

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Stephen J. Mordfin, Development Review Specialist
JLS
Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: July 8, 2022

SUBJECT: Public Hearing Report for Zoning Commission Case No. 21-26, Consolidated Planned Unit Development and Related Map Amendment from PDR-1 to MU-30 for property located at 301 Florida Avenue, N.E., Square 772-N, Lot 3

I. BACKGROUND

The subject site is located at 301 Florida Avenue, N.E. It is approximately 8,720 square feet in area, occupies the entire square with three street frontages, and is currently used as a surface parking lot with no structures. The site is located in an area characterized by high-rise mixed-use residential and street level retail development. A more complete description of the site is provided in the OP setdown report dated February 28, 2022 (Exhibit 12).

At its March 10, 2022 public meeting the Zoning Commission set down for a public hearing Zoning Commission Case 21-26, a consolidated Planned Unit Development (PUD) with a PUD-related zoning map amendment from PDR-1 to MU-30 filed by NRP Properties LLC. The application would allow the construction of a mixed-use all-affordable residential and retail high-rise building.

The proposal is essentially the same as that at setdown, but with minor modifications, including the elimination of the overhang encroachment into National Park Service property on the east side of the site, refinement of the lay-bys on 3rd Street and N Street, the provision of tandem bicycle parking spaces within the building and additional outdoor short-term bicycle parking spaces.

II. RECOMMENDATION

The Office of Planning (OP) recommends the Commission **approve** this PUD application subject to DDOT approval of the proposed loading spaces. On balance, and as analyzed through a racial equity lens, the proposal would be not inconsistent with the Comprehensive Plan or the NoMa Vision Plan and Development Strategy.

III. RESPONSES TO OP AND ZONING COMMISSION COMMENTS FROM SETDOWN

The following summarizes OP and Zoning Commission comments from the time of setdown and their current status.

	Comment	Applicant Response	OP Analysis
ZC 1	May: How does the applicant propose to improve safety on Florida Avenue? The sidewalk is narrow and the cars move quickly.	The applicant proposes to: <ol style="list-style-type: none"> 1. Eliminate all existing curb cuts; 2. Widen all sidewalks and bring into conformance with DDOT & ADA standards. Existing sidewalks to be widened by 2 feet, creating 10-foot wide sidewalks, 8-foot wide adjacent to tree boxes and; 3. Install planters and curb extensions on north side of N Street to decrease roadway width and calm traffic; 4. Install bike parking in excess of that required to encourage non-auto use; and 5. Landscape public space around the perimeter of the site to create comfortable environment for pedestrians. 	OP finds the proposal to add street trees and planting boxes along the Florida Avenue frontage, in addition to the curb extensions for the bike lane and the two-foot width expansion of the sidewalk on Florida Avenue, would provide for a greater separation between the traffic and pedestrians on Florida Avenue. Work in public space will require approval from DDOT or the Public Space Committee.
ZC 2	May: Reach out to the National Park Service East regarding the small reservation on the east end of the square.	<i>“On April 21, 2022, the Applicant met with Tammy Stidham, the Deputy Associate Regional Director for Lands and Planning at NPS, who stated NPS’ policy prohibiting projections over federal park land. Accordingly, the Updated Plans remove the 3-foot metal embellishment and modify the top of the Project to include a new embellishment that does not project over NPS land.”</i>	The applicant removed the 3-foot metal embellishment that projected over NPS land.
ZC 3	Hood: Applicant should come to the hearing prepared to talk about racial equity and the percentage of units at the various Medium Family Incomes (MFI).	The applicant provided a Racial Equity Analysis under Section V. of the pre-hearing statement. The project is proposed to be an all-affordable building with half of the units to be offered at or below fifty percent (50%) MFI and the other half at thirty percent (30%) MFI.	The applicant provided a racial equity analysis of the proposal.

