

**APPLICATION OF CQ METRO LAND LLC  
FOR REVIEW OF BUILDINGS AND STRUCTURES IN THE NHR ZONE**



**PORTION OF LOT 1039 IN SQUARE 5860**

## **DEVELOPMENT TEAM**

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## **EXHIBITS**

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## **I. Introduction / Overview**

This application is submitted on behalf of CQ Metro Land LLC, an affiliate of Redbrick LMD (the “**Applicant**”), for Zoning Commission design review and approval of new construction in the North Howard Road (“**NHR**”) Zone. The property is comprised of a portion of Lot 1039 in Square 5860,<sup>1</sup> as shown in the plat attached as **Exhibit A** (the “**Property**”).

The Property is currently unimproved. The Applicant intends to construct a new hotel (the “**Parcel 7 Building**” or “**Building**”) containing approximately 160 guest rooms and approximately 4,000 square feet of gross floor area (“**GFA**”) devoted to hotel function rooms and commercial adjunct space (bar / lounge and meeting room) (the “**Project**”). The Project will have an overall floor area ratio (“**FAR**”) of approximately 3.59. The Project will be built to a maximum height of approximately 99 feet, measured from the elevation of the curb at the midpoint of the front of the Building to the highest point of its proposed architectural parapet. At the roof level, the Project will contain an elevator overrun and egress stair within a single enclosure with a height of approximately fifteen (15) feet and other unenclosed rooftop mechanical equipment. The roof level will also contain green roof area and solar panels. The Project will contain one (1) loading berth on the east side of the ground floor, which will be accessed from an existing WMATA-owned private access roadway along the east side of the Property.<sup>2</sup>

The Property is located in Ward 8 along Howard Road, SE between South Capitol Street, SE and the Anacostia Freeway (I-295), immediately south of Anacostia Park (the “**Park**”), and immediately adjacent to the Anacostia Metrorail Station. The Property is designated for Mixed Use (High Density Residential/High Density Commercial/Institutional) uses on the Future Land Use Map of the District of Columbia Comprehensive Plan (“**FLUM**”) and is located within a Land Use Change Area and a Resilience Focus Area on the Generalized Policy Map of the Comprehensive Plan (“**GPM**”).

The Project is an important part of the Applicant’s multi-phased, multi-building Bridge District development, which runs along Howard Road, SE just south of the new Frederick Douglass Memorial Bridge (the “**Bridge**”). The Bridge District is conveniently located adjacent to the Anacostia Metrorail Station on the Green Line, adjacent to Anacostia Park and Poplar Point, and approximately 0.3 miles from the Anacostia River. The Project follows the recent completion of Bridge District Phase 1 (Parcels 3 and 4),<sup>3</sup> which has brought approximately 758 units of new housing, including approximately 77 units of new affordable housing, and approximately 44,464 GFA of retail use,<sup>4</sup> including an anchor Atlas Brew Works. The Project is approximately 350 feet

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<sup>1</sup> The Applicant is in the process of completing a division of lots that will divide Lot 1039 into two new assessment and taxation (“**A&T**”) lots. The eastern tax lot will have a land area of approximately 24,010 square feet and will become the record lot upon which the proposed Project is constructed. The western tax lot will have a land area of approximately 8,432. All zoning tabulations for the proposed project are based upon the 24,010 square feet of land area that comprises the Project site.

<sup>2</sup> The Applicant holds a perpetual non-exclusive easement for vehicular ingress and egress across and over the WMATA-owned access road that is recorded in the Land Records of the District of Columbia.

<sup>3</sup> Z.C. Order No. 21-13.

<sup>4</sup> For purposes of this statement, all references to “retail” shall be assumed to include uses falling within the following use categories: Retail (11-B DCMR § 200.2(bb)); Services, General (11-B DCMR § 200.2(cc)); (Services, Financial (11-B DCMR § 200.2(dd)); Eating and Drinking Establishments (11- B DCMR § 200.2(i)); Animal Sales, Care, and Boarding (11-B DCMR § 200.2(e)); Daytime Care (11-B DCMR § 200.2(h)); Entertainment, Assembly, and Performing Arts (11-B DCMR § 200.2(m)); Medical Care (11-B DCMR § 200.2(o)); Education, Private (11-B DCMR § 200.2(k)); Education, Public (11-B DCMR § 200.2(l)); and Arts, Design, and Creation (11-B DCMR § 200.2(e)).

east of Bridge District – Parcel 5,<sup>5</sup> which is currently under construction and will bring approximately 272 additional units of housing (approximately 29 affordable units) and approximately 8,649 GFA of additional retail use. Finally, the Project is located approximately 600 feet from Bridge District – Parcel 1 and 2,<sup>6</sup> which is approved for approximately 818 dwelling units (approximately 85 affordable units), approximately 151 lodging units, and approximately 24,666 GFA of retail use.

## **II. Jurisdiction of the Zoning Commission**

The Zoning Commission has jurisdiction to grant approval of the proposed development pursuant to Subtitle K, Section 1005.

## **III. Coordination with the Community**

The Applicant has been collaborating with the community for many years, including Advisory Neighborhood Commission (“ANC”) 8A, where the Property is located.<sup>7</sup> The Applicant continues to coordinate directly with the ANCs and broader neighborhood on ways to support the community, including reducing rent for local retailers and funding for community non-profits. The Applicant has had multiple meetings with key community stakeholders regarding the Project and provided an initial overview of the Project to ANC 8A on June 2, 2026. The Applicant anticipates presenting the project at ANC 8A’s July 2026 meeting.

## **IV. Description of Property**

The Property and overall Bridge District are located just across the Anacostia River from the Capitol Riverfront, The Yards, and Buzzard Point, and just minutes from Downtown DC. Photographs of the Property and surrounding Bridge District are included in the architectural plans and drawings attached as **Exhibit B** (the “Plans”). As shown on Sheet A0.03 of the Plans, the Property contains approximately 24,010 square feet of land area and is located on the north side of the Bridge District, with the Anacostia Metrorail station parking garage and Parcel 6 of the Bridge District to the west and east, respectively. The Anacostia Metrorail Station is located immediately east of the Property, and Historic Anacostia is located approximately 0.4 miles to the east, on the opposite side of the Anacostia Freeway. The Property is currently vacant. As shown on the plat attached as **Exhibit A**, the Property’s only public right-of-way frontage is technically part of Anacostia Freeway (I-295).<sup>8</sup> Access to the Property is gained via an unnamed access road that is partially within adjacent public right-of-way and partially extends across the adjacent property that is owned by WMATA (Lot 1040). As shown on the civil drawings included in the Plans, the Property is encumbered by several subsurface infrastructure constraints, including an eleven (11)-foot-wide sewer tunnel along the west side of the Property, a twelve (12)-foot sewer tunnel along the south side of the Property, and a 40-foot-wide Anacostia River Tunnel that passes

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<sup>5</sup> Z.C. Order No. 25-07.

<sup>6</sup> Z.C. Order Nos. 22-39 and 22-39A.

<sup>7</sup> The Applicant worked with both ANC 8A and 8C during a previous Planned Unit Development (“PUD”) application for property now included in the NHR Zone, as well as on a text amendment to create the NHR Zone, a map amendment to rezone the Property and other nearby property to the NHR zone, and a recent map amendment for property immediately adjacent to the Anacostia Metrorail station to the NHR zone (which included the Property).

<sup>8</sup> Jurisdiction of the portion of Anacostia Freeway right-of-way that is adjacent to the Property was transferred by the federal government to the District of Columbia (“DDOT”) for highway purposes pursuant to a transfer of jurisdiction approved in April 1967 and recorded in the Surveyor’s records at Subdivision Book 133 Page 45.

through the northwest corner of the Property. As discussed below, the presence of this subsurface infrastructure and related clearance requirements imposed by DC Water significantly influence and limit the footprint, size, design, orientation, programming, and operations of the Project.

## **V. Description of Project**

### **a. Overall Project**

The Project consists of a new hotel building located on Parcel 7 within the Bridge District development in Washington, DC. The Project will expand the mix of uses within the Bridge District by introducing lodging accommodations that can serve visitors to the District, nearby employment centers, entertainment destinations, and recreational amenities along the Anacostia River, along with the Anacostia community itself. The hotel will reinforce the pedestrian-oriented character of the Bridge District while establishing a highly visible hospitality destination at a prominent gateway location near the Frederick Douglass Bridge and Anacostia Freeway.

The Project will contain approximately 86,181 GFA on a site containing approximately 24,010 square feet of land area. This results in an overall density of approximately 3.59 FAR, which is substantially below the 9.0 FAR permitted within the NHR Zone. The building will rise to a maximum height of approximately 99 feet, as measured from the elevation of the curb opposite the middle of the front of the building and will contain approximately 160 guest rooms distributed across seven (7) stories above grade, together with hotel amenities, food and beverage space, guest services, and operational support areas. The Project will not provide vehicle parking spaces and instead will rely on its transit-accessible location and multimodal transportation connections for access. The Project will provide a minimum of nine (9) long-term bicycle parking space and two (2) short-term bicycle parking spaces. Detailed zoning tabulations for the Project are provided on Sheets A1.02 through A1.04 of the Plans.

As shown on Sheets A0.02 and A0.03 of the Plans, the Project will complement the existing and planned phases of the Bridge District. Together, these projects will establish a vibrant mixed-use neighborhood containing residential, retail, service, lodging, office, and recreational uses that support the continued revitalization of neighborhoods east of the Anacostia River. The Project will contribute to the continued evolution of this area into a thriving mixed-use destination that leverages its proximity to the Anacostia River, Poplar Point, Navy Yard, a Metrorail station, and Downtown Washington while creating new opportunities for residents and businesses in Wards 7 and 8. Importantly, the Project will be one of the first hotels located on the east side of the Anacostia River. As such, it represents a significant economic development opportunity for Wards 7 and 8 and helps address a longstanding lack of hotel accommodations in this part of the District. In addition to generating construction-related employment, the hotel will create permanent direct and indirect employment opportunities that are accessible to local residents across a wide range of occupations, including hotel operations, management, food and beverage service, security, and hospitality support functions.

