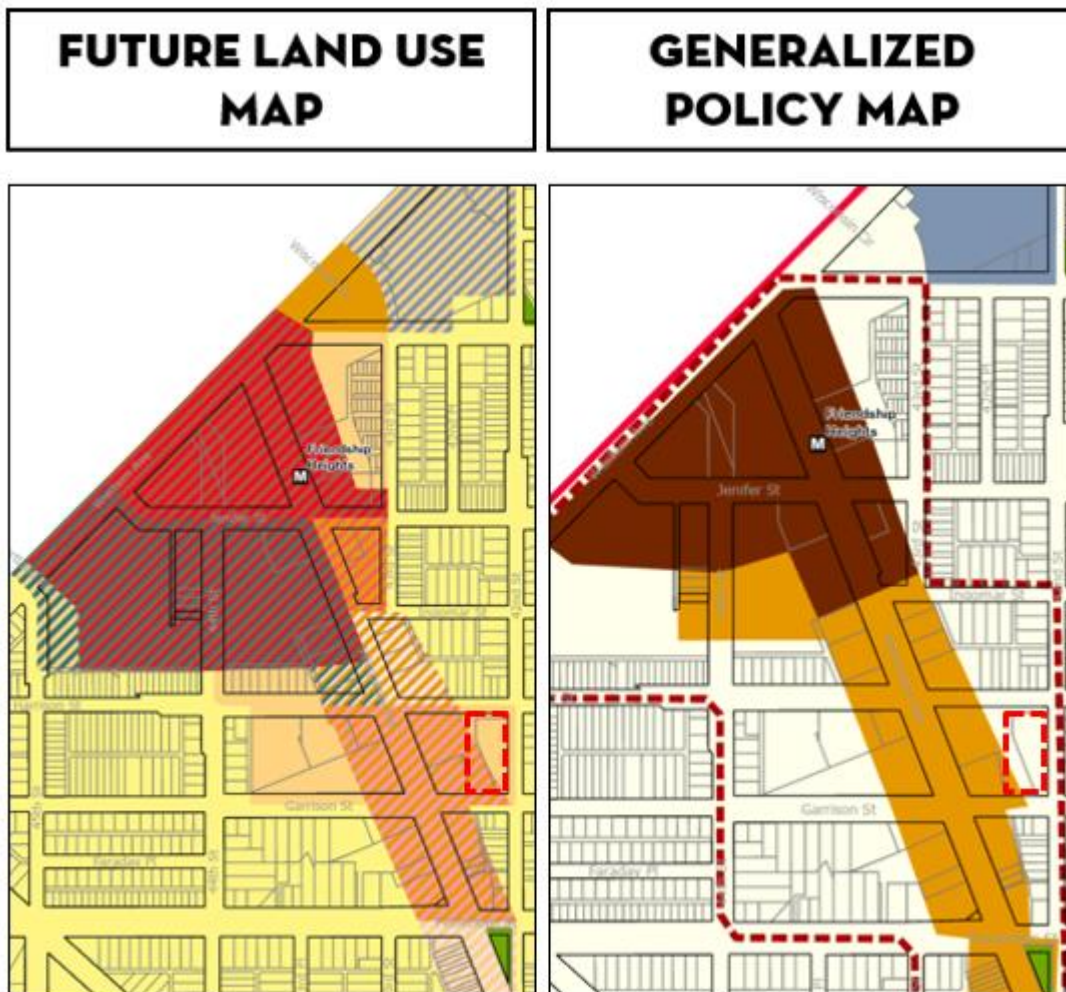
VI. PLANNING CONTEXT

Brief History of the Site

Friendship Heights was named for the 3,123-acre “Friendship” tract patented in 1711. The first subdivision of the name was platted by Henry W. Offutt by 1902, nearby in Maryland. In 1909, the Capital Realty Company undertook its own subdivision of the former Heider farm on Wisconsin, naming it Wisconsin Avenue Park. The following year, much of the Voigt farm was carved into the National Highlands neighborhood, and in 1924, Offutt subdivided portions of two small farms on River Road in the District. The piecemeal development of these subdivisions gives the residential streets a variety not unlike Tenleytown. This stretch of Wisconsin, home to transit terminals and the Tolman laundry, was still sparsely developed, defined as much by convenience shops and gas stations when Lord & Taylor became the first major store, erected on the Mazza family parcel in 1959.

The applicant provides an interesting history of discriminatory land use and financing tools used for the exclusion of Black residents and other minorities at [Exhibit 3F](#) p.33, as well as current efforts by the District and the area to address this history. The 1937 Federal Housing Administration map, which used race to determine loan eligibility, designated many areas in Rock Creek West as high-risk. Racially restrictive covenants and zoning policies, often enforced by real estate developers and White citizens associations, were used to create and maintain racial barriers. In this manner, federal and local zoning policies concentrated investment in predominantly White areas. Today, Rock Creek West remains predominantly White, with 74% of the population."

Comprehensive Plan Maps



Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that most of the site is appropriate for Moderate Density Residential. A smaller portion near Garrison St. NW is designated as appropriate for Mixed Medium-density Residential and Moderate-density Commercial.

