

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** *J.S.* Matt Jesick, Development Review Specialist  
Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

**DATE:** February 3, 2025

**SUBJECT:** ZC #24-15 – 901 Monroe Street, NE – Setdown Report for a Consolidated Planned Unit Development and Related Map Amendment

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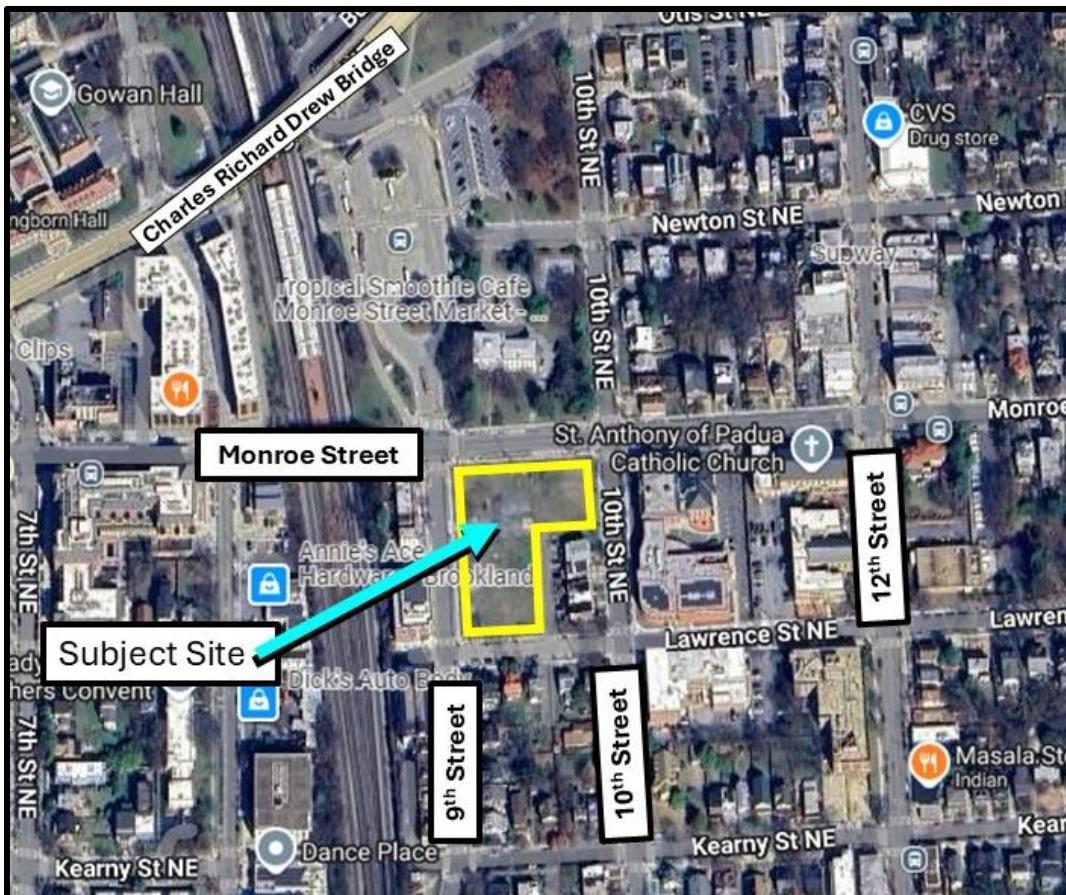
### **I. SUMMARY AND RECOMMENDATION**

901 Monroe Street, LLC requests a consolidated PUD and related map amendment from MU-3A and R-2 to MU-5B to construct an apartment building totaling approximately 230 units. The vacant subject site is across Monroe Street from the Brookland metro station. The proposed height would be 75 feet tall and the FAR would be 4.2. The project would be not inconsistent with the maps and policies of the Comprehensive Plan, including when viewed through a racial equity lens. The Office of Planning (OP), therefore, recommends that the Commission **set down** the application for a public hearing. OP will continue to work with the applicant to address the comments in this report, and any comments raised by the Commission at the setdown meeting.

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

|   |  |                |
|---|--|----------------|
| <b>Applicant</b>                        | 901 Monroe Street, LLC   |                |
| <b>Location</b>                         | Square 3829, Lot 23<br>901 Monroe Street, NE   | Ward 5, ANC 5B |
| <b>Current Zoning</b>                   | MU-3A – Low density mixed use<br>R-2 – Moderate density semi-detached residential  |                |
| <b>Proposed PUD-Related Zoning</b>      | MU-5B – Medium density mixed use   |                |
| <b>Relief and Flexibility Requested</b> | <ul style="list-style-type: none"> <li>• PUD-related map amendment</li> <li>• Design flexibility</li> </ul> No zoning relief or flexibility required or requested. |                |
| <b>Existing Development</b>             | Vacant   |                |

|  |   |
|--|---|
| <b>Adjacent Development</b>                          | Six rowhouses at the southeast corner of this same square; School across 10 <sup>th</sup> Street; To the north across Monroe Street is the Brooks Mansion and grounds and the Brookland metro station and bus oval; Rowhouses and a small office building to the west across 9 <sup>th</sup> Street, and the railroad / red line tracks beyond; The block to the south is primarily single family detached residential. |
| <b>Comprehensive Plan<br/>Generalized Policy Map</b> | Neighborhood Conservation Area  |
| <b>Comprehensive Plan<br/>Future Land Use Map</b>    | Medium Density Residential / Moderate Density Commercial mixed use  |
| <b>Relevant Small Area<br/>Plans and Studies</b>     | <ul style="list-style-type: none"><li>• Brookland/CUA Metro Station Small Area Plan</li><li>• Mayor's Order on Housing</li></ul>  |



Vicinity Map

|                 | <b>Existing MU-3/R-2 Parameters</b>  | <b>SUMMARY OF PROPOSED DEVELOPMENT PARAMETERS UNDER MU-5B</b>                                    |
|-----------------|--|--|
| Site Area       | 60,000 square feet (1.38 acres)  | 60,000 square feet (1.38 acres)  |
| Floor Area      | 72,000 sf max  | 267,145 square feet  |
| FAR             | 1.0 (1.2 IZ)   | 4.2  |
| Height          | 40 feet; 3 stories   | 75 feet; 6 stories   |
| Dwelling Units  |  | 230  |
| IZ              | Required: 10% of the residential floor area<br>= approx.. 2,200-3,900 gross res sf | Proffer: 15% of the residential floor area<br>= approx. 37,686 sf (0.15 x 251,241 gross res. sf) |
| Vehicle Parking |  | 54 spaces  |
| Bicycle Parking |  | 80 long term, 12 short term  |

### **III. SUMMARY OF OP'S COMMENT**

The following summarizes OP's comments from this report. OP will continue to work with the applicant to adequately address this issue prior to a public hearing.

|   | <b>OP Comment</b>  | <b>Planning and/or Zoning Rationale</b>   |
|---|--|---|
| 1 | The applicant should commit to provide solar power generation on-site. | The Comprehensive Plan calls for construction in the District to be energy efficient, with an emphasis on renewable energy. Environmental protection is critical to achieving equity as negative environmental outcomes tend to have a greater impact on minority populations and future generations. |
| 2 | The applicant should consider a higher percentage of IZ.               | Additional information is needed about the proffers and IZ.   |

### **IV. PROJECT DESCRIPTION – REFER ALSO TO APPLICANT FILING AT EXHIBIT 3**

The applicant proposes to construct a multifamily residential building on a vacant lot in the Brookland neighborhood, across Monroe Street from the Brookland metro station<sup>1</sup>. The site includes the entire northern and western portions of the subject square, with six rowhouse style buildings, not part of this application, occupying the southeastern corner of the block on separate lots. The proposed project would be a 75 foot tall building with approximately 230 units, ranging from studios to 3-bedroom units. 15% of the residential floor area, estimated to be 33 units, would be reserved for IZ units, which is greater than the 10% requirement. The applicant will provide IZ location plans and a breakdown of IZ units by type in a future submission.

<sup>1</sup> The Commission previously approved a project on the subject site, in case #10-28, but that project was never constructed.

