

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Matthew Jesick, Project Manager
MBR Maxine Brown-Roberts, Associate Director for Development Review

DATE: September 4, 2026

SUBJECT: OP Public Hearing Report for Zoning Commission #26-07, Design Review in the Northern Howard Road (NHR) Zone

I. RECOMMENDATION

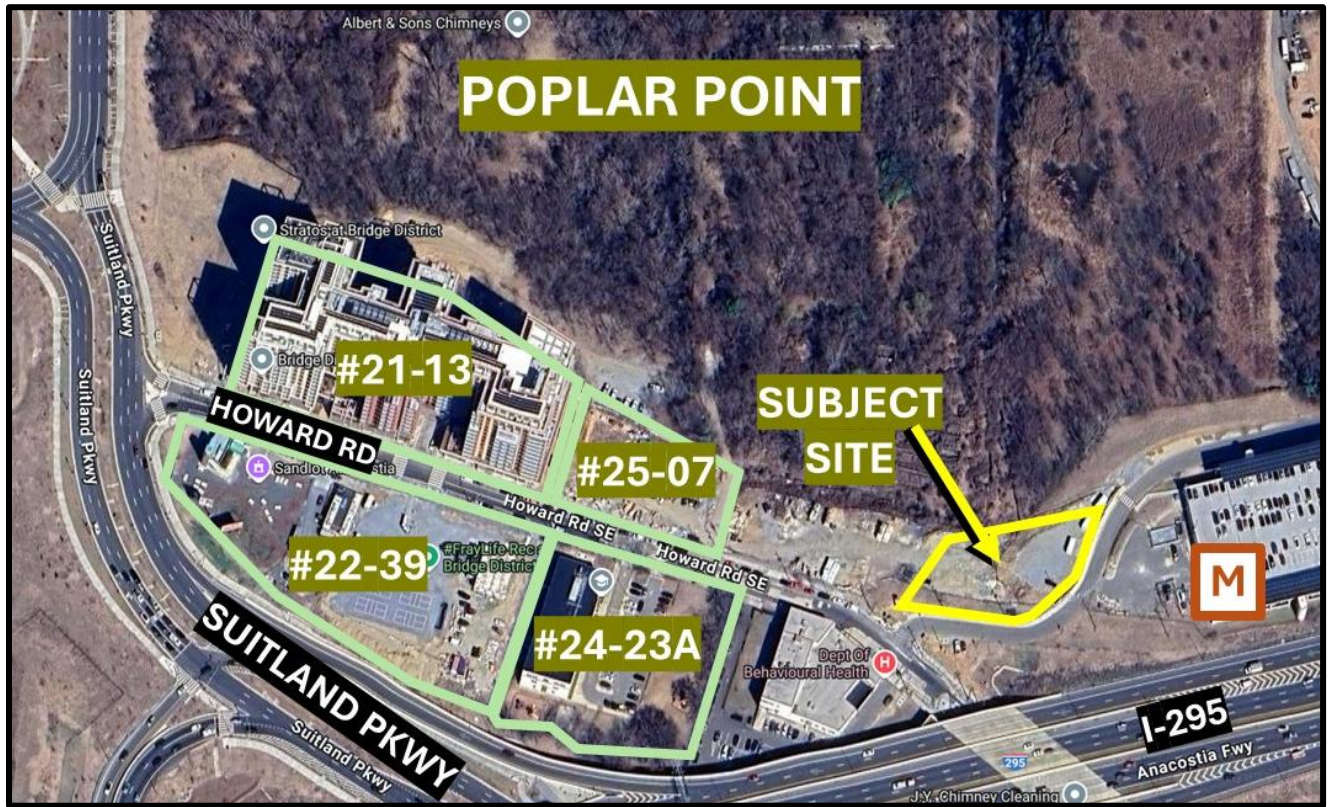
This application filed by CQ Metro Land, LLC is for a new hotel in a zone which establishes a mandatory design review by the Zoning Commission. Evaluation of the subject application is against the criteria contained in Subtitle K Chapter 10 – the Northern Howard Road Zone – and Subtitle X Chapter 6 – the general design review criteria. **The application successfully meets many of the relevant criteria, but not all. The Office of Planning (OP) can recommend approval once the issues identified in this report have been addressed.**

OP recommends **approval** of the requested flexibility for side and rear yard requirements, and special exception relief for the residential requirement, vehicle parking, bicycle shower requirement, loading, and roof structure design.

II. APPLICATION-IN-BRIEF

Location	Howard Road, SE - Square 5860, Lot 1039 - Ward 8, ANC 8A
Applicant	CQ Metro Land, LLC
Zoning	Northern Howard Road (NHR) (High density mixed use)
Historic District or Resource	None
Site Area	24,010 sq. ft.
Proposed Development	
Height	99' to top of architectural parapet
FAR	3.59

Floor Area	0 sf – residential <u>86,181 sf – commercial (hotel / hotel adjunct)</u> 86,181 sf – total
On-site energy generation	Requirement: 1% of total building energy use shall be generated on-site (K § 1008.2); Application states that rooftop solar array will comply.
Zoning Relief / Flexibility	1. Side yard (K § 1001.8, pursuant to X § 603) – 16’4” required on east side; 0 feet proposed; <i>flexibility requested</i> 2. Rear yard (K § 1001.9, pursuant to X § 603) – 17’1” required on north side; 15’1” proposed; <i>flexibility requested</i> 3. NHR zone minimum residential requirement (K § 1001.3, pursuant to K § 1006) – 2.5 FAR residential required; 0 residential proposed; <i>special exception requested</i> 4. Vehicle parking (K § 1007.2 and C § 701, pursuant to C § 703) – 21 spaces required; 0 spaces provided; <i>special exception requested</i> 5. Bicycle shower requirement (C § 806.4, pursuant to C § 807) – 4 showers required; 1 shower provided; <i>special exception requested</i> 6. Loading (K § 1007.4 and C § 901, pursuant to C § 909) – 2 loading berths required; 1 loading berth proposed; <i>special exception requested</i> 7. Roof structure enclosing walls (C § 1503.3, pursuant to C § 1506) – Single-height enclosing wall, set back 1-to-1, required to screen rooftop structures and mech. equipment; Variable height wall and parapet proposed. <i>special exception requested</i>
Lot Characteristics and Existing Development	Vacant lot; Property does not front directly on Howard Road, but rather abuts I-295 right of way; Access to the property is provided via an easement on a WMATA-owned driveway; The lot generally slopes down from east to west; The lot is not within the 100 or 500 year flood plains; Buildable area constrained by various underground easements.
Adjacent Properties and Neighborhood Character	Site is on the north side of I-295, immediately adjacent to the north entrance of the Anacostia Metro Station. The applicant is in the process of developing most of the privately owned land on either side of Howard Road. This includes the following approved design review cases, all with a mix of residential and retail: - ZC #21-13 – completed; - ZC #25-07 – under construction; - ZC #22-39 – approved. The Commission also approved a renovated and expanded charter school on the south side of Howard Road in ZC #24-23A. Please refer to the map below. Adjacent to the property to the north is the Poplar Point parcel, currently owned by the National Park Service (NPS), but which is to eventually be transferred to the District. Planning for that site has begun. Please see Attachment 4 for the Preferred Alternative Proposed Land Use Plan from the Poplar Point Environmental Assessment.



III. SUMMARY OF OP COMMENTS

The following summarizes OP Comments from this report.

	OP Comment	Planning and / or Zoning Rationale
1	The applicant should examine ways to provide greater activation of the ground floor on the east side of the building. Methods could include: • Rearranging internal uses and building circulation so that lobby, amenity, or retail space fronts the access street; • Creating building entrances; • Provide significant fenestration into the interior of the building.	Comprehensive Plan policy and Design Review standards seek to create active, safe, pedestrian-friendly sidewalks, especially in areas close to metro and that serve as access points to metro stations. It is also anticipated that this location will serve as a major connection to future development at Poplar Point.
2	The applicant should examine ways to create a more engaging east façade on upper stories. Methods could include: • Rearranging guest room layout so that rooms face east, adding windows to that side; • Adding other, non-fenestration articulation to the façade.	Comprehensive Plan policies and Design Review criteria seek to create building façades that engage the public realm.

3	The applicant should examine the possibility of relocating the loading dock to the west building façade.	Comprehensive Plan policies and Design Review criteria seek to make pedestrian connections as safe, convenient and inviting as possible. The east façade, which OP views as critical due to its location fronting on a metro entrance, fronting on an existing metro access street, and fronting on a likely future street connection to Poplar Point, could be improved if the loading dock were moved. OP views the west open space, while a nice amenity for this building and potential building to the west, as having a lower degree of importance to the urban design of the area, both now and in the future.
4	Should it prove impossible to relocate the loading dock, the applicant should commit to provide the exterior murals, as described in Exhibit 15.	In conformance with Comprehensive Plan policies and Design Review criteria, the murals could help to soften the pedestrian environment and project a more pleasing façade toward active public areas.

IV. PROJECT AND AREA DESCRIPTION

The applicant proposes a hotel with approximately 160 guest rooms and approximately 4,000 square feet of hotel function rooms and commercial adjunct space. The total height of the building measured to the top of the parapet, would be 99 feet, with 7 full stories and a partially exposed cellar level. The total FAR would be 3.59. The building footprint would not be impacted by the 100- or 500-year floodplains. Underground, the site is bounded or crossed by a number of DC Water easements, which helped shape the proposed building footprint.

Vehicular access to the site would be from an existing WMATA access street which is located partially on a DDOT right-of-way and partially on WMATA property. The access street provides pedestrian, bike and vehicular access to the north entrance of the Anacostia Metro Station, and the WMATA garage on the north side of the Anacostia Freeway. The applicant has an easement which permits access across WMATA's property to the site. The property does not technically front on Howard Road, though the building would continue the development pattern established by the applicant in this new neighborhood, which they term the Bridge District.

It is anticipated that many hotel guests and staff would arrive by transit, but the main vehicular access point to the site would be a circular drive off the WMATA access street. The front door of the hotel would face south onto the circular drive. A walking and biking promenade would be constructed on the north side of the building, in conformity with past Bridge District projects on the north side of Howard Road. The intent is to link all the buildings to the metro station. A pedestrian path is proposed on the west boundary of the site, to link Howard Road and the promenade.

The design proposes a restaurant space on the west side of the first floor, with the restaurant use extending to the cellar on that side, where the grade drops down and would allow for outdoor

The site is located at the east end of the Bridge District, directly across the access street from the metro entrance. To the north is Poplar Point, a large federal parcel that is to be transferred to the District. Planning for Poplar Point has begun, and the Environmental Assessment (EA) process, led by the National Park Service, has arrived at a Draft Preferred Alternative Land Use Plan. Please see the Land Use Plan at Attachment 5. After the EA is complete the District will undertake its own, more detailed master planning process for the site. While not finalized, the EA Land Use Plan gives a sense of what development could occur on Poplar Point. The Land Use Plan also envisions one of the few access points to Poplar Point at the general vicinity of the WMATA access street, as well as a central public plaza at the metro entrance. The upgraded street would be an important connection from the neighborhood south of the freeway, and from Howard Road, into Poplar Point. See below for a detailed view of the EA Land Use Plan in the vicinity of the current project. Based on this concept of development at Poplar Point, the proposed hotel sits at a critical location. But even without any development at Poplar Point, the existing access street is the main connection to the metro entrance, a role that will grow in importance as the Bridge District is built out.