*Moderate Density Residential: This designation is used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although **greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development**. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category, and other zones may also apply. 227.6*

Medium Density Residential: This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-3 Zone District is consistent with the Medium Density Residential category, and other zones may also apply. 227.7

Moderate Density Commercial:

This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Low-Density Commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in Low Density Commercial areas. Density typically ranges between a FAR of 2.5 and 4.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The MU-5 and MU-7 Zone Districts are representative of zone districts consistent with the Moderate Density Commercial category, and other zones may also apply. 227.11

The proposal would be, on balance, not inconsistent with the intent of the FLUM designations. The Plan envisions additional density as being consistent with the designation's guidance through a PUD or for the provision of Inclusionary Zoning. In this case, as part of this PUD application, the applicant would exceed IZ requirements. In addition, the FAR for the site as a whole, including the portions zoned MU-4 and R-2 for which the applicant is not utilizing density, would be an FAR of 3.06. This is consistent with the density permitted for a moderate density residential designation.

Generalized Policy Map

The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and 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. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5

The proposed PUD and map amendment would not be inconsistent with the Generalized Policy Map. The map identifies the property as within a Neighborhood Conservation Area. This designation does not preclude development that addresses critical citywide housing needs. The proposed project aligns with this objective by introducing new housing units, including affordable options, on the site.

COMPREHENSIVE PLAN POLICES THROUGH A RACIAL EQUITY LENS

The Commission's Racial Equity Tool asks what community is impacted by the zoning action. The subject property is in the Rock Creek West (RCW) planning area. In general, the proposal would be consistent with the racial equity goals of the Comprehensive Plan. The proposal would add much needed housing stock to the planning area, including dedicated affordable units, with no direct displacement and little risk of indirect displacement.

The Zoning Commission has developed a four-part Racial Equity Toolkit for Applicants and OP to utilize in evaluation of actions brought before the Commission.

Part 1 – Guidance regarding the Comprehensive Plan

Citywide Elements of the Comprehensive Plan

As noted above, the proposal would not be inconsistent with both the Comp Plan Generalized Policy Map and Future Land Use Map. The proposed development is also, on balance, not inconsistent with the Citywide and Area Elements of the Comprehensive Plan. For the full text of each policy statement referenced, please refer to Appendix I in this report, or refer to the Comprehensive Plan available on the Office of Planning website – www.planning.dc.gov. Please refer to the [OP Set Down Report](#) for the full text and complete analysis of these policies in relation to the proposed PUD and Consolidated Map Amendment.

Chapter 3 - Land Use Element

Policy LU-1.1 Supporting Growth

Policy LU-1.1.1: Future Planning Analysis and Resilience Focus Areas

Policy LU-1.4.1: Station Areas as Neighborhood Centers

Policy LU-1.4.2: Development Around Metrorail Stations

Policy LU-1.4.3: Housing Around Metrorail Stations

Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations

Policy LU-1.4.6: Development Along Corridors

Policy LU-1.5.1: Infill Development

Policy LU-2.1.1: Variety of Neighborhood Types

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Policy LU-2.1.8 Explore Approaches to Additional Density in Low and Moderate-Density Neighborhoods

Policy LU-2.1.13: Planned Unit Developments in Neighborhood Commercial Corridors
Policy LU-2.2.4: Neighborhood Beautification

Chapter 4 - Transportation Element

Policy T-1.1.4: Transit-Oriented Development
Policy T-1.1.7: Equitable Transportation Access
Policy T-2.4.1: Pedestrian Network
Policy T-2.4.2: Pedestrian Safety
Policy T-3.1.1: TDM Programs

Chapter 5 - Housing Element

Policy H-1.1.1: Private Sector Support
Policy H-1.1.2: Production Incentives
Policy H-1.1.3: Balanced Growth
Policy H-1.1.5: Housing Quality
Policy H-1.1.8: Production of Housing in High-Cost Areas
Policy H-1.1.9: Housing for Families
Policy H-1.2.2: Production Targets
Policy H-1.2.5: Moderate-Income Housing
Policy H-1.2.7: Density Bonuses for Affordable Housing
Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas

Chapter 6 Environmental Protection

Policy E-1.1.1: Resilience to Climate Change as a Civic Priority
Policy E-1.1.2: Urban Heat Island Mitigation
Policy E-3.2.7: Energy-Efficient Building and Site Planning
Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
Policy E-4.2.1: Support for Green Buildings

Chapter 9 Urban Design

Policy UD-2.2.1: Neighborhood Character and Identity
Policy UD-2.2.5: Infill Development
Policy UD-4.2.1: Scale and Massing of Large Buildings
Policy UD-4.2.4: Creating Engaging Facades

Rock Creek West Area Element

Policy RCW-1.1.1: Neighborhood Conservation
Policy RCW-2.2.1: Housing Opportunities
Policy RCW-2.2.5: Land Use Compatibility Along Wisconsin Avenue NW
Action RCW-2.2.A: Zoning and Design Measures

Potential Inconsistencies

The following potential inconsistencies with the Comprehensive Plan we also identified in the application materials:

Policy LU-1.4.7: Parking Near Metro Stations

Policy LU-2.1.11: Residential Parking Requirements

Policy T-1.1.8: Minimize Off-Street -

Policy H-1.6.5: Net-Zero, Energy Efficient Housing

Part 2 – Applicant/Petitioner Community Outreach and Engagement

The applicant has provided details of their ongoing outreach efforts at [Exhibit #3F](#), page 31. This includes adjacent neighbors and area residents and businesses, the Harrison Condominium Homeowners Association, and ANC 3E. These discussions were initiated in 2018 regarding the re-development of this block and have continued since. The applicant notes the inclusion of more two and two-bedroom + dens units resulting from a demand for more family sized units, improved environmental design, removal of the television tower, and the provision of dedicated affordable housing units as responsive to community input. The filing also notes that parking was a major concern, with fears of over-flow parking onto neighborhood streets. Since the Set Down meeting the applicant has continued to engage with the ANC and other community stakeholders. The applicant went before the ANC at a regularly scheduled meeting on March 13, 2025, and again on June 12, 2025 where the applicant and the ANC reviewed the final language for the memorandum of understanding containing commitments from the applicant. The ANC will submit a letter or resolution of support to the public record in advance of the public hearing.

