

**BEFORE THE ZONING COMMISSION
OF THE
DISTRICT OF COLUMBIA**

SPRING FLATS MD, LLC

**STATEMENT IN SUPPORT OF
A PETITION FOR A ZONING MAP AMENDMENT
FROM THE RF-1 DISTRICT TO THE RA-2 DISTRICT**

**FOR
1125 SPRING ROAD, NW
(SQUARE 2902, LOTS 804 & 807)**

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B	Relevant portion of the 2016 Zoning Map
C	Relevant portion of the Comprehensive Plan Future Land Use Map
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I.
INTRODUCTION

Spring Flats MD LLC (the “Petitioner”), through undersigned counsel, submits this statement in support of its petition pursuant to Subtitle Z, Section 201.7(b)(1) of the District of Columbia Municipal Regulations, Title 11 (11 DCMR) (the “Zoning Regulations”) to amend the Zoning Map of the District of Columbia (the “Zoning Map”) to rezone property located at 1125 Spring Road, NW (Square 2902, Lots 804 and 807) (the “Subject Property”), from the RF-1 District to the RA-2 District. A building plat showing the lots to be rezoned is attached hereto as Exhibit A, and a portion of the Zoning Map showing the Subject Property is attached hereto as Exhibit B.

The requested Zoning Map amendment is not inconsistent with the Comprehensive Plan Future Land Use Map (“FLUM”) or the Generalized Policy Map (“GPM”), advances the purposes of the Comprehensive Plan and other District reports, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

II.
DESCRIPTION OF THE SUBJECT PROPERTY AND SURROUNDING AREA

The Subject Property is located in Square 2902 in the Petworth neighborhood of Ward 4. Square 2902 is bounded by Quincy Street, NW to the north, 10th Street, NW to the east, Spring Road, NW to the south, and 13th Street and Kansas Avenue, NW to the west, and is bisected horizontally by Quebec Place, NW. The Subject Property is located on the southern portion of Square 2902 and is bounded by 10th Street to the east, Spring Road to the south, District-owned property to the west, and a 15-foot wide public alley to the north. The eastern-most portion of the Subject Property is a closed portion of 10th Street, NW, which will be rebuilt and rededicated as a public street.

The Subject Property consists of approximately 144,400 square feet of land area (approximately 3.3 acres). The Subject Property has approximately 632.5 linear feet of frontage on Spring Road, NW to the south, and approximately 552.6 linear feet of frontage along the public alley to the north. As shown on the Zoning Map (Exhibit B), Square 2902 is located in the RF-1 District. The Subject Property is presently improved with a vacant community health care center formally known as the Hebrew Home for the Aged (the “Hebrew Home”); a utility/chiller building at the rear of the Hebrew Home; the former Paul Robeson School last used for mental health treatment and education towards the eastern edge of the Subject Property; and a parking lot.

The Hebrew Home was constructed in 1925 and was used as a nursing home from 1925 to 1969. In 1968 the District purchased the Hebrew Home and converted it to a community health center. The Hebrew Home is comprised of approximately 85,800 square feet and is virtually intact; however, the building has fallen into disrepair and is presently vacant. The Hebrew Home is listed in the D.C. Inventory of Historic Sites and the National Register of Historic Places.

As shown on the Comprehensive Plan Future Land Use Map (“FLUM”) attached hereto as Exhibit C, the Subject Property is designated as a Local Public Facility, which reflects the prior uses at the Subject Property. The neighborhood surrounding the Subject Property in all directions

is designated as Moderate Density Residential, and properties along Georgia Avenue, approximately 0.2 miles to the east of the Subject Property, are designated mixed-use Moderate Density Commercial and Medium Density Residential. As shown on the Comprehensive Plan Generalized Policy Map (“GMP”) attached hereto as Exhibit D, the Subject Property is designed within a Neighborhood Conservation Area.

The Subject Property is located approximately 0.3 miles from the Georgia Avenue/Petworth Metrorail station, and is close to multiple major Metrobus lines on Georgia Avenue, New Hampshire Avenue, and 14th Street, NW. The Subject Property has a Walkscore of 93, a Transitscore of 78, and a Bikescore of 88.

III. **EXISTING AND PROPOSED ZONING**

A. Existing Zoning

The Subject Property is currently zoned RF-1. The purpose of the RF-1 District is to provide for areas predominantly developed with attached row houses on small lots within which no more than two dwelling units are permitted. 11-E DCMR § 300.1. The maximum permitted building height not including the penthouse in the RF-1 District is 35 feet and 3 stories. 11-E DCMR § 303.1. New construction of three or more immediately adjoining residential row dwellings or flats, built concurrently on separate record lots, are permitted a maximum building height of 40 feet and three stories. 11-E DCMR § 303.2. The maximum permitted penthouse height in the RF-1 District is 12 feet and one story. 11-E DCMR § 303.7. The maximum permitted lot occupancy is 60% for detached, semi-detached, and attached dwellings and flats; 60% for the conversion of a building to an apartment house, or the lot occupancy as of the date of the conversion, whichever is greater, and 40% for all other structures. 11-E DCMR § 304.1. The minimum lot width for a row dwelling or flat is 18 feet (16 feet as a special exception Inclusionary Zoning (“IZ”) development), 30 feet for a semi-detached dwelling, and 40 feet for all other structures. 11-E DCMR § 201.1. The minimum lot area for a row dwelling or flat is 1,800 square feet (1,500 square feet as an IZ development), 3,000 square feet for a semi-detached dwelling, and 4,000 square feet for all other structures. *Id.*

B. Proposed Zoning

The Petitioner requests a Zoning Map amendment pursuant to 11-Z DCMR § 201.7(b)(1) to rezone the Subject Property to the RA-2 District. The purposes of the RA Districts are to (i) permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and (ii) permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones. 11-F DCMR § 301.1.

