

OP Preliminary Report

TO: District of Columbia Zoning Commission

FROM: Crystal Myers, Project Manager
JLS
Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: May 21, 2020

SUBJECT: Preliminary Report for Zoning Commission Case No. 20-09, Consolidated Planned Unit Development and Related Map Amendment from R-3 to RA-2 at 2419 25th St. SE.

I. RECOMMENDATION

The Office of Planning (OP) recommends that the Zoning Commission **set down** the application by Wagner, LLC for a consolidated Planned Unit Development (PUD) with a PUD-related map amendment from R-3 to RA-2 to construct a 67-unit all affordable senior housing building on a vacant lot at 2419 25th St. SE. On balance, the proposal would not be inconsistent with the Comprehensive Plan.

II. AREA DESCRIPTION

Address: 2419 25th St. SE

Ward, ANC: Ward 8; ANC 8B

Comprehensive Plan Area: Far Southeast/Southwest Area Element

General Context and Site Description:

The vacant site is on the southwest corner of Wagner St, SE and 25th St, SE and directly across the street from Stanton Elementary School. On its southern and western sides, the site is surrounded by the Transitional Care Center's rehabilitation center building and dialysis center building. There are detached single-family houses further to the west of the site. Across Wagner St, SE to the north of the site are single-family detached houses and three-story multifamily buildings.

The site is approximately two blocks away from the Good Hope Marketplace, which is an existing shopping center with a grocery store. It is also 0.2 miles away from the Skyland PUD, (ZC 09-03), which is a mixed-use development that is currently under construction. The site is 0.9 miles from the Naylor Rd Metro station and there are several bus routes with a stop directly adjacent to the site.

III. SITE DESCRIPTION

Legal Description: Square 5740 Lot 337

Property Size: 19,601 square feet

Current Zoning: R-3

Existing Use of Property:

The site is vacant. It was originally part of the adjacent Transitional Care Center property. It was subdivided from the property in 2004.

Location Map:



IV. PROJECT DESCRIPTION

Applicant: Wagner, LLC

Proposed Zoning: Rezone from R-3 to RA-2 Zone

Proposed Use of Property: The proposal is for a 67-unit affordable senior housing building. All the units would be for residents with an income up to 60% median family income (MFI). After a minimum of 40 years 12% of the building would be dedicated to the inclusionary zoning (IZ) program at 60% MFI and the rest would convert to market rate.

	Proposal
Building Height (ft.)	55ft
FAR	2.59
Residential Units	67 units

The unit mix would be 6 studios, 58 one-bedrooms, and 3 two-bedrooms. Their sizes would range from approx. 445 sq.ft for a studio to 733 sq. ft. for a two bedroom.

The building would have a traditional architectural design and would relate to the context and scale of the surrounding neighborhood. Its height and massing would step down from 5 stories to 4 stories between its higher density institutional neighbors to its lower density residential neighbors.

The site has access to a variety of transportation options. It is well-located adjacent to bus stops for various metro bus routes and the project includes a small parking lot with four parking spaces, a car share space, and bicycle racks. Long term bicycle parking would be inside the building.

The proposal would add landscaping and pedestrian improvements to the site. A sidewalk would be added to the site along Wagner St. SE and connection with the existing crosswalk at the Wagner St SE and 25th St SE intersection. This would provide a safer pedestrian experience on the site. Ornamental street trees, shrubs, and perennials would be added to provide the site with an attractive and inviting appearance.

