

Champlain Street Partners, LLC

**Application for Review and Approval of a
Consolidated Planned Unit Development and Amendment to the Zoning Map**

2384 Champlain Street, NW

Square 2560, Lot 827

September 19, 2025



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DEVELOPMENT TEAM

APPLICANT:	Champlain Street Partners LLC 1443 Pennsylvania Avenue, SE Washington, DC 20003
ARCHITECT:	TEASS \ WARREN Architects 609 H Street, NE Washington, DC 20002
TRANSPORTATION ENGINEER:	Gorove Slade Associates, Inc. 1140 Connecticut Avenue, NW, Suite 600 Washington, DC 20036
CIVIL ENGINEERS:	VIKA Capitol, LLC 4910 Massachusetts Avenue, NW, Suite 16 Washington, DC 20016
LAND USE COUNSEL:	Goulston & Storrs, PC 1999 K Street, NW, Suite 500 Washington, DC 20006

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I. INTRODUCTION

A. Summary of Application

Champlain Street Partners LLC (the “**Applicant**”) submits this application (“**Application**”) to the District of Columbia Zoning Commission (“**Commission**”) for review and approval of a consolidated Planned Unit Development (“**PUD**”), and a related amendment to the Zoning Map (“**Map Amendment**”).

The property that is the subject of this Application is located at 2384 Champlain Street, NW (Square 2560, Lot 827), which contains approximately 7,348 square feet of land area (the “**Property**”). The Property is currently zoned RA-2 and is bounded by private property to the north and south, Champlain Street to the east, and a public alley to the west. The Property is within the boundaries of Advisory Neighborhood Commission (“**ANC**”) 1C.

This Application seeks Commission review and approval of a consolidated PUD, which establishes the height and massing, building design and materials, and a package of public benefits for a new affordable residential building on the Property; and a Map Amendment, which seeks to rezone the entirety of the Property from the existing RA-2 zone to the RA-3 zone (collectively the “**Project**,” plans and drawings for which are included herewith as **Exhibit C**, the “**Plans**”).

The Project consists of (i) approximately 28,731 square feet of gross floor area (“**GFA**”) of multifamily residential use; (ii) approximately 44 units of affordable housing; (iii) four (4) at-grade vehicle parking spaces; and (iii) approximately 1,000 square feet of rooftop solar panel array area. The Project’s public benefits include superior urban design and architecture, superior site planning and efficient and economical land utilization; approximately 44 units of affordable housing for households earning 30%-80% MFI (including 32 replacement units and 12 new units); Certified Business Enterprise (“**CBE**”) and First Source hiring and contracting commitments; and Enterprise Green Communities Certification standards.

The Project is consistent with the goals and policies of the Adams Morgan Vision Framework (“**AM Framework**”) and is not inconsistent with the District Elements of the Comprehensive Plan (“**Comp Plan**”) and other adopted policies and programs applicable to the Property, including when viewed through a racial equity lens. The Application satisfies the requirements for a PUD and Map Amendment under the Zoning Regulations.

B. The Applicant

The Applicant, Champlain Street Partners, LLC, is a partnership between Housing Help Plus (“**HHP**”), MED Developers, LLC, and Mutreja Development LLC, all of which are D.C.-based real estate and development companies that specialize in the construction and operation of affordable housing.

The Developer (MED Developers, LLC) has established its capabilities by designing and delivering innovative solutions to house the city’s most vulnerable populations. All these properties involved creating new development, financing, and management models, and all continue to operate successfully. MED’s owned and operated facility in Logan Circle, “Erna’s House,” exclusively caters to women exiting homelessness and abusive environments, reflecting

MED's ability to manage high-impact facilities in upscale neighborhoods. Since its delivery over ten years ago, the property has been embraced by the community and has served to stabilize the lives of hundreds of its residents. Additionally, MED Developers are partners in the delivery of Belmont Crossing Apartments, a 100% affordable Low Income Housing Tax Credit ("LIHTC") redevelopment that has delivered 169 units to date with a planned delivery of 490 affordable units total. MED Developers is a partner in HR Crawford Gardens, a 100% affordable LIHTC multi-generational development that targets the elderly population, along with 16 permanent supportive housing units in Northeast DC. MED recently closed on 1109 Congress Street, a 70-unit 100% permanent supportive housing development (which was approved as a PUD and Map Amendment by the Zoning Commission pursuant to Z.C. Order No. 16-13) that is currently under construction with a planned delivery of first quarter 2027.

HHP, the nonprofit sponsor for the Project, has operated and specialized in affordable housing facilities in Washington, D.C. since 2014. A leader in property management, residential services, and affordable housing development, HHP pursues client focused outcomes that serve its mission of supporting vulnerable populations throughout the District. HHP has operated the existing apartment building on the Property since its acquisition in 2019. HHP retains a right of first refusal for the Project that will guarantee long-term affordability.

Mutreja Development LLC is engaged as the development consultant for the Project. Neil Mutreja, the sole principal of the firm, is an affordable housing LIHTC real estate developer with over 20 years of experience in a real estate portfolio including over 240 apartment developments, totaling nearly 14,000 units. Mr. Mutreja has extensive knowledge in financial modeling, development consulting, and procurement of various financing sources. His expertise applies to overseeing various affordable housing projects and successfully managing all aspects of housing development needs, including construction, market analysis, property management, and sales. Additionally, Mr. Mutreja provides a leadership role and vital knowledge in the industry to partners, investors, and the development team. Prior to starting his own development firm in 2021, Neil Mutreja was the Senior Vice President of Development for TM Associates, Inc., one of the mid-Atlantic's premier affordable housing developers from 2004 to 2021. In that role, he oversaw project planning, design, and implementation, including land development, creating legal and financial structures, market analysis and new market development, Federal regulatory compliance specialization, USDA Rural Development and HUD transfer applications, tax credit applications, applications for FHLBanks, HTF and HOME funds, tax credit syndication negotiations and construction and permanent financing applications.

II. BACKGROUND

A. Location and Existing Uses

The Property is in Ward 1 of Northwest D.C. within the Adams Morgan neighborhood and ANC 1C. As shown on the plat attached as **Exhibit A**, the Property contains approximately 7,348 square feet of land area and is currently zoned RA-2. To the east, the Property has approximately 50 feet of frontage along Champlain Street, and approximately 51 feet of public alley frontage to the west. A two-story rowhouse immediately abuts the Property to the north. The Line Hotel is located immediately north of the rowhouse. A three-story condominium building abuts the Property to the south.

Currently, the Property is improved with a 32-unit apartment building that was constructed in approximately 1941. The existing units within the building are primarily micro-units, comprised of sixteen (16) efficiency units, fourteen (14) one (1)-bedroom units, and two (2) two (2)-bedroom units. The extremely small unit size within the existing building is demonstrated in the table below.

Unit Count and Average Unit Size with Existing Building			
Unit Type	Count	% Total	Avg. SF
Studio / Efficiency	16	50%	327
1 Bedroom	14	44%	515
2 Bedroom	2	6%	652
Totals	32	100%	13,742

The building is currently subject to a ten (10)-year affordability covenant that expires in 2029. Under the existing covenant, the dwelling units in the existing building are devoted to households earning up to 80% of the D.C.-area Median Family Income (“**MF**I”). In 2019, HHP acquired the Property and completed critical improvements to address pre-existing fire and life safety code violations. HHP’s acquisition was a result of the existing tenants assigning their first right to purchase the Property under the D.C. Tenant Opportunity to Purchase Act (“**TOPA**”). Since then, HHP has been able to stabilize the Property and bring it up to code. Despite these improvements, the existing building is still in need of major modernization and improvement given its age and inadequate micro-unit configuration and related inefficient layout and systems.

B. Characteristics of the Surrounding Area

The Property is in the Adams Morgan neighborhood, just east of the 18th Street, NW commercial corridor. The surrounding area has an interesting zoning and development history, transitioning from a commercial / light-industrial area in the 1930s to the mixed-use / residential area that exists today. As shown on the context map attached as **Exhibit B**, zoning in the area is a mixture of moderate density residential (RA-2) and moderate density mixed use (MU-5A). Several properties in the immediate area, including along the subject block of Champlain Street, are also subject to the Reed-Cooke (RC) provisions of Subtitle C, Chapter 7, which, as related to the Project, exist to: protect current housing and provide for development of new housing; maintain heights and densities at appropriate levels; and protect adjacent and nearby residences from adverse traffic, parking, environmental, social, and aesthetic impacts. 11-G DCMR § 700.2.