The maximum density in the RA-2 District is 1.8 FAR (2.16 with IZ development). 11-F DCMR § 302.1 and 11-C DCMR § 1002.3. The maximum height in the RA-2 District is 50 feet with no limit on the number of stories. 11-F DCMR § 303.1. The maximum permitted penthouse height is 12 feet, except 15 feet for penthouse mechanical space, and one story is permitted with a

second story permitted for penthouse mechanical space. 11-F DCMR § 303.2. The maximum lot occupancy in the RA-2 District is 60%. 11-F DCMR § 304.1.

C. Effect of the Proposed Map Amendment

The requested Zoning Map amendment satisfies each of the statutory standards applicable to Zoning Map amendments. The rezoning to the RA-2 District is also consistent with the Comprehensive Plan FLUM and GPM, advances the purposes of the Comprehensive Plan and other District reports, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan. The table below sets forth the development standards for the RF-1 District compared to the RA-2 District.

Development Standard	RF-1	RA-2
Building Height	35 feet and 3 stories 40 feet and 3 stories for new construction of 3 or more immediately adjoining new residential row dwellings or flats, built concurrently on separate record lots Subtitle E §§ 303.1 and 303.2	50 feet, no limit on stories Subtitle F § 303.1.
FAR	No maximum FAR specified Maximum number of dwelling units: Two units within a principal structure or one unit each in a principal structure and an accessory structure. A building existing before May 12, 1958 may be used for more than two units pursuant to Subtitle U, Chapter 3.	1.8 FAR 2.16 FAR (IZ) Subtitle F § 302.1 Subtitle C § 1002.3
Lot Occupancy	60% for the conversion of a building to an apartment house, or the lot occupancy as of the date of the conversion, whichever is greater 40% for all other structures Subtitle E § 304.1.	60% Subtitle F § 304.1
Rear Yard	20 feet Subtitle E § 306.1	4 in./ft. of height, 15 ft. minimum Subtitle F § 305.1

**IV.
STANDARDS APPLICABLE TO A PETITION
FOR A ZONING MAP AMENDMENT**

The requested Zoning Map amendment is submitted as a rulemaking pursuant to 11-Z DCMR § 201.7(b)(1), which states that Zoning Map amendments may be initiated by private

persons, organizations, or other entities in cases where the petitioner does not own all of the property proposed to be rezoned. In a rulemaking case before the Commission, there are no parties or motions. 11-Z DCMR § 201.8.

Pursuant to the Zoning Act of 1938, approved June 20, 1938, as amended (52 Stat. 797; D.C. Official Code § 6-641.01 *et seq.* (2012 Repl.)) (the “Zoning Act”), there are a number of criteria that must be applied by the Zoning Commission in adopting and amending the Zoning Regulations and Zoning Map. The Zoning Act states that the Zoning Regulations are designed to “promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital ...” The Zoning Act further provides that:

[z]oning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and zoning regulations shall be designed to lessen congestion in the street, to secure safety from fire, panic, and other dangers, to promote health and the general welfare, to provide adequate light and air, to prevent the undue concentration of population and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein. D.C. Code § 6-641.02.

The Commission must apply these standards and criteria in determining whether to approve a requested Zoning Map amendment. The proposed rezoning of the Subject Property from the RF-1 District to the RA-2 District will promote each of the purposes described above.

V.

EVALUATION OF PROPOSED MAP AMENDMENT AND COMPLIANCE WITH STATUTORY STANDARDS

A. Comprehensive Plan

The rezoning of the Subject Property to the RA-2 District is not inconsistent with the policies and goals of the Comprehensive Plan, including the FLUM and GPM. The Comprehensive Plan guides the District’s development, both broadly and in detail. 10A DCMR § 103.2. The Comprehensive Plan includes maps and policies for the physical development of the District, and addresses social and economic issues that affect and are linked to the development of the city and its citizens. The Plan allows the District to ensure that its resources are used wisely and efficiently and that public investment is focused in the areas where it is needed most. 10A DCMR § 100.14. Subsection 226.1(d) of the Comprehensive Plan provides that the “zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.”

If an application arguably "conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole." *Durant I v. Dist. Of Columbia Zoning Comm'n*, 65 A.3d 1161, 1168 (D.C. 2013). The Comprehensive Plan reflects numerous "occasionally competing policies and goals," and, "[e]xcept where specifically provided, the Plan is not binding." *Id.* at 1167, 1168 (internal quotation marks omitted). Thus "the Commission may balance competing priorities" in determining whether a project would be inconsistent with the Comprehensive Plan as a whole. *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm'n*, 73 A.3d 107, 126 (D.C. 2013).

1. Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the Generalized Policy Map, is intended to provide a generalized guide for development and conservation decisions. 10A DCMR §§ 200.5 and 226.1. The land use category definitions on the FLUM describe the general character of development in each area, citing typical building heights (in stories) as appropriate. However, the granting of density bonuses may result in heights that exceed the typical ranges cited. 10A DCMR § 226.1(c). The densities within any given area on the FLUM "reflect all contiguous properties on a block," but there may be "individual buildings that are higher or lower than these ranges within each area." *Id.*

The Comprehensive Plan does not require that each block "strictly correspond" with the general description of the associated land use designation on the Future Land Use Map. *See Z.C. Order No. 08-15, Finding of Fact No. 74(a)*. Indeed, the "Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements for setbacks, height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. By definition, the Map is to be interpreted broadly." 10A DCMR § 226.1(a).

As shown on Exhibit C, the FLUM designates the Subject Property in the Local Public Facilities land use category. The Local Public Facilities designation includes the following:

"land and facilities occupied and used by the District of Columbia government or other local government agencies (such as WMATA), excluding parks and open space. Uses include public schools including charter schools, public hospitals, government office complexes, and similar local government activities. Because of the map scale, local public facilities smaller than one acre—including some of the District's libraries, police and fire stations, and similar uses—may not appear on the Map. Zoning designations vary depending on surrounding uses."