The project would provide an enhanced public realm, with the building set back from the property line on Monroe and 9<sup>th</sup> Streets to allow for more pedestrian space. Upper floors on those façades would also be set back. On 10<sup>th</sup> and Lawrence Streets the building would be sculpted with various bays and step backs, with the goal of relating to adjacent properties. The top floor along 10<sup>th</sup> Street would be set back on both its east and south sides, and the entire 10<sup>th</sup> Street wing would be setback 15 feet from the adjacent rowhouse property line. Similarly, the alley façade would be composed of bays that break down the building mass.

The project would have no curb cuts on any street, and all vehicular and loading access would be from the existing public alley off Lawrence Street. The applicant would widen the 10 foot alley to 20 feet through the dedication of a public use easement on their property.

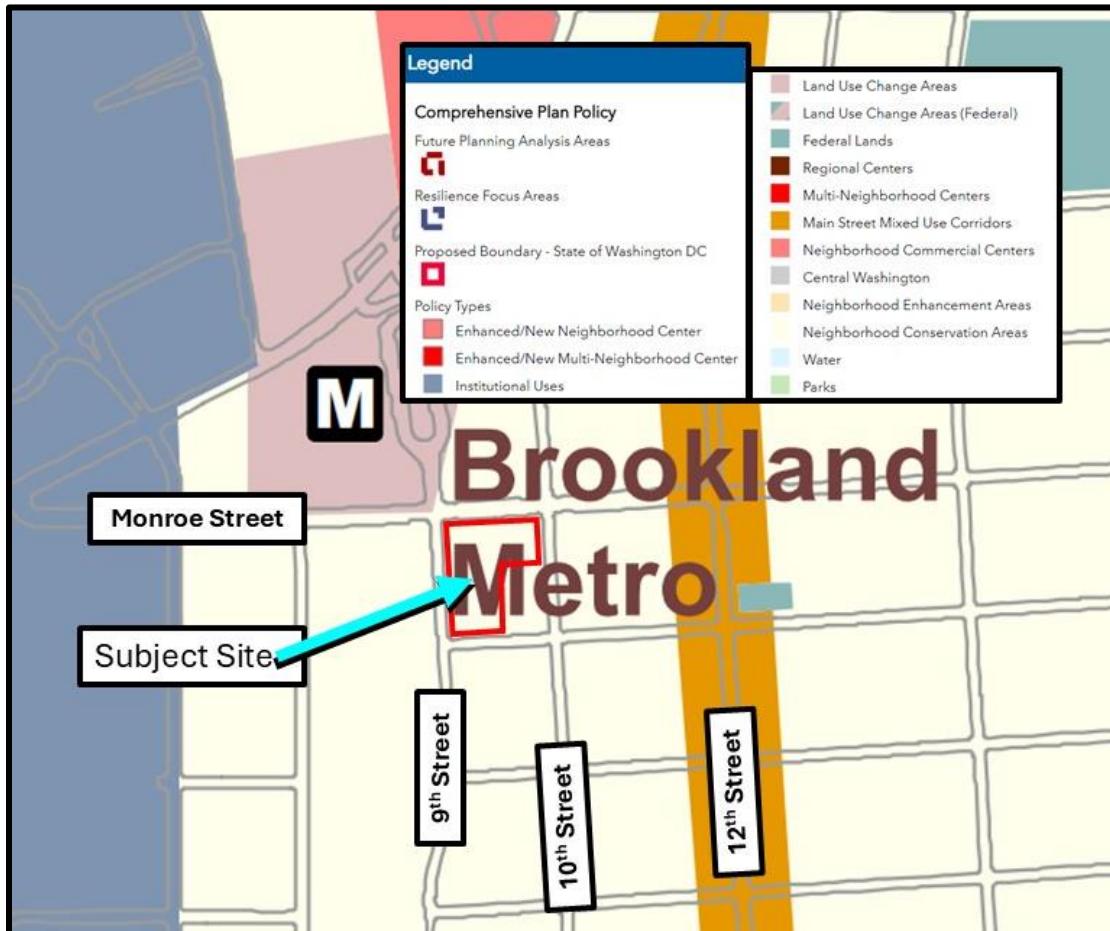
The primary façade material facing the surrounding streets, as well as on the south façade facing the adjacent rowhouses, would be brick. The brick color would vary to differentiate various building bays, banding, or inset façade panels, or to separate the building base from upper stories. Portions of the façade facing the alley or courtyards, or on the top story, would be clad in neutral-toned cementitious panel. OP supports the material selection and finds that brick is appropriate, given its predominance in nearby historic buildings such as the adjacent rowhouses and the Luke C. Moore high school immediately to the east, as well as in significant new construction such as Monroe Street Market to the west across the railroad tracks.

The roof plan (Exhibit 3G, Sheet 32) shows significant areas of green roof, and also seems to indicate the presence of solar panels (“Green Roof w/ PV”). The written application documents do not mention solar power, however, and OP has asked the applicant to clarify that the project will provide solar power, in conformance with Comprehensive Plan guidance.

## **V. COMPREHENSIVE PLAN**

### **COMPREHENSIVE PLAN MAPS**

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



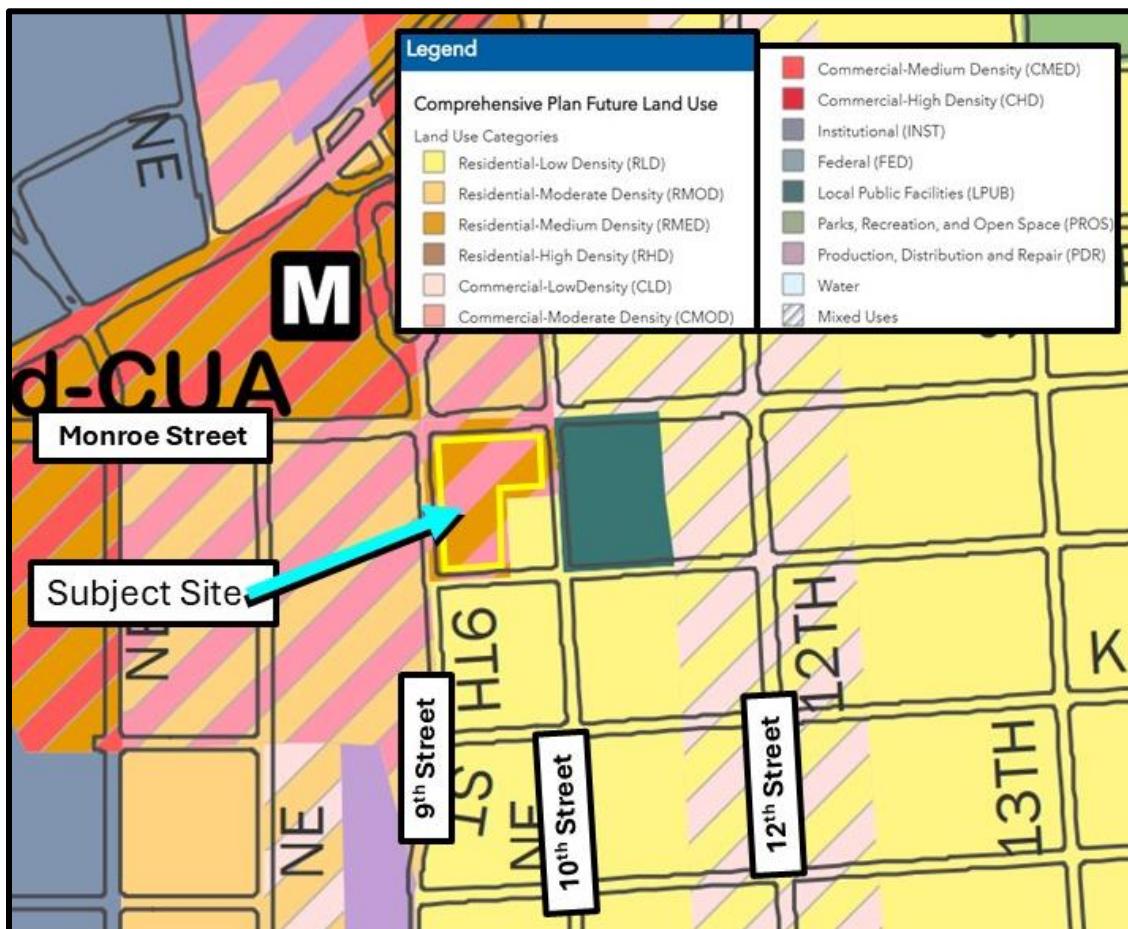
The **Future Land Use Map** (FLUM) designates the site as appropriate for mixed use Medium Density Residential and Moderate Density Commercial. The Plan defines those designations as follows:

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 proposed PUD-related map amendment to MU-5B and the associated project with an FAR of 4.2 would not be inconsistent with these designations.