The Project will also play an important role in supporting the long-term redevelopment vision for Poplar Point. Located immediately adjacent to one of the District's most significant planned redevelopment areas, the hotel (and larger Bridge District) will provide lodging and visitor-serving services that support future commercial, recreational, cultural, and entertainment

uses planned for Poplar Point. In particular, the Project is uniquely positioned to support the future anchor destination use envisioned for Poplar Point by providing nearby lodging for visitors, tourists, nearby residents, and patrons.

b. General Design Constraints and Influences

Beyond its architectural and operational objectives, the Project is intended to function as a catalyst for continued economic growth and investment on the east side of the Anacostia River. The Project occupies a strategic location that will allow it to serve the wider District, the Anacostia community, the Bridge District, and future development at Poplar Point. The Project site presents unique development challenges due to the presence of major below grade DC Water infrastructure, including the Anacostia River Tunnel, stormwater and sewer facilities, and related utility easements that traverse the Property. The presence of these significant infrastructure utilities has substantially influenced the design and programming of the Project. The proposed hotel is designed as a contemporary building that furthers the evolving architectural identity of the Bridge District, while responding to the unique physical constraints and opportunities of its site. The proposed hotel is located at the east end of the Bridge District, in proximity to the Frederick Douglass Bridge, and along a future gateway into Poplar Point, thus making it both a destination for visitors and a visual marker within the larger Bridge District development.

The Project complements the architectural character of other completed and planned buildings within the Bridge District, while introducing a distinct hospitality-focused identity appropriate for its highly visible location. The design of the Project is heavily influenced by the significant subsurface infrastructure that traverses the site, including the Anacostia River Tunnel, major storm sewer facilities, and associated utility easements. As shown on Sheets L0.00 through L0.02 of the Plans, these infrastructure elements establish substantial development constraints that directly informed the placement, massing, loading functions, landscape improvements, and overall organization of the building. Rather than treating these conditions as limitations, the design team used them as organizing elements that helped shape the Project's architecture and site planning strategy.

The building footprint, foundation, and massing configuration are all responsive to the specific horizontal and vertical clearance requirements established by DC Water for long-term access to the aforementioned below-grade tunnel infrastructure. The relationship between the building, tunnel infrastructure, and required access areas is illustrated on Sheets A3.01, A3.02, L0.01, and L0.02 of the Plans. The Project has been designed to preserve the access corridors necessary for inspection, maintenance, repair, and emergency operations while maximizing the development potential of the Property. The current hotel design ensures that DC Water can continue to operate and maintain this important public infrastructure without compromising the operation of the hotel and vice versa.

The Project's transportation and service strategy similarly reflects a deliberate effort to balance site constraints, the operational needs of the hotel, and the creation of a safe and consistent public realm. As shown on Sheet A0.03 of the Plans, the Project benefits from direct access to regional transit, bicycle, pedestrian, and roadway networks. To that end, the Applicant's request for full parking relief recognizes the site's proximity to transit, bicycle infrastructure, and pedestrian connections, and avoids having to devote land area and ground floor space to parking

facilities and associated vehicular access points. Likewise, the Applicant's provision of a single, carefully located loading area minimizes the footprint devoted to loading functions, further reduces curb cuts, and preserves the wider design concept of expanding pedestrian and biking areas and elevating the related user experience while still addressing the operational needs of the hotel.

c. Building Design

As noted above, the proposed hotel consists of approximately 86,181 GFA, has a maximum height of approximately 99 feet (seven (7) stories), and will contain approximately 160 guest rooms. As shown on Sheets A2.02 through A2.05 of the Plans, the ground floor accommodates the hotel lobby, guest amenity areas, and back-of-house operational support areas, while Levels 2 through 7 contain guest rooms organized along a double-loaded corridor that connects to a central circulation core. A partial basement level contains additional guest amenity and back-of-house functions. At the roof level, the building contains a single mechanical penthouse enclosure that contains an elevator override and egress stair tower and other unenclosed mechanical equipment, all of which will meet or exceed applicable setback requirements. As shown on Sheet A2.05 of the Plans, the roof level will also contain extensive green roof areas and space to accommodate photovoltaic panels.

The building's massing is shaped by both architectural and site-planning considerations. As shown on Sheets A2.01 through A2.05 of the Plans, the footprint responds directly to the location of the previously discussed below-grade DC Water and utility infrastructure that traverses the Property. These constraints influenced the configuration of the building envelope, the placement of structural elements, and the organization of service areas. Due to these infrastructure constraints – specifically limitations on how much load can be placed above the tunnels and the need to meet and maintain DC Water access clearances – the Applicant was limited in where it could locate the required loading and service functions of the hotel. As shown on Sheet A2.02 of the Plans, the loading berth and service operations are located on the east side of the building, away from the most constrained portions of the Property. This solution minimizes potential impacts on critical public infrastructure and accommodates the horizontal and vertical access clearances required by DC Water. It also allows hotel operations and tunnel maintenance activities to occur independently if DC Water needs to access the tunnels in the future. Furthermore, by consolidating service activities into a single loading berth the Project reduces the amount of curb space and site area devoted to loading operations and minimizes disruptions to the pedestrian environment, allowing the project to maximize the pedestrian and bicycle infrastructure planned for the site.

The contemporary architectural expression of the building is informed by the site's proximity to the Anacostia River, Poplar Point, the emerging architectural character of the Bridge District, adjacent natural elements and features, and the Anacostia community. The façade incorporates a combination of dark brick masonry, panelized rainscreen cladding, including green-toned feature panels, storefront glazing, and architectural screening elements. Together, these materials create a durable, high-quality architectural composition that is appropriate for a hospitality use and is connected to the surrounding context. At the podium level, dark masonry and metal-cladding and integrated green-screen elements establish a strong visual base for the building. Such green hues allow the building to form a visual nexus with the adjacent parkland. Large storefront windows provide transparency into the lobby and guest amenity spaces and

activate the public realm. The upper levels are articulated through a combination of light-colored panelized cladding and vertically proportioned window openings that establish a consistent rhythm across the façade. Variegated green-toned façade panels provide a distinctive architectural identity for the hotel while referencing the adjacent parkland, riverfront, and sustainability-focused character of the Bridge District. The façade panels extend beyond the roof level to create a staggered cornice line that rises to its highest point at southwest corner of the building, creating an architectural focal point that marks the east end of the Bridge District.

d. Landscape Design

The Project’s landscape design emphasizes pedestrian comfort, environmental performance, and visual integration with the larger Bridge District open-space network. As shown on Sheet L0.00 of the Plans, the site incorporates a combination of planted areas, bioretention facilities, landscape buffers, outdoor seating areas, pedestrian pathways, and bicycle infrastructure. The landscape design is also informed by the location of the underlying utility infrastructure and easements. As shown on Sheets L0.00 through L0.03 of the Plans, areas where construction is constrained or not possible have been transformed into landscaped open spaces, bioretention facilities, pedestrian pathways, bicycle amenities, and green infrastructure. This approach converts otherwise constrained portions of the site into meaningful public and environmental amenities while maintaining the access corridors necessary for future infrastructure maintenance. The Project will meet or exceed Green Area Ratio (“GAR”) requirements through a combination of planted areas, green roofs, and bioretention facilities, and will also satisfy the LEED and renewable energy generation requirements under Section 1008 of the NHR zone. A preliminary GAR scoresheet is provided on Sheet A1.05 of the Plans, while the location of green roofs, landscaped areas, and potential photovoltaic arrays is shown on Sheets A2.05 and L0.03 of the Plans.

e. Public Realm Design

The Project’s public realm design reinforces the larger vision for the Bridge District as a connected, walkable, and mixed-use neighborhood. The Project provides public realm improvements along its frontage and throughout the Property. As shown on Sheets L0.00 through L0.02 of the Plans, streetscape improvements include DDOT-compliant sidewalks, landscape planting, pedestrian pathways, bicycle facilities, lighting, outdoor seating areas, and other site furnishings that are consistent with the broader Bridge District streetscape framework. As demonstrated on Sheet A2.02 of the Plans, the Project provides no vehicle parking spaces and only a single loading berth, thereby minimizing conflicts between pedestrians, bicyclists, service vehicles, and passenger vehicles while preserving sidewalk continuity and enhancing the overall quality of the public realm. The Project’s multimodal transportation infrastructure extends beyond the public realm and includes short-term bicycle parking for visitors, secure long-term bicycle parking within the building, and employee shower and changing facilities that support bicycle commuting and reduced reliance on private automobiles. The bicycle promenade and pedestrian pathway network shown on Sheets A0.03 and L0.00 of the Plans strengthen connections between the Project, other Bridge District phases, Anacostia Park, the Frederick Douglass Bridge and South Capitol Street corridor, the Anacostia neighborhood, and the future redevelopment of Poplar Point. The Applicant hopes that these pedestrian and bicycle amenities become a central part of community life in the Bridge District and wider neighborhood.

Overall, the Parcel 7 Hotel will serve as an important hospitality component within the Bridge District, helping create a thriving mixed-use neighborhood that combines housing, recreation, employment, entertainment, retail, and visitor-serving uses. Through its architectural quality, sustainable design features, enhanced landscaping and hardscaping, job creation potential, public realm improvements, multimodal transportation amenities, and thoughtful accommodation of critical public infrastructure, the Project will contribute meaningfully to the continued revitalization of Wards 7 and 8 and the realization of the District's long-term vision for the Anacostia waterfront.

## **VI. Evaluation of NHR Zone Design Review Criteria**

Pursuant to Subtitle K, Section 1005 of the Zoning Regulations, the Applicant must demonstrate that the application satisfies the requirements of the NHR Zone (11-K DCMR § 1005.2) and must also satisfy the design review requirements set forth in Subtitle X, Section 604. The Project satisfies all applicable requirements as follows:

### *Help achieve the objectives of the NHR Zone defined in Subtitle K, § 1000.1 (11-K DCMR § 1005.2(a))*

The proposed Project will substantially advance the stated purposes of the NHR zone, which include:

- Assuring development of the area with a mixture of residential and commercial uses at a suitable height, bulk, and design;
- Encouraging a variety of visitor-related uses (retail, service, and entertainment);
- Providing increased height and density associated with increased housing;
- Encouraging superior architecture and design in all buildings and publicly accessible outdoor spaces;
- Requiring preferred ground-level retail and service uses along Howard Road, SE;
- Providing for development of Howard Road, SE as a pedestrian- and bicycle-friendly street, with street-activating uses, and connections to Metrorail and the broader neighborhood; and
- Encouraging the inclusion of a bicycle track along Howard Road.