The use and development pattern of the surrounding area is one of the most diverse and walkable in the entire District, characterized by a widely varied mix of commercial, residential, and mixed-use developments with institutional uses such as public schools and religious institutions interspersed throughout. The segment of Champlain Street where the Property is located contains a mix of multifamily rental and condominium buildings ranging between two (2) to four (4) stories. Just north of the Property is the eight (8)-story Line Hotel. Several other commercial and mixed-use developments are located further north of the Property along Columbia Road. To the east, the area is characterized by a wide mix of rowhomes and mid- and high-rise apartment buildings. To the west, across the sixteen (16)-foot public alley at the rear of the Property, is the 18th Street commercial corridor which contains one (1) to three (3) story retail, service, and eating and drinking establishment uses. A mixture of rowhomes and mid- and high-rise apartment buildings exist further west of the 18th Street corridor. Additional single- and

multifamily residential uses and the Marie Reed Elementary School and Recreation Center exist to the south of the Property.

The Property is well-served by Metrobus, with the 90, 92, and 96 bus routes running along 18th Street, one block west of the Property, and the 42 and 43 bus routes running along Columbia Road to the north of the Property. There are also several Capital Bikeshare stations within walking distance of the Property.

C. Genesis of the Application

The Applicant initially considered a substantial rehabilitation of the existing building; however, it was determined that a major reduction in unit count would have been necessary to modernize the building and still meet all code, accessibility, and sustainability requirements. In addition to displacing approximately ten (10) households, this would have rendered the project financially infeasible under the Applicant's financing structure. In consultation with existing tenants on the Property, the Applicant then evaluated full redevelopment of the Property with a new apartment building containing approximately 44 units and a combination of unit types that could help address the overcrowding of the families in the existing restrictively small units, while meeting all accessibility and sustainability requirements. As the redevelopment approach provided to be the best strategy for the Property, the Applicant engaged Housing to Home to develop a comprehensive tenant assistance and relocation plan for residents in the existing building. A draft of the relocation plan is attached as **Exhibit E**. Due to the complex and restrictive funding structure of the Project and all-affordable program, the Applicant evaluated the possibility to execute the proposed redevelopment through requesting relief from the Board of Zoning Adjustment or through a standalone Zoning Map amendment. However, based on discussions with the Office of Planning ("OP"), it was determined that a PUD with a related Zoning Map amendment would be necessary to execute the Project.

D. Status of Financing

The ability to secure financing for any real estate development continues to be very challenging, and financing for affordable housing projects is no exception. The Applicant was fortunate enough to receive Housing Preservation Funds in 2019; administered through Capital Impact Partners in partnership with the D.C. Housing and Community Development initiative. The Preservation Funds allowed the project to continue operations and address life safety issues which were addressed at time of acquisition. The Preservation Fund loan has now matured but was granted two extensions to allow the Applicant to continue to pursue affordable housing financing to preserve the Property's affordability. The Applicant applied to the D.C. Department of Housing and Community Development ("**DHCD**") for 9% LIHTC financing to complete the financing stack for the Project. Although the Project was not selected, it received positive feedback from DHCD. According to the response from DHCD, the only reason the Project did not receive the requested LIHTC financing was due to zoning entitlements having not yet been secured. Nonetheless, DHCD indicated to the Applicant that the proposed redevelopment plan was widely accepted, and that the proposal was the first known example of a redevelopment plan that successfully addressed recapitalization of an existing mortgage while maintaining an existing affordability covenant in place, and addressing all necessary D.C. building code, accessibility and sustainability requirements.

III. THE APPLICATION

A. PUD-RELATED ZONING MAP AMENDMENT

The Applicant is seeking a PUD-related Zoning Map amendment to rezone the Property from RA-2 to the RA-3 zone. Zoning tabulations for the Project are included on Sheet 10 of the Plans, and a summary of the primary development standards of the existing and proposed zoning is provided below. As discussed below, the Project is well within RA-3 PUD development parameters. Indeed, while the requested Zoning Map amendment would permit an additional fifteen (15) feet of height on the Property, the proposed 50-foot height of the Project is consistent with the maximum height of the existing RA-2 zone. Thus, the proposal is not gaining any additional height through the PUD. Regarding density, the proposal will gain an additional 1.75 FAR through the PUD, which is necessary to redevelop the Property in a manner that preserves and expands affordable housing on a small site (which creates a higher FAR figure).

Parameter	RA-2 Matter of Right	RA-3 Matter of Right	RA-3 PUD	Project	PUD Flexibility
Height	50 ft.	60 ft.	75 ft.	50 ft.	None
Penthouse Height	12 ft. (habitable) 15 ft. (mech.)	12 ft. (habitable) 18.5 ft. (mech.)	20 ft.	15 ft. (mech)	None
FAR (w/ IZ)	2.16	3.6	4.32	3.90	+1.75
GFA	15,872 sf	26,453 sf	31,743 sf	28,731 sf	+12,859 sf
Lot Occupancy	60%	75%	75%	80%	+20%
GAR	0.4	0.3	0.3	0.3	None
Rear Yard	4 in./ft. (15 ft. min.)	4 in./ft. (15 ft. min.)	4 in./ft. (15 ft. min.)	20 ft. (16'-8" required)	None

IV. PROPOSED SITE PLAN AND BUILDING DESIGN

The primary design and placemaking objective of the Project is to redevelop the Property with a new multifamily residential building for existing and new residents in a safe, secure, and modernized building. The Property will be redeveloped with a new five (5)-story residential building with rear surface parking. Overall, the Project will contain approximately 28,655 square feet of residential GFA, which equates to a floor-area-ratio (“**FAR**”) density of approximately 3.90 FAR. The new building will be a maximum height of approximately 50 feet, plus a fifteen (15) foot rooftop screened mechanical area. The Project will have a maximum lot occupancy of approximately 80%.

As shown on the site plan on Sheet 16 of the Plans, the footprint of the proposed building will be shaped like a shallow “U” with a closed court on its north side. Vehicle parking will be located directly off the public alley at the rear of the Property. At the ground level, the building will be slightly recessed from the front lot line along Champlain Street to provide additional pedestrian circulation space along what is otherwise a narrow sidewalk condition, and to prevent the lobby entry door from swinging into public space. As shown on Sheet 18 of the Plans, the ground floor contains the residential lobby, leasing office, and amenity space along Champlain

Street, and a small number of dwelling units are located at the middle and rear of the ground floor. A trash room is also located at the rear of the ground floor, which has direct access to the rear parking area and public alley. As shown on the zoning tabulation included on Sheet 10 of the Plans, the minimum vehicle parking requirement for the Project is thirteen (13) parking spaces, while the project will provide four (4) vehicle parking spaces. As a result, the application seeks parking flexibility for nine (9) parking spaces. Four (4) floors of residential units will be located above the ground floor, each containing approximately nine (9) units. Access to the upper floors will be provided via an elevator and stairs that are located on the south side of the building. At the roof level, a fifteen (15)-foot elevator override and twelve (12)-foot screened mechanical area will be situated in the middle portion of the roof, substantially set back from the front and rear building walls. The remaining east and west portions of the roof will contain solar panels mounted over an extensive green roof. Additional solar panels are proposed over the screened mechanical area. Overall, the roof level will contain approximately 1,000 square feet of rooftop solar panel array area. Two (2) lightwells will also be located on the roof and extend down through the building to provide light into the proposed dwelling units.

The exterior design of the Project will be comprised of high-quality brick, punched window openings, and copper-colored extruded window frames and a ground floor “storefront” to allow for more visibility into and out of the building to enhance interactivity. The proposed brick, in part an homage to the existing building on the Property and the immediate surroundings, will be of a reddish-brown hue. The brick will be installed in a running bond pattern with soldier courses at the bottom and top of each story to add articulation to the façade. Due to the narrow width of Champlain Street, the Applicant is unable to provide bay projections or balconies under the D.C. Building Code, which are often used to add visual interest and character to a residential building. The Applicant has slightly recessed the ground floor, which will add visual interest to the façade as an alternative to projection-based architectural expressions. The recessed ground floor will also create a shallow overhang that can provide a degree of weather protection and will also widen the sidewalk adjacent to the Property. Above the ground floor, the Applicant is proposing copper-colored extruded window frames which will create a shadow effect and give depth to the façade. Randomized copper-colored decorative screen panels will also be installed on the upper floors on the Champlain Street frontage. At the roof level, the enclosure around the screened mechanical equipment and elevator override will be similar in color to the copper-colored window frames and screening along Champlain Street.