10A DCMR § 225.15. The Comprehensive Plan states that the intent of the FLUM is to show use rather than ownership. The Local Public Facilities designation includes high-impact uses such as solid waste transfer stations and stadiums, as well as low-impact uses such as schools. 10A DCMR § 226(g). Importantly, the FLUM does not show density or intensity on Local Public Facilities sites. Therefore, the Comprehensive Plan states that if a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity, unless otherwise stated in the

Comprehensive Plan Area Elements or an approved Campus Plan. 10A DCMR § 226.1(h) (emphasis added); *see also* Z.C. Order Nos. 16-11, 06-31, 11-02/11-02A, and 11-10, where the Zoning Commission applied the standard of 10A DCMR § 226.1(h) by comparing the proposed site density to the surrounding neighborhood context and FLUM designations in approving PUDs and Zoning Map amendments for properties designated in the Local Public Facilities category.

The Subject Property's designation as a Local Public Facility reflects its prior institutional uses. However, on June 30, 2016, the District of Columbia Office of the Deputy Mayor for Planning and Economic Development ("DMPED") issued a Request for Proposals ("RFP") to redevelop the Subject Property with new market-rate housing and affordable housing that targets the lowest income bands, includes housing reserved for seniors, and dedicates at least 30% of the residential units for affordable housing. The RFP, attached hereto as Exhibit E, also prioritized proposals that included sustainable public space improvements, maximized density, and incorporated historic elements into building design. Specifically, the RFP welcomed submissions that include a zoning change to RA-2 (*see* RFP, p. 7), and specified that projects should "maximiz[e] the development envelope such as through modification of current zoning." *See* RFP, p. 19. The RFP also stated that "respondents should address the rehabilitation of the existing Hebrew Home" *See* RFP, p. 7. Therefore, the proposed Zoning Map amendment is fully consistent with the District's goals for redevelopment of the Subject Property.¹

Moreover, the proposed rezoning of the Subject Property is consistent with the surrounding neighborhood context. The neighborhood surrounding the Subject Property is primarily residential, with a variety of housing types and densities that include row dwellings, flats, and apartment homes on Georgia Avenue. Mixed use commercial and residential buildings are located along Georgia Avenue one block to the west of the Subject Property, with ground-floor retail uses and multi-family residential uses above. Thus, the proposed rezoning to the RA-2 District to support redevelopment of the Subject Property is consistent with the surrounding residential uses.

In addition, the proposed rezoning is consistent with FLUM designations for properties surrounding the Subject Property. As shown on Exhibit C, the FLUM designates surrounding properties in all directions of the Subject Property as Moderate Density Residential. **The Comprehensive Plan specifically references the RA-2 District as being consistent with the Moderate Density Residential category** in some locations. *See* 10A DCMR § 225.4.² In addition, the Commission has previously granted Zoning Map amendment applications to the R-5-B District (the RA-2 District under the 1958 Zoning Regulations) for properties designated Moderate Density Residential on the FLUM. *See* Z.C. Order No. 15-13, which rezoned property located at Square

¹ The District selected the Applicant's RFP proposal for redevelopment of the Subject Property, which includes the adaptive reuse of the Hebrew Home as an affordable senior living facility and the construction of a new mixed-income apartment home and eight new for-sale townhome style condominium dwellings. The housing proposed for the Subject Property will be reserved for a range of household incomes, with at least 80% reserved as affordable housing. The project contemplates the following housing mix: (i) 48 units at 30% of the Median Family Income ("MFI"); (ii) 70 units at 50% of the MFI; (iii) 30 units at 60% of the MFI; (iv) 2 units at 100% of the MFI; and (v) 37 units at market rate. The final unit mix will be subject to execution of a Land Disposition and Development Agreement ("LDDA") with the District of Columbia and Council approval, and will be enforced pursuant to recordation of an affordable housing covenant.

² 10A DCMR § 225.4 provides that the R-5-B District is consistent with the Moderate Density Residential category in some locations. Under the 2016 Zoning Regulations, the R-5-B District was converted to the RA-2 District.

1043, Lots 142, 849-851, and 859, and designated as Moderate Density Residential on the FLUM and a Neighborhood Conservation Area on the GPM, from the C-M-1 and R-4 Districts to the R-5-B District; *see also* Z.C. Order No. 15-33, which rezoned property located at Square 1043, Lots 128, 156, 157, 818, and 819, and designated as Moderate Density Residential on the FLUM and a Neighborhood Conservation Area on the GPM, from the C-M-1 District to the R-5-B District; *see also* Z.C. Order No. 13-09, which rezoned property located at Square 5877, Lot 22, and designated as Moderate Density Residential on the FLUM, from the R-3 District to the R-5-B and SP-1 Districts. Based on the foregoing, including previous Zoning Commission precedent, because the RA-2 District is specifically listed within the Moderate Density Residential category (the land use designation for the areas immediately surrounding the Subject Property), then the proposed Zoning Map amendment to the RA-2 District is not inconsistent with the Comprehensive Plan.

2. Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. 10A DCMR § 223.1. It highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow-up plans, to manage this change. *Id.* The GPM is intended to “guide land use decision-making in conjunction with the Comprehensive Plan text, the FLUM, and other Comprehensive Plan maps.” *Id.* at § 223.2. Boundaries on the map are to be interpreted in concert with these other sources, as well as the actual physical characteristics of each location shown. *Id.*

As indicated on Exhibit D, the GPM designates the Subject Property as a Neighborhood Conservation Area. The Comprehensive Plan’s Framework Element describes Neighborhood Conservation Areas as areas that “have very little vacant or underutilized land. They are primarily residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will be modest in scale and will consist primarily of scattered site infill housing, public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated.” 10A DCMR § 223.4. “The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas but they are small in scale. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map.” 10A DCMR § 223.5.