	Comment	Applicant Response	OP Analysis
ZC 4	Hood: Was this the site of a previous BZA case with an issue about the loading dock being on N Street?	N/A	The previous Zoning Commission case, ZC 15-22, as extended by ZC 15-22A, included loading from N Street, subject to the filing of an application to DDOT for a curbside loading zone. DCOZ has no record of a previous BZA case for the subject property.
ZC 5	Can OP find out if the subject property is eligible for residential parking permits (RPP)?	N/A	Per DDOT, neither Florida Avenue, N Street nor 3 rd Street are eligible for RPP. Therefore, future residents of the building would not be eligible RPP.
OP 1	Bay windows are required to provide a minimum 15-foot projection from the curb for streets in excess of 90-feet in width or receive a code modification from DCRA and the Public Space Committee.	<i>“Since the setdown meeting, the Applicant has met with the Department of Transportation (“DDOT”) to discuss the bay projection on Florida Avenue. Following that discussion, the Applicant is pursuing a public space application for the bay projections as well as a code modification from the Department of Consumer and Regulatory Affairs.”</i>	Assuming the applicant obtains permission for the bay projections, OP is in support of this design proposal.

IV. PROJECT DESCRIPTION

The applicant proposes to construct a twelve-story, 120-foot tall building with a two-level penthouse that would be certified under the Enterprise Green Communities program.

MFI: It would be an all-affordable building with half of the units to be offered at or below fifty percent (50%) Median Family Income (MFI) and the other half at thirty percent (30%) MFI.

Bedrooms: Of the 115 apartments proposed, thirty (twenty-five percent) would have two-bedrooms and twenty-four (twenty percent) would have three-bedrooms.

Balconies: Almost forty-five percent of the units would have balconies, with Juliet balconies provided for all of the units.

Resident Amenities: Amenities available to the residents would include a toddler room, a lab/library, a conference room and a gym.

Penthouse: Four apartments are proposed for the first level of the penthouse and the second level would include the elevator over-ride, mechanical equipment, solar panels, screening and a green roof.

Parking and Loading: Due to the small size and triangular shape of the property, no parking or loading is proposed. A lay-by along the N Street frontage would function as a loading space for the building, and a separate no-parking area on N Street would provide a separate pick-up and drop-off space for the building’s residents. The

V. PLANNING CONTEXT

Title 11 Subtitle X § 304.4(a) requires that a PUD, inclusive of a map amendment, be not inconsistent with the Comprehensive Plan. A full description of the Comprehensive Plan, and analysis of the proposal against its maps and policies is provided in the OP preliminary report ([Exhibit 12](#)).

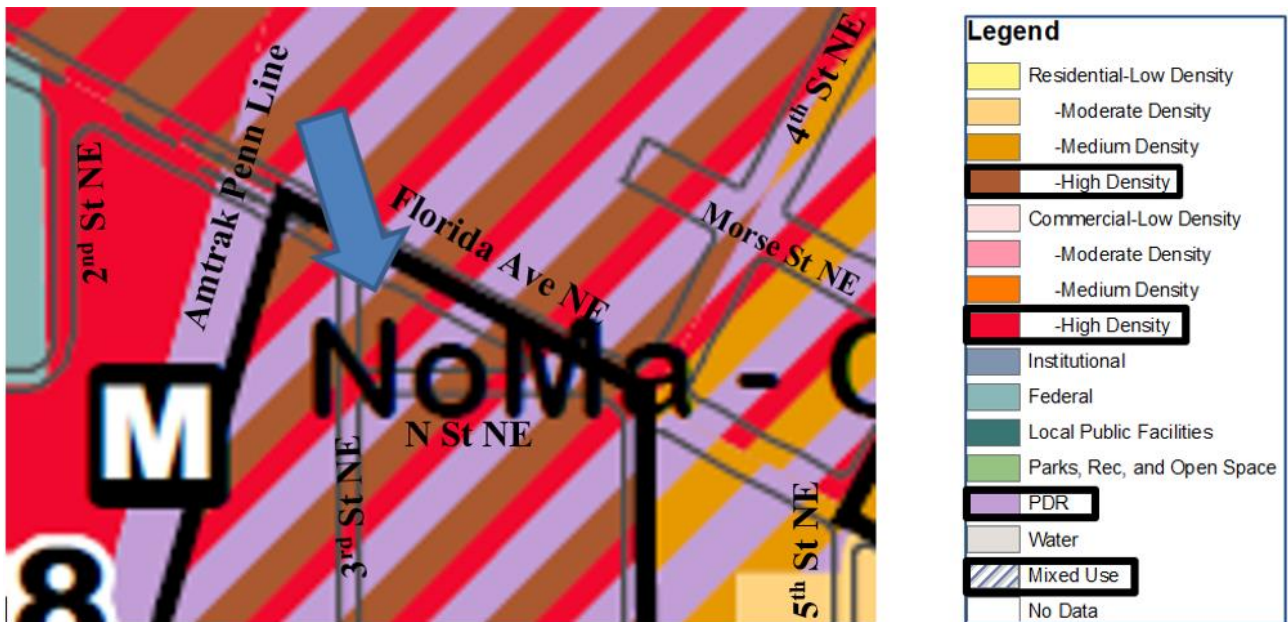
OP continues to determine that, on balance, the proposal is not inconsistent with the Comprehensive Plan as a whole, including the maps and the policy statements. Specifically, the proposal would further policy statements contained in the Land Use, Transportation, Housing, Environmental Protection, Economic Development and Urban Design Citywide Elements, and the Central Washington Area Element.