The Project is designed according to Enterprise Green Communities Certification standards, and the Applicant is designing for near Net Zero energy consumption, with the goal of achieving full Net Zero for the Project. The Project will also be certified through Energy Star Multifamily New Construction. Specific sustainable design features include approximately 1,000 square feet of rooftop solar panel array area; approximately 3,000 square feet of intensive green roof; full electrification throughout the building, including energy efficient heat pump systems and Energy Star appliances; WaterSense certified plumbing fixtures; and enhanced building envelope performance.

A. Public Benefits

The Project includes a package of public benefits and related project amenities in multiple categories set forth in Subtitle X § 305.5. As described in more detail below, this package of public benefits was developed in coordination with the current residents at the Property, ANC 1C, and OP.

B. Requested Design and Zoning Flexibility

The PUD process expressly allows greater flexibility in planning and design than is possible under strict application of the Zoning Regulations. Under Subtitle X, § 303 *et seq*, the Commission is authorized to grant flexibility with respect to development standards, to grant a Zoning Map amendment, and approve relief from the Zoning Regulations as a part of the PUD process. The Zoning Regulations also allow the Commission to approve design flexibility in the final approved plans of a PUD.

This Application seeks the following flexibility:

1. PUD-related Zoning Map amendment: the Applicant is requesting to rezone the Property in connection with the proposed PUD from RA-2 to RA-3. Pursuant to Subtitle X § 303.12, a PUD-related map amendment shall be considered flexibility against which the Commission shall weigh the benefits of the PUD.
2. PUD-related density increase: As a result of the requested PUD-related Zoning Map amendment, the Applicant will gain additional density for the Project. Under the Property's existing RA-2 zoning, a maximum density of 2.16 FAR is permitted. As shown in the Plans, the Project has a maximum density of 3.91 FAR. Thus, the Applicant will gain approximately 1.75 FAR of density through the PUD process, albeit on a small lot. Note, the Applicant is not gaining any additional building height as a result of the PUD. The proposed height of the Project is consistent with the maximum height permitted under the existing RA-2 zoning.
3. Technical zoning flexibility: The Applicant requests the following areas of technical zoning flexibility:
 - a. Lot occupancy (Subtitle F § 210.1): to allow the Project to have 80% lot occupancy, an increase of 5% above the maximum permitted lot occupancy in the proposed RA-3 zone.
 - b. Closed court (Subtitle F § 209.1): to allow the Project to have a closed court width of approximately 8.33 feet, and a closed court area of approximately 393 square feet, where a width and area of 20.67 feet and 854 square feet are required, respectively.
 - c. Minimum parking requirement (Subtitle C § 701.5): to allow the Project to provide four (4) vehicle parking spaces that are directly accessible from the public alley at the rear of the Property, where the minimum parking requirement for the Project is thirteen (13) spaces.

- d. Parking screening requirements (Subtitle C § 714): to allow no screening along the rear lot line of the Property that directly abuts the public alley to allow unimpeded access to the proposed vehicle parking spaces due to the narrow alley configuration.¹

Pursuant to 11-X DCMR §§ 303.12 and 303.13, all flexibility under a PUD, together with the PUD-related Zoning Map amendment, must be balanced against the PUD's public benefits. The package of public benefits set forth herein more than suffices to justify the Project's flexibility, including the requested technical zoning flexibility and Zoning Map amendment.

V. THE APPLICATION SATISFIES THE REQUIREMENTS FOR A CONSOLIDATED PUD AND MAP AMENDMENT

The Project and this Application satisfy the requirements of the Zoning Regulations for review and approval of the Consolidated PUD and related Zoning Map amendment. Accordingly, the Commission should set this Application down for a public hearing and approve the Project.

This Application satisfies: (a) the set down and approval criteria applicable to a consolidated PUD and to a PUD generally; and (b) the requirements for a Zoning Map amendment.

A. The Application Complies with the Consolidated PUD Set Down Criteria and all Other Prerequisites for a PUD

The Commission should set this Application down for a public hearing and approve the Project because the Application satisfies the standards for a consolidated PUD. The procedural regulations applicable to a PUD provide (i) that a PUD must undergo “a general review of the site's suitability as a PUD and any related map amendment; the appropriateness, character, scale, height, mixture of uses, and design of the uses proposed; and the compatibility of the proposed development with the Comprehensive Plan, and city-wide, ward, and area plans of the District of Columbia, and the other goals of the project” plus a “detailed site plan review to determine final transportation management and mitigation, final building and landscape materials” and review for compliance with the Zoning Regulations generally, *id.* § 302.2; (ii) that a “consolidated [PUD] application shall incorporate all information and material for both a first- and second-stage application” set forth in Subtitle Z, Sections 300.11 and 300.12, *id.* § 302.3; and (iii) “[w]hen the [Commission] considers whether to set down a consolidated [PUD] application for a hearing, the [Commission] shall determine whether the application is sufficiently clear and detailed to be considered at one (1) proceeding, *id.* § 302.4. The Application fulfills these requirements.

The Plans and this statement allow the Commission to conduct a consolidated PUD review of “the site's suitability as a PUD” and the “appropriateness, character, scale, height, mixture of uses, and design” of the multifamily residential use proposed. The Plans also include “detailed site plans along with proposed building and landscape materials” for the Commission to conduct its

¹ The Applicant is requesting this area of flexibility out of an abundance of caution to the extent it is required under the existing screening requirements of Subtitle C § 714. The Applicant notes that the Office of Planning's pending text amendment in Z.C. Case No. 25-12 (“omnibus” zoning text petition to modify and clarify the text of various provisions of the Zoning Regulations), includes a clarification that screening is not required for a parking space that is directly access from an alley.

review. The Applicant will submit a comprehensive transportation review (“CTR”) following the Commission’s consideration of this Application for setdown and at least 30 days prior to the public hearing. As set forth below in Section V, the proposed Project is not inconsistent with the Comp Plan. Finally, as set forth on the certificate attached as **Exhibit H**, this Application includes all the materials required of a PUD application.

Pursuant to Subtitle X § 301.1, the minimum land area for a PUD in the RA-3 zone is 15,000 square feet. The Property only contains 7,348 square feet of land area, and thus the Applicant must seek a waiver from the minimum land area requirement. Per Subtitle X § 301.3, for PUDs requiring a minimum land area of 15,000 square feet, the Commission may waive the minimum land area requirement to no less than 5,000 square feet. To do so, the Commission must find, after the public hearing, that the proposed PUD is of exceptional merit and is in the best interest of the District of Columbia or the country, and: (i) the development is identified in an approved Small Area Plan and will be generally not inconsistent with the Small Area Plan, (ii) the development will be constructed or operated by the District of Columbia or federal government and serves a compelling government interest, or (iii) if the development is to be located outside the Central Employment Area, at least 80% of the gross floor area of the development shall be used exclusively for dwelling units and uses accessory thereto. The Applicant meets these criteria. First, the Application is of exceptional merit and in the best interest of the District as it will preserve existing affordable housing and create new affordable housing, which fully aligns with the Mayor’s housing goals and Housing Element policies of the Comp Plan. As described above and shown in the Plans, the existing building contains 32 units of income-restricted housing, which are subject to affordability covenants that are set to expire in 2029. The Applicant is proposing to redevelop the Property with a new multi-family apartment building containing 44 units of income-restricted housing, at deeper levels of affordability than what currently exists. Thus, not only will the entire Project be used for dwelling units, it will be entirely used for affordable dwelling units that will be subject to new affordability covenants. In addition, it is subject to a unique relocation plan, attached as **Exhibit E**, that sets forth the manner in which current tenants will return to vastly improved, and larger units. Based on the foregoing, the Commission should grant the Applicant’s request for a waiver from the minimum land area requirement for a PUD in the RA-3 zone.

The Zoning Regulations set forth certain substantive and procedural requirements for the Commission to process and review this PUD and establishes the criteria against which the Commission should evaluate and decide on this Application. The purpose of the PUD process is to provide for higher quality development through flexibility in building controls, provided that the project that is the subject of the PUD: (i) results in a project superior to what would result from the matter-of-right standards; (ii) offers a commendable number or quality of meaningful public benefits; (iii) protects and advances the public health, safety, welfare, and convenience, does not circumvent the intent and purposes of the Zoning Regulations, is not inconsistent with the Comp Plan, and does not result in action inconsistent therewith; and (iv) undergoes a comprehensive public review by the Commission in accordance with the procedural requirements for a PUD in order to evaluate the flexibility or incentives requested in proportion to the proposed public benefits. 11-X DCMR §§ 300.1, 300.2, 300.5, and 307.1. The Project satisfies each of the above PUD requirements.