#### COMPREHENSIVE PLAN ANALYSIS THROUGH A RACIAL EQUITY LENS AND THE ZONING COMMISSION'S RACIAL EQUITY TOOL

The Commission created a Racial Equity Tool to assist in its evaluation of zoning actions through a racial equity lens. The tool asks applicants and OP to provide analysis of the relevant policies from the Comprehensive Plan and other planning documents and provide analysis of factors related to equity. The applicant's comprehensive racial equity analysis is at Exhibit 3. OP analysis is provided below.

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

The Comprehensive Plan requires the Zoning Commission and staff to examine city policies through a racial equity lens. Racial equity is a broad and encompassing goal of the entire District government. As explained in the Framework Element of the Plan:

*[t]he District seeks to create and support an equitable and inclusive city. Like resilience, equity is both an outcome and a process. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality. Framework Element, § 213.6*

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

Equity is discussed throughout the Comprehensive Plan. In the context of zoning, certain priorities stand out. These include affordable housing, displacement, and access to opportunity. One of the main ways the Comprehensive Plan seeks to address equity is by supporting additional housing development, and the Plan particularly recognizes the potential for additional residential development on underutilized sites near transit. The Plan describes that without increased housing, the imbalance between supply and demand will drive up housing costs. The present proposal would help to achieve those housing goals related to equity by providing market rate and affordable housing on a site that currently has no housing, and is within walking distance of retail, services, recreation, employment opportunities, and mass transit, including a metro station. The project would also be consistent with goals related to non-displacement, as the site currently contains no housing, and the project would lessen housing-cost pressures related to indirect displacement. The project would also provide family-sized housing units, furthering another goal of the Plan.

The proposed zoning action could also further policy objectives related to equity from the Upper Northeast, Land Use, Transportation, Housing, Environmental Protection, and Urban Design Plan elements. Among those policies, in addition to providing new market rate and affordable housing opportunities, the project would further goals aimed at improving the physical design of the neighborhood with safe and improved streetscapes and engaging building façades. The project could, however, more fully address policies related to renewable energy generation. Please refer to Attachment 1 for a complete list of Plan policies applicable to the proposal. When viewed through a racial equity lens, the proposal would not be inconsistent with the Comprehensive Plan.

**Upper Northeast Area Element:** The proposal would help further the policies of the Upper Northeast Area Element that call for compatible infill development on vacant sites, especially near metro.

**Land Use Element:** The existing property is currently vacant. Redevelopment would further policies calling for the provision of additional opportunities for housing, especially housing in close proximity to metro. The project would also further policies calling for neighborhood revitalization and beautification.

**Transportation Element:** The proposed development would further several policies from the Transportation Element, including those supporting transit-oriented development and improvements to pedestrian infrastructure. The project would also meet transportation goals of providing only the necessary amount of vehicular parking, with a ratio of approximately 0.23 spaces per unit.

**Housing:** The Comprehensive Plan supports additional housing development, particularly on underutilized sites near transit. The Plan describes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. Housing at this location, on a currently vacant site, would not result in the displacement of existing residents. The project would provide a substantial number of market rate and affordable units, providing additional housing opportunities and options for the neighborhood and for residents of the rest of DC; this can help to ease upward pressure on housing prices in the neighborhood. The project would also provide housing of varied size for different household sizes.

**Environmental Protection Element:** The project would further policies of the Environmental Protection Element that encourage the use of green roofs and seek to reduce the urban heat island. The project may further policies related to sustainable energy production, but the application materials are unclear in that regard. In discussions with the applicant, they stated that their intention is to have solar panels on the roof, and Sheet 32 of Exhibit 3G seems to indicate the presence of solar panels. The written statements, however, do not discuss solar. The applicant should clarify this aspect of the project.

**Urban Design Element:** The proposed infill development will further the policies of the Urban Design Element by improving the streetscape and overall appearance of the site. The project would also further Urban Design policies focused on creating a more inviting and active pedestrian realm, minimizing curb cuts and creating safe streets. The design of the building itself would also be consistent with policies which promote active and engaging building façades.

In summary, when evaluated through a racial equity lens, the proposed project on balance would not be inconsistent with the Comprehensive Plan and would further numerous policies of the above-referenced Plan elements. Some policies regarding renewable energy may not be furthered by the project, but the applicant can clarify their intentions about solar power in

subsequent filings.

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

Pages 16-19 of Exhibit 3 summarize the applicant's outreach efforts to date, as well as topics raised in those discussions and the applicant's responses. Outreach has included a number of meetings with the ANC and community groups, a dedicated project email and website, a walking tour of the site, and meetings with elected leaders. According to the applicant, the present design reflects feedback from the community. They also indicate that discussions will continue as the PUD application proceeds.

### **Racial Equity Tool Part 3 – Planning Area Data – Upper Northeast Area**

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens. The following tables provide a summary of economic data and a population profile of the planning area. The data source is the 2018-2022 American Community Survey 5 Year Estimates, available via the OP State Data Center (<https://opdatahub.dc.gov/search?tags=racial%2520equity>). Part 3 also asks if the planning area is on track to meet affordable housing goals, and whether the data shows any “intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?”

#### **Economic Data - Upper Northeast Area**

|                                      | Population | Median Income | Unemployment Rate | Owner Occupied | Renter Occupied | Housing Cost Burdened | Below Poverty Line |
|--------------------------------------|------------|---------------|-------------------|----------------|-----------------|-----------------------|--------------------|
| DISTRICT TOTAL                       | 670,587    | \$101,722     | 7.1%              | 41.4%          | 58.6%           | 36.1%                 | 15.1%              |
| PLANNING AREA TOTAL                  | 73,167     | \$82,016      | 9.2%              | 45.1%          | 54.9%           | 40.9%                 | 16.9%              |
| Asian Alone                          | 1,961      | \$158,377     | 4.9%              | 48.1%          | 51.9%           | -                     | 5.4%               |
| Black or African American            | 46,405     | \$69,018      | 12.2%             | 42.8%          | 57.2%           | -                     | 18.7%              |
| Hispanic or Latino*                  | 8,278      | \$54,228      | 8.9%              | 32.2%          | 67.8%           | -                     | 18.7%              |
| Indian and Alaska Native             | 436        | \$65,718      | 0.0%              | 46.2%          | 53.8%           | -                     | 11.6%              |
| Native Hawaiian and Pacific Islander | 96         | -             | 0.0%              | -              | -               | -                     | 0%                 |

|                  | Population | Median Income | Unemployment Rate | Owner Occupied | Renter Occupied | Housing Cost Burdened | Below Poverty Line |
|------------------|------------|---------------|-------------------|----------------|-----------------|-----------------------|--------------------|
| Some Other Race  | 4,092      | \$49,106      | 8.2%              | 25.5%          | 74.5%           | -                     | 17.7%              |
| Two or More Race | 4,260      | \$82,994      | 6.3%              | 35.6%          | 64.4%           | -                     | 17.4%              |
| White Alone      | 15,917     | \$158,586     | 3.9%              | 58.1%          | 41.9%           | -                     | 12.7%              |

\*Hispanic or Latino can be of any race, and the data for this ethnicity is included in the disaggregated racial data above.

### Population Profile - Upper Northeast Area

|                                      | Population | Median Age (years) | 65 Years and Over | Disability Status | Education – Bachelor's Degree or Higher |
|--------------------------------------|------------|--------------------|-------------------|-------------------|---|
| DISTRICT TOTAL                       | 670,587    | 35.5               | 84,451            | 11.0%             | 62.6%                                   |
| PLANNING AREA TOTAL                  | 73,167     | 35.2               | 9,927             | 13.8%             | 47.1%                                   |
| Asian Alone                          | 1,961      | 35.2               | 255               | 2.0%              | 87.6%                                   |
| Black or African American            | 46,405     | 38.4               | 8,312             | 17.5%             | 34.4%                                   |
| Hispanic or Latino*                  | 8,278      | 30.7               | 359               | 7.4%              | 33.4%                                   |
| Indian and Alaska Native             | 436        | 40.1               | 12                | 13.1%             | 44.9%                                   |
| Native Hawaiian and Pacific Islander | 96         | -                  | 0                 | 0%                | 96.9%                                   |
| Some Other Race                      | 4,092      | 26.8               | 102               | 8.0%              | 21.6%                                   |
| Two or More Race                     | 4,260      | 28.7               | 357               | 11.4%             | 49.0%                                   |
| White Alone                          | 15,917     | 35.2               | 889               | 6.5%              | 83.8%                                   |

\*Hispanic or Latino can be of any race, and the data for this ethnicity is included in the disaggregated racial data above.

