

August 4, 2025

**BY IZIS**

Mr. Anthony Hood, Chairperson  
D.C. Zoning Commission  
441 4<sup>th</sup> Street NW, Suite 200-S  
Washington, DC 20001

**Re: Z.C. Case No. 24-15: Application of 901 Monroe Street, LLC (the “Applicant”) to the District of Columbia Zoning Commission for a Consolidated PUD and Related Zoning Map Amendment – Post-Hearing Submission of the Applicant**

Dear Chairperson Hood and Members of the Commission:

During the June 23, 2025, and July 7, 2025, public hearings in the above-mentioned case, the Commission requested that the Applicant provide additional information into the record of the case. The information provided in this statement and the attached Exhibits address the Commission’s requests for additional information.

**Potential for Further “Sculpting” of the Building**

In response to the Commission’s comments provided at the conclusion of the July 7, 2025, public hearing, the Applicant reviewed the possibility of additional “sculpting” of the building. The Applicant and its design team took to heart these comments and (as shown in the attached Exhibit A) has modified the fifth and six floors along the 10<sup>th</sup> Street frontage of the building. These modifications result in a loss of 268 square feet of gross floor area.

The Applicant believes that it is important for the Commission to recognize that Horning and Menkiti are long-time owners and managers of affordable housing in Washington, DC, and collectively operate a portfolio of 2,081 affordable units. These organizations are proud of their commitment to affordable housing and deeply understand what these units mean to the families that occupy them and the communities they help thrive. The Horning and Menkiti team members are excited about this project’s potential to create thirty-six (36) new Inclusionary Zoning (IZ) units in Brookland.

The Applicant is very familiar with the challenges of operating and building new affordable housing in the District of Columbia. As it has been well reported, the District of Columbia is well below its affordable housing production goals as enumerated in the Mayor’s 2019 Housing Equity Report. As of 2024, the upper Northeast Planning Area, where this project

is located, had only achieved 66% of the Mayor's goal. With construction starts down 79% in 2024, these goals seem further from being realized.

The reality is that building affordable units can't come without a subsidy. These subsidies take a variety of forms, including direct subsidies such as tax credits or the Housing Production Trust Fund, or indirect subsidies like tax abatements. Unlike other methods of affordable housing production, the only subsidy available for units in the IZ program is rental income from other sources at the property, namely the rents of the market-rate units, as IZ rents barely break even. It is critical to maintain building square footage, particularly on upper floors, to not only cover the costs of construction but also include a substantial IZ commitment at the property.

The reduction of residential gross floor area, through "sculpting", sharply impacts the Applicant's ability to finance the IZ units as it effectively removes a critical subsidy. Without the additional density on the upper floors, IZ units are no longer financeable. If upper floor space is lost, the Applicant must reduce the IZ commitment by a deeper level. Real estate development "math" can sometimes be complicated, but the math in this instance is simple: market rate units in this project will rent for double that of the IZ units. Therefore, to keep the project financeable, every square foot of sculpted area means the loss of two IZ square feet elsewhere in the building. To emphasize the point, 1,000 square feet of sculpting would come at the cost of a loss of nearly three IZ units. Despite these financial constraints, the Applicant is willing to move forward with the revised project, as depicted in Exhibit A, with the loss of 268 square feet of residential gross floor area with no reduction in the affordable housing proffer of 15% of the residential gross floor area of the building<sup>1</sup>.

As noted during the public testimony in this case, the Applicant wants to build a building that is financeable and can become a reality. The Applicant does not want a building that looks great on paper but is not achievable financially. Nor does it want to have to pare back the affordable housing commitment for the sake of "sculpting". Losing affordable units is not a desirable outcome for the many families who could one day occupy these units, nor is it one for two passionate and District-based owners of affordable housing.

### **Materials Depicting Changes to the Project**

In response to the Commission's comments provided at the conclusion of the July 7, 2025, public hearing, the Applicant has attached materials (see Exhibit B) which show the evolution of the project since its initial conception. These changes were made in response to comments from community stakeholders.

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<sup>1</sup> It is also important to note that this project is not utilizing any of the bonus height and density that a PUD project in the MU-5B Zone could achieve.

### **Further Details on Shadow Studies**

During the June 23, 2025, public hearing, Chairman Hood requested additional details regarding the shadow studies that were prepared and presented to the Commission. Those additional details are provided in the attached Exhibit C.

### **Ability to Increase Caliper Size of Trees Along Monroe Street, NE**

During the July 7, 2025, public hearing, Commissioner Wright asked whether the Applicant could install larger caliper street trees along Monroe Street due to the undergrounding of utilities on that street. The Applicant's design team has confirmed that the caliper of street trees that it is proposing along Monroe Street complies with the caliper of trees that DDOT recommends for installation.

### **Additional Details on Construction Management Plan**

Representatives of the Applicant, the 200 Footers, and the Brookland Neighborhood Civic Association held an in-person meeting on July 21, 2025, to discuss the proposed Construction Management Plan. Attendees at the meeting were: Barbara Kahlow (200 Footers); Alta Beals (200 Footers); Dawn Amore (Brookland Neighborhood Civic Association); Andrew Vincent (representative of the Applicant); Mark Rengel (representative of the Applicant); and Peter Conway (representative of the Applicant). The Applicant believes that the meeting and follow-up dialogue was very productive and is pleased to inform the Commission that an agreement was reached between the Applicant and the 200 Footers Group regarding the Construction Management Plan. The Applicant's final Construction Management Agreement, signed and approved by the Applicant and the 200 Footers Group, is attached as Exhibit D.

### **Conclusion**

The Applicant believes that with this submission it has addressed all of the requests for additional information that were made by the Commission. The Applicant looks forward to the Zoning Commission's approval of this application at the September 11, 2025, Public Meeting.

Sincerely,



Paul Tummonds

Encl.

### Certificate of Service

The undersigned hereby certifies that copies of the foregoing document will be delivered by electronic mail to the following addresses on August 4, 2025.

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