V. ZONING SUMMARY

The subject site is zoned Northern Howard Road (NHR), which is intended to “Assure development of the area with a mixture of residential and commercial uses, and a suitable height, bulk, and design of buildings, as generally indicated in the Comprehensive Plan” (K § 1000.2(a)) and to “Encourage a variety of visitor-related uses, such as retail, service, and entertainment” (K § 1000.2(b)). Pursuant to Subtitle K § 1005, this zone includes a mandatory Zoning Commission review against specific criteria found in Subtitles K and X. The following table compares the proposal to zoning requirements.

NHR	Requirement	Proposed	Relief
Lot Area	n/a	24,010 sf	Conforming
FAR K § 1001.2 K § 1001.3	9.0 Total, max. 2.5 Residential, min.	3.59 Total 0.0 Residential	Requested
Height K § 1001.4	130’ max.	99’	Conforming
Lot Occupancy K § 1001.7	100%	55%	Conforming
Side Yard K § 1001.8	None required; If provided, 2 in. / ft. of height = 16’4”	Zero feet on east	Requested
Rear Yard K § 1001.9	2.5 in. / ft. of height = 17’1”	15’1”	Requested
GAR K § 1001.12	0.2 min.	0.2	Conforming
Vehicle Parking K § 1007.2	21	Zero	Requested
Bicycle Parking K § 1007.3	Long term – 9 min. Short term – 2 min.	Long term – 9 Short term – 2	Conforming
Bicycle Showers K § 1007.3 and C § 806.4	4 showers	1 shower	Requested
Loading K § 1007.4	Two 30 ft. berths	One 30 ft. berth	Requested
LEED Certification K § 1008.1	LEED Gold required	LEED Gold	Conforming
Renewable Energy K § 1008.2	1% of building energy requirement must be provided by on-site renewable energy generation	Rooftop solar array to provide required energy generation	Conforming

NHR	Requirement	Proposed	Relief
Penthouse Enclosing Walls C § 1503	Rooftop structures and mech. equipment enclosed by a single wall of uniform height, set back at 1-to-1	Rooftop structures and mech. equipment enclosed by walls and an extended parapet of varying height	Requested

VI. REVIEW CRITERIA

A. Subtitle K Design Review Criteria

The zoning for this site provides specific criteria in Subtitle K § 1005 for Zoning Commission review of any proposed development. The following is OP analysis of the applicable standards to this application.

1005 ZONING COMMISSION REVIEW OF BUILDINGS, STRUCTURES, AND USES (NHR)

1005.1 For all properties within the NHR zone, all proposed buildings and structures, or any proposed exterior renovation to any existing buildings or structures that would result in a substantial alteration of the exterior design, shall be subject to review and approval by the Zoning Commission in accordance with the following provisions.

The applicant proposes a new hotel building with ground floor commercial, subject to Zoning Commission design review.

1005.2 In addition to proving that the proposed use, building, or structure meets the standards set forth in Subtitle X, Chapter 6, and the relevant provisions of this chapter, an applicant requesting approval under this section shall prove that the proposed building or structure, including the architectural design, site plan, landscaping, sidewalk treatment, and operation, will:

(a) Help achieve the objectives of the NHR zone defined in Subtitle K § 1000.1;

The purposes of the NHR zone include creating a mix of residential and commercial uses, as well as visitor-related uses. The zone also encourages a high degree of pedestrian and bicycle mobility, as well as superior architecture. It also seeks to encourage superior architecture, including active streets, pedestrian and bicycle friendly design. The proposed project would further the goal of providing for visitor-related uses, and the architecture is attractive. **While the site plan generally provides for pedestrian and bike mobility – through the trail on the north side of the building and the sidewalk along the access drive – the design could more fully achieve a pedestrian-friendly outcome through changes to the architecture and ground floor, as discussed in this report.**

(b) Help achieve the desired use mix, with the identified preferred uses specifically being residential, office, entertainment, retail, or service uses;

Although “hotel” is not specifically called out in this subsection as being a preferred use, lodging is certainly a use that supports the purposes of the zone, to provide visitor-related uses. It would also be an important component in creating a balanced use mix in the Bridge District, complementing the residential and retail components of projects already approved or built. The hotel adjunct, likely a restaurant or lounge, would serve both the hotel guests and members of the public.

- (c) *Provide streetscape connections for future development on adjacent lots and parcels, and be in context with an urban street grid;*

The Poplar Point Environmental Assessment Draft Preferred Alternative Land Use Plan (“EA Plan” see Attachment 5) indicates that there would likely be a new roadway immediately adjacent to the east side of the hotel. It would serve as a connection between Poplar Point’s main east-west artery and Howard Road, creating one of the few – and therefore critical – pedestrian, bicycle and vehicular entry points to the new neighborhood. Further, the EA Plan calls for a major public plaza in front of the metro entrance which would serve as a civic focal point for the new neighborhood. It would be preferable if the architecture of the hotel, both on the ground floor and upper floors, and the uses on the ground floor, could present a better face to what is likely to be an important street and public amenity. Even if the new street and the new development in Poplar Point are not built for several years, the existing access drive still serves as an important pedestrian connection to the metro entrance. **The hotel design, therefore, should be made to be more like a typical street frontage in the District, rather than the alley-like façade the current design presents.**

- (d) *Minimize conflict between vehicles, bicycles, and pedestrians;*

OP supports the incorporation of a ped-bike path along the rear of the building to provide a car-free connection to adjacent development, and a link to the metro station from the Bridge District parcels to the west.

It is OP’s preference that the location of the loading dock be moved to the west side of the building to minimize pedestrian conflicts and to improve the urban design on the east side of the building. Exhibit 3, pp. 4 and 5, implies that trucks may be too heavy for the DC Water infrastructure on the west side of the property. **The applicant should provide additional details about the weight limitations on the west side of the building and whether trucks could be accommodated in that area.** OP finds compelling the applicant’s argument that, should DC Water need access to that area, a loading dock on the east side would allow for uninterrupted hotel operations.

After additional study, should it be determined that the loading dock must remain on the east side of the building, OP supports the concept of a mural on the garage door, as shown in Exhibit 15A. **OP also recommends additional changes to the ground floor to make the pedestrian environment more inviting, as discussed in this report and referral agency comments at Attachments 3 and 4.**

- (e) *Minimize unarticulated blank walls adjacent to public spaces through facade articulation;*

Three of the four sides of the building propose significant fenestration with next to no blank areas on the façades. The east side of the building (see Ex. 3G, Sheet A6.04, and Ex. 15A, Sheet A6.04), which fronts the access street and the metro entrance, is almost completely blank. **The applicant should explore adding windows and entrances to this side of the building. This could likely be achieved in multiple ways, but some options to study include:**

- **Moving “back of house” spaces, including the east egress stairs, to a more central location in the floorplate, or to the north wall, both on the ground floor and on upper floors;**
- **Shifting guest rooms so that windows face east;**
- **Adding balconies to the design;**
- **Shifting hotel amenity spaces and the lobby to front on the access street, including entrances where possible.**

(f) Minimize impact on the environment, as demonstrated through the provision of an evaluation of the proposal against LEED certification standards; and

The LEED scorecard at Exhibit 3G, Sheet A7.01, indicates that the project would achieve LEED Gold. The design includes green roof areas and solar power generation, as well as bioretention areas at ground level.

(g) Promote safe and active streetscapes through building articulation, landscaping, and the provision of active ground level uses.

As previously discussed in this report, the design could more fully comply with this aspect of the design review with both architectural and use changes along the access street on the east side of the building. OP does support the highly transparent southern façade, the potential outdoor seating area on the west side of the building, and the planned promenade on the north side of this and other buildings.

1005.3 Each application for review under this section shall provide a report on the following items as part of the initial submission:

(a) Coordination by the applicant with the Department of Employment Services (DOES) regarding apprenticeship and training opportunities during construction and operation at the subject site, and the provision of any internship or training opportunities during construction and operation at the subject site, either with the applicant or with contractors working on the project independent of DOES;

According to Exhibit 3, p. 10, the applicant has partnered with organizations and their contractors to train electrical apprentices “who acquired on-job skills and experience at the Bridge District Phase 1 project site.” The application goes on to state that seven local contractors have been hired for construction projects. The applicant states that they will “endeavor to continue these efforts” and that they are “aiming to...explore ways” to host workforce and development opportunities and hiring events for residents. The applicant has also contributed funds to regional training

programs for building trades. OP would support further commitments to local hiring, and more details on discussions held with DOES.

- (b) *Efforts by the applicant to include local businesses, especially Wards 7 and 8 businesses, in contracts for the construction or operation of the proposed project;*

According to Exhibit 3, p. 10, the applicant has been working with local nonprofits and government officials to publicize opportunities to engage in the construction and operation of the project. Exhibit 15, p. 5, also provides information on hiring local interns, training programs for working mothers to obtain flagger certifications, and the inclusion of a minority-owned subcontractor that supported building trades apprenticeships.

- (c) *Efforts by the applicant to provide retail or commercial leasing opportunities to small and local businesses, especially Ward 8 businesses, and efforts to otherwise encourage local entrepreneurship and innovation; and*

According to the Exhibit 15, p. 5, the applicant has tailored its leasing approach to better attract local and/or startup businesses, and has seen success in that area in completed portions of the Bridge District. They state that they will continue that model as future retail opportunities become available.

- (d) *Coordination by the applicant with the State Archaeologist and any plans to study potential archeological resources at the subject site, and otherwise recognize local Anacostia history.*

The applicant has previously completed Phase I and Phase II archaeology studies which concluded that no significant historic resources were identified on the subject site. In an email to OP, the applicant stated that one concept for the murals proposed with Exhibit 15 is that they draw inspiration from local neighborhood history.

1005.4 *The applicant shall also provide evidence that the information required by Subtitle K § 1005.3 has been served on any ANC on or adjacent to the NHR zone.*

Exhibit 3, p. 22, details the applicant's engagement efforts with various local organizations, including ANCs 8A and 8C. The applicant confirmed in an email to OP that the information required by Subtitle K § 1005.3 has been served on the ANCs through transmission of the application materials.

B. Subtitle X Design Review Criteria – Section 603, Design Review Flexibility and Special Exception Relief

The zoning regulations also require review against the general design review criteria in Subtitle X Chapter 6. The following is OP analysis of the standards applicable to this application.

603.1 *As part of the design review process, the Zoning Commission may grant relief from the development standards for height, setbacks, lot occupancy, courts, and building transitions; as well as any specific design standards of a specific zone. The design review process shall not be used to vary other building development standards including FAR, Inclusionary Zoning, or green area ratio.*

The application requests flexibility from the following development standards:

1. Side yard (K § 1001.8);
2. Rear yard (K § 1001.9).

The application requests special exception relief from:

3. NHR zone minimum residential requirement (K § 1001.3);
4. Vehicle parking (K § 1007.2 and C § 701);
5. Loading (K § 1007.4 and C § 901);
6. Bicycle shower requirement (C § 806.4);
7. Roof structure enclosing walls (C § 1503.3).