### **Data Trends Over Time**

Analysis of data over time can yield other insights into trends in the planning area. The following data compares the 2018-2022 American Community Survey data described above with data from the 2012-2016 American Community Survey, again available from [OP's State Data](#)

Center. Each table below covers both 5-year periods and compares the data from the Upper Northeast planning area with District-wide data.

#### Population by Race/Ethnicity

The Upper Northeast planning area has a majority minority population with 63% of its residents being Black and 11% of its residents being Hispanic in the 2018 to 2022 period. Though in the majority, the Black population decreased from 71.4% of the population to 63% from 2012 to 2022, which is reflective of the District-wide trend during this period. The White population in the planning area increased from 18.4% to 21.8%.

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

| Race or Ethnicity                    | District 2012-2016 | District% 2012-2016 | District 2018-2022 | District% 2018-2022 | UNE 2012-2016 | UNE% 2012-2016 | UNE 2018-2022 | UNE% 2018-2022 |
|--------------------------------------|--------------------|---------------------|--------------------|---------------------|---------------|----------------|---------------|----------------|
| <b>Total Population</b>              | 659,009            | 100%                | 670,587            | 100%                | 70,682        | 100%           | 73,167        | 100%           |
| Asian Alone                          | 24,036             | 4%                  | 27,067             | 4%                  | 1,351         | 1.9%           | 1,961         | 2.7%           |
| Black or African American            | 318,598            | 48%                 | 297,101            | 44%                 | 50,450        | 71.4%          | 46,405        | 63.4%          |
| Hispanic or Latino*                  | 69,106             | 10%                 | 77,168             | 12%                 | 6,799         | 9.6%           | 8,278         | 11.3%          |
| Indian and Alaska Native             | 2,174              | 0%                  | 2,209              | 0%                  | 438           | 0.6%           | 436           | 0.6%           |
| Native Hawaiian and Pacific Islander | 271                | 0%                  | 420                | 0%                  | 12            | 0%             | 96            | 0.1%           |
| Some Other Race                      | 29,650             | 4%                  | 30,879             | 5%                  | 3,673         | 5.2%           | 4,092         | 5.6%           |
| Two or More Race                     | 18,245             | 3%                  | 47,278             | 7%                  | 1,775         | 2.5%           | 4,260         | 5.8%           |
| <b>White Alone</b>                   | 266,035            | 40%                 | 265,633            | 40%                 | 12,983        | 18.4%          | 15,917        | 21.8%          |

#### Age & Vulnerable Population

The Upper Northeast planning area's median age was slightly older than the Districtwide median during both 5-year periods. While the District's median age increased by over three years between study periods, UNE's median age increased by less than one year. When race is considered, the data shows that the Black residents in Upper Northeast were older than most of

the other groups during the ten-year period.

The UNE planning area had a higher percentage of vulnerable residents than the District as a whole. Over the 10-year period, the number of residents 65 and older and the number of residents who identified as disabled decreased in the planning area, but the number of residents under 18 rose slightly.

| Vulnerable Population | District<br>2012-2016 | District<br>2018-2022 | UNE<br>2012-2016 | UNE<br>2018-2022 |
|-----------------------|-----------------------|-----------------------|------------------|------------------|
| Persons 65 and Older  | 11.4%                 | 12.6%                 | 14.4%            | 13.6%            |
| Persons Under 18      | 17.4%                 | 18.5%                 | 19.6%            | 20.9%            |
| Percent Disable       | 11.3%                 | 11.0%                 | 15.5%            | 13.8%            |

| Median Age                                  | District<br>2012-2016 | District<br>2018-2022 | UNE<br>2012-2016 | UNE<br>2018-2022 |
|---|-----------------------|-----------------------|------------------|------------------|
| <b>Total</b>                                | 32.3                  | 35.5                  | 34.3             | 35.2             |
| <b>Asian Alone</b>                          | 33.3                  | 35.6                  | 35.4             | 35.2             |
| <b>Black or African American</b>            | 40.3                  | 38.1                  | 42.2             | 38.4             |
| <b>Hispanic or Latino</b>                   | 31.3                  | 32.2                  | 28.2             | 30.7             |
| <b>Indian and Alaska Native</b>             | 31.4                  | 41.1                  | 35.1             | 40.1             |
| <b>Native Hawaiian and Pacific Islander</b> | -                     | -                     | -                | -                |
| <b>Some Other Race</b>                      | 29.6                  | 28.8                  | 28.8             | 26.8             |
| <b>Two or More Race</b>                     | 28.3                  | 30.8                  | 29.1             | 28.7             |
| <b>White Alone</b>                          | 33.1                  | 35.3                  | 33.5             | 35.2             |

#### Median Household Income

The UNE planning area has a significantly lower median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2018-2022 survey periods. The planning area median income, however, tracked with the citywide trend and increased significantly over the 10-year period, although those gains were not distributed evenly across racial groups. The median income of White and Asian residents saw significant increases, while other groups saw more modest gains.

| Median Household Income   | District<br>2012-2016 | District<br>2018-2022 | UNE<br>2012-2016 | UNE<br>2018-2022 |
|---------------------------|-----------------------|-----------------------|------------------|------------------|
| Total Median              | \$72,935              | \$101,722             | \$55,720         | \$82,016         |
| Asian Alone               | \$91,453              | \$123,660             | \$70,238         | \$158,377        |
| Black or African American | \$40,560              | \$57,076              | \$47,712         | \$69,018         |
| Hispanic or Latino        | \$60,848              | \$94,203              | \$47,581         | \$54,228         |
| Indian and Alaska Native  | \$51,306              | \$60,390              | -                | \$65,718         |

| Median Household Income              | District 2012-2016 | District 2018-2022 | UNE 2012-2016 | UNE 2018-2022 |
|--------------------------------------|--------------------|--------------------|---------------|---------------|
| Native Hawaiian and Pacific Islander | -                  | -                  | -             | -             |
| Some Other Race                      | \$41,927           | \$61,851           | \$38,781      | \$49,106      |
| Two or More Race                     | \$83,243           | \$108,455          | \$78,598      | \$82,994      |
| White Alone                          | \$119,564          | \$160,745          | \$107,152     | \$158,586     |

### Homeownership

More residents in the UNE planning area own their home than in the District as a whole – 45.1% compared to 41.4%. The homeownership rate in the planning area dropped slightly over the two survey periods, while the overall rate in the District went up slightly. The homeownership rate among Black households in the planning area went down from 45.9% to 42.8%, while other racial groups, such as American Indian and Alaskan Native, and Asian, saw dramatic increases in the homeownership rate. These trends seem to be particular to the planning area; District-wide, Black homeownership appeared to hold steady. For American Indian and Alaskan Native, homeownership rates citywide went down. And the rate of homeownership for Asian households went up citywide, but much more modestly than in the planning area.