1. *The Project Is Superior to the Development of the Property under the Matter-of-Right Standards.*

The Project's proposed residential use, enhanced design, sustainable elements, public benefits, tenant relocation strategy, and the community engagement process that accompany this Application all exceed what would otherwise be required under matter-of-right standards. Specific aspects of the Project that are superior to a development under the existing RA-2 development standards include:

- Housing/Affordable Housing and Robust Tenant Relocation Strategy: The Application will not only result in a greater amount of housing compared to the amount that could be constructed under existing RA-2 zoning, but it will also provide far greater affordable housing. In addition to preserving the existing 32 units of income-restricted housing that currently exists on the Property, the Project will provide an additional twelve (12) units of income-restricted housing. Additionally, the proposed 44 units of income restricted housing will be set aside at deeper levels of affordability than would be required under IZ regulations. In addition, the Applicant is implementing a robust tenant relocation strategy to ensure that existing residents can be located off site during construction and have the option to return to a vastly improved unit upon Project completion.
- Sustainability: As proposed, the Project will exceed the sustainability requirements that exist under the standard DC Building Code. The Project is designed to achieve a high rating under the Enterprise Green Communities Certification, with a preliminary score of 68 (minimum is 40). As shown in the Plans, the Project will contain approximately 1,000 square feet of rooftop solar panel array area, covering nearly the entire roof area of the proposed building. The Applicant is striving to achieve Net Zero energy consumption for the Project.
- Hiring and Training Opportunities: As part of the Project, the Applicant will enter into a new First Source Agreement with the D.C. Department of Employment Services and Certified Business Enterprise ("CBE") agreement with the D.C. Department of Small and Local Business Development. Additionally, the Project will be compliant with HUD Section 3 requirements and follow prevailing wages (Davis-Bacon wage scale) as prescribed by Housing Production Trust Fund ("HPTF") financing.
- Community Engagement: Finally, the Project is undergoing a public review process with multiple opportunities for current tenants, neighbors, community groups, ANC 1C, and public agency participation. Indeed, on October 9, 2024, ANC 1C voted unanimously in support of the Project.² These opportunities for public input and engagement would not exist for a matter-of-right development of the Property.

² After the ANC's vote to support the application, the Applicant encountered unexpected financing issues that delayed submission of the PUD application at that time. These issues have been resolved and thus the Applicant is proceeding with the PUD application. While nothing has changed in the Project since ANC 1C voted in support of the application, the Applicant intends to coordinate with the ANC to confirm its support and determine whether it would like to issue an updated support letter.

2. The Public Benefits Are Commendable in Number and Quality.

As detailed below, the Project delivers public benefits and other project amenities. These public benefits fulfill goals set forth in the Comp Plan and the AM Framework, the housing priorities set forth by the District, particularly as related to the preservation of affordable housing, and the preferences, needs, and concerns of the ANC and community residents identified during the Applicant's community engagement process. Accordingly, the public benefits package is a meaningful set of commitments that satisfy the intent and purposes of the PUD process.

3. The Project Protects and Advances Public Health, Safety, Welfare, and Convenience and Does Not Circumvent the Purposes of the Zoning Regulations.

As detailed in this statement, the Project protects and advances public health, safety, welfare, and convenience. The existing building on the Property contains 32 units of covenanted income-restricted housing for households earning up to 80% MFI, which is set to expire in 2029. The existing building, which was constructed in 1941, needs significant modernization. In accordance with a comprehensive tenant relocation plan that gives existing tenants a guaranteed right of return, the Applicant will redevelop the Property with a new multi-family building that will contain approximately 44 units of new covenanted income-restricted housing for households earning between 30%-80% MFI.

The proposed height and density of the Project are consistent with the guidance provided in the Comp Plan and with the intent and purposes of the Zoning Regulations. While the Applicant is requesting a PUD-related Zoning Map amendment to the RA-3 zone, the height of the Project will remain consistent with the 50-foot allowable height under the existing RA-2 zone. As discussed in the Comp Plan section of this statement, the proposed density of the Project is not inconsistent with the guidance provided in the Framework Element relative to the Future Land Use Map, and with the policies / recommendations of the Housing Element and AM Framework.

4. The Project Will Undergo a Comprehensive Public Review that Evaluates the Project's Flexibility and Incentives in Proportion to the Project Public Benefits.

Any PUD must undergo a comprehensive public review by the Commission to evaluate the flexibility or incentives requested in proportion to the proposed public benefits. This Application will undergo such a review. The Applicant requests that the Commission proceed to undertake a comprehensive public review of and set this Application down for public hearing in accordance with the foregoing standard as soon as possible.

B. This Application Satisfies the Requirements for Commission Review of a Map Amendment

The Commission should grant the requested PUD-related Map Amendment to change the zone for the Property from RA-2 to RA-3 because this Applicant satisfies the filing requirements for a Map Amendment and all substantive criteria relevant to the Map Amendment, which will be valid only in combination with and contingent upon the development of the Project being built and operated under the conditions of the PUD approval. As set forth below in Section V, the proposed

Map Amendment is not inconsistent with the Comprehensive Plan, AM Framework, or other adopted public policies and active programs related to the Property.

VI. THE PROJECT SATISFIES THE APPLICABLE PUD EVALUATION CRITERIA

The Project satisfies the criteria by which the Commission must evaluate a PUD, which under Subtitle X § 300.4 shall also include the proposed Zoning Map amendment. First, in reviewing the Application, the Commission must find, based on the Applicant's evidence, that the Project satisfies the three elements of the PUD evaluation standard, that is that the Project: (a) is not inconsistent with the Comp Plan and other adopted public policies and active programs related to the Property, (b) does not result in any unacceptable impacts on the surrounding area or on the operation of District services and facilities, and (c) includes specific public benefits that satisfy the relevant requirements. 11-X DCMR § 304.4(a)-(c). Second, if the Commission finds that the Project satisfies those three criteria, then the Commission must judge, balance, and reconcile the relative value of the public benefits against the development incentives and flexibility requested as part of the Project and any potential adverse effects of the Project. *Id.* § 304.3.

The Project satisfies the three foregoing criteria and supports a balancing in favor of granting approval of this Application.

A. The Project Is Not Inconsistent with the Comp Plan (11-X DCMR § 304.4(a))

To approve the PUD and related Zoning Map amendment, the Commission must find that the proposal is “not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.” 11-X DCMR §§ 304.4(a), 500.3. As clearly demonstrated below, the proposal is not inconsistent with the Comp Plan and other adopted public policies, *viz.*, the AM Framework and the Mayor's Order on Housing.

The Commission reviews a PUD application against the Comp Plan “*as a whole*.” That is, the Commission may find that a PUD application is not inconsistent with the Comp Plan even if the application presents actual or potential inconsistencies with one or more individual Comp Plan policies.³ The Commission must weigh and balance competing policy objectives and explain its analysis.⁴ As part of its Comp Plan analysis, the Commission must consider the Application through the lens of racial equity. 10-A DCMR § 2501.8.

1. Racial Equity and the Comprehensive Plan

Equity is a primary focus of the Comp Plan, especially in the context of zoning where certain priorities stand out, including affordable housing, avoiding displacement of existing

³ *Friends of McMillan Park v. District of Columbia Zoning Comm'n.*, 211 A.3d 139, 146 (D.C. 2019) (“The Commission may approve a PUD that is inconsistent with one or more non-mandatory policies in the Comprehensive Plan as long as it recognizes these conflicting policies and explains why they are outweighed by other, competing considerations.”) (internal quotations marks and citations omitted).

⁴ *Id.* at 144 (“Even if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole. The Comprehensive Plan reflects numerous occasionally competing policies and goals and, except where specifically provided, the Plan is not binding. Thus, the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole.”) (internal quotations marks and citations omitted).

residents, and creating and increasing access to opportunity. The Framework Element states that equity is both an outcome and a process, and exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. 10A DCMR § 213.6.

The Comp Plan emphasizes that considerations of equity, and particularly racial equity, must be part of a District agency’s evaluation and implementation of Comp Plan policies and actions. To do this, the Implementation Element calls for agencies to prepare and implement tools that will assist in evaluating and implementing the Comp Plan through a “racial equity lens.” The Commission considers racial equity as an integral part of its analysis as to whether a proposed zoning action is “not inconsistent” with the Comp Plan. 10A DCMR § 2501.8.