The proposed Zoning Map amendment is consistent with the objectives for Neighborhood Conservation Areas. The RA-2 District will support future redevelopment of the Subject Property, which is presently underutilized and includes the vacant Hebrew Home. The RA-2 zoning will allow the Petitioner to take advantage of the underutilized site by adaptively reusing the Hebrew Home as a multi-family building, which is not permitted under the existing RF-1 District. The RA-2 District will also support future residential development, which is consistent with the prevailing residential uses in the surrounding neighborhood. Indeed, the Neighborhood Conservation Area designation anticipates change to occur as residential use on infill sites, and supports reuse opportunities, as is the case here. Moreover, redevelopment of the Subject Property will enhance the established neighborhood by converting a vacant building and underutilized site to productive

residential use. Any other future development enabled by the proposed Zoning Map amendment at the Subject Property will be designed to be compatible with the existing scale and architecture of the surrounding neighborhood and will comply with all applicable RA-2 zoning requirements.

3. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District of Columbia. 10A DCMR § 300.1. Because the Land Use Element integrates the policies and objectives of all the other District Elements, “it should be given greater weight than the other elements as competing policies in different elements are balanced.” 10A DCMR § 300.3.

The District’s underlying goal of the Land Use Element is to:

[e]nsure the efficient use of land resources to meet the long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries. 10A DCMR § 302.1.

The proposed Zoning Map amendment will advance this important goal by complying with the policies listed below and set forth in the Land Use Element of the Comprehensive Plan.

- *Policy LU-1.3.2: Development Around Metrorail Stations - Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 10A DCMR § 306.11*

The proposed Zoning Map amendment will support new residential development around Metrorail stations. The Subject Property is located approximately 0.3 miles from the Georgia Avenue/Petworth Metrorail station and will be developed as an infill project on land that is currently poorly utilized and partially vacant. Due to its transit-oriented location, future development enabled by the Zoning Map amendment will minimize automobile use and maximize transit ridership.

- *Policy LU-1.3.3: Housing Around Metrorail Stations - Recognize the opportunity to build senior housing and more affordable “starter” housing for first-time homebuyers adjacent*

to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations. 10A DCMR § 306.12

Consistent with this Policy, the Zoning Map amendment will allow for additional density at the Subject Property that can be developed with new senior and affordable housing adjacent to the Georgia Avenue/Petworth Metrorail station. New development in this location will reduce the need to own a private vehicle and thus decrease overall household expenses for residents who are impacted the most.

- *Policy LU-1.4.1: Infill Development - Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. 10A DCMR § 307.5*

Future redevelopment of the Subject Property permitted by the proposed Zoning Map amendment will allow for infill development on land that is underutilized, partially vacant, and creates a gap in the surrounding residential urban fabric. New development will be consistent with the RA-2 District, which is a zone that allows for heights and densities that are consistent with the surrounding neighborhood and the FLUM and will complement the established character of the area. Future conversion of the existing Hebrew Home into the amount of affordable senior housing contemplated by the District as a result of the proposed Zoning Map Amendment will also prevent any sharp changes in the existing development patterns.

- *Policy LU-2.1.1: Variety of Neighborhood Types - Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. 10A DCMR § 309.5*

The proposed Zoning Map amendment will enable the development of a varied neighborhood with higher density development at the Subject Property incorporated into the existing context. Redevelopment of the Subject Property under the RA-2 District will not have negative impacts on the existing identity and character of the neighborhood because it will rehabilitate an existing vacant building, activate the site, provide much-needed new housing and affordable housing, and generally be a positive attribute that helps to improve the area.

- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods - Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful*

neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. 10A DCMR § 309.8

The proposed Zoning Map amendment will allow for increased housing supply, including affordable housing and senior housing, while simultaneously preserving the existing historic Hebrew Home and utilizing sustainability elements to help restore the environment, since any development on the Subject Property will have to comply with the District of Columbia’s Green Building Act of 2006 (D.C. Official Code §6-1451.01 *et seq.* (2012)) and the District’s stormwater management regulations (Title 21 DCMR, Chapter 5 and Title 20 DCMR, Chapter 31). Doing so will help to improve the Petworth neighborhood and create a successful neighborhood.

- *Policy LU-2.1.4: Rehabilitation Before Demolition - In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition. 10A DCMR § 309.9*
- *Policy LU-2.1.12: Reuse of Public Buildings - Rehabilitate vacant or outmoded public and semi-public buildings for continued use. Reuse plans should be compatible with their surroundings, and should limit the introduction of new uses that could adversely affect neighboring communities. 10A DCMR § 309.17*
- *Policy LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings - Reduce the number of vacant and abandoned buildings in the city through renovation, rehabilitation, and where necessary, demolition. Implement programs that encourage the owners of such buildings to sell or renovate them, and apply liens, fines, and other penalties for non-compliant properties. 10A DCMR § 310.4*

Consistent with the three above-referenced Policies, the Zoning Map amendment will enable future rehabilitation and adaptive reuse of the existing Hebrew Home, which is an underutilized, older public building. Under the current RF-1 District, redevelopment of the existing Hebrew Home into an apartment house with the amount of affordable housing contemplated by the District is not permitted as a matter-of-right. The reuse of the existing Hebrew Home is consistent with the District’s priority of reusing existing buildings rather than demolishing them, and incorporating those buildings as compatible uses and structures within their surroundings. Moreover, the vacant, former Paul Robeson School is also proposed to be demolished in order to develop new housing on the Subject Property. New residential uses on the Subject Property, enabled by the proposed Zoning Map amendment, will fit in with the existing residential neighborhood and will not create any adverse effects.

- *Policy LU-2.2.4: Neighborhood Beautification - Encourage projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of*

abandoned buildings, street and sidewalk repair, and park improvements. 10A DCMR § 310.5

As part of any redevelopment project enabled by the Zoning Map amendment, the public streetscape surrounding the Subject Property will be improved to meet the District Department of Transportation (“DDOT”) standards and will beautify the public space adjacent to the Subject Property.