OP's analysis of the requested flexibility and special exception relief is below, and OP recommends that the Commission approve all areas of requested flexibility or relief.

603.2 *Except for height, the amount of relief is at the discretion of the Zoning Commission, but provided that the relief is required to enable the applicant to meet all of the standards of Subtitle X § 604. The Zoning Commission may grant no greater height than that permitted if the application were for a PUD.*

Flexibility Analyses

1 & 2 – Side and Rear Yard Flexibility: The following flexibility is requested for required yards:

Rear yard (north side) – 17'1" required, 15'1" proposed;
Side yard (east side) – 16'4" required, zero feet minimum proposed.

The application's analysis of compliance with the criteria of this section can be found on page numbers 27 and 28 of Exhibit 3 (PDF pages 31 and 32). The applicant states that the "flexibility is necessary for the Applicant to fully satisfy the design review standards of Subtitle X § 604."

The record does not seem to explain why the flexibility is necessary to meet the design review standards, as required by X § 603.2. But in communications with OP, the applicant indicated that in their view, shifting the building to the west or south, or shrinking the footprint of the building, would negatively impact the project's ability to fulfill the goals of the NHR design review and the general design review. Specifically, the applicant cited the provision of publicly accessible outdoor spaces (K § 1000.2(d)) and pedestrian connections to the broader neighborhood (K § 1000.2(f)), as purposes of the NHR zone that would be furthered by the current design. This is similar to the general design review goals of providing public gathering spaces (X § 604.7(b)) and promoting connectivity internally and with the surroundings (X § 604.7(f)(1) and (4)). The applicant views the open space at the west of the site as an important north-south connection

between this parcel and the future development site to the west. The applicant also stated to OP that, internal to the building, altering the footprint would result in negative impacts to the ground floor program and to the ability to provide guest rooms on upper floors. In their view, this would curtail the project's ability to meet the NHR goal of providing visitor-related uses (K § 1000.2(b)). OP concludes, therefore, that the flexibility is required to fully meet the design review criteria of the X § 604, and recommends **approval of the flexibility**.

Special Exception Analyses

3 – NHR zone minimum residential requirement: The NHR zone requires that each lot provide at least 2.5 FAR of residential use. In this case, the application proposes a hotel with no residential use. K § 1009 allows for a combined-lot-development process whereby two separate lots in the NHR zone can share the responsibility of providing the required use, even if one of them individually does not meet the residential threshold. This applicant has not chosen to pursue that regulatory path, but rather request special exception relief from the requirement of K § 1001.3, pursuant to K § 1006.

K § 1006.1 states that:

The Zoning Commission may grant special exception relief from the development standards of § 1001 of this chapter and from the Designated Street use and design standards of § 1004 of this chapter, subject to the standards of Subtitle X, Chapter 9 and to the applicable conditions of this chapter and provided that the applicant demonstrates the special exception relief would result in a design that still complies with the purposes of this chapter.

Granting the requested relief would not impair the project's compliance with the purposes of the NHR zone, such as developing the area with a mixture of residential and commercial uses, and encouraging a variety of visitor-related uses (K § 1000.2(a) and (b)). The minimum residential requirement was put in place to ensure that the NHR area did not develop as a solely-office enclave. However, the prior approvals in the zone have ensured that the NHR corridor will have an abundance of residential use. While the zone requires 2.5 FAR of residential, the prior three mixed-use projects approved in the zone have included 7.5, 6.3, and 6.9 FAR of housing (Ex. 3, p. 29), more than making up for a lack of residential on this site. Because of the zone's anticipation that residential use could be shifted between lots, granting the relief would not impair the intent of the zone. Further, the proposed hospitality use would complement the other uses on the corridor, and should not negatively impact nearby properties.

4 – Vehicle parking: For the proposed building, C § 701 would require 21 vehicular parking spaces, based on the size of the building, the lodging use, and its proximity to metro. The application requests relief to provide zero parking spaces. Relief can be granted pursuant to C § 703, subject to an applicant's demonstration that one or more of the factors of C § 703.2 are satisfied by a development. The proposed hotel should satisfy three of the factors, namely:

- (a) *Due to the physical constraints of the property, the required parking spaces cannot be provided either on the lot or within six hundred feet (600 ft.) of the lot in accordance with Subtitle C § 701.8;*

- (b) *The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities;*
- (d) *Amount of traffic congestion existing or which the parking for the building or structure would reasonably be expected to create in the neighborhood;*

The application materials demonstrate that the site is encumbered by a number of subsurface easements. That fact, coupled with the elevation near the floodplain and the awkward shape of the property, would make excavation, waterproofing, and ramping down to lower levels difficult, and would make any garage layout inefficient. The site, however, has excellent access to metro – being right across from the north entrance to the Anacostia metro station – and to bus – being within walking distance of the major bus hub at the south metro entrance. The application also states that the hotel would have only minimal staff, and that guests are also anticipated to arrive by taxi and rideshare. The draft transportation analysis at Exhibit 15B concludes that granting relief should not have a detrimental impact on the transportation network due to the reliance on alternative modes of travel (Ex. 15B, p. 2). Furthermore, granting relief should not impair the intent of the Regulations as the NHR zone seeks to create a walkable environment, and the proposal should minimize vehicular trips and vehicle and pedestrian conflicts.

5 – Loading: The proposed lodging use would typically generate a requirement of two 30-foot loading berths, but the applicant in this case requests special exception relief, pursuant to C § 909, to provide only one berth. Relief can be granted upon a finding that the full loading requirement is unnecessary due to a lack of demand (C § 909.1(b)). The draft transportation analysis (Ex. 15B, p. 22) states that the single loading berth should be sufficient, given “the nature of the development itself as the project will be a select-service hotel with no full-service restaurant, ballroom, or banquet facilities, meaning loading demand is inherently lower than for a full service property”. The transportation memo goes on to propose a loading management plan that would include a loading dock manager on-site who would schedule and monitor deliveries (p. 23). Granting the relief should not negatively impact adjacent properties, as the single berth should be sufficient for the demand, and there should be no trucks using public or quasi-public space for parking or loading. Relief should also not impair the intent of the Regulations, which anticipate that in certain circumstances the required amount of loading would not be necessary.

6 – Bicycle shower requirement: The proposed use would generate a requirement of four showers for employees who commute by bicycle. The design proposes one shower and the applicant requests relief pursuant to C § 807.4. Relief from the required number of showers can be granted upon the applicant’s demonstration of the following:

- *The intent of Subtitle C § 806 is met (C § 807.4(a)), and*
- *The use will not generate the demand for the full number of showers and changing facilities required (C § 807.4(b)(1))*

Granting relief should not impair the intent of C § 806, which is to “ensure that long-term bicycle parking spaces are usable by the long-term occupants, especially employees, of non-residential uses” (C § 806.1). Exhibit 3, p. 30, states that while the shower requirement is based on the floor area of the building, in the case of a hotel the majority of the floor area is not occupied by employees, as in an office building, but rather hotel guests. The applicant also argues that in this

particular case, the hotel has limited services and little function space, so would therefore have a small number of employees and a lower demand for shower facilities. Granting relief would not impact adjacent properties as the number of showers is an issue completely internal to the building's design and function.

7 – Roof structure enclosing walls: The penthouse regulations require a single enclosure for rooftop equipment and structures, and that enclosing walls be set back 1-to-1 from the edge of the roof. The design proposes enclosing screens on the north and east sides of the rooftop equipment, and an extended decorative parapet on the south and west. The parapet would be an extension of the building walls on those sides. Special exception relief to penthouse requirements is permitted pursuant to C § 1506.1 and X § 900, and upon demonstration of one of the following factors listed in C § 1506.1(c):

- (1) *The strict application of the requirements of this chapter would result in construction that is unduly restrictive, prohibitively costly, or unreasonable, or is inconsistent with building codes;*
- (2) *The relief requested would result in a better design of the penthouse or rooftop structure without appearing to be an extension of the building wall;*
- (3) *The relief requested would result in a penthouse or rooftop structure that is visually less intrusive; or*
- (4) *Operating difficulties such as meeting D.C. Construction Code, Title 12 DCMR requirements for roof access and stairwell separation or elevator stack location to achieve reasonable efficiencies in lower floors; size of Subtitle C § 115 building lot; or other conditions relating to the building or surrounding area make full compliance unduly restrictive, prohibitively costly or unreasonable.*

Strict application of the setback and screening requirements would be unduly restrictive. The present design would allow rooftop equipment to be concentrated at the southwest corner of the roof, which thereby allows concentrated areas of green roof and solar panels in other sections of the roof. This efficient layout would be superior to locating mechanical units away from the roof edge, and leaving remnant spaces around the periphery for green roof or solar. The proposed layout would meet the overall purpose of the regulation – to screen mechanical equipment and to have rooftop structures complement the architecture of the overall building. In the proposed design, the parapet at this corner of the roof would reach a maximum height of 18 feet, tall enough to screen mechanical equipment and the stair tower. And the parapet would be a continuation of the main wall of the building, continuing without interruption the green paneled exterior. Granting the relief should not have a detrimental impact on nearby properties. While the parapet would be taller than typical parapets, as noted it would blend seamlessly with the building architecture. And its total height would still be less than that anticipated by the zone, or approved for other buildings in the zone.

C. Subtitle X Design Review Criteria – Section 604, Design Review Standards

604.1 *The Zoning Commission will evaluate and approve or disapprove a design review application subject to this chapter according to the standards of this section and for Non-*

Voluntary Design Reviews subject to this chapter according to the standards stated in the provisions that require Zoning Commission review.

604.2 *For Non-Voluntary Design Review, the application must also meet the requirements of the provisions that mandated Zoning Commission approval.*

The requirements of Subtitle K are reviewed above.

604.3 *The applicant shall have the burden of proof to justify the granting of the application according to these standards.*

604.4 *The applicant shall not be relieved of the responsibility of proving the case by a preponderance of the evidence, even if no evidence or arguments are presented in opposition to the case.*

604.5 *The Zoning Commission shall find that the proposed design review development is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.*

For analysis against the Comprehensive Plan, please refer the applicant filing at Exhibit 3 and the OP analysis in Section 6.D. below.

604.6 *The Zoning Commission shall find that the proposed design review development will not tend to affect adversely the use of neighboring property and meets the general special exception criteria of Subtitle X, Chapter 9.*

The proposed scale of the building and its uses should not negatively impact nearby properties. The height and density are anticipated by the Comprehensive Plan and permitted by the NHR zone. In fact, the zone would allow for significantly more height and density, which OP would support. The proposed design of the development, however, could have a detrimental impact on nearby properties. The blank east façade would not present an active or engaging front to existing or planned public places such as the metro entrance and the potential future street and plaza associated with the Poplar Point neighborhood. The design would not maximize street activation or pedestrian comfort.