In addition, the following changes in the proposal from setdown further address Comprehensive Plan policies as follows:

Amendment	Comprehensive Plan Policy	OP Analysis
1. Bicycle room revised to: <ul style="list-style-type: none"> a. Incorporate EV charging for ten percent of the bicycles; and; b. Tandem-family sized spaces added to four percent of the bicycles 	<i>Action T-2.3.C: moveDC Bicycle Element. Implement the recommendations of the Vision Zero DC Action Plan and the Bicycle Element of moveDC to: • Build more and better bicycle facilities.</i>	moveDC is referenced in the Transportation Element of the Comprehensive Plan. The addition of electric charging and tandem parking spaces for bicycles would improve the functionality of the Bicycle Room, and the use of electric bicycles.
2. Two additional short-term bicycle parking spaces added	<i>Policy T-2.3.3: Bicycle Safety Increase bicycle safety through continued expansion of protected bike lanes (cycle tracks) and other separated facilities, traffic-calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improved bicycle access where barriers to bicycle travel now exist. 410.11 (emphasis added)</i>	Additional short-term bicycle parking spaces would facilitate the use of bicycles within the surrounding neighborhood.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for Mixed Use, a combination of High Density Residential, High Density Commercial and PDR (Production, Distribution and Repair).



Future Land Use Map

High Density Residential: Defines neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas.

High Density Commercial: Defines the central employment district, other major office centers, and other commercial areas with the greatest scale and intensity of use in the District. Residential is also a permitted use in all commercial categories and typically required to maximize density in the low, moderate and medium density commercial land use categories.

Production, Distribution, and Repair: Defines areas characterized by manufacturing, warehousing, wholesale and distribution centers, transportation services, food services, printers and publishers, tourism support services, and commercial, municipal, and utility activities which may require substantial buffering from housing and other noise-, air-pollution and light-sensitive uses. This category is also used to denote railroad rights-of-way, switching and maintenance yards, bus garages, and uses related to the movement of freight, such as truck terminals.

Mixed Use Categories: The Future Land Use Map indicates areas where the mixing of two or more land uses is encouraged. The particular combination of uses desired in a given area is depicted in striped patterns, with stripe colors corresponding to the categories defined on the previous pages. The Mixed Use category generally applies in the following three circumstances:

- a. Established, pedestrian-oriented commercial areas which also include substantial amounts of housing, typically on the upper stories of buildings with ground floor retail or office uses;
- b. Commercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future. The pattern envisioned for such areas is typically one of pedestrian-oriented streets, with ground floor retail or office uses and upper story housing; and

- c. Large sites (generally greater than 10 acres in size), where opportunities for multiple uses exist but a plan dictating the precise location of these uses has yet to be prepared. 225.18