Part 3 – Disaggregated Data by Planning Area

The data below compares the demographic information for the Rock Creek West (RCW) Planning Area with District-wide information, disaggregated by race and ethnicity retrieved from the DC Demographic Data Hub at <https://opdatahub.dc.gov/>. The data is from the last two 5-year American Community Surveys (ACS DATA) conducted by the US Census to demonstrate the trajectory of demographic change over time. Each table below covers both 5-year periods and compares the data for the Rock Creek West (RCW) Planning Area, in which the subject site is located, with District-wide data.

Please see the [OP Set Down Report](#) for detailed disaggregated data. In summary, the data shows that the Rock Creek West Planning Area has the highest percentage of white residents and lowest percentage of black residents out of all ten planning areas. It is of note that within this planning area, median income for black residents decreased over the two time periods, which is the only other planning area aside from Central Washington to exhibit this decrease. The planning area is older than the District average, has the second highest percentage of owner-occupied housing out of all areas, and has significantly lower poverty and unemployment rates than the District average. One third of the residents are cost burdened, which is significant, but also lower than the District average.

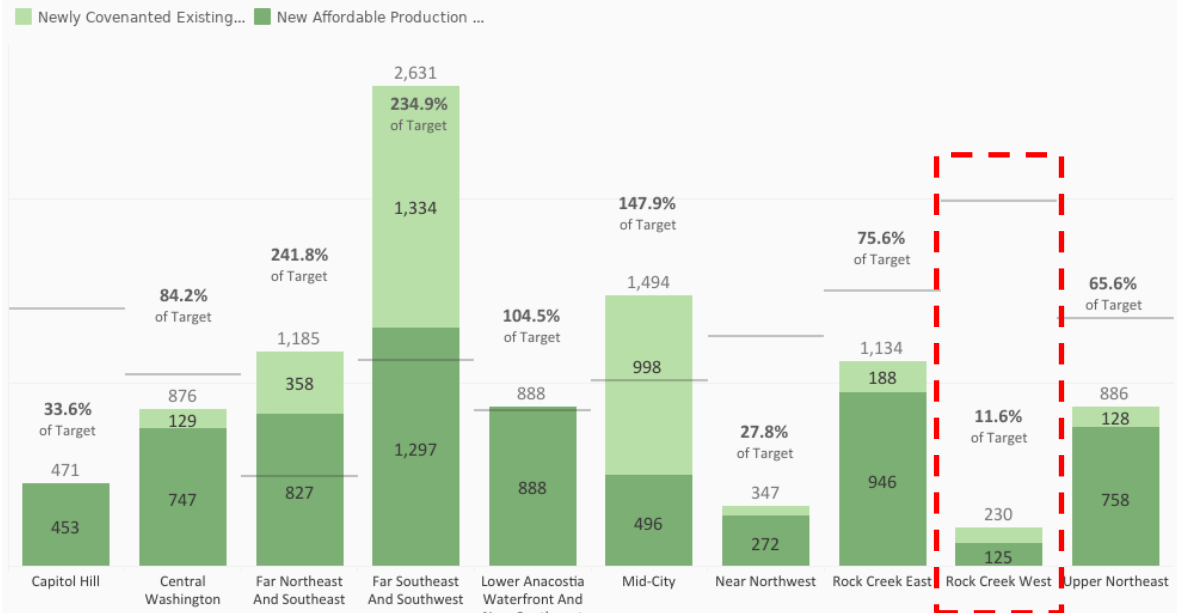
Affordable Housing Goal

The District set a goal in its 2019 Housing Equity Report of producing 36,000 new housing units and 12,000 affordable units by 2025. Although the RCW area does have rent controlled units, these are not dedicated affordable units, and there is relatively little availability of dedicated affordable units in the area at present.

The table below summarizes the progress made toward that goal by Planning Area as of September, 2024. The Rock Creek West planning area has produced the fewest dedicated affordable units at 355, or only 11.6% of the target. The proposed PUD would allow for development of 126 new

units, 33% of which would be dedicated affordable,, which would help to improve housing opportunities and options for residents.

New Affordable Housing Units Since 2019 by Planning Area



As of September 2024

Part 4 – Zoning Commission Evaluation Factors

Please refer to OP’s analysis above under Part 1 of the Racial Equity Tool discussion for policies which potentially be advanced by the requested PUD and map amendment. The proposal is not inconsistent with the Citywide Elements of the Comprehensive Plan and should further the policies of the Land Use, Transportation, Housing, Environmental Protection, and Urban Design Citywide Elements, and the RCW Area Elements.