- *Policy LU-2.3.7: Non-Conforming Institutional Uses - Carefully control and monitor institutional uses that do not conform to the underlying zoning to ensure their long-term compatibility. In the event such uses are sold or cease to operate as institutions, encourage conformance with existing zoning and continued compatibility with the neighborhood. 10A DCMR § 311.9*

Upon implementation of the proposed Zoning Map amendment, the existing institutional uses on the Subject Property will be adaptively reused and converted to residential use, thus ensuring that the Subject Property will conform to the underlying zoning to ensure its long-term compatibility with the surrounding residential neighborhood.

4. Housing Element

The District’s overarching goal for housing is to “[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia. 10A DCMR § 501.1. The proposed Zoning Map amendment will advance this goal and several policies within the Housing Element of the Comprehensive Plan as follows:

- *Policy H-1.1.1: Private Sector Support - Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 10A DCMR § 503.2*

Through the Zoning Map amendment, the Petitioner will be able to provide new housing and affordable housing to help meet the needs of present and future District residents. Under the existing RF-1 District, multi-family dwellings are not permitted, which stifles the ability to provide new moderate density housing and affordable housing at the Subject Property. The proposed location for new housing is consistent with the District’s land use goals, as noted above, as well as with related transportation goals, which encourage development surrounding public transportation options.

- *Policy H-1.1.3: Balanced Growth - Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. 10A DCMR § 503.4*

As stated above, the Zoning Map amendment will allow for the development of new housing on underutilized, vacant land. The proposed Zoning Map amendment, which is consistent with the FLUM, will help to ensure that the Subject Property is appropriately zoned to help the city meet its long-term housing needs, including the needs of seniors and low- and moderate-income households.

- *Policy H-1.1.5: Housing Quality - Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood. 10A DCMR § 503.6*

Any future affordable housing developed at the Subject Property, and enabled by the Zoning Map amendment, will be designed to meet the same high-quality standards required for the market-rate housing, and will be indistinguishable from the market rate housing in its exterior appearance. Upon the rezoning, the overall Subject Property will be able to be redeveloped to include open spaces and amenities available to residents living in the moderate density affordable and market-rate housing. These policy goals will be further prescribed in an affordable housing covenant against the Subject Property.

- *Policy H-1.2.1: Affordable Housing Production as a Civic Priority - Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. 10A DCMR § 504.6*
- *Policy H-1.2.3: Mixed Income Housing - Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. 10A DCMR § 504.8*

As previously stated, the proposed RA-2 District will allow for the future development of new affordable housing for low- and moderate-income households at the Subject Property, consistent with the Policies listed above. Additionally, future development at the Subject Property will be mixed-income, such that the affordable housing will not further concentrate poverty in areas that already have substantial affordable housing.

- *Policy H-1.2.4: Housing Affordability on Publicly Owned Sites - Require that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households. 10A DCMR § 504.11*

Consistent with this Policy, the Zoning Map amendment will foster the development of new affordable housing on publicly-owned land. Petitioner's proposed future development

of the Subject Property contemplates that 80% of the residential units will be affordable at various levels of affordability with a focus on low and moderate income households.

- *Policy H-1.2.5: Workforce Housing - In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, fire fighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city. 10A DCMR § 504.12*

The proposed RA-2 District will enable the development of affordable housing at the Subject Property, including moderate income housing that is affordable for individuals working in the public service professions with wages insufficient to otherwise afford market-rate housing.

- *Policy H-1.3.1: Housing for Families - Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. 10A DCMR § 505.6*
- *Policy H-1.3.2: Tenure Diversity - Encourage the production of both renter-occupied and owner-occupied housing. 10A DCMR § 505.7*

The RA-2 District will enable the future development of a range of housing types and tenures, including larger units for families, and both for-sale and for-rent units.

- *Policy H-1.3.3: Assisted Living and Skilled Nursing - Promote the development of assisted living and skilled nursing facilities. Zoning and health regulations should be designed to promote an increase in supply, security, and affordability of housing for the elderly. 10A DCMR § 505.8*
- *Policy H-4.1.1: Integration of Special Needs Housing - Integrate special needs housing units throughout the city rather than segregating them into neighborhoods that already have high concentrations of such housing. (10-A DCMR § 515.3)*
- *Policy H-4.2.2: Housing Choice for Seniors - Provide a wide variety of affordable housing choices for the District's seniors, taking into account the income range and health-care needs of this population. Recognize the coming growth in the senior population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority. Acknowledge and support the establishment of Senior Villages throughout the city that allow seniors to remain in their homes and age in-place. 10A DCMR § 516.8*
- *Policy H-4.2.3: Neighborhood-Based Senior Housing - Encourage the production of multi-family senior housing in those neighborhoods characterized by large numbers of seniors living alone in single family homes. This will enable senior residents to remain in their*

neighborhoods and reduce their home maintenance costs and obligations. 10A DCMR § 516.9.

Consistent with the District’s goals set forth in the Policies listed above, the RA-2 District will enable development of a variety of new affordable housing choices for seniors that meet universal design standards and can accommodate assisted living and nursing needs. Specifically, the Zoning Map amendment will allow for development of multi-family senior housing that will allow those seniors to remain in their neighborhoods while reducing home maintenance costs and obligations.

5. Transportation Element

The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.” 10A DCMR § 401.1.