The Project substantially advances these objectives by introducing one of the first hotels on the east side of the Anacostia River that will support the burgeoning Bridge District, Historic Anacostia neighborhood, and other destinations throughout the city. As shown on Sheets A0.02 and A0.03 of the Plans, the Project also occupies a strategic location that will support future redevelopment at Poplar Point, including the anchor destination that is contemplated for that area. The Project's height, density, and scale are appropriate for the Property and are substantially below the maximum development potential permitted within the NHR zone. As shown on Sheets A1.02 through A1.04 of the Plans, the Project's approximate density and height of 3.59 FAR and 99 feet, respectively, are well below the 9.0 FAR and 130-foot height permitted in the NHR zone.

The Project also demonstrates the Applicant's commitment to superior architecture and design. As shown on Sheet A5.01 and Sheets A6.01 through A6.04 of the Plans, the building incorporates a high-quality palette of brick masonry, metal panel rainscreen systems, architectural screening elements, extensive glazing, and green accent features that create a contemporary lodging use that complements the evolving character of the Bridge District while responding to the broader context. The Project promotes a pedestrian- and bicycle-oriented environment through substantial public realm improvements, enhanced pedestrian connections, bicycle infrastructure, and a transportation strategy that eliminates vehicle parking while providing short-term bicycle parking, secure long-term bicycle parking, and employee bicycle-support facilities. As shown on Sheets A0.03 and L0.00 of the Plans, the Project strengthens multimodal connections throughout the Bridge District and to the surrounding neighborhood.

*Help achieve the desired use mix, with the identified preferred uses specifically being residential, office, entertainment, retail, or service uses. (11-K DCMR § 1005.2(b))*

The stated intent of the NHR zone is, in relevant part, to encourage a variety of support and visitor-related uses, such as retail, service, and entertainment uses. The Project helps achieve the desired use mix within the NHR zone by introducing a hospitality use that is currently absent in the Bridge District and throughout Wards 7 and 8. Hotels are a quintessential visitor-serving use that support commercial activity, tourism, entertainment, and economic development. The Project will complement the existing residential, retail, office, and recreational uses planned throughout the Bridge District and will provide immediate support and activation to future development at Poplar Point, along with an amenity for the Anacostia community itself.

*Provide streetscape connections for future development on adjacent lots and parcels and be in context with an urban street grid. (11-K DCMR § 1005.2(c))*

As shown on Sheets A0.03, L0.00, and L0.01 of the Plans, the Project has been designed to integrate seamlessly with the broader Bridge District street, bicycle, and pedestrian network. The Project's public realm improvements will connect with existing and future development parcels, including future development on Parcels 1, 2, and 6 and the future redevelopment of Poplar Point. The bicycle promenade, pedestrian circulation network, and public streetscape improvements strengthen connections within the Bridge District and to surrounding destinations, including Anacostia Park, the Anacostia Metro Station, and Historic Anacostia neighborhood. The streetscape surrounding the Project will be coordinated with DDOT to ensure seamless connectivity with adjacent and surrounding transportation infrastructure. As shown in the Plans, the adjacent public and private streetscape will provide a minimum six (6)-foot sidewalk width to ensure safe and comfortable pedestrian circulation. Additionally, the public right-of-way along the south side of Property will be improved with new planted areas and trees.

*Minimize conflict between vehicles, bicycles, and pedestrians. (11-K DCMR § 1002.5(d))*

The Project minimizes conflicts between vehicles, bicycles, and pedestrians in several important ways. Specifically, the Applicant is requesting relief to provide no onsite parking and reduced loading facilities which is expected to reduce the number of vehicle and truck trips in and out of the site, and aligns loading facilities with expected loading demand. The lack of onsite

parking and provision of a single loading berth also substantially reduces the amount of curb space devoted to service functions and minimizes the number and overall width of curb cuts required to serve the site. As shown on Sheet A2.02 of the Plans, loading operations are concentrated on the east side of the building, preserving pedestrian continuity between the proposed hotel and the other Bridge District parcels to the west. The Project also encourages bicycle commuting and reduced reliance on automobiles by providing short- and long-term bicycle parking spaces and an employee shower and changing facility.

*Minimize unarticulated blank walls adjacent to public spaces through facade articulation. (11-K DCMR § 1005.2(e))*

Given the Project's visibility on all sides, each façade has been designed with the care and articulation typically reserved for primary frontages to the maximum extent possible. The Project avoids blank walls through extensive façade articulation, high-quality materials, glazing, and varied architectural expression and color. As shown on Sheets A6.01 through A6.04 of the Plans, each elevation incorporates a combination of masonry, rainscreen panels, glazing systems, architectural screening elements, and accent materials that create depth, texture, and visual interest. The building's façades are carefully articulated to respond to surrounding public spaces and establish an attractive architectural presence from all viewpoints. The primary south and north facades of the building, which face the hotel's main entrance / access drive and Poplar Point, respectively, are highly articulated to a regularized vertical pattern of windows and character-defining green panelized cladding. As shown in the Plans, the warmth and tone of the green cladding will be accentuated by a modest feature wall on the southwest façade, where the staggered parapet reaches its highest point. At this location, the variability in the green tones of the cladding will create a focal point. On the east side of the building, the placement of required vertical circulation (i.e., egress stair) necessitates a portion of the façade to be solid. In this area, the Applicant is using a change in material and pattern, architectural green screening, and signage to break up the façade.

*Minimize impact on the environment, as demonstrated through the provision of an evaluation of the proposal against LEED certification standards. (11-K DCMR § 1005.2(f))*

As shown on the LEED scorecard on Sheets A7.01 and A7.02 of the Plans, the Project has been designed to achieve a minimum LEED Gold certification based on the LEED V4.0 BD+C Hospitality standard. Note, pursuant to Subtitle K, Section 1008.1, each building constructed or substantially improved in the NHR zone is required to earn certification at the LEED v4.1 for New Construction Gold level. Unfortunately, the U.S. Green Building Council ("USGBC") has not authorized use of the LEED v4.1 standard for hospitality projects in the United States. Therefore, similar to all other Bridge District projects reviewed by the Commission to date, including the recently completed project on Parcels 3 and 4, the Applicant has utilized LEED v4.0 for the Project while also pursuing LEED v4.1 prerequisites and credits using credit substitution where available. This approach has been confirmed to be satisfactory by Zoning Administrator for purposes of meeting the NHR zone LEED requirement for the complete project on Parcels 3 and 4, which the Commission acknowledged in its approval of the development on Parcel 5 (Z.C. Order No. 25-07).

Promote safe and active streetscapes through building articulation, landscaping, and the provision of active ground level uses. (11-K DCMR § 1005.2(g))

The Project promotes safe and active streetscapes through high-quality architecture, extensive landscaping, active hotel lobby and amenity spaces, outdoor gathering areas, and enhanced pedestrian infrastructure. As shown on Sheet A2.02 and Sheet L0.00 of the Plans, the ground floor includes active hospitality uses and a welcoming hotel entrance supported by outdoor seating areas, landscaping, and pedestrian improvements. The activity of the ground floor lobby and guest amenity spaces extends around to the west side of the hotel where additional amenity space at the ground and basement levels will activate the hotel's outdoor terrace. The Project's reduced curb cuts, enhanced bicycle facilities, and improved public realm further strengthen the pedestrian experience and contribute to an active and safe streetscape environment.

Coordination 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. (11-K DCMR § 1005.3(a))

The Applicant previously partnered with The Rock Run Group LLC to engage local CBE subcontractor (Robinson LLC) to train District electrical apprentices (including ones from Wards 7 and 8) who acquired on-job skills and experience at the Bridge District Phase 1 project site. At Bridge District Phase 1, the Applicant engaged seven (7) local contractors in construction projects and has continued to solicit and engage with local contractors for the residential building currently under construction on Parcel 5. The Applicant will endeavor to continue these efforts for the Project. Additionally, prior to the start of construction of the Project, the Applicant is aiming to partner with the general contractor to explore ways to create and host a variety of workforce development and training opportunities and hiring events for community members and job seekers, including students.

The Applicant has also used Project funds to contribute to and support the DMV Academy, a federally recognized 501(c)(3) nonprofit organization that provides top-tier training programs for the mechanical, electrical, plumbing, drywall, and painting trades in DC, MD, and VA.

Efforts to include local businesses, especially Wards 7 and 8 businesses, in contracts for the construction or operation of the proposed project. (11-K DCMR § 1005.3(b))

The Applicant has already undertaken efforts to attract local businesses to the Project and the wider Bridge District. The Applicant has been working with The Rock Run Group, LLC, Developing Economic Opportunities (“DEO”) DC, and Councilmember Trayon White (via the Ward 8 CARE) to share and discuss opportunities and identify qualified local businesses to support with the construction and operation of the Project.

Efforts 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. (11-K DCMR § 1005.3(c))

The Applicant's placemaking strategy for the Bridge District emphasizes small and local businesses as part of the retail mix for the Bridge District. The Applicant recently added two (2) more local businesses (Café Cino and FlowWell Yoga + Wellness) within the Bridge District and intends to continue to do so on the Project. The Applicant has also been working with ANC 8A, Anacostia BID, and directly with neighbors to identify businesses to support pop-up events and activations. Additionally, the Applicant has encouraged Ward 8 residents and other community stakeholders to refer qualified small and local businesses, and the Applicant has had several meetings with interested local entrepreneurs. The ANC 8A Chair has previously made supportive introductions to business owners that the Applicant has met with to discuss opportunities.

Coordination with the State Archaeologist and any plans to study potential archeological resources at the subject site, and otherwise recognize local Anacostia history. (11-K DCMR § 1005.3(d))

In coordination with the D.C. State Historic Preservation Officer, the Applicant has studied the potential for archeological resources at the Property and other locations within the Bridge District. To date, the Applicant has completed Phase I and Phase II studies and found no historical resources on the site. The research potential of the Property was exhausted during the Phase I and Phase II investigations; and therefore, no further archaeological investigations were recommended at the end of these investigations. The Applicant will continue to coordinate with the D.C. State Historic Preservation Officer.

## **VII. Evaluation of General Design Review Criteria**

Street frontages are designed to be safe, comfortable, and encourage pedestrian activity. (11-X DCMR § 604.7(a))

The Project's only public street frontage is technically part of the Anacostia Freeway / I-295, which is comprised primarily of grassy areas, a narrow service road, and stormwater facilities related to the freeway. As part of the Project, the Applicant will improve the pedestrian safety and comfort and aesthetic quality of this area. The Project's frontage is designed to create a safe, attractive, and pedestrian-friendly environment. Enhanced sidewalks, landscaping, lighting, and a highly visible hotel entrance will greatly improve the safety and comfort of the adjacent public space. The elimination of vehicle parking and reduction in loading facilities further improve pedestrian safety by reducing vehicular conflict points.