PLANNING CONTEXT

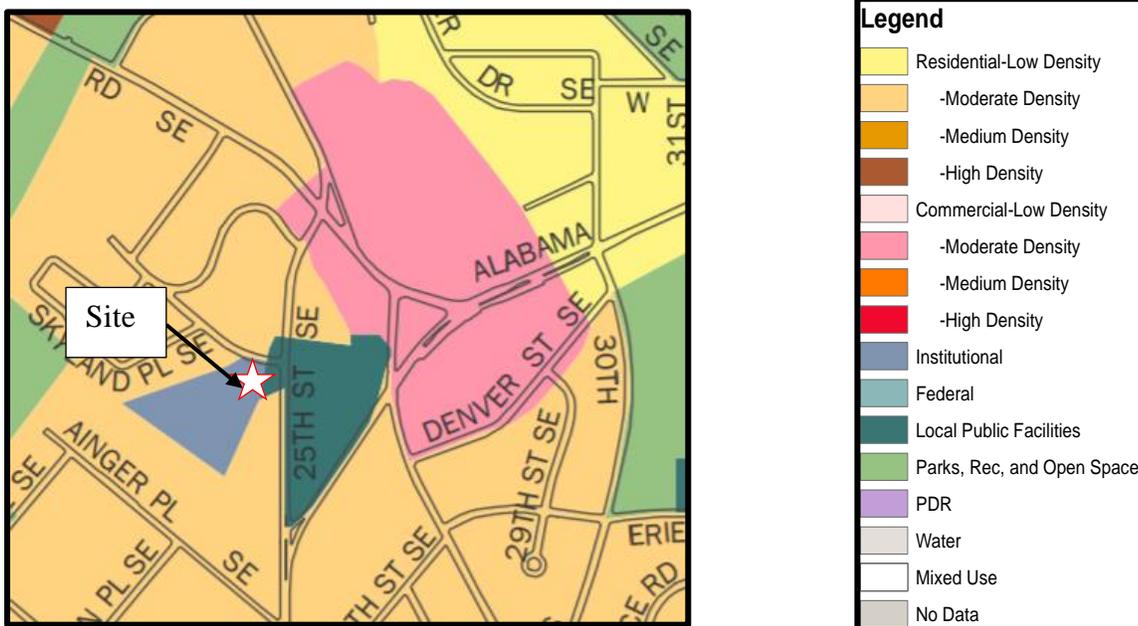
A. COMPREHENSIVE PLAN MAPS

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226, Attachment III), the maps are intended to provide generalized guidelines for development decisions. They are to be “interpreted broadly” and are not parcel-specific like zoning maps; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development’s physical characteristics including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

As described below, the proposed PUD and map amendment would be not inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for local public facilities and institutional uses. The surrounding area is designated for moderate density residential development.



Local Public Facilities: This designation includes 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. 225.15

Institutional: This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. Smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. 225.16

Moderate Density Residential: This designation is used to define the District’s row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 225.4

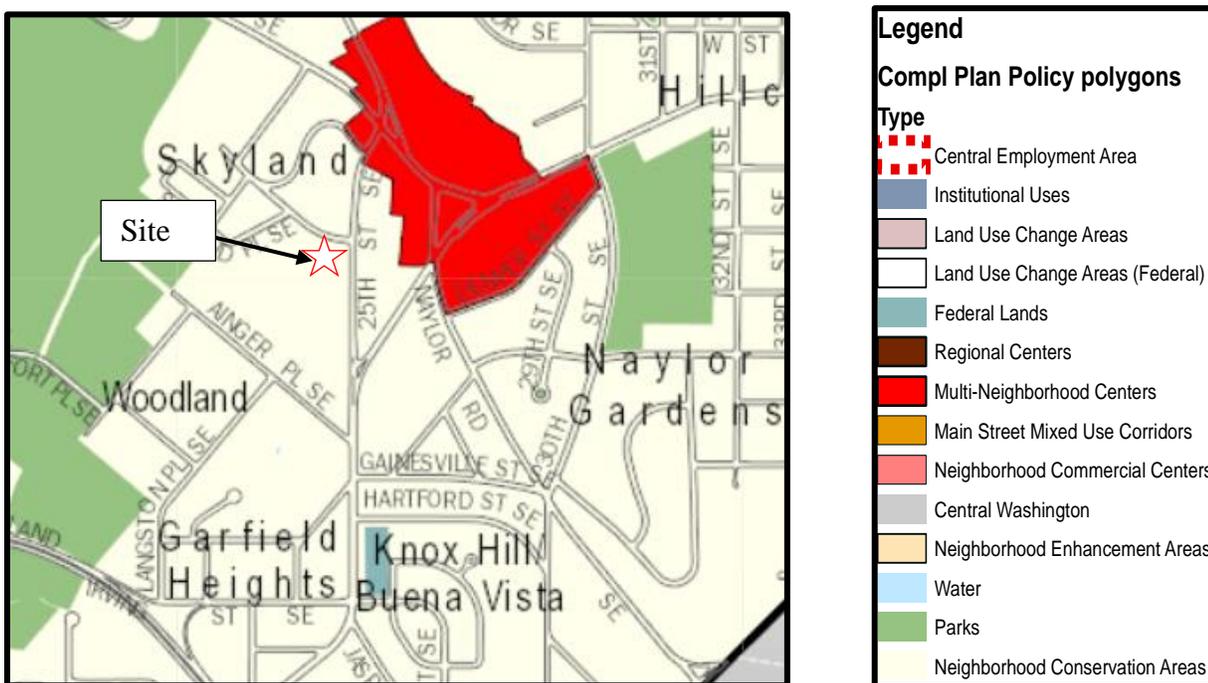
The site is designated as local public facility or institutional use on the FLUM. Originally, the site was part of the Transitional Care Center Capitol City property, which is an institutional use, but it was subdivided in 2004. The site is no longer associated with an institutional use and has not been developed. The FLUM designates the area surrounding the site as moderate density residential. The proposed RA-2 zone for the site would be consistent with this designation and the proposed residential building would be in character with the neighboring developments.