The focus of the racial equity lens component of a Comp Plan evaluation depends upon the type of zoning action being proposed, the location of the zoning action, and the extent to which the zoning action can address localized and citywide equitable development issues. To assist the Commission in applying a racial equity lens to its Comp Plan determinations, the Commission has developed a Racial Equity Tool that applicants are expected to utilize throughout the process of a proposed zoning action. The Racial Equity Tool emphasizes community outreach, and is intended to facilitate proactive and meaningful engagement with the community most likely to be affected by the proposed zoning action to: (i) gain insight on negative conditions that may exist in the community, particularly those that are a result of past and present discrimination, (ii) develop an understanding of community priorities, and (iii) solicit input on potential positive and negative outcomes of the proposed zoning action.

The Applicant’s Comp Plan evaluation was guided by the Commission’s Racial Equity Tool and was also informed by the D.C. Office of Planning’s Equity Crosswalk (effective August 21, 2021) (the “**Equity Crosswalk**”), which highlights Comp Plan policies and actions that explicitly address racial equity. The planning guidance and data pertaining to the Mid-City (“MC”) Planning Area contained in the table below were also considered in the preparation of the Applicant’s Comp Plan evaluation:

Planning Guidance and Goals
<ul style="list-style-type: none">· Housing Equity Report (October 2019) housing goals for the MC Planning Area:<ul style="list-style-type: none">· Total housing production goal (market rate and affordable): 4,210 units (5,057 total units have been produced since 2019) *· Affordable housing production goal: 1,010 units (1,481 units have been produced or newly covenanted since 2019) *· Comprehensive Plan policies supporting advancing diversity and equity in all planning areas, production of long-term affordable housing at all income levels, CBE participation and local hiring.· MC planning and development priorities / concerns: Loss of neighborhood diversity and the need for affordable housing at all income levels.
* Source : https://open.dc.gov/36000by2025/

2. Evaluation of Comprehensive Plan Policy Guidance

The Applicant has conducted a thorough evaluation of the proposed PUD's consistency with the Comp Plan, including the policies of all applicable Citywide and Area Elements, the Future Land Use Map (“**FLUM**”), and the Generalized Policy Map (“**GPM**”). The Applicant's full Comp Plan evaluation can be found in **Exhibit D**.

Overall, the Applicant finds the proposal to be not inconsistent with the Comp Plan, including when viewed through a racial equity lens. The Property is within a designated **Neighborhood Conservation Area** on the GPM (**Figure 1**). As shown in **Figure 2**, the Property is in an area that is designated for **Moderate Density Residential** development on the FLUM.

The Project is not inconsistent with the GPM. The Project will maintain the residential use of the Property by replacing an outdated multifamily building with a new, appropriately scaled and sustainably designed multifamily building that will entirely preserve and expand the amount of affordable housing on the Property, thus helping to address the District's housing needs without causing permanent displacement of existing residents, and without causing indirect displacement. The Project design is compatible with the scale and character of the surrounding area. The height of the Project will remain within the 50-foot height that is permitted as a matter of right under the site's existing RA-2 zoning. The height and lot occupancy are also compatible with the scale, pattern, and character of the surrounding neighborhood. Notably, as shown in the full Comp Plan evaluation at **Exhibit D**, the 50-foot (5 stories) and approximate 80% lot occupancy of the Project falls within the ranges of heights and lot occupancies found along this specific block of Champlain Street. This concept is further underscored by the height study of the Property's vicinity, shown on Sheet 14 of the Plans, which shows the Project's five stories will be well within the building heights and masses within the neighborhood.

The proposed PUD, including the related Zoning Map amendment to RA-3, is not inconsistent with the FLUM. The FLUM is not a zoning map and does not prescribe specific development standards for a specific property. Rather, the FLUM is intended to be read and applied broadly by area rather than on a property-by-property basis, particularly within the context of a PUD where the Commission can evaluate a specific development proposal. While the proposed RA-3 zone is not one of the zones expressly referenced by the Framework Element as being consistent with the Moderate Density Residential FLUM designation, it also states that “other zones may also apply.” The Framework Element also specifically states that “even if a zone is not identified in a category, it can be permitted as described in Section 227.2.” 10-A DCMR § 228.1(e).

The Comp Plan specifically acknowledges that PUDs allow greater height and density and do not prescribe limits on height and density for PUDs. The Framework Element states, “the goal of a PUD is to permit development flexibility greater than specified by matter-of-right zoning, such as increased building height or density...the Zoning Commission may include a zoning map amendment for the purpose of the PUD, which is applicable only for the duration of the PUD, and subject to PUD condition.” 10-A DCMR § 224.7. The reason for this wide range of flexibility for height, density, and the specific zone that can be approved is because the PUD process affords the Commission the ability to evaluate a specific project design and program to ensure that it does not result in unacceptable impacts on the surrounding area. 10-A DCMR § 227.



Figure 1: Excerpt of GPM showing Property within a designated Neighborhood Conservation Area.

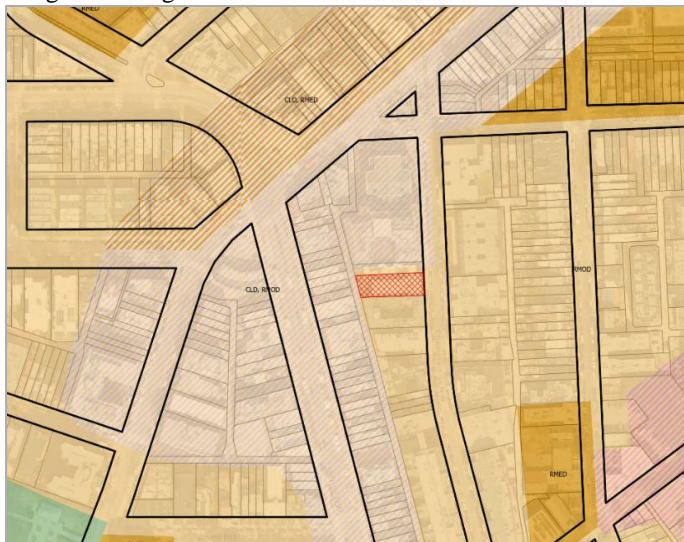


Figure 2: Excerpt of FLUM showing Property designated Moderate Density Residential

When read together with Mid-City Area Element policy guidance, the height, density, massing, and scale of the Project are compatible with adjacent uses and are appropriate given the heights and densities of the surrounding context. As noted above, although the proposed RA-3 zone permits a maximum height of 75 feet under a PUD, the proposed Project has a maximum height of 50 feet, which is consistent with the matter-of-right height permitted under the site's existing RA-2 zoning (a zone that is specifically referenced in the Framework Element as being consistent with the Moderate Density FLUM category). Indeed, the Applicant only needs the proposed RA-3 zone to accommodate the Project's density (3.91 FAR) on its own site, which by itself could be described as a medium density building. However, when evaluating a proposed zone the Commission considers, in part, the intent of the FLUM, which reflects typical densities of all contiguous properties on a block that may contain buildings with higher or lower individual densities. As shown in the Applicant's full Comp Plan evaluation in **Exhibit D**, approximate densities along the 2300 block of Champlain Street range from less than 2.0 FAR to greater than 5.0 FAR. Overall, the existing average density of all contiguous properties along the block – not including the proposed Project - is approximately 2.24 FAR, which is well within the 2.592 FAR that is permitted under a PUD in the moderate-density RA-2 zone, and just above the 2.16 FAR that is permitted as a matter-of-right. Inclusive of the Project, which has a density of approximately 3.91 FAR, the average density of all contiguous properties along the block increases to approximately 2.31 FAR. As such, the proposed Project is not inconsistent with the FLUM since the overall density along the 2300 block of Champlain Street will remain well within the density that is contemplated for an area designated for moderate density residential use.

The table below identifies the specific Comp Plan policies that will be advanced by the proposed PUD. Regarding Comp Plan policies that explicitly focus on advancing racial equity, as identified by the Equity Crosswalk, the Project will help maintain the mixed-use character of the Adams Morgan neighborhood and a variety of neighborhood types in all areas of the District by

bringing preserving and expanding affordable multi-family housing on a site that is well-served by transit and within walking distance to numerous city services and neighborhood-serving commercial uses. (MC-2.4.3, LU-2.1.1, LU-2.1.2.) The preserved and new affordable units provided by the Project will assist the District in achieving its housing production goals and advancing diversity and equity in the Mid-City Planning Area and the District as a whole. (H-1.2.2, H-1.2.3, H-1.2.9.) The Project will also advance multiple Housing Element policies that are focused on redevelopment of existing income-restricted housing, avoiding displacement, and long-term affordability restrictions. (H-2.1.4, H-2.1.5, H-2.1.6, H-2.1.6, H-2.1.9.) Finally, redevelopment of the Property will replace an outdated apartment building with a new development that is subject to District green building standards, thus improving the overall environmental condition of the Property and helping to reduce the urban heat island effect. (E-1.1.2.)