Public gathering spaces and open spaces are encouraged. (11-X DCMR § 604.7(b))

The Project incorporates a landscaped outdoor seating area for hotel guests, bicycle amenities, and connections to the broader network of public spaces throughout the Bridge District, with a particular focus on enhancing pedestrian amenities on the west and north sides of the Project. As shown on Sheet L0.00 of the Plans, the hotel's furnished patio will be located near the bicycle promenade that will extend across the north side of the Property. A new pedestrian path

will also connect the bicycle promenade to the pedestrian network being built out along Howard Road as part of the overall Bridge District development. These connections and spaces encourage social interaction and complement the extensive public realm improvements planned throughout the neighborhood.

*New development respects the historic character of Washington's neighborhoods. (11-X DCMR § 604.7(c))*

The Project respects the character of Washington's neighborhoods while responding appropriately to its unique context. The Property is located within a rapidly developing area characterized by transportation infrastructure, parkland, and large-scale redevelopment sites. The Project's scale, height, and contemporary architectural expression are appropriate for this setting and will not adversely impact nearby historic resources or neighborhoods. Further, the area lacks any strong urban form to which the Project might relate to and is severed from the Anacostia neighborhood to the east and south. To that end, the Project is approximately 0.40 miles from the Historic Anacostia neighborhood, between which runs the I-295 freeway. As such, the Project is not expected to have any adverse impact on the Anacostia historic district or individual historic landmarks.

In addition, the newly constructed South Capitol Street ovals on the east and west sides of the Bridge have potential to become truly active public spaces that connect both sides of the Anacostia River. The eastern oval can serve as a gateway into Poplar Point and Anacostia Park. Furthermore, in coordination with DDOT the Applicant is in the midst of improving a two (2)-acre park immediately west of Bridge District Phase 1. The Project, and the overall Bridge District, can help activate the areas directly east of the Frederick Douglass Bridge.

*Buildings strive for attractive and inspired façade design. (11-X DCMR § 604.7(d))*

As shown on Sheet A5.01 and Sheets A6.01 through A6.04 of the Plans, the Project exhibits a high-quality architectural design characterized by carefully composed façades, durable materials, extensive glazing, and thoughtful articulation. The building's design responds to both the growing urban setting of the Bridge District and its proximity to Poplar Point and the Anacostia River, creating a distinctive hospitality use that is reflective of its location east of the Anacostia River. The architectural expression of the building is contemporary and draws from the emerging character of the Bridge District and the wider context. The façades incorporate a combination of dark brick masonry, panelized rainscreen cladding, metal accents, expansive ground-floor storefront systems, and green-toned panelized cladding. These materials provide texture, depth, and visual interest at a prominent gateway location into the Bridge District.

At the ground floor, extensive storefront glazing and a highly visible hotel entrance create transparency and visual engagement at the main hotel point of arrival and with the public realm. The podium level establishes a strong base through the use of masonry and metal materials that relate to the pedestrian scale and reinforce the building's hospitality character. Above the ground floor, the building is articulated through a carefully organized pattern of vertical window openings and contrasting material panels that break down the scale of the building and create visual rhythm across each elevation. The building's massing is also a direct response to the unique sub-surface constraints and topography of the site. Rather than being a simple rectangular box, the angular and

staggered form of the building is distinctive in its own right and contributes positively to the architectural identity of the Bridge District. It also will serve as a prominent visual marker for visitors arriving from both the east and west ends of the Bridge District.

*Sites are designed with sustainable landscaping. (11-X DCMR § 604.7(e))*

As shown on Sheets L0.00 through L0.03 of the Plans, the Project incorporates sustainable landscaping through the use of bioretention facilities, planted areas, green roofs, stormwater management measures, and native plantings. The landscape design contributes to environmental performance while enhancing the visual character of the site. The Applicant's landscape strategy is designed to support both environmental sustainability and the pedestrian experience. At the ground level, landscaped areas, bioretention facilities, and planting beds are incorporated into the site's public realm to improve stormwater management, reduce heat-island effects, and provide visual interest. The Project's streetscape improvements include new plantings and landscaped areas that will create a more comfortable and attractive pedestrian experience. The Project also incorporates extensive green roof areas and rooftop sustainability features, as shown on Sheets A2.05 and L0.03 of the Plans. These elements contribute to stormwater retention, improve building performance, and support the environmental goals of the NHR zone. In addition, rooftop photovoltaic panels will contribute to renewable energy generation and further reduce the Project's environmental footprint.

*Sites are developed to promote connectivity both internally and with surrounding neighborhoods. (11-X DCMR § 604.7(f))*

The Project promotes connectivity through a coordinated network of sidewalks, bicycle facilities and pedestrian pathways that connect the proposed hotel to the broader Bridge District, Anacostia Park, the Anacostia Metro Station, future development at Poplar Point, and surrounding neighborhoods. As shown on Sheet A0.03 of the Plans, the Project strengthens multimodal connections within the area and throughout the wider transportation network. The Project occupies a strategic location at the east end of the Bridge District and will help link existing development, future development parcels, and surrounding neighborhood and regional destinations. As shown on Sheets A0.02 and A0.03 of the Plans, the Property is located immediately adjacent to future development at Poplar Point and benefits from direct access to pedestrian, bicycle, transit, and vehicular networks serving the broader Anacostia waterfront and community. The Project's location allows it to function as both a destination and a connector within the larger area.

Internally, the site has been designed to prioritize safe and intuitive pedestrian movement. Sidewalks, bicycle facilities, outdoor gathering areas, and the hotel entrance are configured to create clear circulation routes and visual connections throughout the Property. The promenade and pathways shown on Sheets A0.03 and L0.00 of the Plans connect the Project to the larger Bridge District open-space and pedestrian/bicycle network and wider networks stretching through the local community and Downtown. The Project also strengthens connectivity to the wider area by providing visitor accommodations that support future economic activity, and destination uses within Poplar Point. As one of the first hotels on the east side of the Anacostia River, the Project will help connect visitors to the existing fabric of the Anacostia neighborhood and the growing number of recreational, cultural, entertainment, and commercial destinations in Wards 7 and 8.

## **VIII. Evaluation of General Special Exception Criteria**

Pursuant to 11-X DCMR Section 604.6, the Zoning Commission must find the Project meets the general special exception standards of the Zoning Regulations. The Project must satisfy a two-pronged test to satisfy special exception review: (i) that the Project is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and (ii) that the Project will not affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Map. The Project satisfies these requirements, as follows:

### ***The Project Is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps. (11-X DCMR § 901.2(a))***

The Project is in harmony with the general purpose and intent of the Zoning Regulations and the Zoning Map applicable to the Property. The Project introduces a new hotel to an area that lacks such in quality transient accommodations, supports economic development east of the Anacostia River, advances the long-term redevelopment of Poplar Point, and creates employment opportunities for District residents. The Project’s proposed height and density are substantially below the maximum limits permitted in the NHR zone and are appropriate for the Property’s location within the Bridge District.

### ***The Project Will Not Affect Adversely the Use of Neighboring Property in Accordance with the Zoning Regulations and Zoning Map. (11-X DCMR § 901.2(b))***

The Project will not adversely affect neighboring properties. Rather, it will complement the existing and planned development within the Bridge District and support future redevelopment at Poplar Point. The Project’s height, massing, architecture, and public realm improvements are appropriate for the surrounding context and consistent with the planning objectives for the area. The Project has been carefully designed to accommodate the Anacostia River Tunnel and associated utility infrastructure. The building footprint, foundation design, and service areas have been coordinated with DC Water’s access requirements, and the loading berth has been located on the east side of the site to minimize potential impacts on sensitive infrastructure beneath the western portion of the Property. This arrangement protects critical public infrastructure while allowing both hotel operations and future tunnel maintenance activities to occur efficiently and independently. Accordingly, the Project satisfies the applicable special exception criteria and will have a positive impact on the surrounding neighborhood and the broader community.

## **IX. Evaluation of Comprehensive Plan Consistency**

Pursuant to 11-K DCMR § 1005.2, as part of its review the Commission must find the proposed Project to be not inconsistent with the Comprehensive Plan (“**Comp Plan**”).<sup>9</sup> See 11-X DCMR § 604.5. As stated in the Framework Element, in deciding as to Comp Plan consistency, “the [Commission] must consider the many competing, and sometimes conflicting, policies of the [Comp Plan], along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the [Commission] to consider and balance those policies relevant

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<sup>9</sup> D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the Generalized Policy Map (“**GPM**”) and Future Land Use Map (“**FLUM**”) (D.C. Resolution R24-0292).

and material to the individual case...and clearly explain its decision-making rationale.” 10A DCMR § 224.8. To approve the Project, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination as to whether the Project is “not inconsistent” with the Comp Plan when read as a whole.

Equity, and particularly racial 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 residents, and creating / 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. 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.

To assist the Commission in applying a racial equity lens to its Comp Plan determinations, the Commission developed a Racial Equity Tool (published on February 3, 2023) 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 in order 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. Preparation of the following Comp Plan evaluation was guided by the Commission’s Racial Equity Tool and was also informed by the D.C. Office of Planning’s (“OP”) Equity Crosswalk (effective August 21, 2021) which highlights Comp Plan policies and actions.

Per **Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan)** of the Racial Equity Tool, the Applicant has conducted a thorough evaluation of the Project’s consistency with Comp Plan policy guidance. In conducting this evaluation, the Applicant has thoroughly considered the goals and policies of each Comp Plan element. For those Citywide Elements that are more directly applicable to the Project, a narrative is provided explaining the basis for the Applicant’s determination that the Project is not inconsistent with that element. In addition, the Applicant’s evaluation also includes a specific assessment of potential Comp Plan inconsistencies. In particular, the Applicant finds that the proposed Project will advance several policies within the Lower Anacostia / Near Southwest Area, Land Use, Economic Development, and Urban Design Elements related to economic development east of the Anacostia River, creation of employment opportunities for Ward 7 and 8 residents, and expansion of the District’s hospitality and tourism sector. The Applicant’s evaluation did not identify any policies within the Comp Plan that are plainly or unequivocally inconsistent with the proposed Project. While certain policies may warrant balancing against other Comp Plan objectives, the Applicant concludes that any potential tensions are substantially outweighed by the numerous policies advanced by the Project and do not rise to the level of a policy inconsistency. Accordingly, the Applicant finds that the Project is not inconsistent with the Comp Plan when read as a whole and through a racial equity lens.