The Framework Element of the Comprehensive Plan addresses the situation when there is a change in use of an institutional or local public sites:

- h. The Map does not show density or intensity on institutional and local public sites. 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.*

Generalized Policy Map

The Generalized Policy Map indicates that the site is located within a Neighborhood Conservation Area.



Neighborhood Conservation areas 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. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided 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 proposal would not be inconsistent with the site's Neighborhood Conservation area designation on the General Policy Map. As a vacant site, it is an ideal location for a neighborhood development in a neighborhood conservation area. Development the site with this proposed residential building would strengthen the neighborhood. Its design would be compatible with the character of the surrounding mixed-use neighborhood.

B. COMPREHENSIVE PLAN WRITTEN ELEMENTS

Citywide Elements of the Comprehensive Plan

The proposed development is not inconsistent with the following policies of the Citywide Elements of the Comprehensive Plan:

Chapter 3 Land Use

The Land Use Chapter provides the general policy guidance on land use issues across the District.

Policy LU-1.3.4: Design To Encourage Transit Use: *Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots. 306.13*

Policy LU-1.4.2: Long-Term Vacant Sites: *Facilitate the reuse of vacant lots that have historically been difficult to develop due to infrastructure or access problems, inadequate lot dimensions, fragmented or absentee ownership, or other constraints. Explore lot consolidation, acquisition, and other measures which would address these constraints. 307.6*

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 309.8.*

Policy LU-2.1.8: Zoning of Low and Moderate Density Neighborhoods: *Discourage the zoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through R-4) for multifamily apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood. 309.13*

Policy LU-2.1.11: Residential Parking Requirements: *Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. 309.16*

Policy LU-2.2.4: Neighborhood Beautification: Encourage projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. 310.5

Though the proposed residential building is different than the FLUM's designated use for the site, a residential building would be appropriate in this location and not inconsistent with the policy guidance of the Land Use Element. This proposal would allow for a moderate density residential building on a vacant lot in a moderate density residential neighborhood. Locating a residential building for seniors in this mixed use and transit accessible location is an efficient use of land. Its location immediately adjacent to the Transitional Care Center rehabilitation center would also allow seniors to be close to medical resources if necessary. Additionally, the proposal's plan to develop a long-time vacant site with an attractive affordable residential building would contribute to advancing and beautifying the neighborhood.

Chapter 4 Transportation

The Transportation Element provides policies and actions to maintain and improve the District's transportation system and enhance the travel choices of current and future residents, visitors and workers.

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. 403.10

Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning: Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks. 409.8

Policy T-2.3.3: Bicycle Safety: Increase bicycle safety through traffic calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improving bicycle access where barriers to bicycle travel now exist. 409.10

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. 410.5

Policy T-2.4.2: Pedestrian Safety: Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals. 410.6

Policy T-2.6.1: Special Needs: Address the transportation needs of all District residents, including those with special physical requirements and trip needs, such as access to medical centers or senior centers. 412.2

Policy T-2.6.2: Transit Needs: Establish, expand, or continue assistance for transit-dependent groups in the District, including the elderly, students, school age children, and persons whose situations require special services, including the homeless. 412.3

The proposal complies with many of the Comprehensive Plan's transportation policies. It provides multiple transportation options for senior residents. The location is along many Metrobus routes and

is a short walking distance from neighborhood-serving retail. The proposal would improve the area's pedestrian network and safety by providing a sidewalk along Wagner ST. NE and connecting it to the crosswalk at the Wagner St SE and 25th SE intersection. The proposal would also provide vehicle spaces, a car share space, and bicycle parking on-site.

Chapter 5 Housing

The Housing Element describes the importance of housing to neighborhood quality in the District of Columbia and the importance of providing housing opportunities for all segments of our population.