In accordance with guidance provided by the D.C. Court of Appeals, the Applicant's Comp Plan evaluation also includes a specific assessment and balancing of potential Comp Plan inconsistencies. The table below contains the Comp Plan policies where the Applicant assesses there could be an inconsistency, as well as a list of competing / outweighing Comp Plan policies and other considerations. As discussed in the full Comp Plan evaluation in **Exhibit D**, to the extent the proposal is inconsistent with the Comp Plan policies listed below, the Applicant believes such inconsistencies are far outweighed by other Comp Plan policies and competing considerations such that, when read as a whole, the proposal is not inconsistent with the Comp Plan.

Summary of Comp Plan Policies Advanced by the Proposed Zoning Map Amendment	
Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.	
	Mid-City Area Element
MC-1.1.1, MC-1.1.7, MC-1.1.12, MC-1.2.1, MC-2.4.1, <u>MC-2.4.3</u> , MC-2.4.5	
	Land Use Element
<u>LU-2.1.1</u> , <u>LU-2.1.2</u> , LU-2.1.3, LU-2.1.8, LU-2.1.9	
	Transportation Element
T-1.1.2, <u>T-1.1.7</u> , T-2.3.B, T-3.1.1, T-3.2.D, T-3.4.1	
	Housing Element
H-1.1.1, H-1.1.9, H-1.2.1, <u>H-1.2.2</u> , <u>H-1.2.3</u> , H-1.2.5, H-1.2.7, H-1.2.8, <u>H-1.2.9</u> , H-1.2.10, H-1.2.11, H-1.6.5, <u>H-2.1.1</u> , <u>H-2.1.2</u> , <u>H-2.1.4</u> , <u>H-2.1.5</u> , <u>H-2.1.6</u> , <u>H-2.1.9</u>	
	Environmental Protection Element
<u>E-1.1.2</u> , E-3.2.3, E-3.2.6, E-3.2.7, E-3.2.8, E-4.1.2, E-4.2.1, E-4.4.1	
	Urban Design Element
UD-2.2.1, UD-4.2.4	

Evaluation / Balancing of Potential Comp Plan Inconsistencies	
Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.	
Potential Inconsistency	Outweighing Policies / Considerations
<ul style="list-style-type: none"> · LU-2.1.4: Rehabilitation Before Demolition · UD-2.2.4: Transitions in Building Intensity · UD-2.2.5: Infill Development 	<ul style="list-style-type: none"> · Consistency with Adams Morgan Vision Framework <p><u>Mid-City Planning Area Element</u></p> <ul style="list-style-type: none"> · MC-1.1.7: Preservation of Affordable Housing · MC-2.4.1: Creating an Inclusive Adams Morgan <p><u>Housing Element</u></p> <ul style="list-style-type: none"> · <u>H-2.1.1: Redeveloping Existing Income-restricted Affordable Housing</u> · <u>H-2.1.2: Preserving Affordable Rental Housing</u> · <u>H-2.1.5: Conversion of At-Risk Rentals to Affordable Units</u> · <u>H-2.1.6: Long-Term Affordability Restrictions</u> · <u>H-2.1.9: Redevelopment of Affordable Housing</u> <p><u>Environmental Protection Element</u></p> <ul style="list-style-type: none"> · <u>E-1.1.2: Urban Heat Island Mitigation</u> · E-3.2.3: Renewable Energy · E-3.2.6: Alternative Sustainable and Innovative Energy Sources · E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

3. *Equity as a Process*

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. 10 A DCMR § 213.7. As a process, racial equity is employed when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Commission’s Racial Equity Tool places a heavy emphasis on community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Commission shall be accompanied by a discussion of efforts made by an applicant to meaningfully engage the community early in the zoning process. The information contained in the table below addresses the questions set forth in Part II (Community Outreach and Engagement) of the Racial Equity Tool. As demonstrated, the Applicant has engaged with the community, and it will continue to do so during the PUD process.

Community Outreach and Engagement
Description of affected community (including defining characteristics).
The affected community is comprised of the tenants that reside within the existing building on the Property and the greater Adams Morgan neighborhood and Ward 1 community members. The Applicant entered into a development agreement with 2384 Champlain NW Tenant Association, Inc. (the “ Tenant Association ”) in 2019 and agreed to address all life safety and code issues as well as pursue a redevelopment of the Property and keep the affordability covenant in place.
Characteristics of the affected community that influenced outreach plan / efforts.
The proposed plan for redevelopment of the Property requires new construction and relocation for the existing tenants. The Applicant, together with Housing to Home, have been working with existing tenants to develop a comprehensive tenant assistance and relocation plan that will facilitate the off-site relocation of tenants as efficiently as possible, as well as the efficient return of tenants after completion of the Project. Overall neighborhood outreach was performed to inform neighboring communities of the Project timeline, potential construction activities, and environmental mitigation efforts to keep construction disturbances to a minimum.
Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).
Outreach methods that were used by the Applicant have included emails, phone calls, and virtual meetings. The Applicant did offer in-person meetings, but community members and review agencies did not pursue this meeting modality.
Community outreach timeframe / dates of major meetings and points of engagement
The Applicant presented the proposed Project to ANC 1 on October 9, 2024, and received unanimous support for the proposal. Additionally, outreach was conducted with the Tenant Association and nearby neighbors in June 2025.
Members of the affected community that would potentially benefit from the proposed zoning action.
First and foremost, members of the Tenant Association would benefit from the Project as they will be provided a guaranteed opportunity to return to the newly constructed Project, and reside in a safe, higher-quality, fully code compliant dwelling unit that is similar in size or larger than their previous unit, and at similar rental rates. Additionally, the proposed development would seek green requirements, including solar, which would benefit the tenants and existing neighbors through a project that is more environmentally sustainable than the current building. The proposed project is also pursuing affordable housing financing to keep the affordable covenant in perpetuity that benefits tenants and the overall Adams Morgan neighborhood.
Members of the affected community that would potentially be burdened by the proposed zoning action.
The proposed zoning action would allow for a redevelopment of the Property which may cause disturbances during construction including noise, increased vehicle trips to the site, and rodent disturbance. The Applicant will take proper measures to minimize these disturbances, including following guidelines of Phase I and Phase II environmental reports to manage soil contamination and adherence to construction hours and noise level limitations under D.C. Code.

Community Outreach and Engagement (continued)	
Potential positive outcomes of the proposed zoning action identified by the affected community.	
Potential positive outcomes of the Project that have been identified by the affected community include updated code and accessibility standards, upgraded green standards, developing a solution to retain existing residents in place, and an increase in affordable units to the neighborhood. Additionally, the proposed development allows for the existing tenants to be in larger standard units (as opposed to the current microunits) which has been identified by the Tenants Association and the ANC to address overcrowding in existing units.	
Potential negative outcomes of the proposed zoning action identified by the affected community.	
· No negative outcomes identified to date.	
Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.	
No input has been provided to date.	
Input received from the affected community not incorporated into the proposed zoning action.	
No input has been provided to date.	
Efforts taken to mitigate potential negative outcomes identified by the affected community.	
Not applicable at this time.	

4. *Equity as an Outcome*

As an outcome, racial equity is achieved when race no longer determines one's socioeconomic outcomes, and when everyone has what they need to thrive no matter where they live or their socioeconomic status. 10-A DCMR § 213.9. The table below considers the proposed PUD relative to any anticipated positive and negative impacts or outcomes to racial equity. As demonstrated, the outcomes of the proposal have the potential to positively impact racial equity by facilitating the Applicant's planned redevelopment of the Property which will preserve all 32 existing affordable housing units on the Property (with existing residents guaranteed a right to return following construction) and provide twelve (12) new affordable housing units to help address the demand for affordable housing in the Adams Morgan neighborhood.

Evaluation of Zoning Action Through a Racial Equity Lens	
Direct Displacement	The Project will cause temporary direct displacement of the tenants within the existing building. However, through the comprehensive tenant relocation plan that has been prepared by Housing to Home, the existing tenants will be relocated to another unit within a nearby building, and will be offered a guaranteed right of return to a comparable unit, at similar leasing terms, when construction of the Project is complete. The existing tenants will not have to bear any relocation costs.