## GENERALIZED POLICY MAP EVALUATION

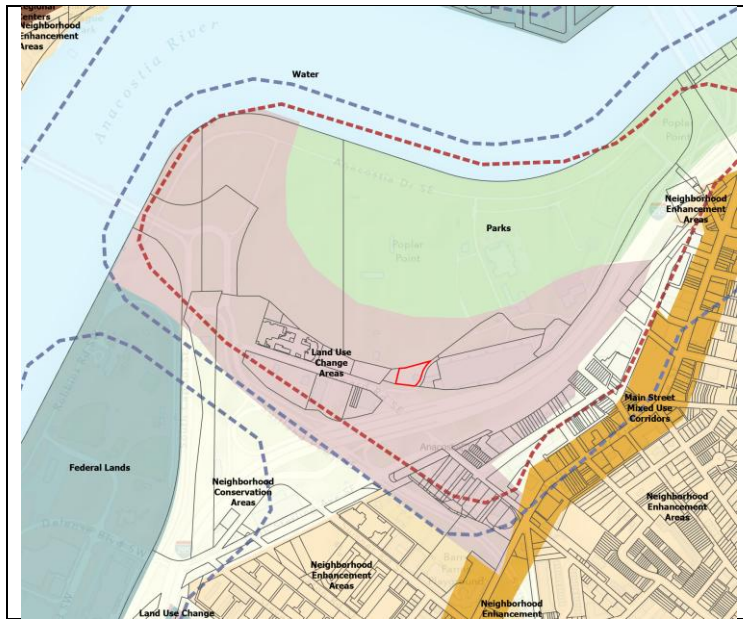


Figure 1: Excerpt of GPM showing Property located within a Land Use Change Area and Resilience Focus Area.

The Generalized Policy Map (“GPM”) provides “a generalized depiction of anticipated changes through the horizon year of the Comp Plan.” It is intended to “guide land use decision-making in conjunction with the Comp Plan text, the Comp Plan Future Land Use Map (“FLUM”), and other Comp Plan maps. Boundaries on the GPM are to be interpreted in concert with these other sources as well as the context of each location.” 10A DCMR § 225.2. As shown in **Figure 1**, the GPM depicts the Property within a Land Use Change Area and Resilience Focus Area. Land Use Change Areas “are areas where change to a different land use from what exists today is anticipated” and “the [FLUM] depicts the specific mix of uses

expected for these areas.” 10A DCMR § 225.9. The “guiding philosophy in the Land Use Change Areas is to encourage and facilitate new development...Many of these areas have the capacity to become mixed-use communities containing housing, retail shops, services, workplaces, parks, and civic facilities.” 10A DCMR § 225.11. The GPM states that development sites within a Resilience Focus Area are encouraged and expected to implement “neighborhood-scale, as well as site-specific solutions, design guidelines and policies for a climate-adaptive and resilient city.”

The Project is not inconsistent with the GPM Land Use Change Area designation. The Property is currently vacant and underutilized, and the Project will redevelop the site with a new hotel use. Together with the mixed-use development completed on Parcels 3 and 4 (Z.C. Order No. 21-13, Bridge District Phase 1), and the approved mixed-use developments on Parcels 1 and 2 across Howard Road (Z.C. Order No. 22-39) and Parcel 5 to the west (Z.C. Order No. 25-07), the Project will further advance the build-out of the Bridge District, a major new, mixed-use community east of the Anacostia River that will bring substantial new housing, affordable housing, neighborhood amenities, lodging, improved access to open space, and access to employment opportunities and other community improvements.

The Project is also not inconsistent with the GPM’s recommendations for developments within Resilience Focus Areas. The Project employs a site-specific resilient design and actively anticipates future flood risk. In addition, critical points of entry to the building have been elevated to have thresholds above the Design Flood Elevation. Finally, the Project design also incorporates several of the resilient design strategies included in the District Department of Energy and the Environment’s published “Resilient Design Guidelines.” Such strategies include, among others,

stormwater infiltration, keeping occupied spaces above the sea level rise adjusted flood elevation, green roofs, and rooftop solar panels that will meet or exceed applicable NHR zone requirements, and use of drought tolerant landscaping.

## FUTURE LAND USE MAP EVALUATION

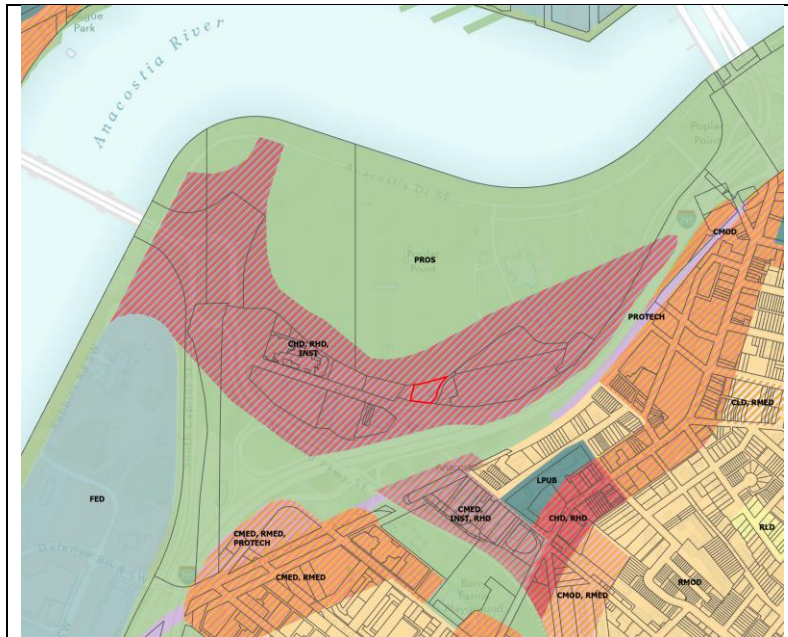


Figure 2: Excerpt of FLUM showing Property designated as Mixed Use (High Density Commercial, High Density Residential, Institutional).

The FLUM shows the general character and distribution of recommended and planned uses across the city and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. 10A DCMR §§ 200.5 and 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical FAR as appropriate. The [FLUM] is not a zoning map and is intended to be interpreted broadly, *See* 10A DCMR § 228.1(a). This is particularly relevant for sites with Mixed Use designations where the mixing of two or more land uses is especially encouraged but is not

mandatory. The FLUM designates the site as Mixed Use (High Density Residential, High Density Commercial, and Institutional). The FLUM designation does not express a preference for residential or commercial development since both are identified as high density. However, policy guidance found in the Comp Plan Elements and the major planning efforts currently being undertaken by the District are supportive of a lodging use on the Property and in the area.

The Project is not inconsistent with the FLUM. The Framework Element does not provide specific guidance on density within areas that are designated for Mixed Use development. Rather, it is simply stated that the general density and intensity of development within a given Mixed-Use area is determined by the specific mix of uses shown, and that the Area Elements may provide detail on the specific mix of uses envisioned. The proposed density of the Project is not inconsistent with the FLUM, and the scale of development envisioned near Poplar Point in the Lower Anacostia Waterfront / Near Southwest Element. The Framework Element states that sites with a High Density Commercial FLUM designation have typical densities that are greater than 6.0 FAR, and sites with a High-Density Residential designation have typical densities that are greater than 4.0 FAR. The Project has a proposed density of only approximately 3.58 FAR and thus is not inconsistent with the FLUM.

## **LOWER ANACOSTIA / NEAR SOUTHWEST AREA ELEMENT EVALUATION**

The Project is not inconsistent with the policies set forth in the Lower Anacostia Waterfront / Near Southwest Area Element (“**AW Element**”). The Project will redevelop an underutilized site within the Bridge District with a new hotel containing approximately 86,181 GFA and approximately 160 guest rooms. Consistent with the AW Element’s vision for new mixed-use waterfront neighborhoods, including express support for new hotels and other commercial development, the Project introduces a significant new lodging use to the east side of the Anacostia River and that will support the long-term redevelopment vision for Anacostia, Poplar Point, and the Anacostia waterfront. As one of the first hotels located east of the Anacostia River, the Project will support the continued development of the Bridge District, existing and future recreational and cultural facilities in Anacostia Park and the surrounding area, and the future anchor destination use contemplated for Poplar Point. The Project will also create short-term, permanent employment opportunities, and generate economic activity that benefits surrounding neighborhoods in Wards 7 and 8 (AW-1.1.2, AW-1.1.7, AW-1.1.8, AW-2.4.3, AW-2.4.5, AW-2.4.7). The Project’s scale, density, and design are appropriate given the site’s proximity to the Anacostia Metrorail Station, the Frederick Douglass Bridge / South Capitol Street, and other major transportation facilities, and are consistent with the AW Element’s recognition that Poplar Point can accommodate development patterns that differ from, but remain compatible with, nearby Historic Anacostia (AW-2.4.5).

The Project also advances the AW Element’s policies related to multimodal transportation, waterfront access, sustainability, and climate resilience. As shown in the Plans, the Project strengthens pedestrian and bicycle connections between the Bridge District, Anacostia Park, the Anacostia Metrorail Station, and future development at Poplar Point through the provision of a bicycle promenade, pedestrian pathways, bicycle parking, and public realm improvements that support a more connected and accessible waterfront district (AW-1.1.10, AW-1.1.11, AW-2.4.8). In addition, the Project incorporates green roofs, bioretention facilities, rooftop solar panels, stormwater management infrastructure, and other sustainability measures designed to achieve LEED Gold certification and support long-term environmental performance and resilience consistent with the AW Element’s policies encouraging climate-adaptive and environmentally sustainable waterfront development (AW-1.1.5, AW-1.1.8).

## **LAND USE ELEMENT EVALUATION**

Overall, the Project is not inconsistent with the policies set forth in the Land Use Element. The Project will redevelop an underutilized site within the Central Employment Area and adjacent to Metrorail that will bring new economic vitality and employment growth to neighborhoods east of the Anacostia River. The Project introduces a significant visitor-serving use that supports the continued growth of the Bridge District into a vibrant mixed-use destination. As one of the first hotels located on the east side of the Anacostia River, the Project will provide hospitality infrastructure that strengthens the Bridge District’s mix of uses, supports Historic Anacostia and future development at Poplar Point, creates permanent employment opportunities, and contributes to the District’s broader goals of creating jobs and directing growth to underserved locations that can accommodate development while benefiting from existing and planned transportation infrastructure (LU-1.2.1, LU-1.2.4, LU-2.4.6).