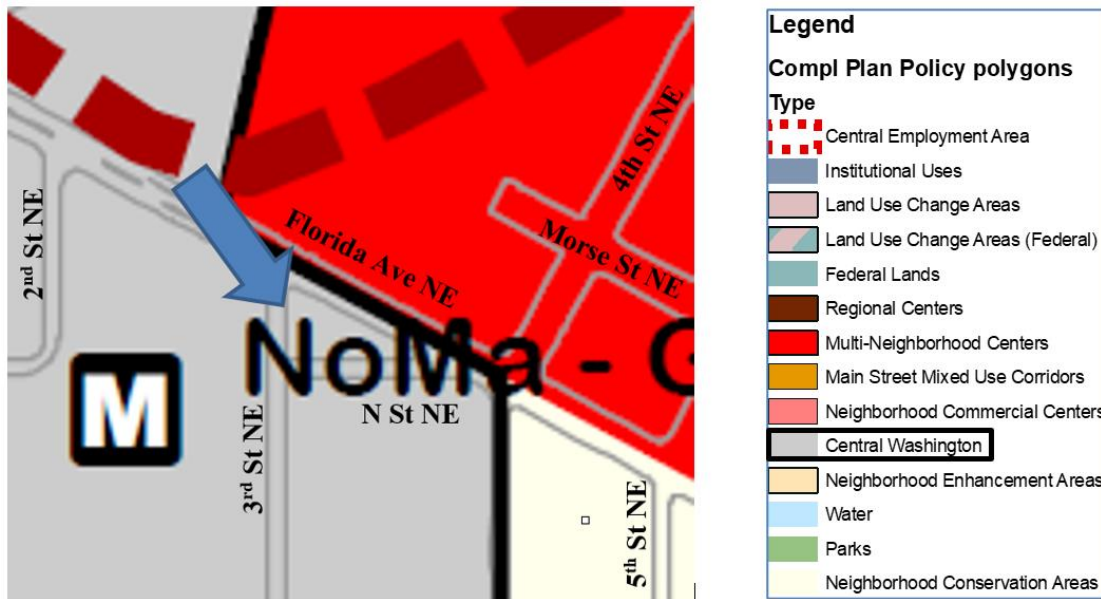
The general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other (for example, ground floor retail with three stories of housing above), the Future Land Use Map may note the dominant use by showing it at a slightly higher density than the other use in the mix ... 225.19

A variety of zoning designations are used in Mixed Use areas, depending on the combination of uses, densities, and intensities. ... 225.21

The PDR stripe is of note in this FLUM designation as the proposed development does not include any PDR uses. However, the emphasis on housing, and especially affordable housing throughout the Comprehensive Plan text, outweighs the PDR stripe in this case.

Generalized Policy Map

The Generalized Policy Map indicates the subject property is located within Central Washington.



Central Washington: Because of its unique characteristics, Central Washington is shown as a feature on the map rather than with the categories above. Detailed policies for this area are included in the Central Washington Area Element.

The proposal would also further goals and objectives of the Central Washington Element and the NoMa Vision Plan and Development Strategy. Specifically, the Central Washington Area Element explicitly calls for new high-density housing in Central Washington, the avoidance of displacement of lower income residents, and making the streets in Central Washington more pedestrian friendly. The NoMa Vision Plan and Development Strategy recommends a mix of commercial and residential uses, that new buildings should be designed to new standards and for new buildings to design to achieve Enterprise Green Communities certification, all of which would be addressed by the proposal.

Comprehensive Plan Analysis Through a Racial Equity Lens

Section 2501.8 of the Comprehensive Plan Implementation Element calls for “*the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.*” The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and whether a proposed zoning action is “not inconsistent” with the Comp Plan. Whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action.

Equity is discussed throughout the Comprehensive Plan. In the context of zoning priorities include affordable housing, displacement, and access to opportunity. One of the key ways the Comprehensive Plan seeks to address equity is by supporting additional housing development, and recognizes the potential for additional residential development on underutilized sites near transit.