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 503.3.*

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 503.6.*

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 504.6.*

Policy H-1.2.2: Production Targets: *Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the areawide median income (AMI). Newly produced affordable units should be targeted towards low-income households in proportions roughly equivalent to the proportions... 504.7*

Policy H-1.2.7: Density Bonuses for Affordable Housing: *Provide zoning incentives to developers proposing to build low- and moderate-income housing. Affordable housing shall be considered a public benefit for the purposes of granting density bonuses when new development is proposed. Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood. 504.14*

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. 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. 516.9*

The proposal would be consistent with the Housing Element policies. The proposal is for an attractive, well-designed 67-unit senior housing building on a lot that is currently vacant. All of the units would be affordable at 60% MFI so the project would be providing more affordable housing than required. This vacant site is near transit and neighborhood commercial uses, so it is an appropriate location for new housing.

Chapter 6 Environmental Protection

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources.

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 603.4.*

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 603.6.*

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. 610.3*

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 613.3.*

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. 614.2*

Policy E-4.1.3: Evaluating Development Impacts On Air Quality: *Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. 618.8*

The proposal would not be inconsistent with the Environmental Protection Element policies. The project is designed to Enterprise Green Communities standards and aims to achieve a level equivalent to LEED silver. It includes using energy efficient systems and materials, alternative energy sources, and stormwater runoff reduction methods. The proposal also has a landscaping plan that proposes new street trees, native species, ground cover, and bioretention areas.

Chapter 9 Urban Design

The Urban Design Element addresses the District's physical design and visual qualities.

Policy UD-2.2.4: Transitions in Building Intensity: *Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent*

buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. 910.11

Policy UD-2.2.5: Creating Attractive Facades: *Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street... 910.12*

Policy UD-3.1.1: Improving Streetscape Design: *Improve the appearance and identity of the District's streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street "furniture", and adjacent building facades. 913.8*

Policy UD-3.1.5: Streetscape and Mobility: *Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Transit shelters, benches, bicycle parking, safe pedestrian connections, and clear wayfinding signage should be provided to facilitate multi-modal travel. 913.12*

Policy UD-3.1.11: Private Sector Streetscape Improvements: *As appropriate and necessary, require streetscape improvements by the private sector in conjunction with development or renovation of adjacent properties. 913.18*

The proposal would not be inconsistent with the policies of the Urban Design Element. The site is adjacent to the large-scale Transitional Care Center rehabilitation building and lower-scale residential developments. The proposed design has the building serving as a transition between the two. It would gradually step down its height and massing between them. The proposed design uses varied forms, façade variations, and setbacks to provide a building that fits into the context of the immediate neighborhood.

The proposed landscape and streetscape improvement would improve the attractiveness of the site for both residents and pedestrians. The proposal includes significant improvements to the pedestrian environment along the site by providing benches, bike racks, and a new sidewalk on Wagner ST SE that would connect to the existing crosswalk on 25th ST SE. The proposed landscaping improvement in the public space, which include street trees, ornamental trees, shrubs, perennials, and lawn would help to soften and frame the building's façade which would contribute to the pedestrian experience. The proposed on-site landscaping, which includes ornamental trees, foundation plantings, evergreens, and shade trees would provide an attractive environment for residents.

Far Southeast/Southwest Area Element

The site is located within the Far Southeast/Southwest Area Element of the Comprehensive Plan. The proposal would particularly further the following Area Element statements and policy objective:

Policy FSS-1.1.4: Infill Housing Development: *Support infill housing development on vacant sites within the Far Southeast/Southwest, especially in Historic Anacostia, and in the Hillside, Fort Stanton, Bellevue, Congress Heights and Washington Highlands neighborhoods. 1808.5*

The proposed development would not be inconsistent with the Far Southeast/Southwest Area Element's guidance. The Far Southeast/Southwest Area Element encourages new development to occur on vacant

sites and in mixed use and transit-oriented areas. The proposal is for a housing development on a vacant lot in a mixed-use area well served by transit.

C. MAYOR’S HOUSING INITIATIVE

In 2019, Mayor Bowser set a goal for the District to achieve 36,000 new housing units by 2025 and a minimum of 12,000 units dedicated to affordable housing. The Mayor’s Order notes that a variety of housing types are needed to meet this goal and specifically notes a need for senior housing. As stated on page2 of the Mayor’s Order, *The District must also plan for a variety of housing types, including units for large and/or multigenerational families, seniors, and persons with disabilities.*

The proposal would help the District meet this goal by providing 67 new affordable senior housing units to the District.

D. SUMMARY OF PLANNING CONTEXT ANALYSIS

On balance, the proposal would not be inconsistent with the Comprehensive Plan and would further the District’s efforts towards meeting its housing goals. It would provide affordable senior housing in a mixed-use transit-oriented location. It would also help to revitalize the surrounding neighborhood by developing a longtime vacant lot with an attractive building and by making significant streetscape and pedestrian improvements.