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

| Owners/Renters                   |                   | District 2012-2016 | District 2018-2022 | UNE 2012-2016 | UNE 2018-2022 |
|----------------------------------|-------------------|--------------------|--------------------|---------------|---------------|
| <b>Total</b>                     | Owner Households  | 40.7%              | 41.4%              | 46.1%         | 45.1%         |
|                                  | Renter Households | 59.3%              | 58.6%              | 53.9%         | 54.9%         |
| <b>Asian Alone</b>               | Owner Households  | 39.4%              | 42.4%              | 32.7%         | 48.1%         |
|                                  | Renter Households | 60.6%              | 57.6%              | 67.3%         | 51.9%         |
| <b>Black or African American</b> | Owner Households  | 35.9%              | 35.9%              | 45.9%         | 42.8%         |
|                                  | Renter Households | 64.1%              | 64.1%              | 54.1%         | 57.2%         |
| <b>Hispanic or Latino</b>        | Owner Households  | 30.9%              | 35.3%              | 30.6%         | 32.2%         |
|                                  | Renter Households | 69.1%              | 64.7%              | 69.4%         | 67.8%         |
| <b>Indian and Alaska Native</b>  | Owner Households  | 32.9%              | 25.8%              | 21.1%         | 46.2%         |
|                                  | Renter Households | 67.2%              | 74.2%              | 78.9%         | 53.8%         |

| Owners/<br>Renters                            |                      | District<br>2012-2016 | District<br>2018-2022 | UNE<br>2012-2016 | UNE<br>2018-2022 |
|---|----------------------|-----------------------|-----------------------|------------------|------------------|
| Native<br>Hawaiian and<br>Pacific<br>Islander | Owner<br>Households  | 9.1%                  | 64.2%                 | -                | -                |
|   | Renter<br>Households | 90.9%                 | 35.8%                 | -                | -                |
| Some Other<br>Race                            | Owner<br>Households  | 17.5%                 | 26.6%                 | 26.5%            | 25.5%            |
|   | Renter<br>Households | 82.5%                 | 73.4%                 | 73.5%            | 74.5%            |
| Two or More<br>Races                          | Owner<br>Households  | 32.7%                 | 43.9%                 | 40.6%            | 35.6%            |
|   | Renter<br>Households | 67.3%                 | 56.2%                 | 59.4%            | 64.4%            |
| White Alone                                   | Owner<br>Households  | 47.8%                 | 47.4%                 | 40.6%            | 58.1%            |
|   | Renter<br>Households | 52.2%                 | 52.6%                 | 59.4%            | 41.9%            |

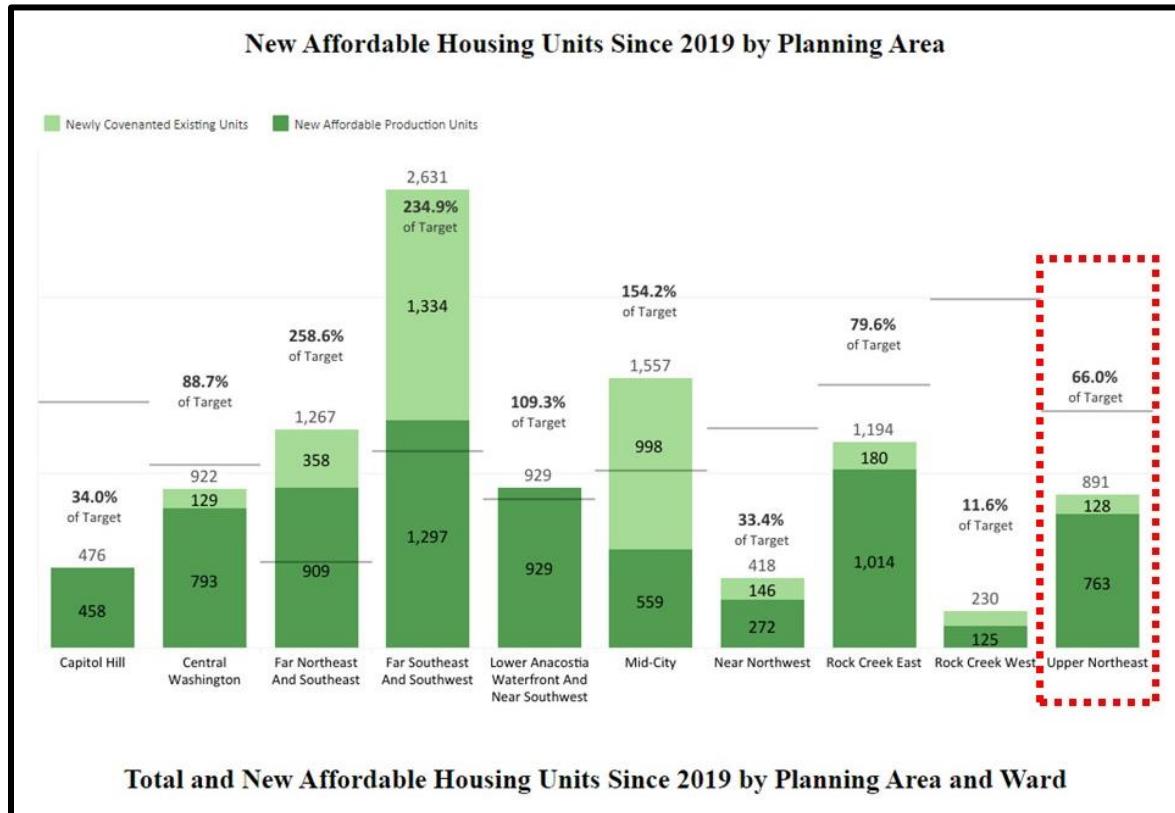
| Cost Burdened<br>Households  | District<br>2012-2016 | District<br>2018-2022 | UNE<br>2012-2016 | UNE<br>2018-2022 |
|--|-----------------------|-----------------------|------------------|------------------|
| Percent of Households<br>spending 30% of their<br>income on their<br>housing | 38.6%                 | 36.1%                 | 42.3%            | 40.9%            |

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

Figure 1, below, from the [DMPED 36,000 by 2025 Dashboard](#), shows that the Upper Northeast Planning Area has not achieved the Mayor's 2025 affordable housing goal. As of January 2025, according to the Dashboard, the Upper Northeast Planning Area had only achieved 66% (891 units) of its 2025 affordable housing production goal of 1,350<sup>2</sup> units. The proposed PUD would contribute to filling the gap in the number of units with an estimated 33 IZ units included in the project. In addition to meeting affordable housing goals, the market rate housing included in the project would fulfill general guidance to create more housing, which should help reduce upward pressure on prices.

<sup>2</sup> 2019 Housing Equity Report, p. 12 -

<https://planning.dc.gov/sites/default/files/dc/sites/housingdc/publication/attachments/Housing%20Equity%20Report.pdf>



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

The available data shows that a number of factors can be distinguished by race. For example, home ownership and home rental rates show a disparity between White and Black populations in the planning area. Similarly, the poverty level for Blacks in the planning area, 18.7%, is significantly higher than for Whites, at 12.7%. Average income shows a high level of disparity between White and Black, although that data might somewhat reflect the much higher percentage of Blacks that are of retirement age compared to Whites in the planning area. Disability status and educational attainment also show significant differences.

The proposal could help to alleviate some degree of inequity, especially regarding housing availability and the number of families that are housing-cost-burdened. Data on the number of households burdened by housing costs is not disaggregated by race, but given unemployment and income levels it can be inferred that additional affordable housing provided by the proposal could help to further equitable outcomes. Another benefit of the proposal would be the provision of residential units in close proximity to several transportation modes, which can help populations of any skill or educational level reach employment opportunities.

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

According to the Racial Equity Tool, the Commission will use the following criteria, themes and questions, along with the above data, in its evaluation of a zoning action's consistency with the Comprehensive Plan, as viewed through a racial equity lens.

- *What Comprehensive Plan policies related to racial equity will potentially be advanced by approval of the zoning action?*

The following policies will potentially be advanced by the proposed project. Please refer to Attachment I for the full text of each policy and OP's analysis above under Part 1 of the Racial Equity Tool discussion.

#### **Upper Northeast Area Element**

- Policy UNE-1.1.1: Neighborhood Conservation
- Policy UNE-1.1.2: Compatible Infill
- Policy UNE-1.1.3: Metro Station Development
- Policy UNE-2.6.1: Brookland/CUA Metro Station Area

#### **Land Use Element**

- 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-1.4.5: Design to Encourage Transit Use
- 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-2.2.4: Neighborhood Beautification

#### **Transportation Element**

- Policy T-1.1.4: Transit-Oriented Development
- Policy T-1.1.8: Minimize Off-Street Parking
- Policy T-1.2.3: Discouraging Auto-Oriented Uses
- Policy T-2.4.1: Pedestrian Network
- Policy T-5.2.2: Charging Infrastructure

#### **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-1.1.8: Production of Housing in High-Cost Areas
- Policy H-1.1.9: Housing for Families
- Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- Policy H-1.2.2: Production Targets
- Policy H-1.2.7: Density Bonuses for Affordable Housing

Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods  
Policy H-1.3.1: Housing for Larger Households

#### Environmental Protection Element

Policy E-1.1.2: Urban Heat Island Mitigation  
Policy E-2.1.3: Sustainable Landscaping Practices  
Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff  
Policy E-5.1.9: Zero-Emission Vehicles