The Project is also consistent with the Land Use Element’s policies promoting transit-oriented development, multimodal transportation, sustainable design, and the efficient use of land near transit facilities. The Property is adjacent to the Anacostia Metrorail Station and major bicycle, pedestrian, and transit facilities, making it an appropriate location for a hotel with no vehicle parking spaces. Instead, the Project emphasizes walking, bicycling, and transit use through the provision of a bicycle promenade, well-maintained sidewalks, short- and long-term bicycle parking facilities, and employee bicycle-support amenities. The Project further advances Land Use Element policies encouraging sustainable and resilient development. These features support the Land Use Element’s goals of promoting transit-accessible development, reducing reliance on automobiles, improving environmental performance, enhancing resilience, and ensuring that growth occurs in a manner that strengthens both the surrounding neighborhood and the District as a whole (LU-1.1.2, LU-1.2.8, LU-1.4.1, LU-1.4.2, LU-1.4.5, LU-1.4.7, LU-2.4.8, LU-2.4.11).

## **TRANSPORTATION ELEMENT EVALUATION**

The Project is not inconsistent with the policies set forth in the Transportation Element. The Project’s location within the Bridge District, in close proximity to the Anacostia Metrorail Station, major Metrobus routes, regional bicycle facilities, the Frederick Douglass Bridge corridor, and the District’s growing waterfront trail network, makes it an appropriate location for a hotel with no vehicle parking spaces. Consistent with the Element’s emphasis on transit-oriented development and minimizing parking, the Project prioritizes walking, bicycling, and transit use through the provision of no onsite parking, bicycle parking, the promenade, and enhanced pedestrian connections (T-1.1.4, T-1.1.8, T-2.3.2, T-2.3.3, T-2.4.1). The Project also advances policies encouraging multimodal connectivity and transportation demand management by reducing vehicle dependency, minimizing curb cuts, and concentrating loading activities into a single loading berth, which minimizes conflicts among pedestrians, bicyclists, and vehicles (T-1.1.3, T-1.1.7, T-3.1.1, T-3.2.10). Finally, the Project strengthens connections between the Bridge District and surrounding neighborhoods while also incorporating loading and site circulation strategies that respond to the unique infrastructure constraints of the Property. (T-2.2.1, T-2.2.2, T-2.5.1, T-3.3.4).

## **ENVIRONMENTAL PROTECTION ELEMENT EVALUATION**

The Project is not inconsistent with the policies of the Environmental Protection Element. In accordance with NHR zone requirements, the Project will promote green building through its adherence to several sustainable operations and maintenance standards (E-4.2.1). The Project is designed to achieve a minimum LEED Gold certification and will contain rooftop solar panels that can generate a minimum of 1% of the energy needed to operate the building (E-3.2.3, E-3.2.6, E-3.2.7). Furthermore, the Project design incorporates several climate resilient strategies that are recommended in DOEE’s resilient design guidelines. Such strategies include protecting mechanical and electrical equipment from flooding, utilizing cool and vegetated roofs, and maximizing natural daylighting (E-1.1.1). The Project will contain substantial ground cover and green roof that will aid in stormwater retention, runoff prevention, and urban heat island reduction. (E-1.1.2, E-4.1.2, E-4.1.3). Additionally, the proposed green roofs, and other landscaped areas within and around the Project will utilize native, drought tolerant species to the maximum extent possible and sustainable landscape practices to minimize (E-2.1.3).

## **ECONOMIC DEVELOPMENT ELEMENT EVALUATION**

The Project is not inconsistent with the policies set forth in the Economic Development Element. The Project directly advances the Element's goals of growing and diversifying the District's economy, expanding employment opportunities, strengthening core industries, and increasing economic activity east of the Anacostia River. The hospitality and tourism sector is specifically identified as one of the District's core economic sectors, and the proposed hotel will strengthen that sector by introducing one of the first hotels on the east side of the Anacostia River and expanding the District's inventory of visitor accommodations in a location that supports the continued growth of the Bridge District and future redevelopment of Poplar Point (ED-1.1.1, ED-1.1.6). In addition to creating permanent jobs in hotel operations, management, food and beverage service, housekeeping, engineering, maintenance, and security, the Project will support a broad network of related industries that may provide goods and services to the proposed hotel, including, for example, linen and laundry services, food and beverage distributors, cleaning and maintenance contractors, security services, and transportation providers (ED-1.1.2). The Project will also generate additional visitor spending that benefits nearby businesses and supports the continued growth of retail, restaurant, entertainment, and recreational uses throughout the Bridge District, Anacostia, and broader Wards 7 and 8. By creating jobs, supporting local businesses, and expanding the District's hospitality infrastructure, the Project advances the Economic Development Element's vision for a more inclusive, resilient, and diversified economy that provides opportunities for District residents and businesses while strengthening one of the District's most important growth sectors (ED-1.1.1, ED-1.1.2, ED-1.1.3, ED-1.1.6).

## **URBAN DESIGN ELEMENT EVALUATION**

The Project is not inconsistent with the policies set forth in the Urban Design Element. The Project advances the Element's objectives of enhancing the quality of the public realm, creating attractive architecture, and reinforcing the identity of emerging neighborhoods through a carefully designed hotel use that will mark the eastern entrance in the Bridge District (UD-1.1.1). As shown in the Plans, the building incorporates a high-quality architectural expression with a varied façade composition, durable materials, extensive glazing, and carefully articulated massing that responds to both the urban character of the Bridge District and the pastoral context of Poplar Point. In addition, the Project incorporates substantial landscaping, green infrastructure, and public realm improvements that strengthen the visual character of the area and support the District's goals for high-quality urban design and sustainable growth (UD-1.1.1, UD-1.1.7).

The Project further advances the Urban Design Element's emphasis on creating walkable, connected, and vibrant public spaces, particularly along the Anacostia waterfront and in areas experiencing significant growth and reinvestment (UD-1.3.1). The Project enhances pedestrian and bicycle connectivity through improved sidewalks, landscaped areas, the promenade, outdoor gathering areas for hotel guests, and direct connections to the broader Bridge District circulation network. The Applicant's decision to provide no vehicle parking and a single loading berth reduces the number and width of curb cuts, minimizes conflicts between vehicles and pedestrians, and allows a greater portion of the site to be devoted to landscaping and public realm improvements. Collectively, these design features create a welcoming and active public realm environment that contributes to the long-term vision for the Anacostia waterfront (UD-1.3.1, UD-1.1.1).

## EVALUATION OF POTENTIAL COMP PLAN INCONSISTENCIES

The foregoing Comp Plan analysis thoroughly demonstrates the numerous ways in which the Project aligns with the policies and goals of the Comp Plan, including the FLUM and GPM. However, as explained in multiple decisions by the D.C. Court of Appeals (“**Court**”), it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because there is intentional overlap within and between the Comp Plan elements, a Comp Plan evaluation must recognize potential inconsistencies and explain why the inconsistencies are outweighed by other Comp Plan policies and/or competing considerations. The Court has provided the following specific guidance:

The Comp Plan is a broad framework intended to guide the future land use planning decisions for the District. Thus, even if a proposal conflicts with one or more individual policies associated with the [Comp] Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the [Comp] Plan as a whole. The Comp Plan reflects numerous occasionally competing policies and goals, and, except where specifically provided, the [Comp] Plan is not binding. Thus, the Commission may balance competing priorities in determining whether a proposal would be inconsistent with the Comp Plan as a whole. If the Commission approves a [proposal] that is inconsistent with one or more policies reflected in the [Comp] Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016) (“*McMillan*”) (internal citations and quotations omitted).

The Implementation Element reflects similar guidance: “[r]ecognize the overlapping nature of the [Comp Plan] elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6.

Consistent with the guidance provided in the Implementation Element and by the Court, the Applicant conducted a thorough Comp Plan evaluation using a racial equity lens and, as detailed throughout this statement, finds the proposal not inconsistent with the Comp Plan when read as a whole. In conducting its evaluation, the Applicant was careful to identify any instances where the proposal may be viewed as being inconsistent with certain Comp Plan policies. Upon review, the Applicant did not identify any potential policy inconsistencies that warrant acknowledgement, and balancing against other Comp Plan policies and considerations that will be advanced by the Project.

### **X. Community Outreach and Engagement**

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, a racial equity lens 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 emphasizes 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 taken by applicants to engage the community early in the zoning process. The information contained in table below addresses the questions set forth in **Part II (Community Outreach and Engagement)** of the Racial Equity Tool. As demonstrated below, the Applicant has engaged with the community, and it will continue to do so during the design review process.

<b>Community Outreach and Engagement</b>
<b>Description of affected community (including defining characteristics).</b>
<ul style="list-style-type: none"> <li>· <u>Affected Community</u>: The Applicant has remained engaged with the following entities to gain input on existing conditions within the community, and to gain input on the Project: ANC 8A, Anacostia BID, Anacostia Coordinating Council, Rock Run Group, Cedar Tree Academy Public Charter School, Ward 8 CARE, and Historic Anacostia Block Association. The Applicant also attended, and hosted, multiple community meetings to discuss overall Bridge District developments.</li>   <li>· <u>Defining Characteristics</u>: The affected community is located in Ward 8, and along with Ward 7, the community is often referred to as east the (Anacostia) river. Communities east of the river are predominantly Black (and home to the majority of the District’s Black residents). For decades, east of the river communities, especially Ward 8, have experienced significant underinvestment that has reduced life expectancy as well as social and economic opportunities. In a 2018 Health Equity Report published by DC Health, east of the river communities were identified as experiencing disproportionately poor health outcomes as measured by the nine key drivers of health tracked in the report: education, housing, employment, income, transportation, food environment, medical care, outdoor environment, and community safety. In recent years, east of the river communities are seeing growing investments and infrastructure projects that have created more economic activity and opportunities to create neighborhood destinations (ex. Historic Anacostia and the Bridge District) that highlight arts, culture, wellness, and sustainability. Ongoing efforts to redevelop St. Elizabeths East Campus and Poplar Point will eventually bring additional investment and opportunities. While much improvement is still needed in many areas, this growth is attracting new residents, more visitors from across the region, and business development that is beginning to close key service and amenity gaps.</li> </ul>
<b>Characteristics of the affected community that influenced outreach plan / efforts.</b>
<ul style="list-style-type: none"> <li>· The affected community is engaged with clear visions on community growth and needs. Community members express that they are often under engaged in development decisions and not often prioritized as critical stakeholders. The community has experienced development projects “flip” quickly, and as a result has not benefited from the opportunity to work with development teams over time. Additionally, the community expressed a desire for development teams to be more active in listening to and partnering with the community in which they are working.</li> </ul>

**Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).**

- Since 2010, the Applicant has been engaged with an array of community stakeholders to gain and maintain an understanding of community needs and aspirations and share the vision for the Bridge District. The Applicant has participated in over 300 meetings with community stakeholders and is a monthly/regular participant in meetings with the following community organizations: ANC 8A, Anacostia BID, Anacostia Coordinating Council, Historic Anacostia Block Association (HABA), Cedar Tree Academy Public Charter School.