V. ZONING ANALYSIS

The site is currently zoned R-3; the applicant is requesting a PUD-related zoning map amendment to the RA-2 zone, which is not inconsistent with the Comprehensive Plan. Below is a table comparing the existing and proposed zone to the proposal:

Zoning Comparison Table

	Existing Zone R-3 Matter of Right	Proposed Zone RA-2 PUD:	Proposal	Flexibility
Minimum Land Area (PUD) X § 301.1	Not applicable	1-acre min. (43,560 sq.ft.)	0.45-acres 19,601 sq. ft.	Yes
Height (ft.) D § 303.1/F§ 303.1 X § 303.7	40 ft./3 stories max.	60 ft. max.	55ft.	No

	Existing Zone R-3 Matter of Right	Proposed Zone RA-2 PUD:	Proposal	Flexibility
Penthouse F § 303.2	12 ft./1 story	12 ft./1 story max. (habitable space)	6 ft elevator overrun	No
		15 ft./2 nd story permitted for penthouse mechanical space		
FAR F § 302.1/ X §§ 303.3 & 303.4	N/A	1.8 – base FAR 20% IZ bonus = 0.36 20% PUD bonus = 0.432 Total FAR = 2.59 max.	2.59 FAR	No
Lot Occupancy D§ 304.1/F§ 304.1	40 % max.	60 % max.	53 %	No
Rear Yard D§ 306.2/F § 305.1	20 ft. min.	4 in. per 1 ft. of building height but not less than 15 ft. (18 ft)	43ft 8in	No
Side Yard F § 306.2	N/A	None required; if side yard is provided than no less than 4 ft.	10 ft.	No
Parking C §§ 701.5 & 702.	1 per 6 dwelling (public assisted housing) units and 50% reduction because site is located within 0.25 mi. of Priority Metrobus stop= 6 spaces	1 per 6 dwelling (public assisted housing) units and 50% reduction because site is located within 0.25 mi. of Priority Metrobus stop= 6 spaces	4 spaces 1 car share (equivalent to 3 spaces) 7 total spaces	No
Bicycle Parking C § 802	N/A	Long Term: 1 space per 3 dwelling units min. (22 spaces req.)	22 long-term bicycle spaces	No
		Short Term: 1 space per 20 dwelling units min. (3 spaces req.)	3 short-term bicycle spaces	
Loading Requirements C § 901.1	Minimum of 1 Loading berth required for residential buildings with 50 or more units	Minimum of 1 Loading berth required for residential buildings with 50 or more units	None Provided	Yes
	Minimum of 1 service/delivery space required for residential buildings with 50 or more units	Minimum of 1 service/delivery space required for residential buildings with 50 or more units	1 service/delivery space provided	No

	Existing Zone R-3 Matter of Right	Proposed Zone RA-2 PUD:	Proposal	Flexibility
Green Area Ratio F § 307.1	N/A	0.4 min.	0.4	No
Driveway Access Requirements C § 711.6	A driveway within 20 ft. of a street lot line must be 20 ft. wide for two-way traffic	A driveway within 20 ft. of a street lot line must be 20 ft. wide for two-way traffic	Driveway at its narrowest width is 12ft.	Yes
Use U § 201 U § 401	Detached, Semidetached, Attached row dwellings	Detached, Semidetached, Attached row dwellings, Apartment buildings	Apartment building	No

Intent of R-3 Zone: Subtitle D § 300 states:

300.6 The purpose of the R-3 zone is to allow for row dwellings, while including areas within which row dwellings are mingled with detached dwellings, semi-detached dwellings, and groups of three (3) or more row dwellings.

300.7 The R-3 zone is intended to permit attached rowhouses on small lots.

Intent of RA-2 Zone: Subtitle G, § 400 states:

300.3 The RA-2 zone provides for areas developed with predominantly moderate density residential.

Both R-3 and RA-2 provide for moderate density residential development, but R-3 is intended for row dwellings. The proposed PUD-related RA-2 zone would allow the project to provide a multifamily building on the site with more height and density than allowed under R-3.

VI. REQUESTED ZONING FLEXIBILITY

Requested Flexibility:

The proposed PUD requests the following flexibility:

1. Flexibility from the Minimum PUD Land Area Requirement

The minimum land area for a PUD in the RA-2 zone is 43,560 sq.ft (1 ac) but X § 301.2 allows the Zoning Commission to waive the minimum requirement to no less than 50 percent of the minimum land area. At 19,601 sq.ft. the site’s land area is less than half the minimum land area required so the proposal requires both a waiver and variance relief.