604.7 *The Zoning Commission shall review the urban design of the site and the building for the following criteria:*

- (a) Street frontages are designed to be safe, comfortable, and encourage pedestrian activity, including:*
 - (1) Multiple pedestrian entrances for large developments;*
 - (2) Direct driveway or garage access to the street is discouraged;*
 - (3) Commercial ground floors contain active uses with clear, inviting windows;*
 - (4) Blank facades are prevented or minimized; and*
 - (5) Wide sidewalks are provided;*

The north, south and west sides of the building would be safe, comfortable, and encourage pedestrian activity. The west side of the property would have a pedestrian path from south to north, and a potential outdoor seating area for restaurant guests. The south side would have the lobby entrance and a direct entrance to the restaurant. The north side would have a walking and biking promenade, linking to the other buildings in the Bridge District. On the east side, the urban design of the site could be improved, using all of the techniques suggested in this subsection: additional entrances, active uses, and clear windows. If the loading dock could be relocated to the western side of the building, that would further improve the pedestrian experience. If such a move proves impossible, OP supports softening the appearance of the garage door with a mural, as suggested in Exhibit 15.

- (b) *Public gathering spaces and open spaces are encouraged, especially in the following situations:*
 - (1) *Where neighborhood open space is lacking;*
 - (2) *Near transit stations or hubs; and*
 - (3) *When they can enhance existing parks and the waterfront;*

The proposed development would include open, landscaped space south of the building, and a public path, landscaped area, and seating area west of the hotel.

- (c) *New development respects the historic character of Washington's neighborhoods, including:*
 - (1) *Developments near the District's major boulevards and public spaces should reinforce the existing urban form;*
 - (2) *Infill development should respect, though need not imitate, the continuity of neighborhood architectural character; and*
 - (3) *Development should respect and protect key landscape vistas and axial views of landmarks and important places;*

The proposed development would complement the streetscape on Howard Road, helping to create an urban form both typical of DC and appropriate for a high density area near metro. The building should not create any undue impacts on views of landmarks and important places. The NHR zone requires that development attempt to create an urban street grid, and while this project would not be responsible for creating a new access road into Poplar Point, the design could improve the building's relationship to the existing access street and to any potential future main entrance to Poplar Point.

- (d) *Buildings strive for attractive and inspired façade design, including:*
 - (1) *Reinforce the pedestrian realm with elevated detailing and design of first (1st) and second (2nd) stories; and*
 - (2) *Incorporate contextual and quality building materials and fenestration;*

The design proposes a generally attractive façade on the south, west and north, and the hotel's modern aesthetic should harmonize with the modern design emphasis present in other buildings

on Howard Road. See Section VII and Attachment 4 for comments from OP's Urban Design Division suggesting additional study of materials and details of the façade. On the eastern side especially, the building does not have attractive or inspired design that would reinforce the pedestrian realm. See, for example, Exhibit 15A, Sheet A6.04.

(e) Sites are designed with sustainable landscaping; and

The application proposes landscaping at the ground level, primarily on the western and southern sides of the building. Portions of these spaces would also serve as part of the building's stormwater retention regime. Green roofs would also be used at the second-floor level above portions of the lobby, and on the main roof. Page 13 of Exhibit 3 states that "native plantings" will be used in the landscape. The applicant should commit to only using native species, in conformance with Comprehensive Plan policy. In addition, Sheets L0.01 through L0.04 of Exhibit 3G provide only a rudimentary landscaping plan. **The applicant should provide a more detailed landscaping plan that would help to understand how the building would appear from Howard Road and from the access road.**

(f) Sites are developed to promote connectivity both internally and with surrounding neighborhoods, including:

- (1) Pedestrian pathways through developments increase mobility and link neighborhoods to transit;*
- (2) The development incorporates transit and bicycle facilities and amenities;*
- (3) Streets, easements, and open spaces are designed to be safe and pedestrian friendly;*
- (4) Large sites are integrated into the surrounding community through street and pedestrian connections; and*
- (5) Waterfront development contains high quality trail and shoreline design as well as ensuring access and view corridors to the waterfront.*

The project would provide a basic sidewalk connection toward the metro entrance from Howard Road, a bike-ped promenade along the north side of the building, and on the west side of the site a north-south walkway from the entrance street to the promenade. As discussed above, connectivity along the east side of the site could be enhanced through changes to the design of the building.

604.8 The Zoning Commission shall find that the criteria of Subtitle X § 604.7 are met in a way that is superior to any matter-of-right development possible on the site.

The proposed building and site design, if changes are made as called for in this report, could meet the criteria in a way that would be superior to a building not subject to design review.

D. Comprehensive Plan

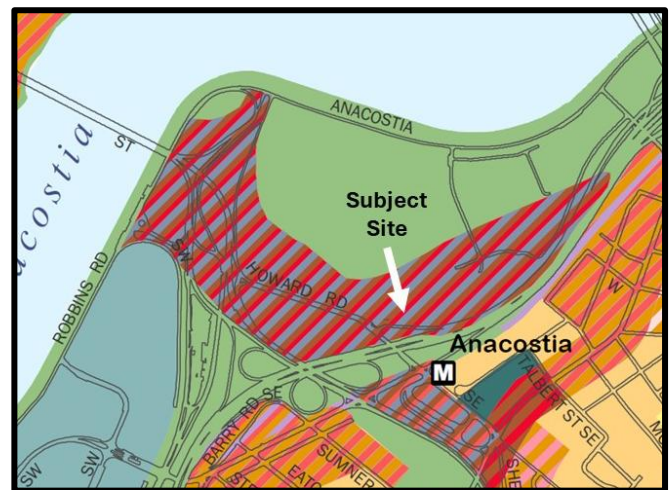
The project would not be inconsistent with the much of the Comprehensive Plan, including certain written policies of the Land Use, Transportation, Economic Development, Urban Design, Environmental Protection, and Lower Anacostia Waterfront / Near Southwest (LAW/NS) Elements. The design could be refined to more fully meet some policies, especially policies from the Urban Design element, as well as some from the Land Use, Transportation, and LAW/NS elements. Please refer to additional analysis below. The subject site is within the Central Employment Area, where it is anticipated that properties would be developed with higher density mixed use. Permitting high density development would allow efficient use of the Anacostia Metro station, and the project would add to a new neighborhood center near a metro station, in conformance with Plan policies. The Environmental Protection Element seeks to expand the use of clean, local energy and minimize a building's energy consumption. The proposed design would further those goals.

The project could also help to create a walkable and bikeable environment, which are also goals of the Plan, and OP recommends improvements to better meet those Plan policies. The Lower Anacostia Waterfront / Near Southwest Area Element specifically seeks to create new waterfront neighborhoods and multimodal streets, and also sets forth the goal of improving connections to Poplar Point. The hotel would be a valuable part of the evolving Bridge District, but the design should place greater emphasis on the existing access street and likely future entrance to Poplar Point.

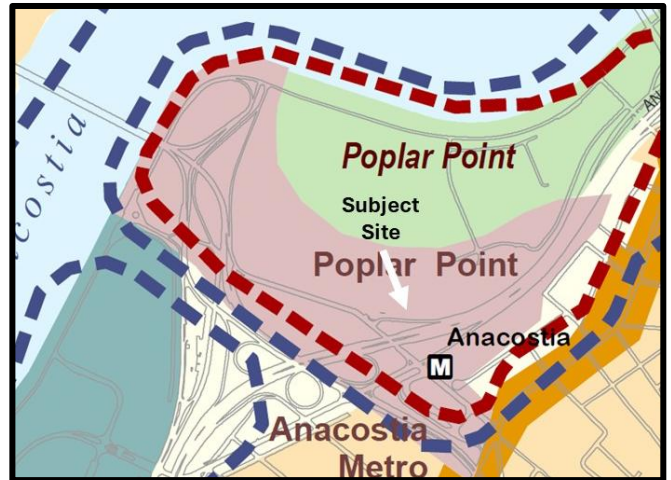
Comprehensive Plan Land Use Maps

The **Future Land Use Map** (right) designates the site as appropriate for a mix of High Density Residential, High Density Commercial, and Institutional uses. The existing zoning, and the proposed project would not be inconsistent with these designations.

The **Generalized Policy Map** (below right) shows the subject site as part of a Land Use Change Area, and places the site on the edge of both a Future Planning Analysis Area, and a Resilience Focus Area.



Future Planning Analysis Area areas are “large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable development...” (§ 2503.2). It is intended that the planning analysis “shall precede any zoning changes in the area.” For this development, the applicant is not requesting a rezoning for the site, and this project would be in conformance with many already-adopted Comprehensive Plan policies and maps.



The Land Use Element defines Resilience Focus Areas as land within the 100- and 500-year floodplain, where “future planning efforts are intended to guide resilience to flooding for new and existing development and infrastructure projects, including public capital projects. (§ 304.8). The applicant provided Resilience Focus Area analysis at Exhibit 3, p. 16. OP notes that, according to Exhibit 3G, Sheet C0.04, the site appears to not be located in either the 100 or 500 year floodplains. The applicant states that they have incorporated DOEE resilient design strategies into the site and building design.

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. Parts 1, 3 and 4 of the tool ask OP to provide analysis of the relevant policies from the Comprehensive Plan and other planning documents, provide data that describe the racial and economic characteristics of the subject planning area, and provide analysis of factors related to equity. The requested information is provided below. The applicant also provided a Racial Equity Analysis at Exhibit 3.

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

The direction to consider equity “as part of [the Zoning Commission’s] Comprehensive Plan consistency analysis” indicates that the equity 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. The Comprehensive Plan provides a number of policies related to the development of this project which, when viewed through a racial equity lens, give the Commission a framework for evaluating the project. Please see a compilation of relevant policies in Attachment 1.

Land Use: The Land Use Element of the Plan seeks to guide growth in such a way that “expands access to affordable housing, education, transportation, employment, and services for communities of color, low-income households, and vulnerable populations” (Comprehensive Plan, § 304.4). The proposed project would enhance access to employment for residents who could work at the building, and would provide lodging services for hotel guests. The project could more fully meet Land Use Element guidance that seeks to maximize walkability and sense of place around metro stations, and also maximize pedestrian safety (§§ 307.9 and 307.13). As this building would be directly across from the north entrance to the Anacostia Metro, the design in general could better address the pedestrian experience, especially on the side that faces the metro and which would serve as a connection between Howard Road and the station entrance.

Connectivity: In conformance with the Transportation Element, the project would generally improve access for hotel workers and visitors to the site, and would improve connections to Howard Road and to the other Bridge District buildings to the west via the development’s multi-purpose trail on the north side of this and other buildings. The hotel would also meet the policies that call for increased development around metro stations (§ 403.11). The design, however, could more fully meet policies of the Transportation Element that call for equitable transportation access and enhanced connections between neighborhoods (§§ 403.13 and 409.7). It is anticipated that the new street to be located to the east of the hotel would be a major connection linking the new neighborhood of Poplar Point and the waterfront with the existing Anacostia neighborhood. The design of the hotel on that side, therefore, should maximize visual engagement with the existing street, focus active uses on that side, and create an environment that is as comfortable for pedestrians as possible given the existing conditions.

Healthy Environment: The project would help to create a more equitable environment, with significant commitments to renewable energy, through the use of a green roof, and by locating jobs and visitor amenities close to transit. Because of its high LEED score and its onsite renewable energy generation, the building would have a smaller environmental impact, contributing to a healthier City. By helping to connect the Anacostia metro station, the Frederick Douglass Bridge, and the Anacostia Riverwalk Trail, neighborhood walkability could encourage more residents of the area to utilize parks, trails and other outdoor amenities, and potentially help to reduce auto usage and add to resident well-being. The Plan also emphasizes that native species should be used in landscaping, and the applicant should commit to use only native species at the subject site.