#### Urban Design Element

Policy UD-2.1.2: Neighborhood Streetscapes  
Policy UD-2.1.6: Minimize Mid-Block Vehicular Curb Cuts  
Policy UD-2.2.1: Neighborhood Character and Identity  
Policy UD-2.2.4: Transitions in Building Intensity  
Policy UD-2.2.5: Infill Development  
Policy UD-3.2.1: Buildings that Enable Social Interaction  
Policy UD-3.2.5: Safe and Active Public Spaces and Streets  
Policy UD-4.2.4: Creating Engaging Facades  
Policy UD-4.2.6: Active Facades

- *What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?*

#### Housing Element

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

#### Environmental Protection Element

Policy E-3.2.1: Carbon Neutrality  
Policy E-3.2.3: Renewable Energy  
Policy E-3.2.7: Energy-Efficient Building and Site Planning  
Policy E-3.2.8: Locally Generated Electricity

The project would generally further policies of the Environmental Protection Element that encourage the use of green roofs and reduction of the urban heat island. However, the applicant should provide more information about the potential for solar power generation on the site. In discussions with the applicant, they stated that their intention is to have solar panels on the roof, and Sheet 32 of Exhibit 3G seems to indicate the presence of solar panels. The written statements, however, do not discuss solar. If the project does not include solar power generation, it could be inconsistent with the above policies. Environmental protection is critical to achieving equity as negative environmental outcomes tend to have a greater impact on minority populations and future generations. If solar power is included, the applicant should commit to a minimum area and quantify what percentage of the building's energy use would be provided for on-site.

- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or*

*outcomes of the zoning action? Note: Additional themes may also apply.*

| Factor                       | Question   | OP Response  |
|------------------------------|--|--|
| <b>Direct Displacement</b>   | Will the zoning action result in displacement of tenants or residents?   | The site is vacant and has no residential or commercial uses, so the proposed project would not result in any direct displacement.   |
| <b>Indirect Displacement</b> | What examples of indirect displacement might result from the zoning action?  | The future provision of additional market rate and affordable housing should provide new opportunities for housing in the neighborhood for lower and middle-income residents. The Comprehensive Plan recognizes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that creates challenges particularly for low-income residents. The PUD results in an affordable housing requirement beyond what would be required by IZ. The proposed PUD provides a clear path to increase the housing supply, increase IZ unit production, and increase the market-rate units available. |
| <b>Housing</b>               | Will the action result in changes to: <ul style="list-style-type: none"><li>▪ Market Rate Housing</li><li>▪ Affordable Housing</li><li>▪ Replacement Housing</li></ul>   | The Comprehensive Plan states that residents of color are a majority of lower-income households in the District and, therefore face a disproportionate share of the problems caused by housing insecurity and displacement (Framework Element § 206.4). The zoning action would result in the creation of approximately 232 total housing units, including about 33 IZ units on a site that currently has no housing. Both the new market rate units and the IZ units would provide new housing opportunities and could help to reduce the upward pressure on housing costs in the vicinity.   |
| <b>Physical</b>              | Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"><li>▪ Public Space Improvements</li><li>▪ Infrastructure Improvements</li><li>▪ Arts and Culture</li><li>▪ Environmental Changes</li><li>▪ Streetscape Improvements</li></ul> | The redevelopment of the site would result in a significantly improved streetscape and pedestrian realm around the property. The proposal would also improve the environmental performance of the property through new landscaping and green roofs, though the applicant should also commit to solar energy production.  |
| <b>Access to Opportunity</b> | Is there a change in access to opportunity? <ul style="list-style-type: none"><li>▪ Job Training/Creation</li><li>▪ Healthcare</li><li>▪ Addition of Retail/Access to New Services</li></ul>   | The application should have a positive impact on access to opportunity. There should be no direct positive or negative impacts to job training, job creation, healthcare, retail or services. However, providing housing in a location with easy access to transit would allow residents access to job opportunities throughout the city and region.   |

| Factor    | Question   | OP Response  |
|-----------|--|--|
| Community | How did community outreach and engagement inform/change the zoning action? | According to page 18 of Exhibit 3, the design was revised based on feedback from the community. A curb cut initially conceived for 10 <sup>th</sup> Street was removed, and now all vehicular access will be from the alley off of Lawrence Street. The application also states that a community suggestion for retail along Monroe Street was studied, but ultimately rejected, based on a difficult retail environment, and the preference to focus retail energy on existing nodes to the east and west. The applicant will also implement a TDM plan to address neighbor concerns about vehicle traffic. |

## VI. OTHER RELEVANT PLANNING DOCUMENTS

### BROOKLAND/CUA METRO STATION SMALL AREA PLAN

The PUD is located in the area covered by the [Brookland/CUA Metro Station Small Area Plan](#) (SAP), a 2009 Council-adopted plan that studied the portions of the Brookland and Edgewood neighborhoods immediately surrounding the Brookland metro stop.

The plan sought to guide “the growth, development and revitalization of underutilized areas within a quarter mile or ten-minute walk of the Brookland/CUA Metro Station” (SAP, p. 1). Guiding principles of the SAP include protecting existing neighborhood character, creating an active pedestrian neighborhood with a variety of housing types for all income levels, and promoting quality in the design of buildings and public spaces (p. 2). The subject site falls within the “Monroe Street Sub-Area” of the SAP. The vision for Monroe Street is for “a revitalized, tree-lined urban street, connecting Brookland from west to east with retail, residential and cultural and arts uses” (p. 6).

The proposed development would help to fulfill the goals of the SAP by providing a significant amount of housing for a range of income levels and for a range of household sizes. It would also redevelop an underutilized site in close proximity to the metro station, and do so with high quality architecture that would frame the street and help to connect Monroe Street from east to west.

The language of the SAP talks specifically about the height envisioned in this area. It states that “Development along Monroe Street east of the WMATA/CSX tracks may be allowed up a maximum 50 feet through a Planned Unit Development, a discretionary approval by the District’s Zoning Commission” (p. 6). It goes on to state that “Buildings in the subarea should step back in height at a ratio of one half (1/2) to one (1) above 50 feet. For example, for every 10 feet in height above 50 feet, the building facade should step back 5 feet from the building edge” (p. 47). This would seem to conflict with the proposed project, which would have a height of 75 feet, with step backs beginning at approximately 60 feet on the 10<sup>th</sup> Street and Lawrence Street façades.

This guidance of the SAP was previously reflected in the Comprehensive Plan, when the FLUM called for moderate density commercial, moderate density residential, and low density residential uses on the subject site. More recently, however, the Council adopted amendments to the Comprehensive Plan that superseded the 2009 guidance of the SAP, and calls for a mix of moderate density commercial and medium density residential uses on the site.

Small area plans provide important guidance for neighborhoods and can fill in any gaps in the information provided by the Comprehensive Plan. However, where there is a conflict between the Comprehensive Plan and a Small Area Plan, the Comprehensive Plan governs. The Framework Element of the Plan states:

Small Area Plans are prepared with community input, to provide more detailed planning guidance, and typically are approved by resolution of the Council. Unless a Small Area Plan has been made binding on the Zoning Commission through its enactment as part of a Comprehensive Plan amendment, a Small Area Plan provides only supplemental guidance to the Zoning Commission and it does so only to the extent it does not conflict with the Comprehensive Plan. 224.5

Therefore, because the Comprehensive Plan has been updated in a way that would support the proposed height of project, that guidance would supersede the previous direction of the SAP.

### **MAYOR'S ORDER ON HOUSING**

On May 10, 2019, the Mayor issued Order #2019-036, which addressed the need for additional housing in the District. It stated that housing provides “*physical, financial and emotional health and opportunity for our residents, their children and grandchildren, [and] also represents a critical underpinning for Washington, DC’s sustainable and inclusive economic growth. For this reason, housing affordability is a top policy priority for Washington, DC*” (Mayor’s Order, p. 1). It goes on to say that “*...increasing supply can help to slow housing cost increases, and affordable set-asides can help to ensure our communities remain inclusive to a wide range of income levels.*”

The Mayor set a goal of producing 36,000 total units by 2025, 12,000 of which would be affordable (p. 2). The Order also emphasizes the need to provide “units for large and/or multigenerational families” (p. 2). As of January 2025, according to the [DMPED 36,000 by 2025 Dashboard](#), the Upper Northeast Planning Area had only achieved 66% (891 units) of its 2025 affordable housing production goal of 1,350<sup>3</sup> units. This project would help alleviate a small amount of that shortfall, and do so by providing family-sized units. Of the approximately 230 units, it is estimated that about 33 would be affordable through the 15% IZ proffer. Also, 12

<sup>3</sup> 2019 Housing Equity Report, p. 12 -

<https://planning.dc.gov/sites/default/files/dc/sites/housingdc/publication/attachments/Housing%20Equity%20Report.pdf>

of the total number of units would be three-bedroom units. This would help to fulfill the goals of the Mayor's Order on Housing.