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The zoning action would not result in any direct displacement of residents or business. The subject property is currently improved with a surface parking lot and defunct radio transmission tower.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	No indirect displacement of residents or businesses is expected. Rather, the new housing units could provide more opportunities for existing residents to remain in the area by providing additional alternatives to single family homes, and the residents would support local businesses, improving their viability.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	The project would provide positive changes to the housing options in this area, with approximately 126 units, of which 113 would be market rate units and 13 IZ with additional affordable housing units provided through the

Factor	Question	OP Response
		<p>HANTA program. would be dedicated affordable units.</p> <ul style="list-style-type: none"> • 75% bonus density (12,894 sq. ft.) reserved for households at 60% MFI • 10% of the penthouse GFA (1,096 sq. ft.) reserved for households at 50% MFI • Remainder of affordable units reserved for households at 80% MFI
Physical	<p>Will the action result in changes to the physical environment such as:</p> <ul style="list-style-type: none"> ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements 	<p>Overall, the project would result in improvements to the public space and neighborhood character. The PUD would replace a surface parking lot and defunct radio tower with new market rate and affordable housing units. The radio tower would be removed at no cost to the District. The existing curb cuts providing access to the surface parking lot would be converted into a private alleyway for loading and vehicle access.</p>
Access to Opportunity	<p>Is there a change in access to opportunity?</p> <ul style="list-style-type: none"> ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services 	<p>The proposed PUD would be an all-residential development. As such it would not directly provide new opportunities or services to the area. However, the new residents of the building would support existing retail and services in the area, while the 42 affordable units would provide access to existing opportunities in the Friendship Heights areas to new residents.</p>
Community	<p>How did community outreach and engagement inform/change the zoning action? (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)</p>	<p>The applicant filings at Exhibit 3F page 39 indicate the following elements of the proposal were added or amended in response to community input:</p> <ul style="list-style-type: none"> • Removal of the television tower • The total number of affordable housing units • The amount of parking proposed, with the neighborhood concerned about too little parking

A. Wisconsin Avenue Development Framework Plan

The proposal would not be inconsistent with the Wisconsin Avenue Development Framework Plan (WADFP) completed in February, 2024. The WADFP was completed by the Office of Planning in response to direction in the 2021 Comprehensive Plan, including the placement of the corridor in a Future Planning Analysis Area on the Generalized Policy Map. The WADFP envisions a zoning action for the corridor, from Friendship Heights to Tenleytown. OP is actively working on this rezoning proposal, and has had preliminary discussions with the ANC and some community groups. Until that is brought forward to the Zoning Commission for consideration, a change in zoning for a site within the study area is envisioned as happening through a PUD, as is the case for this application.

The WADFP envisions the subject property as suitable for moderate-density residential development that would serve as a transitional area between the higher density along Wisconsin Avenue NW and the lower-density residential to the east. Additionally, the proposed development would be generally consistent with the following recommendations of the WADFP:

- Develop housing as the principal use along the corridor.
- Transition building scale, massing, and height along Comp Plan Future Land Use Map (FLUM) boundaries from higher density areas to abutting low-density residential areas.
- Design and orient the shape and massing of buildings to maximize energy efficiency, increase access to light and air, and capture interesting views or vistas.
- Include balconies, terraces, and other private outdoor spaces for residents.
- Design buildings to be attractive to a range of household types and sizes, including families with children and older adults.
- Prioritize upper level building rooftops for housing, residential amenity space, green roofs, and solar panels.
- Minimize parking associated with redevelopment; design it to be located below grade while prioritizing comfortable pedestrian movements. Although the applicant is proposing considerably more parking than required under zoning, the parking would be located underground and the applicant states that the additional parking is proposed at the request of the neighborhood. The proposal would include streetscape improvements and the closing of curb cuts to improve comfortable pedestrian movement.

VII. PUD EVALUATION STANDARDS

The Zoning Regulations define a Planned Unit Development (PUD) as “*a plan for the development of residential, institutional, and commercial developments, industrial parks, urban renewal projects, or a combination of these, on land of a minimum area in one (1) or more zones irrespective of restrictions imposed by the general provisions of the Zoning Regulations, as more specifically set forth in Subtitle X, Chapter 3.*” (Subtitle B-28). The purpose and general standards for a Planned Unit Development are established in Subtitle X§ 300:

- 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, however based on the scale of the project it is not anticipated that it should result in unacceptable impacts to city services. With the implementation of the TDM Plan, the project is not expected to have an adverse impact on traffic and parking in the surrounding neighborhood. Also, as discussed further below, the benefits of the project would be commensurate with the degree of flexibility sought through the application.

VIII. PUBLIC BENEFITS AND AMENITIES:

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)*

The proposal would result in a higher density and height than what would be permitted under the existing zoning districts on the subject property. However, the proposed zone is not inconsistent with the Comprehensive Plan direction for this site.

	Existing R-2 Zone	Existing MU-4 Zone	Proposed Zone: RA-3 w/PUD	PUD Proposal	Difference
Permitted Uses	Low-density residential uses	Low to moderate density mixed use	Predominantly medium-density residential uses	Multiple-dwelling bldg. with 126 units	PUD allows building form
Height	40 ft. 3 stories	50 ft. max.	75 ft.	50 ft. 3 in.	+25 ft.
Floor Area Ratio	N/A	2.5 FAR max. 3.0 IZ	3.0 FAR, 3.6 IZ FAR 4.31 FAR (20% PUD Bonus)	3.06 for the site; 4.308 for the portion to be zoned RA-3	+1.31
Square Feet	N/A	RA-3 site area used to calculate GFA and FAR	123,785 sq ft	123,444 sq ft	-341 sq ft

As such, the applicant is gaining building height and density through the PUD and requested map amendment, as well as flexibility from specified zoning regulations.