Urban Design: The hotel would be an important component of a mixed use neighborhood, adding a new population type to complement the heavily residential uses already approved or built in the

Bridge District. The hotel's modern aesthetic should harmonize with the modern design emphasis present in other buildings on Howard Road. Three sides of the building would present active and engaging façades, as called for by the Plan. The Urban Design Element also seeks to provide each neighborhood with a high standard of urban form and ensure that public spaces are pleasing and useable for all residents. The policies address the need for pedestrian access, and streetscapes that prioritize the human experience with safe and active environments. This element specifies that these objectives can in-part be achieved with engaging ground floors and upper story façades. Well-designed connections are especially encouraged where access is being created to the Anacostia River.

Economic Development and Employment: Establishment of a hotel use would further a number of policies that seek to bolster the hospitality industry. The proposal would also provide employment opportunities for area residents, and those job opportunities would have easy access by transit. The applicant has also been working with local companies in Wards 7 and 8 to provide services on previous projects, and state that they could use local contractors going forward on the project. The applicant has also provided internship opportunities for young adults in the neighborhood, and has also used retail leasing terms to better suit the needs of local and startup businesses (Ex. 15, p. 5).

Lower Anacostia Waterfront / Near Southwest Planning Area (LAW/NS) Element: The project would help fulfill the Area Element policies that call for the creation of new mixed-use neighborhoods. The development also proposes a height and density that would further policies calling for maximizing the use of vacant land near the Anacostia metro station, although OP would support additional height and density, as anticipated by the NHR zone, and given the FLUM designation for the site, and given the proximity to metro. The LAW/NS Element, however, places a strong emphasis on creating connections to Poplar Point, and providing new infrastructure to access what is anticipated by the Comprehensive Plan to be high density development on that site. Refinements to the proposed hotel design could better meet these plan policies.

On balance, when evaluated through a racial equity lens, the proposed project would not be inconsistent with many policies of the Comprehensive Plan, and would further a number of goals of the above-referenced Plan elements. Some Plan policies, however, could be better achieved by the design changes suggested in this report.

Racial Equity Tool Part 2 – Applicant/Petitioner Outreach and Engagement

In Exhibit 3 Section X, the Applicant has detailed their outreach and community engagement efforts, including with ANC 8A, the Anacostia BID, the Anacostia Coordinating Council, and various other neighborhood organizations.

Racial Equity Tool Part 3 – Planning Area Data

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 economic data and a population profile of the planning area. The data source is the 2012-2016 and 2020-2024 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 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?”

Population by Race/Ethnicity

The Lower Anacostia Waterfront / Near Southwest planning area has grown significantly in population over the time periods, from 17,113 residents to 29,332. The area has a population that is fairly evenly divided between White and minority groups, with Whites comprising 54.0% of the population in the latest ACS, slightly higher than the 51.5% of earlier time period. Most racial groups gained in population in the study period, but the Black residents in the planning area, though increasing in absolute terms, decreased as a percentage of the total, from 39.3% to 30.1%. This was reflective of the District-wide trend. Other groups that increased in absolute terms were Asian Alone, Hispanic or Latino, Indian and Alaska Native, Some Other Race, and Two or More Races.

Race or Ethnicity	District 2012-2016	District% 2012-2016	District 2020-2024	District% 2020-2024	LAW/NS 2012-2016	LAW/NS% 2012-2016	LAW/NS 2020-2024	LAW/NS% 2020-2024
Total Population	659,009	100%	681,294	100.0%	17,113	100.0%	29,332	100.0%
Asian Alone	24,036	4%	29,748	4.4%	800	4.7%	1,392	4.7%
Black or African American	318,598	48%	286,997	42.1%	6,733	39.3%	8,822	30.1%
Hispanic or Latino*	69,106	10%	81,152	11.9%	945	5.5%	2,415	8.2%
Indian and Alaska Native	2,174	0%	2,528	0.4%	119	0.7%	121	0.4%
Native Hawaiian and Pacific Islander	271	0%	336	0.0%	22	0.1%	0	0.0%
Some Other Race	29,650	4%	37,984	5.6%	90	0.5%	636	2.2%
Two or More Race	18,245	3%	65,651	9.6%	533	3.1%	2,520	8.6%
White Alone	266,035	40%	258,050	37.9%	8,817	51.5%	15,842	54.0%

Age & Vulnerable Population

The LAW/NS planning area’s median age was similar to the Districtwide median during the first study period, and equal to the Districtwide median during the latter 5-year period. Both the District and the planning area median age increased between study periods. When race is considered, the data shows that the Black residents in LAW/NS had a slightly higher median age than most of the other groups during the study period.

The planning area, in the most recent ACS, had a lower percentage of vulnerable residents than the District as a whole. Over the 12-year period, the percentage of residents 65 and older and the percentage who identified as disabled both went down, while the percentage that were under 18 stayed the same in the Lower Anacostia Waterfront / Near Southwest area.

Vulnerable Population	District 2012-2016	District 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Persons 65 and Older	11.4%	12.8%	13.5%	8.4%
Persons Under 18	17.4%	18.7%	9.7%	9.7%
Percent Disable	11.3%	11.5%	11.8%	10.6%

Median Age	District 2012-2016	District 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Total	32.3	34.4	32.6	34.4
Asian Alone	33.3	35.5	32.6	33.8
Black or African American	40.3	38.2	37.0	36.9
Hispanic or Latino	31.3	32.8	31.3	31.4
Indian and Alaska Native	31.4	34.4	29.4	-
Native Hawaiian and Pacific Islander	-	20.9	-	-
Some Other Race	29.6	30.7	32.7	31.6
Two or More Race	28.3	32.3	31.7	35.3
White Alone	33.1	36.2	32.6	34.4

Median Household Income and Employment

The LAW/NS planning area has a higher median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2020-2024 survey periods. The planning area median income, however, tracked with the citywide trend and increased significantly over the 12-year period, and those gains were realized across racial groups. The unemployment rate for Blacks, while decreasing citywide and in the planning area, remained higher than other racial groups.

Median Household Income	District 2012-2016	District 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Total Median	\$72,935	\$110,689	\$82,118	\$124,999
Asian Alone	\$91,453	\$126,507	\$87,540	\$120,843
Black or African American	\$40,560	\$60,780	\$41,562	\$80,217
Hispanic or Latino	\$60,848	\$116,177	\$87,873	\$141,312
Indian and Alaska Native	\$51,306	\$67,557	-	-
Native Hawaiian and Pacific Islander	-	-	-	-
Some Other Race	\$41,927	\$89,693	-	\$197,850
Two or More Race	\$83,243	\$122,979	\$80,922	\$144,547
White Alone	\$119,564	\$170,843	\$99,187	\$152,615

Unemployment Rate	DISTRICT 2012-2016	DISTRICT 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Total	8.7	6.3	6.3	5.1
Asian Alone	2.3	2.1	0.0	4.9

Unemployment Rate	DISTRICT 2012-2016	DISTRICT 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Black or African American	16.8	12.5	14.0	9.9
Hispanic or Latino	6.2	5.3	1.2	7.8
Indian and Alaska Native	9.8	3.5	0.0	0.0
Native Hawaiian and Pacific Islander	4.8	8.2	0.0	-
Some Other Race	6.8	5.9	0.0	3.4
Two or More Race	6.7	4.7	9.7	2.1
White Alone	3.1	2.6	3.4	3.6

Homeownership

Fewer residents in the LAW/NS planning area own their home than in the District as a whole – 22.6% compared to 41.5%. The homeownership rate in the planning area dropped noticeably 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 25.7% to 16.6%, and similar or even greater decreases were seen across several racial groups. These trends seem to be particular to the planning area and could be due to the large influx of apartment buildings in the area, especially around the ballpark, soccer stadium, and the Navy Yard. District-wide, Black homeownership went down, but by less than one percentage point, and White homeownership went up marginally.

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

Owners/ Renters		District 2012-2016	District 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Total	Owner Households	40.7%	41.5%	35.0%	22.6%
	Renter Households	59.3%	58.5%	65.0%	77.4%
Asian Alone	Owner Households	39.4%	39.4%	48.6%	25.7%
	Renter Households	60.6%	60.6%	51.4%	74.3%
Black or African American	Owner Households	35.9%	35.3%	25.7%	16.6%
	Renter Households	64.1%	64.7%	74.3%	83.4%
Hispanic or Latino	Owner Households	30.9%	37.7%	25.5%	27.3%
	Renter Households	69.1%	62.3%	74.5%	72.7%
Indian and Alaska Native	Owner Households	32.9%	22.1%	28.8%	0.0%
	Renter Households	67.2%	77.9%	71.2%	100.0%

Owners/ Renters		District 2012-2016	District 2020-2024	LAW/NS 2012-2016	LAW/NS 2020-2024
Native Hawaiian and Pacific Islander	Owner Households	9.1%	29.4%	0.0%	-
	Renter Households	90.9%	70.6%	100.0%	-
Some Other Race	Owner Households	17.5%	28.7%	33.0%	15.8%
	Renter Households	82.5%	71.3%	67.0%	84.3%
Two or More Races	Owner Households	32.7%	42.8%	27.8%	31.4%
	Renter Households	67.3%	57.2%	72.3%	68.6%
White Alone	Owner Households	47.8%	48.6%	40.7%	25.0%
	Renter Households	52.2%	51.4%	59.3%	75.0%

Cost Burdened Households (Percent of Households spending 30% of their income on housing)	District 2012-2016*	District 2020-2024	LAW/NS 2012-2016*	LAW/NS 2020-2024
Total Median	38.6%	34.1%	35.6%	33.7%
Asian Alone	-	34.7%	-	46.7%
Black or African American	-	44.4%	-	42.0%
Hispanic or Latino	-	34.0%	-	36.4%
Indian and Alaska Native	-	40.9%	-	100%
Native Hawaiian and Pacific Islander	-	49.0%	-	-
Some Other Race	-	39.0%	-	6.4%
Two or More Race	-	33.3%	-	30.4%
White Alone	-	24.5%	-	29.0%

* Prior to the 2019-2023 ACS, Housing Cost Burden was not disaggregated by race.

- *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, the home ownership rate is higher for the White than the Black population in the planning area, at 25.0% and 16.6%, respectively. The median income provides a starker contrast, with the median Black income trailing other racial groups by a wide margin. Unemployment is also higher for Blacks, at 9.9%, compared to 3.6% for Whites.

OP does not anticipate that the project would make significant improvements in these discrepancies, though there could be opportunities for employment in the hospitality field directly or in businesses that provide services to the hotel. Because the hotel would have excellent transit access, the jobs at the site would be available to residents throughout the city or even the region,

even if they do not have access to a car. The hotel could also potentially bring a new customer base for neighborhood businesses, as tourists presently have limited lodging options in the area.

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?*

Please refer to OP's analysis above, under Part 1 of the Racial Equity Tool discussion.