## VII. ZONING SUMMARY

The site is currently zoned MU-3A and R-2, and the applicant is requesting a PUD-related map amendment to the MU-5B zone. MU-5B is not inconsistent with the Comprehensive Plan, including the combined guidance of the FLUM and the written text of the Plan, as discussed above. Below is a table comparing the existing and proposed zone to the proposal.

| Item                          | Existing Zone MU-3A   | Existing Zone R-2                          | Proposed Zone MU-5B (PUD)  | Proposal  | Flexibility |
|-------------------------------|---|--|--|---|-------------|
| <b>Site Area</b>              | n/a   | 3,000 sf<br>(for a semi-detached building) | 15,000 sf for a PUD<br>(X § 301.1)   | 60,000 sf<br>(1.38 ac.)   | None        |
| <b>Height</b>                 | 40'   | 40', 3 stories                             | 90'  | 75'   | None        |
| <b>FAR</b>                    | 1.2   | n/a  | 5.04   | 4.2   | None        |
| <b>IZ Set aside C § 1003</b>  | 10%   | n/a  | 10%  | 15.0%   | None        |
| <b>Lot Occupancy</b>          | 60%   | 40%  | 80%  | 80%   | None        |
| <b>Rear Yard</b>              | 20'   | 20'  | 15'  | 15'   | None        |
| <b>Vehicle Parking</b>        | 1 per 3 dwelling units in excess of 4 units; 50% reduction w/i half mile of metro | 1 per 2 dwelling units                     | 1 per 3 units in excess of 4 units = 76 spaces min. Minus 50% w/i half mile of metro = 38 spaces | 54 spaces   | None        |
| <b>Bicycle Parking</b>        | Long term – 1 per 3 units<br>Short term – 1 per 20 units                          | None required for single unit              | Long term – 1 per 3 units<br>Short term – 1 per 20 units   | 78 long term;<br>12 short term  | None        |
| <b>GAR</b>                    | 0.3   | n/a  | 0.3  | 0.3   | None        |
| <b>Solar Power Generation</b> | None required by zoning   |  |  | Rooftop solar seemingly indicated on Sheet 32 of Exhibit 3G, but not mentioned in written submissions; the applicant should clarify | None        |

### Requested Flexibility

The PUD application requests only the two areas of flexibility noted below. The project requires no zoning relief or flexibility.

- PUD-related map amendment;
- Design flexibility<sup>4</sup>.

## **VIII. PUD EVALUATION STANDARDS**

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

300.1 *The purpose of the planned unit development (PUD) process is to provide for higher quality development through flexibility in building controls, including building height and density, provided that the PUD:*

- (a) *Results in a project superior to what would result from the matter-of-right standards;*
- (b) *Offers a commendable number or quality of meaningful public benefits; and*
- (c) *Protects and advances the public health, safety, welfare, and convenience, and is not inconsistent with the Comprehensive Plan.*

300.2 *While providing for greater flexibility in planning and design than may be possible under conventional zoning procedures, the PUD process shall not be used to circumvent the intent and purposes of the Zoning Regulations, or to result in action that is inconsistent with the Comprehensive Plan.*

304.3 *In deciding a PUD application, the Zoning Commission shall judge, balance, and reconcile the relative value of the public benefits and project amenities offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.*

304.4 *The Zoning Commission shall find that the proposed development:*

- (a) *Is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site;*
- (b) *Does not result in unacceptable project impacts on the surrounding area or on the operation of city services and facilities but instead shall be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project; and*
- (c) *Includes specific public benefits and project amenities of the proposed development that are not inconsistent with the Comprehensive Plan or with other adopted public policies and active programs related to the subject site.*

Should this project move forward to a public hearing, OP will evaluate the project against the above standards.

### **Public Benefits and Amenities**

The proposed PUD would result in increases in height and density over the matter-of-right zones. Please refer to the table below. The proposal, however, would not maximize the height or density permitted by a PUD in the MU-5B zone. A maximum FAR of 5.04 is permitted in a

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<sup>4</sup> This area of flexibility was raised in discussions with the applicant, and does not yet appear in the written record. The applicant has described the intended design flexibility as the standard flexibility for PUDs, but the exact request should be detailed in future submissions.

PUD, but the project would have an FAR of 4.2. Similarly, the maximum height for an MU-5B PUD is 90 feet, whereas the design proposes a height of 75'.

|             | <u>MU-3A</u> | <u>R-2</u>                     | <u>Proposed Project<br/>(MU-5B PUD)</u> | <u>Difference</u>   |
|-------------|--------------|--------------------------------|---|---|
| FAR         | 1.2          | 1.2<br>(effective FAR)         | 4.2                                     | <b>3.0</b>  |
| Square Feet |              | 72,000 sf                      | 251,745 sf                              | <b>179,745 sf</b>   |
| Height      | 40'          | 40'                            | 75'                                     | <b>35'</b>  |
| Use         | Mixed Use    | Single family<br>semi-detached | Multifamily                             | <b>Multifamily use<br/>permitted in areas<br/>presently zoned R-2</b> |

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

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

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

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

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

Should this application be set down, OP will provide a more detailed analysis of the benefits and amenities proffer, and whether, as required by X § 305.12, they are acceptable in the benefit categories listed in X § 305.5, and whether they are actual benefits of the PUD or requirements

of any redevelopment at the site. The applicant provides their summary of the project benefits at [Exhibit 3](#), pp. 26-27 (pp. 29-30 of the PDF document).

The following is OP's bulletized list from the applicant's summary.

1. “Superior urban design, architecture, and landscaping” – X §§ 305.5(a) and (b)

The applicant cites the architecture of the building, the overall urban design of the project, and the design of the surrounding public space as benefits of the project. OP finds that the architecture is appropriate and that the urban design of the project would enhance the streetscape and make for a safe pedestrian environment with no curb cuts and all vehicular access from the existing alley. The landscaping, including the enhanced building setbacks, would improve the streetscape above what would result from a matter of right project.

2. “Site planning, and efficient and economical land utilization” – X § 305.5(c)

Exhibit 3, p. 26 states that “the Project takes a significantly underutilized site and creates a thoughtfully planned, transit-oriented development.” OP concurs that development of this underutilized site, in close proximity to metro, would be a benefit of the project and makes efficient use of the limited land resources of the District.

3. “Housing and affordable housing” – X §§ 305.5(f) and (g)

The production of housing with three or more bedrooms is considered a benefit of a PUD. In this case, 12 of the units in the building would be three-bedroom units. Furthermore, of the approximately 230 total units, 15% of the floor area is proffered to be subject to IZ, more than the required 10%.

4. “Environmental and sustainable benefits” – X § 305.5(k)(4) & (5)

The application states that “The Project will provide a number of environmental benefits that improve sustainability of the Property and contribute to the neighborhood's overall sustainability, including LEED Gold certification. In addition, the Property is located across Monroe Street from the Brookland/CUA Metro Station reducing the need for vehicular trips” (Exhibit 3, p. 27). OP concurs with that assessment but also encourages the applicant to commit to the use of solar panels on the roof of the building.

5. “Streetscape plans” – X § 305.5(l)

The project would result in wider sidewalks, especially along Monroe Street, due to the building being set back from the property line. OP finds that this is a benefit of the PUD. Similarly, OP also finds that the dedication of a public access easement to double the effective width of the alley is a benefit, especially as it allows for a continuous pedestrian

environment around the entire project, with vehicles exclusively using the alley for access.

6. “Uses of special value” – X § 305.5(q)

The application states that “The Applicant has agreed to work with the Brookland community, the Brookland Neighborhood Civic Association, and ANC 5B to identify appropriate projects that will be included in the final benefits and amenities package of the PUD application” (Exhibit 3, p. 27). At the time of the public hearing OP will review any additional benefits that the applicant proposes as a result of these discussions.