Chapter X Section 305.2 states that “*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.*”

“*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*” (§ 305.10). Section 305.5 lists several potential categories of benefit proffers, and states that “*A project may qualify for approval by being particularly strong in only one (1) or a few of the categories of this section, but must be acceptable in all proffered categories and superior in many.* (X § 305.12).

The Commission “*shall deny a PUD application if the proffered benefits do not justify the degree of development incentives requested (including any requested map amendment)*” (X § 305.11)

The applicant’s benefit and amenities package is in the Applicant’s Statement in [Exhibit 3](#) and identifies categories of benefits from Subtitle X § 305.5 which would apply to the project. There is additional discussion regarding the items that were discussed during the Set Down meeting in [Exhibit 14](#), and a detailed discussion of the finalized benefit and amenities package in [Exhibit 23](#).

OP analysis of those proposed benefits is below, also referencing Subtitle X § 305.5.

Superior urban design and architecture (Subtitle X § 305.5(a))

The proposal offers the design and architecture of the building as a public benefit. The proposed design would integrate into the existing neighborhood character, acting as a transition from the higher-density Wisconsin Avenue corridor. The design varies the façade along 42nd St. NW to appear as four distinct structures. This would help maintain the scale and character of the adjoining neighborhood. The building would include architectural features such as bays, balconies, private entry stoops, varied composition of pitched roofs, cornices, and three- and four-story bays that would reinforce the project's compatibility with the lower-density residential uses adjacent to the site.

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

The proposal offers site planning and efficient and economical land utilization as a public benefit. The proposed development would improve a currently underutilized site, transforming it from largely a surface parking lot into a mixed-use residential community. The project would generate new housing, including affordable units, in a highly desirable location that is currently vacant. The configuration of the PUD Site boundary also allows the multifamily building to occupy a larger area, even though only the RA3 zoned portion will contribute to the overall density. This approach reflects effective site planning and efficient utilization of land resources.

Housing that exceeds the amount required through matter-of-right (Subtitle X § 305.5(f))

The proposal offers 126 units of new housing as a public benefit. This exceeds what could be developed as a matter of right under the R-2 zone, which would allow approximately 12 semi-detached residential units or 8 detached based on existing regulations. The applicant is also proposing family sized two-bedroom and three-bedroom units, as desired by the community.

Affordable housing that exceeds the requirement (Subtitle X § 305.5(g))

The proposal offers affordable housing units as a public benefit. The applicant's proposed affordable housing provision, representing 33% of the residential units, exceeds the affordable housing requirements applicable to a matter-of-right development under both the PUD Site's existing zoning and the proposed RA-3 zone. The applicant is proposing 42 affordable units (based on 33% of projected 126 total units), 10% of which would be set aside for households at 50% Median Family Income (MFI), 75% would be set aside for households at 60% MFI and the remainder for households at 80% MFI.

Environmental and sustainable benefits (Subtitle X § 305.5(i))

The proposal offers its environmental and sustainable design as a public benefit. The application notes the Project would incorporate sustainable features like maximizing solar panel use on the roof and green roofs and EV-ready parking. Residential appliances would run on electricity instead of natural gas. Updated plans from the applicant now include a LEED scorecard indicating that the project has been designed to achieve LEED Silver certification.

While the application references green roofs, rooftop solar panels and electric vehicle (EV)-ready charging spaces in the underground parking garage, and stormwater management

features that slightly exceed the baseline regulatory requirements, it provides little detail or commitment to their provision.

OP encourages the applicant to achieve LEED Gold and provide detail regarding green roofs, rooftop solar panels and electric vehicle (EV)-ready charging spaces.

Streetscape Plans (Subtitle X § 305.5(l))

The proposal offers its streetscape plan as a public benefit. The Project proposes various streetscape improvements designed to enhance accessibility, safety, and capitalize on the PUD Site's proximity to the Wisconsin Avenue corridor. The proposed enhancements are intended to reinforce the residential character of the Project and its relationship to the lower-density residential uses adjacent to the PUD Site.

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

The proposal offers the removal of the tower as being of special value as a public benefit. The project would remove a 705-foot television tower which the applicant contends constitutes a substantial benefit to both the neighborhood and the District of Columbia, and which the applicant notes is a particularly desired outcome by the neighborhood. The tower, an outdated technology rendered obsolete by WTTG/Fox 5 DC's relocation, is visually incongruous with the surrounding neighborhood.

Other Public Benefits and Project Amenities (Subtitle X § 305.5(r))

The proposal offers the "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 a public benefit. Increasing the production of affordable and moderate-income units in Rock Creek West is a priority of the Comprehensive Plan. The Project also substantially advances the RCW Area Element's objectives related to compatible infill development and land use compatibility along Wisconsin Avenue, NW.

IX. DISTRICT AGENCY COMMENTS

The following district agencies have been notified regarding the proposed project:

- Department of Energy and the Environment (DOEE)
- Department of Housing & Community Development (DHCD)
- District Department of Transportation (DDOT)
- Fire and Emergency Medical Services Department (FEMS)
- Metropolitan Police Department (MPD)
- DC Water

OP and the District agencies above held an interagency meeting in order to review and provide feedback to the applicant regarding the project on December 16, 2024. As of the writing of this report the following District agencies have either filed comment to the record or wrote OP to provide written comment:

DDOT has informed OP that they intend to file a report prior to the hearing with two conditions:

- The applicant shall implement the proposed TDM Plan (with one non-substantive revision); and
- Construct curb extensions at the Garrison and Harrison intersections of 42nd Street NW

DDOT also requests that the applicant explore a speed bump during the public space permitting process.