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

Some policies related to equitable urban design, connections and access could be more fully met. The Land Use and Transportation Elements of the Plan both speak to equitable transportation and transit access, especially where barriers have divided communities, and where connections are needed between existing and new neighborhoods. These policies would support an enhanced pedestrian environment linking the Anacostia neighborhood, Howard Road, the project, the metro station, and future development. See, for example, the following:

Policy LU-1.3.6: New Neighborhoods and the Urban Fabric

Policy LU-1.4.1: Station Areas as Neighborhood Centers

Policy LU-1.4.5: Design to Encourage Transit Use

Policy T-1.1.7: Equitable Transportation Access

Policy T-2.2.2: Connecting District Neighborhoods

The Urban Design Element seeks to provide each neighborhood with a high standard of urban form and ensure that public spaces are pleasing and useable for all residents. The policies address the need for pedestrian access, and streetscapes that prioritize the human experience with safe and active environments. This element specifies that these objectives can in-part be achieved with engaging ground floors and upper story façades. Well-designed connections are especially encouraged where access is being created to the Anacostia River. This sentiment is echoed by the Lower Anacostia Waterfront / Near Southwest Area Element, which promotes access improvements to Poplar Point, an area that has largely been cut off from the existing neighborhood by the highway. Please refer to the following policies:

Policy UD-1.3.6: Waterfront Access and Connectivity

Policy UD-1.3.7: Anacostia River Gateways

Policy UD-2.1.1: Streetscapes That Prioritize the Human Experience

Policy UD-2.1.2: Neighborhood Streetscapes

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

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

Policy UD-3.3.1: Neighborhood Meeting Places

Policy UD-3.3.3: Plazas for Diverse Uses
Policy UD-4.2.1: Scale and Massing of Large Buildings
Policy UD-4.2.2: Engaging Ground Floors
Policy UD-4.2.4: Creating Engaging Facades
Policy AW-1.1.8: Waterfront Development Amenities
Policy AW-2.4.5: Scale of Development at Poplar Point
Policy AW-2.4.8: Access Improvements to Poplar Point

- *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
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The site is vacant so development will not result in the displacement of any residents or commercial space tenants.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate any indirect displacement as a result of this zoning action. The property is currently undeveloped. The provision of a hotel should serve as an amenity for both the immediate Howard Road neighborhood and for the larger community.
Housing	Will the action result in changes to: ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing	The project would not include any housing.
Physical	Will the action result in changes to the physical environment such as: ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements	The action would result in visual improvements to the vicinity through the construction of an attractive building that would positively enhance the appearance of the Howard Road corridor. Overall the building and landscaping has the opportunity to improve the pedestrian experience of walking to the metro station. The project would also achieve a high degree of sustainability, including on-site energy generation. With the goal of maximizing pedestrian safety and comfort, as well as the building's relationship to existing and future features of the neighborhood, the east façade, both at the ground level and upper stories, should be improved in appearance and function.
Access to Opportunity	Is there a change in access to opportunity? ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services	The zoning action should lead to an increase in jobs, through construction jobs and permanent jobs at the hotel. According to Exhibit 3, p. 26, "Some of these jobs will be facilitated through the Applicant's continued engagement with the community, and through its close coordination with DOES." On pp. 23 and 24, the application also states that:

		<i>“The Applicant aims to provide the following benefits to the community, ANCs, and Ward 8:</i> <i>• Support community-based organizations in the following areas: [...] economic and workforce development.</i> <i>• Workforce development emphasizing training and priority hiring, and subcontracting opportunities for Ward 8 residents.</i> <i>• Potential to support Ward 8-based entrepreneurs and small businesses, particularly in the food and beverage industry, and to showcase the work of local artists and creatives through curated artwork and installations in guest-facing and amenity spaces.”</i> Exhibit 15, p. 5, provides more detail on the applicant’s efforts at the Bridge District to hire local students for internships, work with local workforce organizations, provide space for local contractors using local apprentices, and adjust leasing strategies to assist local start-up businesses.
Community	How did community outreach and engagement inform/change the zoning action? ▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)	Exhibit 15, p. 2, indicates that the design was changed to incorporate a door in the façade to allow direct access to the restaurant from the exterior. See updated floor plan at Ex. 15A. The application also states that updates to the treatment of the ground floor is in response to community feedback, in addition to feedback from OP.

VII. AGENCY COMMENTS

OP referred this case to government agencies and received the following responses. As of this writing no comments from other agencies have been submitted to the record or received by OP.

- Department of Energy and the Environment (DOEE) – Attachment 2** – DOEE’s comments emphasize the upcoming switch to the building code, which will require electric space and water heating, rather than gas. They state that building permit applications for new buildings submitted after December 31, 2026 will not be permitted to have on-site fuel combustion. They also encourage the applicant to incorporate “additional strategies to lessen the intensity and impact of extreme heat, such as increasing vegetative shading and employing passive strategies that can reduce indoor air temperatures and minimize reliance on mechanical systems.” DOEE also encourages the use of bird-safe materials, in conformance with the Migratory Local Wildlife Protection Act of 2022.

- **OP Neighborhood Planning Division – Attachment 3** – Neighborhood Planning expressed concern about the project’s impact on ongoing planning for Poplar Point. The plans for Poplar Point to date have shown a public plaza in front of the metro entrance, directly across from the subject site. Neighborhood Planning recommends that the design be rethought to present a more engaging façade on the eastern side of the building. In addition to the metro entrance and the future plaza, they emphasize that this will be a location for an important future street connection linking new Poplar Point development to Howard Road and the Anacostia neighborhood south of the freeway. Specific recommendations include increased use of glass, show windows, entry points, and balconies to better engage the future streetscape, relocating uses within the hotel to create more activity on the street, and to remove loading from that side of the building.
- **OP Urban Design Division – Attachment 4** – Urban Design seeks improved design to the public spaces around the building, suggesting the inclusion of fixed and moveable seating, shade structures, and additional plaza areas for outdoor activities. On the east side of the building, in order to improve the pedestrian environment, the relationship to the metro entrance, and the relationship to future development at Poplar Point, Urban Design proposes additional fenestration, architectural articulation, and flexibility to the location of back-of-house uses that would tend to lead to a blank façade. Further comments suggest an additional study of materials and architectural details. The changes should “create a legible, welcoming composition that supports wayfinding toward the plaza and future transit connections.”

VIII. ANC COMMENTS

As of this writing there are no comments in the record from the ANC.

IX. COMMUNITY COMMENTS

As of this writing, the record contains several letters in support at Exhibits 9 through 14.

X. ATTACHMENTS

Attachment 1 – Comprehensive Plan Policies

Attachment 2 – DOEE Comments

Attachment 3 – Office of Planning Neighborhood Planning Division Comments

Attachment 4 – Office of Planning Urban Design Division Comments

Attachment 5 – Poplar Point Environmental Assessment Preferred Alternative Proposed Land Use Plan

Attachment 1 Comprehensive Plan Policies

Chapter 3 Land Use Element

LU 1.1 – Supporting Growth

As the Land Use Element guides the direction of future growth, it also affects future access to housing, education, jobs, services, amenities, and transportation and impacts the health and safety of residents. Growth can and must occur in a way that expands access to affordable housing, education, transportation, employment, and services for communities of color, low-income households, and vulnerable populations. Achieving equitable development requires attention to both the context and needs of different planning areas and to District-wide equity issues, described throughout the Comprehensive Plan. (10-A DCMR 304.4.)

Policy LU-1.1.2: Resilience and Land Use

Implement District-wide, neighborhood-scale, and site-specific solutions for a climate adaptive, emergency responsive, and resilient Washington, DC. 304.9

Policy LU-1.2.2: CEA [Central Employment Area]

...Additionally, the CEA shall include the greatest concentration of the District's private office development, and higher-density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses... 305.7

Policy LU-1.2.3: Appropriate Uses in the CEA

Ensure that land within the CEA is used in a manner which reflects the area's national importance, its historic and cultural significance, and its role as the center of the metropolitan region. Federal siting guidelines and District zoning regulations should promote the use of this area with high value land uses that enhance its image as the seat of the national government and the center of Washington, DC and that make the most efficient possible use of its transportation facilities. An improved balance in the mix of uses will help to achieve Washington, DC's aspiration for an even larger living downtown. 305.8

Policy LU-1.3.6: New Neighborhoods and the Urban Fabric

On those large sites that are redeveloped as new neighborhoods (such as Reservation 13), integrate new development into the fabric of the District to the greatest extent feasible. Incorporate extensions of the street grid, public access and circulation improvements, and new public open spaces. Establish a compatible relationship between new structures and uses and the existing neighborhood fabric. Such sites should not be developed as self-contained communities, isolated or gated from their surroundings, and they should enhance community resilience, equitable development, and promote inclusion. 306.12

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-1.4.5: 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-2.2.4: Neighborhood Beautification

Encourage projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. 311.5

Chapter 4 Transportation Element

Policy T-1.1.3: Context-Sensitive Transportation

Design transportation infrastructure to support current land uses as well as land use goals for mixed-use, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. Facilities should comply with the District's Complete Streets policy, adopted in October 2010, with an emphasis on pedestrian and bicycle-friendly design. 403.9

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-1.1.5: Joint Development

Maximize ridership potential, housing, including affordable housing, and economic development opportunities by fostering transit-supportive commercial and residential joint development projects on WMATA-owned or -controlled land, public land, and private properties adjacent to Metrorail stations. 403.11

Policy T-1.1.7: Equitable Transportation Access

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

Policy T-2.2.2: Connecting District Neighborhoods

Improve connections among District neighborhoods by upgrading transit, auto, pedestrian, and bike connections, and by removing, ameliorating, mitigating, or minimizing existing physical barriers, such as railroads and highways. Recognize where transportation infrastructure has separated communities, particularly low-income residents and communities of color, and encourage strategies that rebuild connections. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan and that plan's approval by the District government. 409.7

Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks such that residents of each of the District's wards have access to high-quality bicycling and pedestrian facilities. 410.9

Action T-2.3.B: Bicycle Facilities

Wherever feasible, require large, new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. Residential buildings with eight or more units shall comply with regulations that require secure bicycle parking spaces. 410.16

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city. 410.5

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals. 410.6

Policy T-3.1.1: TDM Programs

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

Chapter 6 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. (10-A DCMR § 603.6)

Policy E-1.1.5: Resilient Infrastructure

Design infrastructure, such as roads and parks, to withstand future climate impacts, and increase Washington, DC's resilience by having roads and parks serve multiple purposes where possible, including flood risk reduction, urban heat island mitigation, and stormwater management. (10-A DCMR § 603.9)

Policy E-2.1.2: Tree Requirements in New Development

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. 605.6

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 rights-of-way in schools, parks, and housing authority lands. (10-A DCMR § 605.7)

Policy E-2.2.1: River Conservation

Improve environmental conditions along the Anacostia and Potomac rivers and other water bodies, including shorelines, wetlands, islands, tributaries, and the rivers themselves. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitats, creating new wetlands, and reducing litter. Particular focus on the Anacostia is important to address its history of neglect and pollution and to improve conditions for adjoining neighborhoods. 606.6

Policy E-2.5.3: Habitat Management on Private Land

Encourage environmentally sound landscaping and gardening techniques by District homeowners and institutional landowners, and on federal lands to maximize the habitat value of privately owned and federal land. Such techniques should include reduction of herbicide and pesticide use; the selection of disease-resistant, drought-resistant, and native species; the removal of invasive plants; the use of rain gardens to reduce runoff; and landscaping that provides food and cover for wildlife. 609.6