2. Flexibility from the Loading Berth Requirement and Driveway Width Requirements

Loading Berth Requirement

According to C§ 901.1 both a 30-ft loading berth and a 20-ft service delivery space are required. The proposal includes a request for flexibility from this requirement so that only the 20-ft delivery space would be provided.

Driveway Width Requirement

C§ 711.6 requires a 20 ft. width for driveways within 20 ft of a street line. The project is requesting flexibility to propose a 12-ft wide driveway along Wagner ST SE.

3. Additional Flexibility: The applicant also requests flexibility to:

- Provide a range in the number of residential unit (+/- 10%);
- Vary the sustainable features of the Project, provided that the number of points achieved does not decrease below Enterprise Green Communities standards specified by the Order;
- Vary the location of the design of interior components...but no change to exterior configuration of the building;
- Vary the final selection of the exterior materials within the color ranges and material types as proposed, based on availability at the time of construction;
- Vary the parking layout, and the number, location, and arrangement of vehicular parking spaces...without reducing the amount of parking required by the Zoning Regulations;
- Vary the loading configuration so long as the number and size of the provided loading facilities do not decrease below the approved amount in the Order;
- Vary the location, attributes and general design of the streetscape incorporated in the Project to comply with the requirements of and the approval by the DDOT Public Space Division;
- Vary minor refinement to the locations and dimensions of exterior details that do not substantially alter the exterior design shown on the approved Plans...;
- Vary color, font, and message of the proposed signage without changes to the maximum overall dimensions and signage materials from those shown on the approved Plans.

OP will provide detailed analysis of requested flexibility prior to a public hearing.

PUD EVALUATION STANDARDS

The Zoning Regulations define a Planned Unit Development (PUD) as “*a plan for the development of residential, institutional, and commercial developments, industrial parks, urban renewal projects, or a combination of these, on land of a minimum area in one (1) or more zones irrespective of restrictions imposed by the general provisions of the Zoning Regulations, as more specifically set forth in Subtitle X,*

Chapter 3.” (Subtitle B-28). The purpose and general standards for a Planned Unit Development are established in Subtitle X 300:

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

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

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

Public Benefits and Amenities:

Chapter X Section 305.2 states that “*public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title.*”

Subtitle X § 305.5 provides a summary of categories for PUD benefits and amenities. While the final benefits amenities proffer is typically refined and resolved later in the PUD process, at this point, the applicant has proffered the following (refer to Exhibit 3, pages 24 -27) for the proposed PUD:

a) Superior urban design and architecture

The proposed design would gradually step down the building’s height and massing to fit into the context of the immediate neighborhood. The design includes façade articulations, projections, and balconies.

b) Superior landscaping, or creation or preservation of open spaces

The proposed on-site landscaping includes ornamental trees, foundation plantings, evergreens, and shade trees. The project is also proposing improvements in the public space area, which would be subject to Public Space Committee approval. These improvements include benches, bike racks, and a new sidewalk on Wagner St. SE. Street trees, ornamental trees, shrubs, perennials, and lawn would also be added.

c) Site planning and efficient and economical land utilization

The vacant site would be developed with an all affordable senior housing building. The development would take advantage of the site’s transit-oriented location in a mixed-use neighborhood. It would allow residents to age in place.

d) Housing that exceeds the amount required through matter-of-right and includes seniors

The proposal is for a 67-unit senior housing building, so it would provide more housing units than required as a matter of right.

e) Affordable housing that exceeds the requirement

The proposal is for 67 all-affordable dwelling units so all of its 50,733 sq.ft. would be dedicated to affordable housing. This would exceed the inclusionary zoning requirement. If the site were developed as a matter of right under the R-3 zone it would have been required to dedicate approximately 3,528 sq. ft. of its 35, 282 sq.ft. to fulfill its 10% inclusionary zoning requirement. All the units would remain affordable for a minimum of 40 years. Afterwards a minimum of 12% of the building's gross floor area would be dedicated to inclusionary zoning units at 60% MFI.

f) Environmental and sustainable benefits.

The proposal offers its environmental and sustainability improvements as public benefits. The project would achieve Enterprise Green Communities certification and incorporate sustainable design features. OP believes these offerings are sufficient for the District's development requirements but not to be considered public benefits. The project intends to reach an Enterprise certification level comparable to LEED silver. This would fall short of the standard, LEED Gold level specified in the Regulations for this benefit to be considered. Additionally, the proposal requests flexibility to not exceed the minimum certification level for Enterprise Green Communities.