DOEE has provided comments in support of the application which are included in Attachment II of this report.

The Office of the Attorney General has also provided a statement in support of the proposed project and are filed to the record in Exhibit [34](#) (Cover Letter), and [34A](#) (Statement in Support).

X. ANC COMMENTS

As of the writing of this report, no comments from ANC 3E has been filed to the record.

XI. COMMUNITY COMMENTS

At Exhibits [25](#), [26](#), [27](#), [28,29,30,31,32](#), and [33](#) are letters in support of the application.

Attachments:

Attachment I - COMPREHENSIVE PLAN POLICY STATEMENTS

Attachment II – DOEE Comments

ATTACHMENT I - COMPREHENSIVE PLAN POLICY STATEMENTS

Chapter 3 -Land Use Element

Policy LU-1.1 Supporting Growth

Policy LU-1.1.1: Future Planning Analysis and Resilience Focus Areas

The Generalized Policy Map shows areas of large tracts and corridors where analysis is anticipated to plan for *inclusive*, equitable growth and climate resilience. The property is located in the Upper Wisconsin Avenue NW corridor,

Policy LU-1.4.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for residential, economic, and civic development and to accommodate population growth with new nodes of residential development, especially affordable housing, in all areas of the District in order to create great new walkable places and enhance access and opportunities for all District residents. The establishment and growth of mixed-use centers at Metrorail stations should be supported as a way to provide access to housing opportunities at all income levels and emphasizing affordable housing, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities that the stations provide. Station area development should have population and employment densities guided, but not dictated, by desired levels of transit service. This policy should be balanced with other land use policies, which include conserving neighborhoods. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area.

Policy LU-1.4.2: Development Around Metrorail Stations

In developments above and around Metrorail stations emphasize land uses and building forms that minimize the need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas

Policy LU-1.4.3: Housing Around Metrorail Stations

Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. (§ 307.11)

Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations

Explore and implement as appropriate mechanisms, which could include community land trusts, public housing, and shared appreciation models, to encourage permanent affordable rental and for-sale multi-family housing, adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. (§ 307.12)

Policy LU-1.4.6: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. (§ 307.14)

Policy LU-1.5.1: Infill Development

Encourage infill development on vacant land within Washington, DC, particularly in areas where there are vacant lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. Such development should reflect high-quality design, complement the established character of the area and should not create sharp changes in the physical development pattern. (§308.6)

Policy LU-2.1.1: Variety of Neighborhood Types

Maintain a variety of neighborhoods, ranging from low-density to high-density. The positive elements that create the identity and design character of each neighborhood should be preserved and enhanced while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability, racial equity, and opportunity. 310.7

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to preserve historic resources, advance environmental and sustainability goals, and further Fair Housing. The overarching goal to create vibrant neighborhoods in all parts of the District requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, including inclusive and integrated growth and meeting communities and public facility needs. All neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. (§ 310.10)

Policy LU-2.1.8 Explore Approaches to Additional Density in Low and Moderate-Density Neighborhoods

Notwithstanding Policy LU-2.1.5, explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types in low-density and moderate-density neighborhoods where it would result in the appropriate production of additional housing and particularly affordable housing. Build upon the guidance of the April 2020 Single Family Housing Report to diversify the cost of housing available in high-opportunity, high cost low- and moderate-density neighborhoods, especially near transit. However, neighborhood planning and engagement is a condition predicate to any proposals. Infill and new development shall be compatible with the design character of existing neighborhoods. Minimize demolition of housing in good condition. (§ 310.15)

Policy LU-2.1.13: Planned Unit Developments in Neighborhood Commercial Corridors

Planned unit developments (PUDs) in neighborhood commercial areas shall provide high-quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits, such as housing, affordable housing, and affordable commercial space. (§ 310.20)

Policy LU-2.2.4: Neighborhood Beautification

Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. (§ 311.5)

Chapter 4 - Transportation Element

Policy T-1.1.4: Transit-Oriented Development

Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. Encourage development projects to build or upgrade the pedestrian and bicycle infrastructure leading to the nearest transit stop to create last-mile connections. Pedestrian movements and safety should be prioritized around transit stations. (§ 403.10)

Policy T-1.1.7: Equitable Transportation Access

Transportation within the District shall be accessible and serve all users. Residents, workers, and visitors should have access to safe, affordable and reliable transportation options regardless of age, race, income, geography or physical ability. Transportation should not be a barrier to economic, educational, or health opportunity for District residents. Transportation planning and development should be framed by a racial equity lens, to identify and address historic and current barriers and additional transportation burdens experienced by communities of color. (§ 403.13)

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. (§ 411.5)

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the District. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, high-intensity activated crosswalk pedestrian signals, rectangular rapid flashing beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, and pedestrian countdown signals. (§ 411.6)

Policy T-3.1.1: TDM Programs

Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes), to increase the efficiency of the transportation system. (§ 415.10)

Chapter 5 - Housing Element

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. (§ 503.3)