The proposed Zoning Map amendment advances this goal by allowing for new residential development on property located one block away from a major District corridor and in close proximity to a Metrorail station and multiple Metrobus routes. New development at the Subject Property, improving 10th Street, NW and the surrounding streetscape and transit patterns, will enhance Georgia Avenue’s potential as a multi-modal transportation hub that meets the needs of District residents, the regional workforce, and visitors. Moreover, the new residential development permitted on the Subject Property as a result of the Zoning Map amendment will help to support the local economy and enhance the quality of life for District residents. The Zoning Map amendment also advances the specific policies listed below:

- *Policy T-1.1.4: Transit-Oriented Development - Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. 10A DCMR § 403.10*
- *Policy T-2.4.1: Pedestrian Network - Develop, maintain, and improve pedestrian facilities. Improve the city’s sidewalk system to form a network that links residents across the city. 10A DCMR § 410.5*

The Zoning Map amendment will support transit-oriented development by allowing for the construction of new housing within convenient walking distance of the Georgia Avenue/Petworth Metrorail station and multiple Metrobus routes that connect to all areas of the District. As part of redevelopment of the Subject Property according to the RA-2 zoning, the Petitioner will also update the streetscape surrounding the Subject Property to ensure that pedestrians have safe and convenient pathways to access the public transportation options.

- *Action T-1.1.B: Transportation Improvements - Require transportation demand management measures and transportation support facilities such as crosswalks, bus*

shelters, transit resource and information kiosks, and bicycle facilities in large development projects and major trip generators, including projects that go through the Planned Unit Development (PUD) Process. 10A DCMR § 403.14

- *Policy T-3.1.1: Transportation Demand Management (TDM) Programs - Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. 10A DCMR § 414.8*

If the Zoning Map amendment is granted, the Petitioner will be able to redevelop the Subject Property, which will involve collaboration with DDOT to ensure that appropriate Transportation Demand Management measures and transportation support facilities are implemented in connection with development of the Subject Property.

- *Action T-2.3.A: Bicycle Facilities - Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. 10A DCMR § 409.11*

Future redevelopment of the Subject Property will include both long- and short-term bicycle parking spaces.

6. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. 10A DCMR § 600.1. The overarching goal for environmental protection is to “[p]rotect, restore, and enhance the natural and man-made environment in the District of Columbia, taking steps to improve environmental quality, prevent and reduce pollution, and conserve the values and functions of the District's natural resources and ecosystems.” 10A DCMR § 601.1. The proposed Zoning Map amendment is consistent with this goal and with the following specific policies:

- *Policy E-1.1.1: Street Tree Planting and Maintenance - Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods. 10A DCMR § 603.4*
- *Policy E-1.1.2: Tree Requirements in New Development - Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. 10A DCMR § 603.5*

- *Policy E-1.1.3: Landscaping - Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. 10A DCMR § 603.6*

As part of redevelopment of the Subject Property under the RA-2 District, the Petitioner will ensure that new trees and landscaping are planted and maintained. All trees and landscaping located in public space will be provided in compliance with DDOT standards.

- *Policy E-2.2.1: Energy Efficiency - Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees. 10A DCMR § 610.3*
- *Policy E-2.2.4: Alternative Energy Sources - Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. 10A DCMR § 610.6*
- *Policy E-2.2.5: Energy Efficient Building and Site Planning - Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals. 10A DCMR § 610.7*
- *Policy E-3.1.1: Maximizing Permeable Surfaces - Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. 10A DCMR § 613.2*
- *Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff - Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. 10A DCMR § 613.3*
- *Policy E-3.1.3: Green Engineering - Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. 10A DCMR § 613.4*

- *Policy E-3.2.1: Support for Green Building - Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. 10A DCMR § 614.2.*

In accordance with the Policies listed above, future development of the Subject Property enabled by the Zoning Map amendment will incorporate energy-efficient systems to reduce energy use and provide alternative energy sources to contribute to the District’s energy efficiency goals. Redevelopment of the Subject Property will be required to comply with the Green Building Act and the District’s stormwater management regulations, and will be consistent with the Sustainable DC Plan. *See RFP*, pp. 9-10. The RFP also expressed a preference for projects exhibit a commitment to environmental performance beyond the requirements set forth in existing laws and regulations, including commitments to LEED certification at the Gold level or higher and/or a commitment to follow LEED v. 4, the newest version of the LEED rating system; and surpass basic LEED certification by designing to achieve net zero energy ready buildings, net zero energy and net zero waste, and the processing of stormwater and collection and reuse of rainwater and graywater onsite. *See RFP*, p. 10.

7. Historic Preservation Element

The Historic Preservation Element guides the protection, revitalization and preservation of the city’s valuable historic assets. 10A DCMR § 1000.1. The overarching goal for historic preservation is to “[p]reserve and enhance the unique cultural heritage, beauty, and identity of the District of Columbia by respecting the historic physical form of the city and the enduring value of its historic structures and places, recognizing their importance to the citizens of the District and the nation, and sharing mutual responsibilities for their protection and stewardship.” 10A DCMR § 1001.1. The proposed Zoning Map amendment will advance this goal and several policies within the Historic Preservation Element as follows:

- *Policy HP-2.1.1: Protection of District-Owned Properties - Sustain exemplary standards of stewardship for historic properties under District ownership or control. Use historic properties to the maximum extent feasible when adding new space for government activities, promote innovative new design, and ensure that rehabilitation adheres to the highest preservation standards. Properly maintain both designated and eligible historic properties and protect them from deterioration and inappropriate alteration. 10A DCMR § 1008.2*
- *Policy HP-2.1.2: Disposition of District-Owned Properties - Evaluate District-owned properties for historic potential before acting on disposition. When disposal of historic properties is appropriate, ensure their continued preservation through transfer to a suitable new steward under conditions that ensure their protection and reuse. 10A DCMR § 1008.3*

The Hebrew Home is listed in the D.C. Inventory of Historic Sites and the National Register of Historic Places. Accordingly, and in compliance with the above Policies, the proposed Zoning Map amendment will enable the Petitioner to adaptively reuse the

Hebrew Home for multi-family affordable housing for seniors, and utilize innovative new design techniques to ensure that the proposed rehabilitation of the Hebrew Home adheres to the highest preservation standards. Moreover, redevelopment of the Hebrew Home will also be subject to review and approval by the Historic Preservation Review Board (“HPRB”).