The applicant should continue to work closely with OP, other agencies, the ANC and other community groups to develop a full proffer that is commensurate with the flexibility requested, for submission prior to a public hearing on this case. OP will provide detailed analysis of the final benefits and amenities proffer prior to a public hearing.

VII. AGENCY REFERRALS

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

- Department of Energy and the Environment (DOEE)
- Department of Housing & Community Development (DHCD)
- District Department of Transportation (DDOT)
- Fire and Emergency Medical Services Department (FEMS)
- Metropolitan Police Department (MPD)
- DC Water
- Department of Aging and Community Living

VIII. APPENDICES

- I. Area Map with Project Site
- II. Comprehensive Plan Future Land Use Map
- III. Comprehensive Plan Generalized Policy Map

Attachment I

Comprehensive Plan Chapter 1 - Introduction

The Family of Plans 103

The Comprehensive Plan can be thought of as the centerpiece of a “Family of Plans” that guide public policy in the District (See Figure 1.1). In the past, there has been a lack of clarity over the relationship between the Comprehensive Plan and the many other plans prepared by District agencies. This has reduced the Plan’s effectiveness and even resulted in internal inconsistencies between agency plans.
103.1

Under the DC Code, the Comprehensive Plan is the one plan that guides the District’s development, both broadly and in detail. Thus it carries special importance in that it provides overall direction and shapes all other physical plans that District government adopts. In fact, all plans relating to the city’s physical development should take their lead from the Comprehensive Plan, building on common goals and shared assumptions about the future. For example, the growth projections contained in the Comprehensive Plan should be incorporated by reference in other plans that rely on such forecasts.
103.2

As the guide for all District planning, the Comprehensive Plan establishes the priorities and key actions that other plans address in greater detail. The broad direction it provides may be implemented through agency strategic plans, operational plans, long-range plans on specific topics (such as parks or housing), and focused plans for small areas of the city. 103.3

The Comprehensive Plan is not intended to be a substitute for more detailed plans nor dictate precisely what other plans must cover. Rather it is the one document that bridges all topics and is Where appropriate, this Comprehensive Plan includes cross-references and text boxes to highlight other documents in the “Family of Plans.” Some examples include the federally-mandated State Transportation Plan (known as the “Transportation Vision Plan”), the Historic Preservation Plan, the Parks and Recreation Master Plan, and the Public Facilities Plan. Other agency plans may be guided by Comprehensive Plan policies but are outside of the city government’s direct control. These include the District of Columbia Public Schools Master Facilities Plan. 103.6

Attachment II

Comprehensive Plan Chapter 1 - Introduction

The Three “Tiers” of Planning 104

Since the late 1980s, the District has maintained a three-tiered system of city planning comprised of:

- a. Citywide policies*
- b. Ward-level policies*
- c. Small area policies. 104.1*

In the past, the Comprehensive Plan has been the repository for the citywide and ward-level policies. The small area policies, meanwhile, have appeared in separately bound “Small Area Plans” for particular neighborhoods and business districts. As specified in the city’s municipal code, Small Area Plans provide supplemental guidance to the Comprehensive Plan and are not part of the legislatively adopted document. 104.2

The 2006 Comprehensive Plan retains three geographic tiers but incorporates a number of changes to improve the plan’s effectiveness and readability. Probably the most important change is the replacement of “Ward Plans” with “Area Elements.” While Ward Plans were an effective way to express local priorities within the Comp Plan, the boundaries changed dramatically in 1990 and 2000 due to population shifts. Redistricting will occur again after the Censuses in 2010, 2020, and so on. Moreover, the city’s wards are drawn to ensure an equal number of residents in each Council district rather than to provide a coherent rationale for planning the city. Thus, places like Downtown Washington (divided by a ward boundary) and the Anacostia River (divided by four ward boundaries) have been covered in multiple places in past Comprehensive Plans. This has resulted in redundancy and fragmented policies for many of Washington’s most important places. The relationship between the Comprehensive Plan and the three tiers is described below. 104.3

Tier One: The Citywide Elements

The Comprehensive Plan includes 13 Citywide Elements, each addressing a topic that is citywide in scope, followed by an Implementation Element. 104.4

Tier Two: The Area Elements

The Comprehensive Plan includes 10 Area Elements, shown on Map 1.1. Taken together, these ten areas encompass the entire District of Columbia. ... 104.5