**Community outreach timeframe / dates of major meetings and points of engagement**

May 2026

- Met with Destination DC to share concept plans and discuss the impact of hospitality/lodging development in the Bridge District/Ward 8.
- Met with the Historic Anacostia Block Association to present plans and capture feedback about the development and design.

June 2026.

- Call with ANC 8A SMD Commissioner Robin McKinney about design review application/timeline and outreach plans.
- Attended ANC 8A public meeting to notify community of upcoming design review application.

July 2026

- Scheduled to attend ANC 8A public meeting to present the proposed Project.

**Members of the affected community that would potentially benefit from the proposed zoning action.**

- Opportunity for the proposed hotel to increase foot traffic to nearby businesses and cultural destinations, including Grounded and the Go-Go Museum & Café, by attracting both District residents and visitors; ability to promote local businesses, events, and cultural attractions to a broader audience of hotel guests and visitors.
- Residents of the affected community are interested in employment opportunities in the hospitality industry, and others that could benefit from related industries that help service the proposed hotel.
- Commitment to high level of sustainability in design, construction, and operations to ensure that the surrounding, traditionally environmentally stressed community will not be burdened by the Project.
- Continued improvement and enhancement of the public realm, following community input, to ensure areas around the Bridge District maintains the following neighborhood-serving elements where feasible: lighting, tree canopy, planter boxes, and art.
- The Applicant aims to provide the following benefits to the community, ANCs, and Ward 8:
  - Support community-based organizations in the following areas: public safety, food and health equity, arts and culture, and economic and workforce development.
  - Workforce development emphasizing training and priority hiring, and subcontracting opportunities for Ward 8 residents.

- 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.
- Creation of community-oriented and family-friendly spaces (including a public green space) for events, activations, recreation, and community gathering.

**Members of the affected community that would potentially be burdened by the proposed zoning action.**

- Residents within the affected community may experience construction-related disruptions to travel around the Project, including residents living in the Applicant’s recently completed Bridge District Phase 1 development that is in proximity to Parcel 7.
- Cedar Tree Academy may experience construction-related impacts (travel, noise, dust).

**Community input on existing conditions and current challenges that have resulted from past or present discrimination, and current ongoing efforts in the affected community to address these conditions.**

- The Applicant has received the following input from the affected community:
- History of development projects in Ward 8 over promising and under delivering on community benefits.
  - Significant lack of community engagement and opportunities for community members to be heard and provide input on development projects.
  - Lack of or limited investments to sustain economic activity and address longstanding gaps in amenities, housing, public safety and more that can attract new residents and more visitors.
  - Hiring and subcontracting practices that do not emphasize Ward 8 residents, women, and returning citizens.
  - Affordable housing options for larger families are limited; strong interest in three (3)-bedroom units to support generational families who desire to live together.

**Potential positive outcomes of the proposed zoning action identified by the affected community.**

- No relevant input received to date.

**Potential negative outcomes of the proposed zoning action identified by the affected community.**

- Concerns regarding impacts on traffic on Howard Road, SE.

**Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.**

- No changes / modifications necessary at this time.

**Efforts taken to mitigate potential negative outcomes identified by the affected community.**

- The Applicant is requesting full relief from the minimum parking requirement for the hotel, which will minimize the number of vehicle trips generated by the hotel.
- The size of the hotel is relatively modest (approximately 160 guest rooms), and contains only one modest function room, but otherwise no exhibition space or ballrooms. As such,

the hotel is not likely to generate an amount of traffic that would cause adverse impacts on the surrounding transportation network.

**XI. Evaluation of Zoning Action Through a Racial Equity Lens**

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities.” 10-A DCMR 213.6. 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 correlates the potential outcomes of the Project with specific themes related to racial equity that are enumerated **Part IV (Criteria to Evaluate a zoning Action through a Racial Equity Lens)** of the Commission’s Racial Equity Tool. As demonstrated below, the outcomes of the Project have the potential to positively advance equitable development through improvements in land use, employment, and access to opportunity.

<b>Direct Displacement</b>	The Project will not result in any direct displacement of existing residents or businesses as the Property is currently vacant.
<b>Indirect Displacement (Economic and Cultural)</b>	Indirect displacement of tenants or residents is not expected to occur in the area surrounding the Project. A hotel use, generally and at this location, is not likely to cause increases in property values that could cause homeowner displacement. This is particularly true given the distance between the Project and established neighborhoods to the east such as Historic Anacostia, Barry Farm, Fairlawn, and Randall Heights.
<b>Housing</b>	The Project will not result in any positive or negative outcomes to housing since it is a hotel. While the Applicant is requesting relief from the NHR zone 2.5 FAR minimum residential requirement, the lack of housing on the Property is far made up by the significant amount of housing that has and will be constructed on Parcels 1 – 5 of the Bridge District.
<b>Physical</b>	The Project will result in positive outcomes to the physical environment. The public realm will be improved in accordance with DDOT standards, where applicable, thus improving pedestrian safety through well-maintained sidewalks, traffic calming measures, and minimization of curb cuts. Additionally, the Project will construct another segment of the pedestrian/bicycle promenade that the Applicant is constructing along the entire northern edge of the Bridge District.

<b>Physical (continued)</b>	Environmentally, the Project is not expected to increase traffic compared to current site conditions due to its location adjacent to Metrorail and the lack of on-site parking. As such, the Project is likely to result in positive environmental outcomes. The Project incorporates several sustainability and climate resilience strategies, including rooftop solar and green roof areas, and will achieve a minimum LEED Gold certification.
<b>Access to Opportunity</b>	The Project will result in positive outcomes to employment through construction-related jobs and permanent jobs in the hospitality and related industries. Some of these jobs will be facilitated through the Applicant's continued engagement with the community, and through its close coordination with DOES.
<b>Community</b>	<p>From the outreach period, the Project team captured the following comments and feedback from community stakeholders:</p> <ul style="list-style-type: none"> <li>· Community members expressed interest in understanding the potential traffic impacts associated with the proposed hotel development, particularly along Howard Road and surrounding streets.</li> <li>· Residents inquired about the anticipated average nightly room rate and the market segment the proposed hotel is intended to serve.</li> <li>· Participants requested that the project maximize opportunities for local hiring, contracting, and business participation and encouraged the applicant to prioritize partnerships with community-based businesses where feasible.</li> <li>· Questions were raised regarding hotel operations, including site access, circulation, and the parking and staging of motorcoaches and other large vehicles serving hotel guests and groups.</li> <li>· Some attendees referenced prior community discussions regarding proposed hotel development in Ward 8 and sought clarification on how the current proposal responds to lessons learned and community concerns raised during previous projects.</li> <li>· Residents encouraged the applicant to create a hotel</li> </ul>

**Community (continued)**

- experience that reflects local character and culture and to promote nearby commercial, cultural, and recreational destinations to hotel guests.
- Community members expressed interest in opportunities for local artists and creatives to contribute to the design and identity of the hotel, including guest rooms, public spaces, and amenity areas.
- Representatives from DC's tourism industry highlighted the need for additional lodging accommodations east of the Anacostia River and noted growing demand among sports, leisure, and weekend travelers for neighborhood-based hotel experiences that provide access to authentic local communities and destinations beyond traditional tourism districts.
- Project team has emphasized feedback about job creation and workforce development with general contractors within the Bridge District to create a strategy to recruit, train, and hire residents from both Ward 7 and 8.

**XII. Technical Zoning Flexibility for Rear Yard and Side Yard**

Pursuant to Subtitle X § 603.1, as part of the design review process the Commission may grant flexibility from applicable development standards including, among others, yard requirements. In this case, the Applicant is requesting flexibility from the NHR zone rear yard and side yard requirements. Pursuant to Subtitle K § 1001.9, the minimum rear yard requirement for the Project is approximately 17'-1". As shown on the Plans, the Applicant will provide a rear yard of approximately 15'-1" along the entire north side of the Property. The rear yard flexibility can be granted without causing any adverse impacts to the Project or neighboring properties to the north, which only includes Poplar Point. Currently, the area of Poplar Point to the north is open parkland that will not be impacted by the requested rear yard flexibility, especially considering the extent of the rear yard flexibility is only approximately two (2) feet. Further, according to the most recent draft Poplar Point master plan published by the DC Office of Planning the area to the north of the Property could potentially be developed. Even in that scenario, the Applicant's *de minimis* request for rear yard flexibility is unlikely to cause any adverse impacts on future development to the north as that development would also be required to provide a rear yard adjacent to the Property.

As shown on the plans, the Applicant's requested side yard flexibility applies along the Property's east lot line, adjacent to the existing WMATA access road on Lot 1040. Pursuant to Subtitle K § 1001.8, the minimum side yard requirement for the Project is approximately 16'-4". As shown on the Plans, the side yard along the east lot line of the Property will vary in depth with the majority being approximately 3'-0", although it will pinch down to 0'0" in one point where a proposed overhang will technically extend to the east lot line. The side yard flexibility can be granted without causing any adverse impacts to the Project or neighboring properties to the east,

which only include the existing WMATA access road and an unimproved surface lot that is owned by the Applicant. The width of the WMATA access road, which the Applicant holds a perpetual pedestrian and vehicular access easement over, is approximately 25 feet, and thus effectively provides the open space that would otherwise be provided by the required side yard. Further, according to the draft Poplar Point master plan the area to the east of the Property is being looked at as an important future pedestrian and vehicular connection into Poplar Point that is likely to be wider than the existing WMATA access road. As such, notwithstanding the Applicant's request for side yard flexibility the amount of open space along the east side of the Property will be maintained or possibly increase over time.

The rear and side yard flexibility is necessary for the Applicant to fully satisfy the design review standards of Subtitle X § 604. The flexibility is limited to only that necessary for a successful building design. As demonstrated by the Plans and the Applicant's evaluation of the Project against the relevant design review criteria included above, the overall design of the Project is superior to any matter-of-right development possible on the Property and is not inconsistent with the Comp Plan when evaluated through a racial equity lens.