Evaluation of Zoning Action Through a Racial Equity Lens (continued)	
Indirect Displacement (Economic and Cultural)	The Project is not anticipated to cause any indirect displacement, economic or cultural. The Project will increase the number of affordable units on the Property, and provide existing tenants are guaranteed right to return following Project completion. Thus, the Project is likely to have favorable cultural impacts since existing tenants will be able to remain in the neighborhood and maintain their social, cultural, and economic connections. Further, the Project is not expected to result in economic displacement of existing residents in the surrounding area due to rising land values.
Housing	The Project will have positive housing outcomes by preserving the existing 32 affordable units on the Property and providing an additional twelve (12) affordable units. On average, the housing that results from the Project will be larger, healthier, and reach deeper levels of affordability.
Physical	The Project will have positive physical outcomes as it will entail reconstruction of the streetscape adjacent to the Property. The Project will also replace an outdated affordable development with modernized housing for existing and new tenants.
Access to Opportunity	The Project is not anticipated to directly expand access to opportunity. However, the Project will allow existing residents to return to the building and thus maintain their walkable access to the many neighborhood-serving commercial establishments, cultural, educational, and recreational assets, employment opportunities, and relative ease of access to public transit.
Community	Overall, the Project will cause beneficial outcomes for the community.

B. The Project Does Not Result in Any Unacceptable Impacts on the Surrounding Area or on the Operation of District Services or Facilities (11-X DCMR § 304.4(b))

In reviewing the Application, the Commission must evaluate whether the proposal will result in any unacceptable impacts on the surrounding area or on the operation of District services and facilities, and whether any potential impacts are capable of being mitigated or acceptable considering the Project's public benefits. 11-X DCMR § 304.4(b).

The Applicant has considered the Project's potential impacts and believes that no unacceptable adverse impacts will occur on the surrounding area or on the operation of District services or facilities. Overall, the potential impacts of the Project will primarily be positive or neutral. To the extent there is any potential for the Project to cause adverse impacts, they will be capable of being mitigated. Redevelopment of the Property will not have any long-term adverse impacts on the surrounding area or on city services and facilities. Rather, overall, the Project will have favorable impacts on housing and environmental protection. The Project design is intended to integrate with the surrounding buildings by constructing a structure with a height of the existing context (and maintaining the maximum height in the existing RA-2 zone) while integrating

materials and façade elements derived from the surrounding context. While the Project may be disruptive to the existing tenants on the Property that will need to be relocated during construction of the Project, the Applicant, together with its relocation consultant, has worked with existing tenants to develop a comprehensive tenant relocation plan that will mitigate the impacts of relocation to the greatest extent possible. Any potential for the modest increase in the number of dwelling units on the Property to cause impacts on transportation can be mitigated through a Transportation Demand Management (“**TDM**”) plan that will be developed by the Applicant in coordination with DDOT. Further, any potential for short-term construction-related impacts will be mitigated through the Applicant’s adherence to construction management requirements set forth in the D.C. Building Code.

1. Evaluation of Potential City Services and Facilities Impacts

Water Demand. The average daily water demand for the Project will be able to be met by the existing District water system or through upgrades undertaken in conjunction with this Project. The existing building on the Property contains 32 dwelling units. As proposed, the Project will provide 44 dwelling units, an increase of only 12 units, which are comprised of studio and one-bedroom units. The increase in water demand generated by these additional units is unlikely to cause any adverse impact on the existing water distribution system. The proposed connection for the fire and residential water supply will be from within the existing distribution system and will be coordinated with DC Water.

Sanitary Sewer Demand. The proposed sanitary sewer discharge for the Project will be made from the existing municipal sewer system and will be coordinated with DC Water during the permitting process. The Applicant is not aware of any sanitary sewer issues associated with the 32 units within the existing building or within the general area surrounding the Property. The additional twelve (12) dwelling units that will be constructed as part of the Project are expected to have a negligible increase in sanitary sewer demand which the existing municipal sewer system can handle.

Stormwater Management. The Project has been designed to achieve high levels of on-site stormwater retention. The proposed stormwater management system is designed to meet or exceed DOEE’s stormwater management retention and detention requirements. As shown in the Plans, the Project utilizes an expansive amount of rooftop green roof as part of its onsite stormwater management system.

Solid Waste Services. Solid waste and recycling materials generated by the Project will be collected regularly by a private trash collection contractor and thus will not increase demand on the District’s solid waste collection services.

Electrical Services. Electricity for the Project will be provided by the Potomac Electric Power Company (“**PEPCO**”) in accordance with its usual terms and conditions of service. All electrical systems are designed to comply with the D.C. Energy Code. Transformers will be installed on the Property or covered in the adjacent public space in accordance with PEPCO’s and DDOT’s design guidelines. The Project is designed in compliance with the energy conservation requirements of the D.C. Building Code. Conformance to code and Enterprise Green Communities standards will minimize the amount of electricity needed for the heat, ventilation, hot water, and lighting systems contained in the proposed building.

Erosion Control. The Property has relatively flat topography, sloping only gently from the front to the rear alley, and there are existing buildings on either side of the Property to the north and south. Further, there are no sloping vegetated areas on or adjacent to the Property that require special attention. As such, the Project is not expected to cause any erosion. During excavation and construction, erosion on the Property will be controlled in accordance with District of Columbia law and will be managed to not adversely affect neighboring properties, the environment or District services and facilities.

Public Schools. The Project will not have an unacceptable impact on public schools given the modest size of the Project, its mix and type of units, and the capacity for the District's nearby schools to take on additional students. The Applicant expects that the existing public school network will be able to accommodate, without any unfavorable impacts, any increase in school-age children that may reside at the Project. The Project is within the boundaries of Marie Reed Elementary School (2201 18th Street, NW), Columbia Heights Education Campus Middle School (3101 16th Street, NW), and Cardozo Education Campus High School (1200 Clifton Street, NW). DCPS data for these neighborhood public schools as of the 2024-25 school year (the latest year for which data are publicly available) are as follows: Marie Reed Elementary School has a capacity for 562 students and enrollment of 461 students; Columbia Heights Education Campus Middle School has a total capacity for 708 students and enrollment of 535 students; Cardozo Education Campus High School has a capacity for 693 students and enrollment of 561 students.⁵ In addition, multiple charter schools are near the Project, all offering educational options to residents who may seek alternatives to the neighborhood public schools.

Parks/Recreation Centers/Library Services. The Project will have no adverse impacts on parks, recreation centers, and public libraries. Residents of the existing building are already utilizing nearby community facilities, which are within proximity to the Property. The Project will add approximately twelve (12) new dwelling units, which will only cause a modest increase in neighborhood population. This potential increase in population will not have any adverse impacts on neighborhood parks, recreation centers, or libraries.

Fire and Emergency Management Services. The Project will not cause any adverse impacts to the District's fire and emergency management services. In fact, the redevelopment of the Property with a new multifamily apartment building that meets all applicable fire and life safety requirements will make the general condition of the Property safer compared to the existing building.

Construction-Period Impacts on Neighbors. During the construction period for the Project, impacts on the surrounding area are capable of being mitigated. The Applicant has experience successfully completing construction projects without disturbing neighbors. The Applicant will work closely with adjacent and nearby property owners and residents to manage and mitigate construction impacts associated with the Project's development and will maintain regular communication and coordination throughout the Project's construction.

2. Evaluation of Potential General Planning-Related Impacts

⁵ <https://edscape.dc.gov/page/facilities-utilization>

Zoning and Land Use. The Project has no unacceptable zoning or land use impacts on the surrounding area. The Project will maintain residential use of the Property, which is the use that has existed on the Property since the 1940s and is consistent with the FLUM. The height and massing of the proposed building is compatible with the surrounding context, and the proposed Project density is within the range of densities that can be found in the general surrounding context. Given the walkability, availability of transit, and proximity to neighborhood-serving commercial uses and public facilities (schools, recreation centers, etc.), any impacts to land use caused by the modest increase in housing units is likely to be negligible.

Housing. The Project's preservation of the existing 32 units of affordable housing and proposed additional twelve (12) units of affordable housing will have favorable impacts. The Project will replace an outdated apartment building with a new, high-quality apartment building that meets all applicable building and fire codes and provides much healthier living conditions for existing and new residents. By implementing a comprehensive relocation and return plan, the Project does not displace any existing residents and is unlikely to create any adverse impacts on the surrounding housing market. Instead, the additional affordable housing units in the Project will help buffer increasing housing costs, as increases in supply are widely understood to dampen price increases.