The Commission’s racial equity tool serves as a guide to analyzing the Comprehensive Plan and considering potential impacts. The tool starts by asking “What is the expected goal of the zoning action?” and then “What are the anticipated positive and negative impacts and/or outcomes of the zoning action?”. The zoning action requested by this application is for the approval of a planned unit development for a residential building with 116 affordable dwelling units.

The 2020 Census identify the median household income as \$98,082 in the Planning Area, and \$117,752 for Ward 6, while the District-wide median household income was \$131,164. The 2020 Median Household Income data for Ward 6 is broken down by race in the following table. In Ward 6, 59% of households were either cost burdened or severely cost burdened and city-wide 52% of households were either cost burdened or severely cost burdened in 2020. With a median home value of \$545,160, and a median rent of \$2,077, much of the housing within the planning area would likely be out of reach to a portion of the population.

2020 Median Household Income – Ward 6¹

Black	White	Asian	Hispanic and Latino	Total
\$ 50,140	\$ 148,936	\$ 121,944	\$ 120,830	\$ 77,367

The PUD would redevelop an underutilized and unoccupied site immediately next to metro, providing housing options – including a significant amount of affordable housing and family-sized units – with transit access and the ability to reach major employment areas either on transit or by biking or walking. Creating affordable housing has the potential to benefit populations of color who on average have lower income than white residents. The new building would enhance the streetscape and the metro plaza and provide additional residents to support nearby businesses. When evaluated through a racial equity lens as summarized above and discussed in the set down report, the proposal would not be inconsistent with the Comprehensive Plan.

¹ US Census American Community Survey 2016-2020

VI. ZONING ANALYSIS

The site is currently zoned PDR-1 and the applicant is requesting a PUD-related zoning map amendment to the MU-30 zone, which is not inconsistent with the Comprehensive Plan. Below is a table describing the proposal, with any changes from setdown and any relief required noted.

Zoning Table	Proposal	Change From Setdown	Flexibility
Minimum Lot Area	8,720 sq. ft.	None	REQUIRED
Height G § 403	120 feet	None	None Required
Penthouse	17 feet, 8 inches	None	None Required
FAR G § 402	11.61	11.61	None Required
Lot Occupancy G § 404	97.97%	None	None Required
Rear Yard G § 405	45 feet from 3 rd Street centerline	None	None Required
Parking: Residential C § 701.5	None	None	REQUIRED
Parking: Commercial C § 701.5	None	None	None Required
Long-Term Bicycle Parking: Residential C § 802	56 spaces	Added EV charging for 10% of the long-term bicycles and tandem-family sized spaces for 4% of the long-term bicycles	None Required
Short-Term Bicycle Parking: Residential C § 802	18 spaces	26	None Required
Loading: Delivery Space C § 901	None	None ²	REQUIRED
Loading: Loading Space C § 901	None	None ³	REQUIRED
Green Area Ratio G § 407	0.3	None	None Required

² The applicant proposes a 62-foot long no parking pick-up and drop-off zone on 3rd Street adjacent to the site that would be signed to permit no parking and that all unattended vehicles would be ticketed and towed. The space is expected to be used for the day-to-day needs of residents, including food-delivery and rideshare.

³ The applicant revised the application to include three options for the loading space, with the final decision to be made by DDOT. The options proposed are: 1. Installation of a mountable wheel stop between the travel lane and the loading zone; 2. Construction of an intermediate raised loading zone two to three inches above the travel lane; and 3) Striping and “stamping” the lay-by and incorporating signage with loading-only restrictions.

In addition to the proposed PUD-related map amendment, the applicant requests the following zoning flexibility through this PUD:

1. Lot Area: The applicant requests flexibility to reduce the minimum lot size required for a PUD in the MU-30 zone from 15,000 square feet to 8,720 square feet. In this case, the subject square includes only one lot, and that lot occupies the entire square, with the exception of a small piece on the eastern edge of the square that belongs to the National Park Service and functions as a small park or open space. As a result the applicant is unable to increase the size of the subject property as there is no additional privately owned land within the square. OP supports the applicant's request to reduce the minimum lot size for a PUD in the MU-30 zone.