7. “Other Public Benefits Which Substantially Advance the Comp. Plan” – X § 305.5(r)

As discussed in this report, the project would advance many themes and goals of the Comprehensive Plan. As stated in the Zoning Regulations, this can be considered a benefit of the project.

The proposed benefits as described by the applicant are adequate for setdown. The applicant has stated that they will be continuing conversations with the ANC and community regarding the project and the proposed benefits. OP supports those further discussions.

## **IX. AGENCY COMMENTS**

If this application is set down for a public hearing, the Office of Planning will refer it to the following government agencies for review and comment:

- Department of Energy and the Environment (DOEE)
- Department of Housing & Community Development (DHCD)
- District Department of Transportation (DDOT)
- Department of Parks and Recreation (DPR)
- DC Public Schools (DCPS)
- Department of Public Works (DPW)
- Fire and Emergency Medical Services Department (FEMS)
- Metropolitan Police Department (MPD)
- DC Water

## **X. ATTACHMENTS**

Attachment 1 – Comprehensive Plan Policies

## **Attachment 1** **Comprehensive Plan Policies**

### **Upper Northeast Area Element**

#### **Policy UNE-1.1.1: Neighborhood Conservation**

Encourage growth while enhancing the neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond-Riggs, and Arboretum. The residential character of these areas should be preserved while allowing new housing opportunities for all incomes. Places of historic significance, gateways, parks, and important cultural and social places should likewise be preserved and enhanced. 2408.2

#### **Policy UNE-1.1.2: Compatible Infill**

Encourage compatible residential infill development throughout Upper Northeast neighborhoods, especially in Brentwood, Ivy City, and Trinidad, where numerous scattered vacant residentially-zoned properties exist. New and rehabilitated housing in these areas should meet the needs of a diverse community that includes renters and owners; seniors, young adults, and families; and persons of low and very low-income, as well as those of moderate and higher incomes. 2408.3

#### **Policy UNE-1.1.3: Metro Station Development**

Capitalize on the presence of the Metro stations at Rhode Island Avenue, Brookland-CUA, and Fort Totten, to provide new transit-oriented housing, community services, and jobs. New development around each of these three stations is strongly supported. Locating higher-density housing near Metro stations minimizes the impact of cars and traffic that would be expected if the residents lived farther from high-capacity transit. The District will coordinate with WMATA to make the design, density, and type of housing or other proposed development at these stations is compatible with surrounding neighborhoods; respects community concerns and feedback; and serves a variety of household incomes. Development shall comply with other provisions of the Comprehensive Plan regarding the compatibility of new land uses with established development, such as existing production, distribution, and repair (PDR) uses. Development shall also comply with other Comprehensive Plan guidance regarding the provision of appropriate open space, management of mobility, and public services. 2408.4

#### **Policy UNE-2.6.1: Brookland/CUA Metro Station Area**

Encourage mixed-use development on vacant and underused property in the vicinity of the Brookland-CUA Metro station, including the parking lot east of the station. Special care should be taken to preserve the existing low-scale residential uses along and east of 10<sup>th</sup> Street, NE, retain the number of bus bays at the station, and develop strategies to deal with overflow parking and cut through traffic in the station vicinity. 2416.3

### **Land Use Element**

#### **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. 307.9

#### **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. 307.10

#### **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-1.4.5: Design to Encourage Transit Use**

Require architectural and site-planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort, and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include sidewalks, bicycle lanes, lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots or low-density housing. 307.13

#### **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.

**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.

**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.

**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-1.1.8: 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

**Policy T-1.2.3: Discouraging Auto-Oriented Uses**

Discourage certain uses, like drive-through businesses or stores with large surface parking lots and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. 404.6

**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-5.2.2: Charging Infrastructure**

Encourage early deployment of EV charging stations at no charge in appropriate, publicly accessible locations across the District to serve existing neighborhoods. Consider the integration of EV charging stations in new and existing residential and commercial developments. Consideration should also be given to locations where EV charging stations can be retrofitted into parking garages. As EVs become more popular, there will be increased demand for on-street charging stations, which will need to be balanced with other curbside needs and uses. 430.4

## **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.

### **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.

### **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...

### **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-1.2.11 Inclusive Mixed-Income Neighborhoods**

Support mixed-income housing by encouraging affordable housing in high-cost areas and market rate housing in low-income areas. Identify and implement measures that build in long-term affordability, preferably permanent or for the life of the project, to minimize displacement and achieve a balance of housing opportunities across the District. 504.19

### **Policy H-1.3.1: Housing for Larger Households**

Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail.

#### *Would Potentially Not Further*

### **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

## **Environmental Protection Element**

### **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. 603.6

### **Policy E-2.1.3: Sustainable Landscaping Practices**

Encourage the use of sustainable landscaping practices to beautify the District, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. District government, private developers, and community institutions should coordinate to significantly increase the use of these practices, including planting and maintaining mostly native trees and other plants on District-owned land outside the right-of-ways [sic] in schools, parks, and housing authority

lands. 605.7

#### **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. 615.4

#### **Policy E-5.1.9: Zero-Emission Vehicles**

Encourage the use of electric and zero-emissions vehicles. When feasible, provide financial incentives for District residents and businesses to use electric and zero-emissions vehicles, such as reduced motor vehicle tax and license fees. Support expansion of electric vehicle (EV) charging infrastructure, including innovative designs that encourage off-peak charging and enhance efforts to place refueling and recharging equipment at facilities accessible for public use. 620.18

#### ***Would Potentially Not Further***

##### **Policy E-3.2.1: Carbon Neutrality**

Support land use policies that move Washington, DC toward achieving District-wide carbon neutrality by 2050. This means that the District will eliminate GHG emissions, or offset any remaining emissions, by supporting initiatives that will reduce emissions, such as tree planting, renewable energy generation, and land conservation. In the short term, the District government will develop a detailed implementation plan with clear milestones in order to achieve carbon neutrality by 2050. 612.3

##### **Policy E-3.2.3: Renewable Energy**

Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption.

##### **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-3.2.8: Locally Generated Electricity**

Support locally generated electricity from renewable sources, including both commercial and residential renewable energy projects....

### **Urban Design Element**

#### **Policy UD-2.1.2: Neighborhood Streetscapes**

Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low scale buildings, while sidewalks with more trees and vegetation may be appropriate for large-scale development. Pedestrian-oriented lighting should be designed to enhance walkability for all

users, as well as visually reflect the character of neighborhood. 908.4

**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. 908.8

**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. 909.5

**Policy UD-2.2.4: Transitions in Building Intensity**

Design transitions between large- and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single-family or row houses) can be made more pleasing and gradual through a variety of context-specific design strategies, such as a slender massing of taller elements, stepping back the building at floors above its neighbors' predominant roof line, stepping a building's massing down to meet the roof line of its neighbors, or strategic placement of taller elements to mark corners, vista terminations, or large open-space frontages. 909.9

**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. 909.10

**Policy UD 3.2.1: Buildings that Enable Social Interaction**

Residential building design should provide opportunities and spaces for interaction, such as open-air porch entrances, balconies, front stoops, and shared yards. Large multi-family buildings should prioritize individual, ground-level entrances to units that open up to the street in addition to interior access to units through a shared private lobby. 914.3

**Policy UD-3.2.5: Safe and Active Public Spaces and Streets**

The design of the built environment should encourage public activity throughout the day and help minimize the potential for criminal activity. Design measures include active building frontages (such as windows, balconies, and frequently spaced entrances) adequate lighting that avoids glare and shadow, maintaining clear lines of sight and visual access, and avoiding dead-end streets. Where feasible consider closing streets to vehicular traffic to enhance pedestrian and cycling uses of streets. 914.7

**Policy UD-4.2.4: Creating Engaging Facades**

Design new buildings to respond to the surrounding neighborhood fabric by modulating façade 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. In areas lacking a strong building-form pattern, the use of complementary or reinterpreted materials and colors could strengthen architectural identity (see Figure 9.19 for recommended façade design strategies). 918.6

**Policy UD 4.2.6: Active Facades**

Prioritize the placement of multiple entrances for new multi-family and mixed-use buildings across the length of a block rather than a single lobby entrance at one location. New residential developments should promote active facades with spaces for social activity, such as porches, stoops, or patios along public streets, to encourage more activity along the sidewalk and increase social interaction in a neighborhood. 918.9