Transportation. The Project will not have any unacceptable impacts on the public transportation facilities or roadways that it relies on for service. Instead, the Project's transportation impacts are either capable of being mitigated or acceptable given the quality of public benefits arising from the Project. The Applicant will continue to work with the community and coordinate with DDOT to identify and address any outstanding traffic or mobility concerns, and, in consultation with DDOT, the Applicant is undertaking a comprehensive transportation review for the Project.

The Project will require flexibility from the minimum parking requirement for a residential apartment, although it will provide parking spaces. The Project's vehicular traffic impacts will be mitigated by nearby transit and be further mitigated by the Applicant's TDM plan. The Property is well-served by transit and vehicular infrastructure. Multiple Metrobus lines also service the neighborhood, and it is expected that many of the Project's residents will use public transit. The Project's favorable pedestrian, bicycle, and transit access help mitigate any traffic concerns.

Economic. The Project will have favorable economic impacts on the neighborhood and the District more generally. The Project will have a stabilizing and positive effect on the neighborhood's economy and the District as a whole by providing affordable housing for existing and new residents. The Project will provide approximately 44 affordable rental units (32 preserved units and twelve (12) new units) that will allow existing residents to remain in the neighborhood and help meet continued demand for increase affordable housing in the Adam's Morgan neighborhood. The Project's moderate and site-appropriate intensification of land use on the Property has positive tax revenue effects for the District.

Cultural. The Project will have a favorable impact on the culture of the surrounding area. The Project allows existing residents to remain in the neighborhood and adds new residents who will contribute to the diverse socio-economic profile of Adams Morgan, which is one of the most diverse areas of the entire District. The redevelopment of the Property helps revitalize the neighborhood and signifies investment and stewardship of the neighborhood with new residents.

Environmental. The Project will not have any unacceptable impacts on the environment and instead will have favorable impacts because of its environmentally sustainable design. The Project is designed to achieve high levels of environmental performance as evidenced by its satisfaction with the Enterprise Green Community Certification design standards. The Project will include extensive green roof and rooftop solar in furtherance of sustainability objectives. The Project's environmental sustainability measures and compliance with DC stormwater regulations are a major improvement over the outdated building and other conditions that currently exist on the Property.

C. The Project Includes Specific Public Benefits

This Application achieves the goals of the PUD process by providing high quality development with public benefits to the neighborhood and the District as a whole. With the preservation of the 32 existing affordable dwelling units and the guaranteed ability for existing tenants to return to the Property following construction, the public benefits relate primarily to the geographic area of the ANC in which the Project is located, while the additional twelve (12) affordable dwelling units and the environmental sustainability benefits of the Project will accrue to the District as a whole. The objective of the PUD process is to encourage high quality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning. Pursuant to 11-X DCMR § 305.12, a proposal may qualify for approval by being particularly strong in only one or a few public benefit categories but must be acceptable in all proffered categories and superior in many. This Application satisfies that objective. The specific public benefits fall with the categories under Subtitle X § 305.5 as described below.

1. Superior urban design and architecture (X § 305.5(a))

The Project's urban design and architecture are superior public benefits. Through the use of brick and high-quality metal detailing and decorative screening the Project's high-quality design provides subtle gesture toward the design of the existing 1940s building and complements the surrounding neighborhood. The Project is appropriately scaled to the general development pattern along the 2300 block of Champlain Street. Given the narrowness of the street, the modest ground-level setback provided by the Project will provide a degree of pedestrian comfort adjacent to the Property.

2. Affordable housing in excess of the amount that would have been required through matter-of-right development and at deeper levels of affordability (X § 305.5(g)(1) and (2))

The Project provides a substantial amount of permanent affordable rental housing. As previously stated, the existing building on the Property contains 32 units of income-restricted housing that are subject to affordability covenants that are set to expire in

2029. Under the existing covenants, the units are devoted to households earning up to 80% MFI. The existing units consist of microunits that are outdated and overcrowded. Through the PUD process, the Applicant will redevelop the Property with a new apartment building that contains approximately 44 dwelling units, all of which will be devoted to income-restricted housing that are subject to new, long-term affordability covenants. The new affordability covenants will devote the proposed 44 units to households earning between 30%-80% MFI. The proposed affordable housing far exceeds what would otherwise be required through matter-of-right development under existing zoning. Under the Property's existing RA-2 zoning, approximately 1,500 – 2,000 GFA of affordable housing would be required if the Property was redeveloped, which, assuming rental, would have to be devoted to households earning up to 60% MFI. In contrast, the Project will be 100% devoted to affordable housing (approximately 28,730 GFA), which will be devoted to households earning between 30%-80% MFI.

3. *Environmental and sustainable benefits exceeding the standards required by regulation (X § 305.5(k)(5))*

The Project includes important sustainable design elements and achieves appropriate levels of environmental certification, with a possibility of achieving Net Zero energy consumption. The Project has been designed to meet Enterprise Green Community Certification design standards and will achieve the GAR requirement. Specific sustainable benefits in the Project include approximately 3,000 square feet of green roof, and approximately 1,000 square feet of rooftop solar panel array area.

The Project includes at least three distinct categories of substantive public benefits as defined according to the public benefits categories set forth in Subtitle X, § 305 of the Zoning Regulations. The public benefits criteria at Subtitle X, §§ 304.4(c), 305.2 and 305.4 require that the public benefits proposed as part of a PUD application: (a) be not inconsistent with the Comprehensive Plan and other adopted public policies, (b) benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from a matter-of-right development of the Property, (c) be tangible, quantifiable, measurable, and able to be completed prior to issuance of a certificate of occupancy, and (d) relate to the geographic area of the ANC(s) in which the Project is located. The Project's public benefits satisfy each of these criteria. The public benefits are not inconsistent with the Comprehensive Plan or other adopted public policies because the benefits are integral parts of the Project, which itself is not inconsistent with the Comprehensive Plan or other adopted public policies, all as described above and in **Exhibit D**.

With respect to the second criterion, the public benefits would not be required under a matter-of-right development at the Property. Additionally, each of the public benefits applicable to the construction of the Project is tangible, quantifiable, measurable, and able to be completed prior to issuance of a certificate of occupancy. Finally, with the preservation of the 32 existing affordable dwelling units and the guaranteed ability for existing tenants to return to the Property following construction, the public benefits relate primarily to the geographic area of the ANC in which the Project is located, while the additional twelve (12) affordable dwelling units and the environmental sustainability benefits of the Project will accrue to the District as a whole. Accordingly, the public benefits satisfy the applicable public benefits criteria.

D. The Project Satisfies the Evaluation and Balancing Criteria Required for Commission Review of a PUD

Pursuant to Subtitle X, §§ 303.12 and 304.3, in deciding this Application the Commission must, according to the specific circumstances of the instant application, judge, balance, and reconcile the relative value of: (i) the public benefits, (ii) the development incentives, including the Map Amendment and zoning and other flexibility requested as part of the Project, and (iii) any potential adverse effects of the Project.

The Project satisfies the foregoing PUD balancing test. The Project's public benefits, primarily its preservation of existing affordable housing and contribution of additional affordable housing justify the PUD-related Zoning Map amendment, increase in density, and flexibility in lot occupancy, which are the development incentives being requested in this Application. Without the Zoning Map amendment and resulting additional density, the Applicant would not be able to preserve the existing income-restricted housing to the same high quality as it is proposing, and it would not be able to provide any additional affordable housing. Most likely, the Applicant would only be able to implement more modest updates to the existing building that would be just enough to meet existing building and life safety requirements, if any modernization project would be able to be funded at all. The Project's preserved and new affordable housing units justify the increase density and lot occupancy requested. The Project's modest potential adverse effects are more than justified by the Project's provision of such a significant amount of preserved and new affordable housing, which the Comp Plan Framework Element describes as a high priority public benefit. The relative value of the Project and its public benefits warrant granting the requested PUD approval.

VII. CONCLUSION

For the foregoing reasons, the Applicant submits that this Application for review and approval of a consolidated PUD and related Zoning Map amendment meets the standards of the 2016 Zoning Regulations; is consistent with the purposes and intent of the Zoning Regulations and Zoning Map; enhances the health, welfare, and safety and convenience of the citizens of the District of Columbia; satisfies the requirements for approval of a PUD; provides significant public benefits; and advances important goals and policies of the District.

Accordingly, the Applicant respectfully requests the Commission to set this Application down for a public hearing as soon as possible.

Respectfully submitted,

Goulston & Storrs

/s/ Jeff C. Utz

Jeff C. Utz