Although the Citywide and Area Elements are in separate sections of this document, they carry the same legal authority. The Area Elements focus on issues that are unique to particular parts of the District. Many of their policies are “place-based,” referencing specific neighborhoods, corridors, business districts, and local landmarks. However, the policies are still general in nature and do not prescribe specific uses or design details. Nor do the Area Elements repeat policies that already appear in the citywide elements. They are intended to provide a sense of local priorities and to recognize the different dynamics at work in each part of the city. 104.6

Tier Three: The Small Area Plans

As noted above, Small Area Plans are not part of the Comprehensive Plan. As specified in the DC Code, Small Area Plans supplement the Comprehensive Plan by providing detailed direction for areas ranging

in size from a few city blocks to entire neighborhoods or corridors. In the past, Small Area Plans have been prepared for places in the city where District action was necessary to manage growth, promote revitalization, or achieve other long-range planning goals. Examples include the H Street NE corridor, the Takoma Metro station area, and the Shaw/Convention Center area. Small Area Plans are adopted by the DC Council by resolution. The Comprehensive Plan is adopted in a different manner—by legislation—and becomes part of the DC Municipal Regulations. 104.8

In the future, additional Small Area Plans will be developed. The Implementation Element of this Comprehensive Plan outlines where and under what conditions such plans should be undertaken. Existing Small Area Plans are cross-referenced in the Comprehensive Plan Area Elements and should be consulted for further detail about the areas they cover. 104.9

Attachment III

Comprehensive Plan Chapter 2 – Framework Element

Guidelines for Using the Generalized Policy Map and the Future Land Use Map 226

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guides for development and conservation decisions. Several important parameters, defined below, apply to their use and interpretation.

- a. *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.*
- b. *The Future Land Use Map is a generalized depiction of intended uses in the horizon year of the Comprehensive Plan, roughly 20 years in the future. It is not an “existing land use map,” although in many cases future uses in an area may be the same as those that exist today.*
- c. *The densities within any given area on the Future Land Use Map reflect all contiguous properties on a block—there may be individual buildings that are higher or lower than these ranges within each area. Similarly, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate. It should be noted that the granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited here.*
- d. *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.*
- e. *The designation of an area with a particular land use category does not necessarily mean that the most intense zoning district described in the land use definitions is automatically permitted. A range of densities and intensities applies within each category, and the use of different zone districts within each category should reinforce this range. There are more than twice as many zone districts (about 30, plus more than a dozen overlay zones) as there are Comprehensive Plan land use categories. For example, there are at least three zone districts corresponding to “Low Density Residential” and three zone districts corresponding to “Moderate Density Residential.” Multiple zones should continue to be used to distinguish the different types of low- or moderate-density residential development which may occur within each area.*
- f. *Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the existing C-2-A zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area and the adjacent uses. A correspondence table indicating which zones are “clearly consistent”, “potentially consistent” and “inconsistent” with the Comprehensive Plan categories should be prepared to assist in Comprehensive Plan implementation and future zoning actions (see Action LU-4.3.B).*
- g. *The intent of the Future Land Use Map is to show use rather than ownership. However, in a number of cases, ownership is displayed to note the District’s limited jurisdiction. Specifically, non-park federal facilities are shown as “Federal” even though the actual uses include housing*

and industry (e.g., Bolling Air Force Base), offices (e.g., the Federal Triangle), hospitals (e.g., Walter Reed), and other activities. Similarly, the “Local Public” designation includes high-impact uses such as solid waste transfer stations and stadiums, as well as low-impact uses such as schools. Other maps in the Comprehensive Plan are used to show the specific types of public uses present in each area.

- h. The Map does not show density or intensity on institutional and local public sites. 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.*
- i. Streets and public rights-of-way are not an explicit land use category on the Future Land Use Map. Within any given area, the streets that pass through are assigned the same designation as the adjacent uses.*
- j. Urban renewal plans remain in effect for parts of the District of Columbia, including Shaw, Downtown, and Fort Lincoln. These plans remain in effect and their controlling provisions must be considered as land use and zoning decisions are made.*
- k. Finally, the Future Land Use Map and the Generalized Policy Map can be amended. They are not intended to freeze future development patterns for the next 20 years. The Comprehensive Plan is intended to be a dynamic document that is periodically updated in response to the changing needs of the city. Requests to amend the maps can be made by residents, property owners, developers, and the District itself. In all cases, such changes require formal public hearings before the DC Council, and ample opportunities for formal public input. The process for Comprehensive Plan amendments is described in the Implementation Element. 226.1*