### **XIII. Requests for Technical Zoning Relief**

As part of the application the Applicant is requesting special exception relief from the following zoning requirements:

- Minimum residential requirement under Subtitle K § 1001.3;
- Minimum vehicle parking requirement under Subtitle C § 701.5;
- Minimum loading requirement under Subtitle C § 901.1.
- Minimum long-term bike parking employee shower requirement under Subtitle C § 806.4; and
- Penthouse enclosing wall / screening requirement under Subtitle C § 1503.3;

As individually addressed below, the above areas of relief all satisfy the general special exception criteria set forth under Subtitle X § 901.2, which requires a showing that the relief:

- a. Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;
- b. Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and
- c. Will meet such [other] special conditions as may be specified in the [Zoning Regulations].

Generally, pursuant to the Zoning Act of 1938 and Subtitle A § 101.1, the Zoning Regulations are intended to:

- Lessen congestion;
- Promote health and the general welfare;
- Secure safety from fire, panic, and other dangers;
- Provide adequate light and air;

- Prevent undue concentration of population and the overcrowding of land; and
- Provide distribution of population, business and industry, and use of land that will tend to create conditions favorable to transportation, protection of property, civic activity, and recreational, educational, and cultural opportunities; and that will tend to further economy and efficiency in the supply of public services.

Additionally, per Subtitle K § 1000.2 the state purposes of the NHR zone include, among others, development of the area with a mixture of residential and commercial uses and encouraging a variety of visitor-related uses.

a. NHR zone minimum residential requirement

Pursuant to Subtitle K § 1001.3, a building on a lot in the NHR zone shall provide a minimum 2.5 FAR of residential use. As shown in the Plans, the Applicant is proposing a hotel use on the Property without any residential use. As a result, the Applicant requires special exception relief which can be granted without adversely affecting the use of neighboring properties in accordance with the Zoning Regulations, and without compromising the general purpose and intent of the Zoning Regulations.

The relief from the minimum residential requirement is in harmony with the general purpose and intent of the Zoning Regulations. As stated above, the Zoning Regulations are intended to, among other things, provide distribution of business and industry. Additionally, the NHR zone is intended to facilitate development of a mixture of residential and commercial uses and encourage visitor-related uses. The proposed hotel is consistent with these stated purposes and will advance economic development and job growth in Ward 8. The proposed hotel will also provide a new lodging option for visitors to the District. The relief will also not adversely affect neighboring property as the lack of residential use will not have a material impact on neighboring properties. Indeed, the proposed hotel is a matter-of-right use in the NHR zone, and the relief will not diminish the residential goals for the Bridge District because the Applicant has, and will, far exceed the minimum 2.5 FAR residential requirement on other parcels. Specifically, the Applicant recently completed construction on Parcels 3 and 4, which provides approximately 7.5 FAR of residential use. On Parcels 1 and 2, the Applicant is approved for approximately 6.33 FAR of residential use. And on Parcel 5, which is currently under construction, the Applicant will provide approximately 6.9 FAR of residential use.

b. Special exception from minimum vehicle parking requirement

Pursuant to Subtitle C § 701.5, the minimum parking requirement for the proposed hotel is approximately 21 spaces. As shown on the Plans, the proposed hotel is designed without any on-site parking. As such, the Applicant is requesting a special exception for full relief from the minimum parking requirement.

The requested special exception satisfies the general special exception criteria of Subtitle X § 901.2. The lack of onsite parking for the proposed hotel will maximize the use of transit, taxi and carshare, and other alternative modes of travel by hotel guests and employees. This is consistent with the general intent of the Zoning Regulations to lessen

congestion and promote health and the general welfare. The relief will also not adversely affect the use of neighboring property, and in particular Cedar Tree Academy located to the southwest of the property. Again, the lack of onsite parking will drive down the number of vehicle trips to the Property, thus reducing traffic on the surrounding transportation network, including Howard Road.

c. Special exception from minimum loading requirement

Pursuant to Subtitle C § 901.1, the minimum loading requirement for the proposed hotel is two (2) loading berths. As shown on the Plans, the Applicant is proposing to provide one (1) loading berth located on the east side of the hotel, accessible from the existing WMATA access road. The requested relief is in harmony with the purpose and intent of the Zoning Regulations. The Zoning Regulations are designed to lessen congestion and provide for the general welfare. As this relates to zoning, these purposes are achieved by ensuring that buildings and uses have adequate loading facilities that can accommodate expected loading demand. In this case, the expected loading demand is expected to be relatively low. The proposed hotel will only contain approximately 160 guest rooms and has a very modest amount of commercial adjunct (bar / lounge) space. Additionally, the hotel will contain only a limited function room and commercial adjunct space, which are often the hotel components that generate the greatest number of truck trips when more significant. As such, the Applicant and its traffic consultant believe that the expected loading demand for the hotel can be accommodated with only one loading berth. Further, the requested loading relief is not expected to affect neighboring property adversely. First, the properties that are closest to the hotel loading facilities currently contain the WMATA access road and the WMATA parking garage. In addition, because the one loading berth that is proposed will be able to accommodate expected loading demand, the requested loading relief is unlikely to adversely impact future development on Poplar Point. Finally, the hotel loading facilities are located away from what will likely be the main pedestrian routes leading from the hotel to the Bridge District and Metrorail.

d. Special exception from minimum long-term bicycle parking shower requirement

Pursuant to Subtitle C § 806.4, the minimum long-term bicycle parking shower requirement is four (4) showers. As shown in the Plans, the Applicant proposes to provide one (1) shower in the lower level near the bike storage room. As noted above, the hotel will have limited service and contain approximately 160 guest rooms, a modest bar / lounge space, and only a limited function room and no exhibit spaces. As such, the hotel is expected to have a relatively small employee count that would be on-site at any given time. In fact, while the showers required under the zoning regulations are intended to serve employees of non-residential uses, the requirement under the regulations is based upon the overall square footage of a building. In this case, the large majority of the building's square footage will not be occupied by hotel employees, but rather hotel guests. As such, there is no need to provide the four (4) showers that are required when the overall number of hotel employees that are onsite at any given time is unlikely to generate demand for any more than the one (1) shower being proposed. Thus, the Applicant believes the number of showers being proposed is consistent with the purpose of the shower requirement to support and promote the use of bicycle travel by employees of non-residential uses. Furthermore,

the requested relief will have no adverse effect on the use of neighboring properties as it is not the kind of relief that could result in spillover impacts.

e. Special exception from roof structure enclosing walls requirement

The Applicant seeks special exception relief from the penthouse enclosing walls requirements of Subtitle C § 1503. Pursuant to Subtitle C § 1503.3, when consisting solely of mechanical equipment, the equipment shall be enclosed fully as prescribed, except that louvers may be provided. In this case, the only enclosed penthouse being proposed is a single mechanical penthouse enclosure that contains an elevator override and egress stair tower. The only other rooftop equipment will be lower mechanical equipment that will all be set back 1:1 from the edge of the roof upon which it is located. As shown on the roof plan, the mechanical yard will be located on the southwest portion of the hotel roof. This is the portion of the roof level that will be screened by the staggered extended parapet of the hotel building. As shown on Sheet A2.05 of the Plans, the extended parapet at the southwest corner of the hotel will reach a maximum height of approximately 18 feet above the level of the roof, which will be more than sufficient to screen the rooftop equipment within the mechanical yard.

Relief from the aforementioned penthouse enclosing walls is permitted by special exception pursuant to Subtitle C § 1506.1. In order for the relief to be granted, the Commission must find that the Applicant meets the following criteria:

- General special exception criteria of Subtitle X, Chapter 9;
- The Applicant's demonstration that reasonable effort has been made for the housing for mechanical equipment, stairway, and elevator penthouses to be in compliance with the required setbacks; and
- At least one of the criteria enumerated in Subtitle C § 1506.1(c).

The Applicant satisfies all criteria listed above. Regarding the general special exception criteria, the relief can be granted as it is consistent with the purpose and intent of the Zoning Regulations and Zoning Map and will not adversely affect the use of neighboring property in accordance with zoning. Generally, the purpose and intent of the penthouse regulation is to ensure a reasonable degree of architectural harmony of penthouses and roof structures with the building upon which they sit and with the surrounding context. The penthouse regulations achieve this purpose through regulating penthouse and roof structure height, setbacks, enclosing walls, and enclosed area.

While the Applicant is requesting relief from the mechanical screening requirement because all of the equipment will be located behind the extended parapet wall at the southwest corner of the building the equipment will still be screened and not visible from surrounding streets and open spaces. As such, the purpose and intent of the enclosing wall requirements will continue to be met. Additionally, the requested relief will not adversely impact the use of neighboring property because the mechanical equipment will still be screened by the extended parapet wall. The Applicant has designed the proposed roof plan

such that the elevator override, stair tower, and unenclosed mechanical equipment meets all applicable setback requirements. Finally, the strict application of the enclosing wall requirements would result in construction that is unduly restrictive. Specifically, if the Applicant were required to screen the equipment within the mechanical yard, it would require the construction of screening that would also need to be setback 1:1 from the edge of the roof, despite already being screened by the extended parapet of the hotel. This would reduce the amount of roof area that is available for the placement of required mechanical equipment and potentially require the Applicant to reduce the amount of green roof area to accommodate of the mechanical equipment that is required to construct the hotel.

#### **XIV. Requests for Design Flexibility**

In addition to the flexibility granted under Subtitle Z § 702.15, and Applicant requests the following revised and additional areas of minor design flexibility:

Exterior Details – Location and Dimension: To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior configuration of the building or design shown on the plans approved by the order. Examples of exterior details would include, but are not limited to, doorways, canopies, railings, and skylights. This flexibility shall also include the ability to add, remove, or adjust the location and dimension of egress doors and pathways in order to comply with applicable fire and life safety codes.

Streetscape Design: To vary the location, attributes, and general design of the approved streetscape within adjacent public right-of-way and the WMATA-owned access road, to comply with the requirements of, and the approval by, the DDOT Public Space Division and/or WMATA and to accommodate such variations on the project property, as may be required;

Landscape Materials: To vary the final selection of landscaping materials utilized based on availability at the time of construction.

Number of Hotel Guest Rooms: To provide a range in the approved number of hotel guest rooms of plus or minus ten percent (10%);

Roof Elements: To vary the roof plan as it relates to the green roof areas, solar panels, and mechanical equipment planters, provided that no relief is required; and

Ground Floor Frontages: To vary the final design of the ground floor frontages of the building, including the location and design of entrances, show windows, and signage, in accordance with the needs of the hotel and/or commercial adjunct operator.