- *Policy HP-2.4.1: Rehabilitation of Historic Structures - Promote appropriate preservation of historic buildings through an effective design review process. Apply design guidelines without stifling creativity, and strive for an appropriate balance between restoration and adaptation as suitable for the particular historic environment. 10A DCMR § 1011.6*
- *Policy HP-2.4.2: Adaptation of Historic Properties for Current Use - Maintain historic properties in their original use to the greatest extent possible. If this is no longer feasible, encourage appropriate adaptive uses consistent with the character of the property. 10A DCMR § 1011.7*

Consistent with these Policies, the RA-2 District will enable the Petitioner to preserve and adaptively reuse the existing Hebrew Home, ensuring that the historic qualities are maintained and upgraded. The Hebrew Home was originally used as a nursing home, and was later converted to a community health center. Future redevelopment of the Hebrew Home as senior housing is generally consistent with the building’s originally-intended use.

- *Policy HP-2.4.3: Compatible Development - Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, preserve the established form of development as evidenced by lot coverage limitations, yard requirements open space, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, repair, maintenance, and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail. 10A DCMR § 1011.8*
- *Policy HP-2.4.4: Suitability to the Historic Context - Apply design standards in a manner that accounts for different levels of historic significance and different types of historic environments. Encourage restoration of historic landmarks while allowing enhancements of equivalent design quality, provided such enhancements do not damage the landmark. Exercise greater restraint in residential historic districts and areas with a clear prevailing development pattern or architectural style. Allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more dramatic new design, for example, in non-residential areas and in areas without a significant design pattern. 10A DCMR § 1011.9*

In compliance with these Policies, the RA-2 District will allow for the renovation of the Hebrew Home into a multi-family building, enabling the building’s historic features to be preserved and allowing for compatible new infill development adjacent to the building on the Subject Property. Any and all new improvements will be in scale with and respect the

historic context of the Hebrew Home building through sensitive siting and design and appropriate use of materials.

- *Policy HP-2.4.5: Protecting Historic Building Integrity - Protect historic buildings from demolition whenever possible, and protect the integrity of whole buildings. Discourage treatments like facadism or relocation of historic buildings, allowing them only when there is no feasible alternative for preservation, and only after a finding that the treatment is necessary in the public interest. Waivers or administrative flexibility should be provided in the application of building and related codes to permit maximum preservation and protection of historic resources while ensuring the health and safety of the public. 10A DCMR § 1011.10*

The proposed Zoning Map amendment will facilitate development that adaptively reuses and renovates the existing Hebrew Home rather than demolishes it. In doing so, the Petitioner will protect the integrity of the entire building, with the final scope of work to be reviewed and approved by HPRB.

8. Rock Creek East Area Element

The Subject Property is located within the Rock Creek East Area Element of the Comprehensive Plan. The Rock Creek East Planning Area encompasses the 7.4 square miles located east of Rock Creek Park, north of Spring Road NW, and west of North Capitol Street and Riggs Road. 10A DCMR § 2200.1. Rock Creek East is an attractive residential community containing many stable low and moderate density neighborhoods. 10A DCMR § 2200.2. Georgia Avenue is the commercial heart of this Planning Area, with local shops that serve the adjacent neighborhoods. 10A DCMR § 2200.3. Rock Creek East is served by two major transit hubs—the Takoma and Georgia Avenue/Petworth Metrorail stations. 10A DCMR § 2200.4.

As part of development of the Comprehensive Plan, the District held workshops to gain insight from residents on neighborhood planning issues. At those meetings, the Rock Creek East community indicated that “[w]hile protecting established neighborhoods is a priority, Rock Creek East also recognizes the need to provide a variety of housing choices. This community has always taken pride in the fact that it is economically integrated, with housing options for seniors, lower income households, young professionals, middle class families, and persons with special needs, as well as affluent households.” 10A DCMR § 2207.2(b). The community also indicated that the “important historic resources in the Planning Area should be recognized and protected.” 10A DCMR § 2207.2(i).

In accordance with these priorities and the District’s overarching goal for Rock Creek East, the proposed Zoning Map amendment is consistent with the following specific policies:

- *Policy RCE-1.1.1: Conservation of Low Density Neighborhoods - Maintain and conserve the attractive, stable neighborhoods of the Rock Creek East Planning Area. Any new development in the Planning Area should be attractively designed and should contribute to the community’s positive physical identity. 10A DCMR § 2208.2*

Consistent with this Policy, the Zoning Map amendment will permit the Petitioner to reuse the existing Hebrew Home as an apartment house and construct new improvements that are attractively designed, appropriate within the context of the surrounding residential neighborhood, and contribute to the community's physical appearance.

- *Policy RCE-1.1.3: Directing Growth - Concentrate economic development activity and employment growth in Rock Creek East around the Georgia Avenue/Petworth Metrorail and Takoma station areas, along the Georgia Avenue corridor, along Kennedy Street, and on 14th Street NW between Allison and Decatur Streets. Provide improved pedestrian, transit, and bicycle access to these areas, and improve their visual and urban design qualities in order to create a unique destination for the local community to enjoy. 10A DCMR § 2208.4*

The Zoning Map amendment will foster economic development and employment growth in close proximity to the Georgia Avenue/Petworth Metrorail station and the Georgia Avenue corridor by bringing new residents to the Subject Property. As part of future redevelopment of the Subject Property under the RA-2 zoning, the Petitioner will work with DDOT during the permitting process to incorporate improved pedestrian and bicycle facilities.