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. 612.5

Policy E-3.2.6: Alternative Sustainable and Innovative Energy Sources

Support the development and application of renewable energy technologies, such as active, passive, and photovoltaic solar energy; fuel cells; and other sustainable sources such as shared solar facilities in neighborhoods and low- or zero-carbon thermal sources, such as geothermal energy or wastewater heat exchange. Such technology should be used to reduce GHGs and imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed energy generators and passive solar homes relying on the sun as a primary energy source. (10-A DCMR § 612.8)

Policy E-3.2.8: Locally Generated Electricity

Support locally generated electricity from renewable sources, including both commercial and residential renewable energy projects. Policies could support the option to share a solar project among several

neighbors (i.e., community solar), financial incentives, research and education, and maximizing existing programs to help install solar panels and solar thermal systems throughout the District. 612.10

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-4.2.1: Support for Green Building

Broaden the requirements for the use of green building methods in new construction and rehabilitation projects to include all building typologies, and develop green building standards for minimum performance or continued improvement of energy use through improved operation and maintenance activities. 616.3

Policy E-6.1.3: Control of Runoff

Continue to implement water pollution control and management practices aimed at reducing runoff and pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. 622.8

Chapter 8 Economic Development

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services. 703.12

Policy ED-1.1.2: Economic Linkages

Leverage the potential of core industries to provide new employment opportunities, particularly the growth of businesses that supply essential goods and services to the government, universities, hospitals, law firms, hotels, nonprofits, and other major employers in the District. 703.13

Policy ED-2.3.1: Growing the Hospitality Industry

Develop an increasingly robust tourism and convention industry, which is underpinned by a broad base of arts, entertainment, restaurant, lodging, cultural and government services. Strive to increase the total number of visitors to the District, the number of visitors staying in the District, and longer visitor stays in the District. Promote the District not only as the preferred base for exploring Washington, DC's attractions, but also the preferred overnight base for visiting regional attractions. 709.5

Policy ED-2.3.3: Amenities Beyond the Mall

Promote the development of cultural amenities beyond the Mall in an effort to more fully capitalize on and distribute the economic benefits of tourism. 709.7

Policy ED-2.3.4: Lodging and Accommodation

Support the development of a diverse range of hotel types, serving travelers with varying needs, tastes, and budgets. New hotels should be encouraged both within Central Washington and in outlying commercial areas of the District, particularly in areas that are underserved by hotels. 709.8

Policy ED-2.3.9: Hospitality Workforce Development

Recognize the potential for the hospitality sector to generate entry-level jobs and opportunities for upward mobility for District residents by promoting career and job training and job placement initiatives in this

sector, and by working with local hotels, the District of Columbia Hotel Association, the Washington Convention and Tourism Corporation, unions, and others. 709.13

Policy ED-2.3.10: Waterfront Destinations

Promote the Anacostia and Potomac waterfronts as destinations for District residents and visitors in an effort to capitalize on the amenities and economic benefits of tourism in neighborhoods adjacent to the rivers. 709.14

Chapter 9 Urban Design

Policy UD-1.3.6: Waterfront Access and Connectivity

Improve the physical connections between neighborhoods and nearby waterfronts. Where feasible, extend the existing urban grid into large waterfront sites to better connect nearby developed areas to the shoreline. Greater access to the waterfront should also be achieved by reconfiguring roadways and other infrastructure along the waterfront to reduce access impediments for neighborhoods with limited access, and for pedestrians and bicyclists. Provide a consistent design treatment for waterfront trails (see Figure 9.11). 905.11

Policy UD-1.3.7: Anacostia River Gateways

Improve visual design qualities and pedestrian access of the gateways to and from Wards 7 and 8 neighborhoods from the Anacostia River crossings, with landscape and transportation improvements along Howard Road, Martin Luther King, Jr Avenue, Pennsylvania Avenue, Randle Circle (Minnesota and Massachusetts SE), Benning Road, East Capitol Street, and Kenilworth Avenue. 905.13

Policy UD-2.1.1: Streetscapes That Prioritize the Human Experience

Commercial streetscapes should be designed to be comfortable, safe, and interesting to pedestrians. At a minimum, commercial corridor sidewalks should be designed with clear, direct, accessible walking paths that accommodate a range of pedestrian users and facilitate a sense of connection to adjacent uses. Where width allows, corridors should have a generous presence of shade trees and café seating areas, as well as bicycle facilities. In areas with large pedestrian volumes, streetscapes should provide seating, drinking fountains, publicly accessible restrooms, and other infrastructure that supports increased frequency and duration of walking. 908.3

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-2.1.4: Connections Between Public Spaces and Streets

Public spaces, such as parks and plazas, should have entry points that create clear and porous visual and physical connections to the adjacent public realm. Where possible, coordinate streetscape designs to create a continuous experience between parks and streets. Limit the installation of tall fences or grade changes that create boundaries between parks and public rights-of-way. Public gathering spaces should be incorporated directly into the streetscape through pedestrian amenities, such as benches, public art, spacing of shade trees, and gardens. 908.6

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-2.2.3: Neighborhood Mixed-Use Centers

Undertake strategic and coordinated efforts to create neighborhood mixed-use centers that reinforce community identity and form compact, walkable environments with a broad mix of housing types, employment opportunities, neighborhood shops and services, and civic uses and public spaces. New buildings and projects should support the compact development of neighborhood centers and increase the diversity of uses and creation of public spaces where needed. 909.8

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-3.3.1: Neighborhood Meeting Places

Provide places for neighborhood public life through the creation of public plazas at existing Metro stations or urban squares in new development. Encourage the activation of such spaces through the design of adjacent structures, including the location of shop entrances, window displays, awnings, and outdoor dining areas. 915.3

Policy UD-3.3.3: Plazas for Diverse Uses

Design plazas to accommodate physical activities like dancing or ball play, passive activities like sitting and chess, and cultural events like concerts, exhibits, and historical celebrations. Plazas can also provide space for cafe-style seating and farmers markets. When programming plazas, consider the needs of users with varying mobility levels. 915.5

Policy UD-4.2.1: Scale and Massing of Large Buildings

Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest. 918.3

Policy UD-4.2.2: Engaging Ground Floors

Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. 918.4

Policy UD-4.2.4: Creating Engaging Facades

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

Lower Anacostia Waterfront / Near Southwest Area Element

Policy AW-1.1.2: New Waterfront Neighborhoods

Create new mixed-use, mixed-income neighborhoods on vacant or underused waterfront lands, particularly on large contiguous publicly owned waterfront sites. Within the Lower Anacostia Waterfront/Near Southwest Planning Area, new neighborhoods should continue to be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, and Navy Yard/Capitol Riverfront. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside via trails, additional water recreation opportunities, and improved park access points along the Anacostia shoreline. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Opportunities for grid interconnected neighborhood-scale energy utilities systems as part of the development of these areas should be evaluated, using renewable energy sources to provide greater environmental benefits for the community. The new waterfront neighborhoods should integrate new parks and amenities, enhance public access to the waterfront, and incorporate resilient design to mitigate flooding. 1907.3

Policy AW-1.1.5: Flood-Resilient and Climate-Adaptive Development

Provide guidelines and promote the planning, design, construction, and management of resilient buildings in flood hazard areas within the Lower Anacostia Waterfront/Near Southwest Planning Area. Design and construct developments to be adaptive to future flood hazard conditions due to storm surge and sea level rise. 1907.6

Policy AW-1.1.7: Waterfront Area Commercial Development

Encourage commercial development in the waterfront area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia waterfront, as well as space for government and private sector activities, such as offices and hotels. A mix of high-density commercial and residential development should be focused along key corridors, particularly along Maine Avenue and M Street SE and SW, along South Capitol Street, and near the Waterfront and Navy Yard Metro stations. Maritime activities, such as cruise ship operations, should be maintained and supported as the waterfront redevelops. 1907.8

Policy AW-1.1.8: Waterfront Development Amenities

Leverage new development in the Waterfront Planning Area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements. 1907.9

Policy AW-1.1.10: Pedestrian Orientation of Waterfront Uses

Provide a high level of pedestrian and cyclist amenities along the shoreline, including informational and interpretive signs, benches and street furniture, and public art. Pedestrian and cyclist facilities should be designed to accommodate the greatest number of users with varying abilities. Where possible, trail design should support the safe use of the trail in the evenings. Continue to coordinate with federal agencies to ensure the continuity of character and wayfinding and explore additional opportunities for public access on federally owned waterfront properties. 1907.11

Policy AW-2.4.3: Poplar Point Mixed Use Neighborhood

Create a new transit-oriented mixed-use neighborhood oriented around the Poplar Point Park and linked to the Anacostia and Congress Heights Metro stations. The neighborhood should include a significant component of affordable housing, as well as retail and civic uses that benefit the adjacent communities east of I-295. To minimize the loss of useable open space, development should use the land recovered after the realignment and reconstruction of the Frederick Douglass Bridge. 1913.9

Policy AW-2.4.5: Scale of Development at Poplar Point

Provide a scale and pattern of development at Poplar Point that recognizes the area's proximity to a Metro station and other major surface arterials. The area is physically separated from surrounding neighborhoods and, therefore, may accommodate buildings and site plans that are unlike but compatible with the fine-grained pattern found in nearby Historic Anacostia. Development should be pedestrian-oriented and include active ground floor uses. The massing, height, and bulk of buildings and related features, such as parking, also should respect adjacent park uses and environmentally sensitive areas. 1913.11

Policy AW-2.4.7: Poplar Point as an Economic Catalyst Use development at Poplar Point to bring economic development opportunities to adjacent neighborhoods, particularly Barry Farm and Historic Anacostia. Activities at Poplar Point should foster the success of existing businesses in Historic Anacostia, provide job opportunities, and create cultural, educational, and institutional uses that benefit communities in Wards 7 and 8. 1913.13

Policy AW-2.4.8: Access Improvements to Poplar Point

Improve access to Poplar Point by redesigning the road system on the site's perimeter; rebuilding the Frederick Douglass (South Capitol) Bridge; converting the Anacostia Metro station to a multimodal terminal; adding provisions for pedestrians and bicycles along Howard Road SE, W Street SE, and Good Hope Road SE; and providing water taxi service on the Anacostia River. 1913.14

Attachment 2 DOEE Comments

DOEE Development Review Comments ZC 26-07: Bridge District Parcel 7 Hotel

DOEE applauds the applicant's commitment to achieving LEED Gold certification under the v4.1 BD+C: Hospitality system. DOEE also commends the applicant for meeting or exceeding the Northern Howard Road zone requirements for renewable energy generation and meeting the required GAR and stormwater management. The stormwater management plans will be reviewed in more detail by DOEE during permitting. The applicant is welcome to coordinate with DOEE as the design progresses.

The following recommendations are intended to assist the applicant in complying with District laws and incorporating strategies that support the goals of the [Sustainable DC 2.0](#), [Clean Energy DC](#), and [Climate Ready DC](#) plans. Contact kate.tanabe@dc.gov with questions or to discuss recommendations further.

Electrification

DOEE commends the applicant's commitment to electrification in previous Bridge District projects, as well as the commitment to electrifying some elements of the proposed hotel. Per correspondence with Goulston & Storrs, the applicant is currently considering the use of gas for "emergency/standby power generation, heating within the dedicated outdoor air system and air handling units, and kitchen equipment serving the ground floor food and beverage area," which is disappointing given the Northern Howard Road zone's sustainability goals.