Policy H-1.1.2: Production Incentives

Provide suitable regulatory, tax, and financing incentives to meet housing production goals, prioritizing affordable housing production in support of the targets in Policy H-1.2.2. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for those that do not, and relaxation of height and density limits near transit. Strongly encourage incentives and strategies that result in the production of more deeply affordable housing, such as the use of income averaging across a range of affordable housing income levels. (§ 503.4)

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District to meet its long-term housing needs, including the need for low- and moderate density single family homes, as well as the need for higher-density housing. (§ 503.5)

Policy H-1.1.5: Housing Quality

Require the design of affordable and accessible housing to meet or exceed the high-quality architectural standards achieved by market-rate housing. Such housing should be built with high-quality materials and systems that minimize long-term operation, repair, and capital replacement costs. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance, should be generally compatible with the design character of the surrounding neighborhood, and should address the need for open space and recreational amenities. (§ 503.7)

Policy H-1.1.8: Production of Housing in High-Cost Areas

Encourage development of both market rate and affordable housing in high-cost areas of the District, making these areas more inclusive. Develop new, innovative tools and techniques that support affordable housing in these areas. Doing so increases costs per unit but provides greater benefits in terms of access to opportunity and outcomes. (§ 503.10)

Policy H-1.1.9: Housing for Families

Encourage and prioritize the development of family-sized units and/or family-sized housing options which generally have three or more bedrooms, in areas proximate to transit, employment centers, schools, public facilities, and recreation to ensure that the District's most well-resourced locations remain accessible to families, particularly in areas that received increased residential density as a result of underlying changes to the Future Land Use Map. Family-sized units and/or family-sized housing options include housing typologies that can accommodate households of three or more persons and may include a variety of housing types including townhomes, fourplexes and multi-family buildings. To address the mismatch between meeting the needs of larger households and the financial feasibility of developing family-sized housing, support family-

sized housing options through production incentives and requirements that address market rate challenges for private development that may include zoning, subsidies or tax strategies, or direct subsidy and regulatory requirements for publicly owned sites. (§ 503.11)

Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority

The production and preservation of affordable housing for low- and moderate-income households is a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all District neighborhoods.

Policy H-1.2.2: Production Targets

Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in Washington, DC from 2018 to 2030, or approximately 20,000 units, should be affordable to persons earning 80 percent or less of the area-wide MFI. In aggregate, the supply of affordable units shall serve low-income households in proportions roughly equivalent to the proportions shown in Figure 5.8: 30 percent at 60 to 80 percent MFI, 30 percent at 30 to 60 percent MFI, and 40 percent at below 30 percent MFI. Set future housing production targets for market rate and affordable housing based on where gaps in supply by income occur and to reflect District goals. These targets shall acknowledge and address racial income disparities, including racially adjusted MFIs, in the District, use racially disaggregated data, and evaluate actual production of market rate and affordable housing at moderate, low, very-low, and extremely-low income levels. (§ 504.9)

Policy H-1.2.3: Affordable and Mixed-Income Housing

Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. (§ 504.10)

Policy H-1.2.5: Moderate-Income Housing

In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of those earning moderate incomes with wages insufficient to afford market rate housing in the District.

Policy H-1.2.7: Density Bonuses for Affordable Housing

Provide zoning incentives, such as through the PUD process, to developers proposing to build affordable housing substantially beyond any underlying requirement. Exceeding targets for affordable housing can refer to exceeding the quantity or depth of affordability otherwise required. The affordable housing proffered shall be considered a high priority public benefit for the purposes of granting density bonuses, especially when the proposal expands the inclusiveness of high-cost areas by adding affordable housing. When density bonuses are granted, flexibility in development standards should be considered to minimize impacts on contributing features and the design character of the neighborhood. (§ 504.15)

Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas

Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods. (§ 504.17)

Policy H-1.2.11: Inclusive Mixed-Income Neighborhoods

Prioritize, encourage, and incentivize build-first, one-for-one, on-site, and in-kind replacement of affordable units, including larger family-sized units. In addition, encourage and incentivize relocation and right of return plans when projects redeveloping affordable housing seek additional density beyond that permitted by existing zoning. Work to identify and coordinate financial assistance to ensure long-term affordability, preferably permanent or for the life of the project, when projects meet these criteria.

Chapter 6 Environmental Protection

Policy E-1.1.1: Resilience to Climate Change as a Civic Priority

Advance the District's resilience to climate change as a major civic priority, to be supported through improved mitigation, adaptation, and human preparedness.

Policy E-1.1.2: Urban Heat Island Mitigation

Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives.

Policy E-3.2.7: Energy-Efficient Building and Site Planning

Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals.

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.

Policy E-4.2.1: Support for Green Buildings

Broaden the requirements for the use of green building methods in new construction and rehabilitation projects to include all building typologies, and develop green building standards for minimum performance or continued improvement of energy use through improved operation and maintenance activities.

Chapter 9 Urban Design

Policy UD-2.1.6: Minimize Mid-Block Vehicular Curb Cuts

Curb cuts should be avoided on streets with heavy pedestrian usage and minimized on all other streets. Where feasible, alleys should be used in lieu of curb cuts for parking and loading access to buildings. Curb cuts for individual residences should only be allowed if there is a predominant pattern of curb cuts and driveways on the block face.