- *Policy RCE-1.1.6: Development of New Housing - Encourage the retention of existing subsidized housing units within the Rock Creek East Planning Area, along with other measures to increase housing choices and improve housing affordability for area residents. **This should include the production of new mixed income housing** along Georgia Avenue, and the encouragement of mixed income housing in the industrially zoned area west of Georgia Avenue between Upshur and Shepherd, and **on District-owned land along Spring Road near the Petworth Metro Station. A particular emphasis should be placed on providing low cost affordable housing for seniors.** 10A DCMR § 2208.7 (emphasis added)*

Consistent with this Policy, the proposed Zoning Map amendment will enable increased housing options and improve housing affordability for Rock Creek East residents. Specifically, the Zoning Map amendment will enable development of new mixed-income and senior housing on District-owned land along Spring Road near the Georgia Avenue/Petworth Metrorail station with an emphasis on affordable housing for seniors.

B. District Housing Studies

In addition to being not inconsistent with the Comprehensive Plan, the proposed Zoning Map amendment to the RA-2 District will also advance many of the policies set forth in other District housing studies and reports, since it will support future higher density residential development, including affordable housing and senior housing, at a site that would otherwise not be able to construct more than two dwelling units per record lot.

For example, the proposed Map Amendment is consistent with the comprehensive housing strategy developed by the District in 2006, entitled "Homes for an Inclusive City," (the "Housing

Strategy”).³ The Housing Strategy recommends a variety of policies and actions to preserve and create mixed-income housing throughout the District. One primary recommendation from the Housing Strategy is for the District to “support a balanced growth policy which allows for increased population densities and mixed-income, mixed-use development along major corridors and transit stops.” *See* Housing Strategy, p. 2. The Housing Strategy notes that the District’s booming rental market has hit the elderly especially hard, and that low income elderly are in special need of affordable shelter. *See* Housing Strategy, p. 16. Consistent with these goals, the RA-2 District will allow for increased densities relative to the RF-1 District, and will support development of multi-family mixed-income housing in close proximity to public transportation. Moreover, the Zoning Map amendment will permit redevelopment of the Hebrew Home, which is proposed to be redeveloped with affordable senior housing.

The height, density, and number of dwelling units permitted in the RA-2 District is consistent with the District report “Bridges to Opportunity: A New Housing Strategy for D.C.” (“Bridges to Opportunity”), published in 2013, which builds upon the work of the Housing Strategy to encourage even more housing choices that are affordable across the spectrum of incomes.⁴ *See* Bridges to Opportunity, p. 5. The Bridges to Opportunity report encourages the production of both affordable and market-rate housing to reduce pressure on the supply and demand sides of the affordable housing equation and to create a more balanced and stronger affordable housing landscape. *Id.* at 6. Consistent with this goal, the Zoning Map amendment will enable greater residential density and new affordable and market rate housing. Increasing the overall number of residential units in the District will help to reduce pressure on supply and demand for affordable housing to District residents.

C. Health, Safety, and General Welfare

The proposed Zoning Map amendment would further the public health, safety, and general welfare of the District of Columbia. The requested rezoning to the RA-2 District will provide for the redevelopment of a vacant and underutilized site that will put the Subject Property back to productive use and contribute to the ongoing revitalization of the Petworth neighborhood and the Georgia Avenue corridor in a manner that is compatible with surrounding development. By permitting moderate density development at the Subject Property, the proposed Zoning Map amendment will protect the health and safety of District residents by rehabilitating a vacant building with an active use that will provide new housing and affordable housing and generate additional activity in the neighborhood. The Zoning Map amendment will also promote the general welfare through the jobs created as a result of the redevelopment of the Subject Property, both short-term and long-term, and through new revenue for the District government generated by individual income tax, property tax, and sales taxes.

D. No Adverse Consequences

The Zoning Map amendment will not result in the overcrowding of land or the undue concentration or population, nor will it have any significant adverse impacts on traffic congestion in the surrounding area. The Zoning Map amendment will allow redevelopment of an underutilized

³ Available at https://www.brookings.edu/wp-content/uploads/2016/06/housingstrategy_fullreport.pdf

⁴ Available at <http://www.cohho.org/wp-content/uploads/2014/01/DC-Housing-Taskforce-2013-Strategy.pdf>

site one block away from one of the District’s designated “Great Streets” and in close proximity to Metrorail and Metrobus.⁵ It will return a vacant property to active, productive use, thereby enhancing the quality of the entire community and increasing revenue for the District. The Zoning Map amendment will not generate any negative external effects, but will instead promote the efficient use of high-value land in a manner that will, among other things, enhance the city’s affordable housing stock and preservation of historic assets.

E. Proposed RA-2 Zone Would Create Favorable Conditions

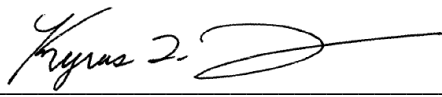
As discussed above, the proposed Zoning Map amendment will advance a number of policies embodied in the various elements of the Comprehensive Plan, and will enable development that promotes the recommendations of the District-issued RFP for the Subject Property. The Zoning Map amendment will not generate any negative external effects, but will instead promote the efficient use of high-value land in a manner that will, among other things, enhance the city’s affordable housing stock and preservation of historic assets.

VI.
CONCLUSION

For all of the reasons stated herein, the Petitioner submits that the proposed rezoning of the Subject Property from the RF-1 District to the RA-2 District meets all of the requirements for an amendment to the 2016 Zoning Map. The proposed Zoning Map amendment is consistent with the District's plans and policies for the Subject Property. Furthermore, the proposed rezoning is not inconsistent with the Comprehensive Plan and will further each of the specific objectives set forth in the Zoning Act. Moreover, the rezoning is fully consistent with the District’s development goals for the Subject Property as set forth in the RFP. Accordingly, the Petitioner respectfully requests that the Commission schedule a public hearing on this petition and grant the requested Zoning Map amendment.

Respectfully submitted,

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⁵ The District’s Great Street program is a multi-agency and multi-year commercial revitalization initiative to transform emerging corridors into thriving and inviting neighborhood centers. The program utilizes public actions and resources to leverage private investment in retail, office space, housing, and cultural facilities across the District. For more information visit <https://greatstreets.dc.gov/>