Electrification is a top priority for the District as we work toward [carbon neutrality](#). DOEE highly discourages installing gas-powered equipment or systems except for emergency power generation. Additionally, commercial building permit applications submitted after December 31, 2026, will be required to meet the following provisions:

- No onsite fuel combustion for space heating and water heating for new construction or large additions.
- Conserve at least the same amount of energy that would be conserved under the 2024 International Energy Conservation Code.

DOEE recommends that the applicant reach out to the Department of Buildings (dob@dc.gov) with any questions regarding the upcoming permit requirements, as use of gas for dedicated outdoor air systems and reheating systems may be considered space heating for permitting purposes.

Examples of all-electric hotels across the country, including properties within the [Hilton](#) and [Limelight](#) portfolios, demonstrate how sustainability can be elevated as a core feature. Pursuing a similar approach could position the hotel as a distinctive, sustainability-focused offering within the District. All-electric buildings can save on construction costs by avoiding the need to install gas piping.

It's also easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages the project team to evaluate electric options now ahead of the net-zero energy building code, which will be adopted by December 31, 2027. See the [Building Innovation Hub's update](#) and other resources. DOEE's Urban Sustainability Administration and Energy Administration are happy to meet with the applicant for further discussion. Reach out to kate.tanabe@dc.gov to schedule a meeting.

Climate Resilience

Given the site's proximity to the flood zone, DOEE applauds the applicant for anticipating future flood risk and implementing design strategies like elevating entry points and occupied spaces. DOEE recommends that the applicant explore additional strategies from the [Resilient Design Guidelines](#), including protecting mechanical and electrical equipment from flood elevation and specifying a resilient elevator.

The site is also located in an area with the highest [Heat Sensitivity Exposure Index](#) value. DOEE recommends that the applicant consider additional strategies to lessen the intensity and impact of extreme heat, such as increasing vegetative shading and employing passive strategies that can reduce indoor air temperatures and minimize reliance on mechanical systems. See the Resilient Design Guidelines for more information.

Bird-safe Building Materials

This project is subject to the [Migratory Local Wildlife Protection Act of 2022](#). Under the Act, building permits for new construction and some substantial alterations of commercial building issued after January 1, 2025 must use bird-friendly materials on building facades and exterior fenestration up to 100 feet above ground. DOEE encourages the applicant to review [DC Code § 8-2241](#) for additional details and explore the [American Bird Conservatory's Products Database](#), which rates a variety of products based on threat factor. The Act requires materials have a maximum material threat factor of 30.

Attachment 3 Office of Planning Neighborhood Planning Division Comments

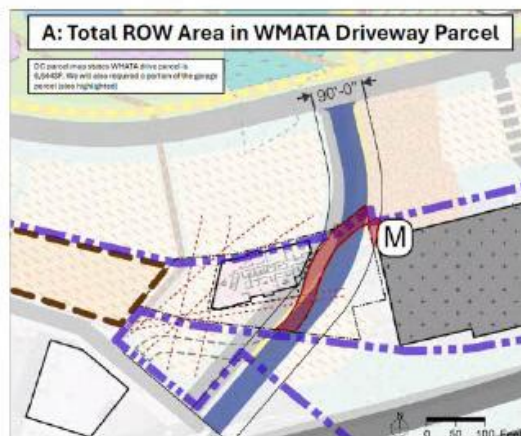
Jesick, Matthew (OP)

From: Abousamra-Rivera, Rita (OP)
Sent: Wednesday, August 26, 2026 12:27 PM
To: Jesick, Matthew (OP)
Cc: ElGawish, Heba (OP); Mohan, Radhika (OP); Brown-Roberts, Maxine (OP)
Subject: RE: Zoning Commission #26-07 - Howard Road Hotel - Request for Comments
Attachments: Poplar Point Plan-Parcel 7 Alignment.png

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Matt,

Thank you for sharing the design review application with Neighborhood Planning and bringing this to my attention. As the Poplar Point Master Plan project manager, I find this application significantly lacking and non-reflective of the conversations that OP and DMPED have had with Redbrick. I've included a snip from an illustrative diagram that the District and Redbrick discussed as a solution for alignment (note: existing WMATA road highlighted in red, Draft Land Use Plan right-of-way shown in gray, and shifted planned road that accommodates Redbrick development while continuing to make the Poplar Point development feasible shown in blue):



Accordingly, my main concern is that the current development is designed such that it completely turns its back on Poplar Point and can obstruct ongoing plans for Poplar Point, a project that Redbrick has been a stakeholder in since its initial stages. It fails to factor in the draft land use plan shared with Redbrick and the public as part of the Poplar Point Plan's Environmental Assessment process led by the District and NPS.

While the submitted language refers to the benefit of development for the future Poplar Point development and alignment with the Comprehensive Plan's Urban Design Element, it does not show good urban design along the WMATA roadway, where a key gateway into Poplar Point and equity-driven major connection with the historic Anacostia neighborhood is planned. Applicant mentions a green screen and mural in exhibit 15, which Neighborhood Planning can support but find insufficient as a

standalone solution to contribute to the active pedestrian-priority environment outlined in plans for Poplar Point - especially with the back of house, blank walls, and service area positioned directly across the street from the planned center of activity, community plaza and major gateway for Poplar Point. It is also worth noting that the development is positioned around the corner from the main planned mixed-use street and East-West connection to the north of the Redbrick development (the relocated Anacostia Drive), though it does not immediately abut it.

Though it is understandable that plans are based on existing conditions, the applicant should submit an additional memo recognizing and accurately representing the stakeholder conversations DMPED and OP have had with Redbrick and their design team to reach a design that would be supportive and non-restrictive of the ongoing planning effort for Poplar Point, as well as a plan and elevation/other supporting graphic(s) showing:

- how building positioning and street wall will interface with the planned public space and streetscape at Poplar Point, by including, particularly on the eastern edge facing the planned metro civic plaza and major connector street:
 - an engaging façade with a play in materials and active building projections that accommodate people and blur the private-public space divide (balconies, show windows, bay windows, etc.);
 - high visibility glass and frequent entry points into the hotel;
 - at least a 10' wide tenant zone that can accommodate planted areas and sidewalk seating between the building face and the sidewalk pedestrian clearance;
 - a tree lined sidewalk with an 8' unobstructed pedestrian clearance and additional space for pedestrian and micromobility amenities; and,
 - other tactical urbanism solutions that prioritize pedestrians such as continuing the sidewalk material and scoring pattern through the south vehicular loop.
- ground floor uses within the building that contribute to the surrounding public space as opposed to private Redbrick space. Accordingly, redistribute hotel ground floor uses to:
 - relocate the back of house and service area to another street;
 - position active uses such as retail and/or restaurants (lounge?) that can activate the sidewalk with café seating, or open lobby area visible to pedestrians; and,
 - murals and vegetated screens can remain on walls where active uses are not feasible, with the understanding that the good majority of that street wall should be activated with uses.

Best,



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Get involved in DC 2050, the District's next comprehensive plan, at dc2050.com. Let your voice be heard as we shape the future of DC, the place we call home.

Attachment 4 Office of Planning Urban Design Division Comments

ZC 26-07 Urban Design (UD) Comments

Public Space

- **Front Yard Forecourt and Arrival Experience**
Strengthen the forecourt to function as a true arrival and public amenity. Add a mix of fixed and movable seating, layered planting, shade structures, and small programmed elements (kiosks, performance nodes) to encourage lingering and support hotel and district activity. Design the forecourt to accommodate both everyday use and events tied to the Bridge District.
- **Public Realm Connectivity to Poplar Point and Metro Station**
Demonstrate a clear, phased strategy for connecting the site to the future Poplar Point Plan area and the metro station. Provide direct pedestrian connections, protected bike links, clear sightlines, and coordinated grade transitions so the hotel becomes a seamless node in the district's multimodal network. Include wayfinding and lighting that anticipates transit flows and peak arrival patterns.
- **Gathering Spaces, Patio Capacity, and Programming Diversity**
Expand and diversify gathering opportunities beyond the furnished patio. Provide small plazas, shaded seating clusters, flexible event terraces, and outdoor dining zones to distribute activity and serve different user groups. Design furniture and paving to support seasonal programming and temporary activations.
- **Bike Promenade, Circulation, and Safety** Clarify the bike promenade's terminus and its connection to the Anacostia Riverwalk Trail and local bike network. Design transitions with clear markings, durable surfacing, and intuitive wayfinding to ensure safe, comfortable movement for cyclists and pedestrians between the hotel, riverfront, and future transit hub.
- **Landscape, Microclimate, and Stormwater Integration**
Use planting and stormwater strategies to improve comfort and ecological performance. Prioritize native, resilient species, canopy trees for shade, and bioswales or permeable paving to manage runoff and reduce heat island effects while defining public spaces and circulation routes.

Building Design

- **East Façade Activation and Service Integration**
The east façade is currently designed as a largely solid wall with little to no fenestration. This creates a blank edge that may have a significant impact on the pedestrian experience and the building's relationship to the surrounding site. Consider introducing additional openings, architectural articulation, landscaping,

or other façade treatments to provide greater visual interest and improve the relationship between the building and adjacent public spaces.

The east side of the building appears to function primarily as a back-of-house area. While this may be appropriate from an operational standpoint, the design should ensure that service functions do not result in a visually inactive or unwelcoming edge. Additional architectural treatment and landscape buffering could help screen service areas while maintaining a more engaging presence along the site.

- **Responding to the Bridge District and Poplar Point Master Plan**

The hotel design should anticipate and respond to the evolving Bridge District and the Poplar Point Master Plan. Design façades, massing, and entry sequences so they read coherently with future development patterns and a future metro plaza - including potential sightlines, pedestrian corridors, and transit plaza relationships. Provide flexible ground-floor conditions that can adapt to future changes in circulation, retail demand, or public realm alignment as the master plan is implemented.

- **Materiality, Durability, and Contextual Fit**

The proposed material palette does not appear to fully respond to or complement the existing architectural context. Consider revisiting the selection, scale, color, and application of materials to create a stronger relationship with surrounding buildings while still allowing the project to establish its own architectural identity. Materials should also be considered in terms of durability, maintenance, and their contribution to the overall character of the public realm.

- **Façade Hierarchy and Human Scale**

Establish a clear façade strategy that addresses both skyline presence and pedestrian experience. Use canopies, entry porches, scaled cornices, and human-scale detailing at arrival points and along active edges to create a legible, welcoming composition that supports wayfinding toward the plaza and future transit connections.

Overall Recommendation

The project would benefit from a stronger emphasis on public realm activation, site connectivity, and contextual integration. Particular attention should be given to transforming blank or service-oriented edges into more visually engaging conditions, increasing opportunities for gathering and social interaction, and establishing clear connections to surrounding pedestrian and bicycle networks. The overall site design should create a welcoming, connected, and active environment that complements the existing context while providing a distinct identity for Metro Plaza.

Draft Preferred Alternative
Proposed Land Use Plan



¹ The lots owned by the applicant, Redbrick, while outside of the Poplar Point EA study area, are highlighted on the land use plan for the purpose of understanding the context.