Policy UD-2.2.1: Neighborhood Character and Identity

Strengthen the visual qualities of Washington, DC's neighborhoods as infill development and building renovations occur by encouraging the use of high-quality and high-performance architectural designs and materials. In neighborhoods with diverse housing types, or when introducing more diverse infill housing types, use design measures to create visual and spatial compatibility.

Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs.

Policy UD-4.2.1: Scale and Massing of Large Buildings

Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest.

Policy UD-4.2.4: Creating Engaging Facades

Design new buildings to respond to the surrounding neighborhood fabric by modulating facade rhythms and using complementary materials, textures, and color, as well as well-designed lighting. Varying design tactics may be used to engage a building with its surroundings. In contexts with smaller lot sizes and multiple

closely spaced building entrances, breaking up a building façade in the vertical direction is encouraged, along with strongly defined and differentiated bases, centers, and tops of buildings. ...

Rock Creek West Area Element

Policy RCW-1.1.1: Neighborhood Conservation

Preserve the low-density residential neighborhoods west of Rock Creek Park. Future development in both residential and commercial areas should be carefully managed to address the existing scale, function, and character of these neighborhoods. Updates to zoning regulations offer the opportunity to create more accessory dwelling units for this area to help absorb a share of the District's growth and provide a more proportional portion of affordable and moderate- income housing sensitive to existing neighborhood context. (§ 2308.2)

Policy RCW-1.1.4: Infill Development

Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage mixed-use projects that combine housing, including affordable housing, neighborhood-serving retail, and commercial uses. s. Design transitions between large- and small-scale development to ameliorate the appearance of overwhelming scale and to relate to context of lower-scale surrounding neighborhoods. (§ 2308.5)

Policy RCW-2.2.1: Housing Opportunities

Pursue the opportunity for additional housing, including affordable and moderate- income housing, with some retail and limited office space on Wisconsin Avenue and underdeveloped sites west of the Friendship Heights Metro station. (§ 2312.7)

Policy RCW-2.2.5: Land Use Compatibility Along Wisconsin Avenue NW

Future development along Wisconsin Avenue NW should be architecturally sensitive to adjoining residential neighborhoods. Use a variety of means to improve the interface between mixed-use districts and lower-scale residential uses, such as architectural design, the stepping down of building heights away from the avenue, landscaping and screening, and additional green space improvements. (§ 2312.11)

Action RCW-2.2.A: Zoning and Design Measures

Continue to work with the community, the ANCs, and local property owners to address concerns regarding building density and height, PUDs and related density bonuses, and architectural design in the Planning Area. Zoning techniques should be considered to break up the auto-oriented commercial appearance of much of Wisconsin Avenue NW and instead create a more pedestrian-oriented street, distinct in function and visual character from adjacent residential areas. (§ 2312.13)

Potential Inconsistencies

The following potential inconsistencies with the Comprehensive Plan we also identified in the application materials:

Policy LU-1.4.7: Parking Near Metro Stations

Encourage the creative management of parking around transit stations, ensuring that multimodal needs are balanced. New parking should generally be set behind or underneath buildings. Parking should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters, while considering the commuting characteristics of District residents, such as access to transit stations and mode use, to provide equitable outcomes. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station. (§ 307.15)

Policy LU-2.1.11: Residential Parking Requirements

Parking requirements for residential buildings should respond to the varying levels of demand associated with different unit types, unit sizes, unit locations (including proximity to transit), and emerging transportation trends and new technology (such as the sharing economy and autonomous vehicles (AVs)).

Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation-demand management measures are implemented and a reduction in demand can be demonstrated. (§ 310.18)

Policy T-1.1.8: Minimize Off-Street

Parking An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. (§ 403.14)

The application is proposing to provide 82 parking spaces where only 41 are required. As stated elsewhere, the applicant has committed to working with DDOT to study and mitigate the potential impacts of such a large increase in off-street parking.

Policy H-1.6.5: Net-Zero, Energy Efficient Housing

Encourage new housing units in the District to be net-zero energy and water efficient. (§ 508.9)

ATTACHMENT II – DOEE Comments

DOEE Development Review Comments

ZC 24-12: 4201 Garrison St. NW

DOEE commends applicant for committing to achieving LEED Silver certification through the Multifamily Midrise rating system. This certification is designed for this specific building type and offers the most impactful benefits for the project's future residents. Additionally, DOEE applauds the applicant on the commitment to providing all-electric residential units and installing rooftop solar photovoltaic systems. Finally, DOEE commends the applicant for exceeding the required Green Area Ratio.

The following recommendations are intended to assist the applicant with incorporating strategies that will improve energy performance, advance sustainability, and minimize the applicant's impact on the environment. Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) and the [DC Sustainable Energy Utility](#) (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Please reach out to kate.tanabe@dc.gov with questions or for more information.

Electrification

DOEE encourages the applicant to consider electric options for whole-building systems, such as HVAC. While the applicant's commitment to all-electric residential units is commendable, fully electric buildings (e.g., units and whole-building systems) reduce indoor air pollution caused by combustion equipment and can save on operating costs when coupled with solar energy, which the applicant plans to do.

All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises.

The transition away from fossil fuel-powered building systems is a necessary step for the District to achieve its carbon emission reduction goals. The [Clean Energy DC Building Code Amendment Act of 2022](#) calls for the District to adopt a net-zero energy building code, by the end of 2026, that applies to the new construction or substantial improvement of any building subject to the Commercial Provisions of the DC Energy Conservation Code, including commercial buildings and residential buildings taller than 3 stories.