2. Residential Parking Spaces

The applicant requests to reduce the number of on-site parking spaces from 19 to none. Due to the small size and unusual shape of the lot, the provision of parking within the building would eliminate the entire first floor, including the lobby and retail space, while generating very few parking spaces on each level. As the site is located within a walkable neighborhood and transit rich area, including bus service and easy access to the NoMa-Gallaudet Metrorail station, OP supports the applicant's request to reduce the number of on-site residential parking spaces to zero.

3. Delivery and Loading Spaces

Similar to the issue related to the provision of on-site parking, the applicant is unable to provide either a delivery or a loading space. The applicant proposes to establish one loading space within the public space of N Street adjacent to the west side of the subject property that would also serve as a lay-by space for the building, and a no parking zone along the N Street frontage of the subject property for pick-up and drop-off. OP supports the applicant's request to not provide either a delivery or a loading space and defers to DDOT on the appropriate design of the spaces.

VII. 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

Subtitle X Section 305 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. “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” (§ 305.2). “A project amenity is one (1) type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors” (§ 305.10). Section 305.5 lists several potential categories of benefit proffers, and states that “(a) project may qualify for approval by being particularly strong in only one (1) or a few of the categories in [that] section, but must be acceptable in all proffered categories and superior in many” (§ 305.12). The Commission “shall deny a PUD application if the proffered benefits do not justify the degree of development incentives requested (including any requested map amendment)” (§ 305.11).

The applicant’s most recent summary of project benefits and amenities (Exhibit 22) provides additional information requested at setdown. Additional Entitlements Gained Through the Proposed PUD are summarized below.

	MoR	Proposed PUD	DIFFERENCE
Height	50-foot max.	120 feet	70 feet
Residential Gross Floor Area	New Residential Uses not Permitted	101,628.sq.ft.	101,628 sq.ft.
Lot Occupancy	N/A	97.7%	N/A
Use	Industrial and commercial uses permitted	Mixed use residential and retail building	New residential uses not permitted

OP analysis of the proffer is summarized in the following table, and detailed below. Where noted, additional information about proffers is needed prior to a final decision on the case.

ITEM	MITIGATION	PUBLIC BENEFIT	PROJECT AMENITY	REQUIRED	PROFFER
Urban Design, Architecture <i>X § 305.5(a)</i>			X		
Site Planning, Efficient Land Utilization <i>X § 305.5 (c)</i>		X			
Housing and Affordable Housing <i>X §§ 305.5 (f) and (g)</i>			X		

ITEM	MITI-GATION	PUBLIC BENEFIT	PROJECT AMENITY	REQUIRED	PROFFER
Streetscape Plans <i>X § 305.5 (l)</i>		X			
Other <i>X § 305.5 (r)</i>		X			

(a) Superior urban design and architecture

The proposed building would take advantage of the small, triangularly shaped lot by occupying almost the entire lot. The portion of the façade facing the corner of Florida Avenue and N Street, N.E. would generally mimic the shape of the Flatiron Building in Manhattan, resulting in an unusual streetscape. Windows on the fourth through the twelfth floors of the building would round that corner, with the lower floors providing for a base of the structure.

(b) Site Planning, Efficient Land Utilization

The subject property is currently in use as a surface parking lot with no buildings and measuring one-fifth of an acre, which the applicant proposes to replace with a twelve-story mixed use building with 115 dwelling units, over 3,000 square feet of retail space and common areas designed to meet the needs of the future residents. Those common areas include a lab/library, a gym, and a toddler room/indoor playground.

(c) Superior landscaping, or creation or preservation of open spaces

The building on floors one through four would be set back two feet from lot line along the Florida Avenue frontage, enlarging and widening the public sidewalk to between eight and twelve feet in width. The increased width, including the planting of new trees within thirteen newly established tree boxes, would soften hardscape along all sides of this square, largely devoid of any trees or other plantings. A landscaped area on the west side of the square, along the 3rd Street frontage of the building, would soften the residential entrance to the building.

(d) Site planning and efficient and economical land utilization

The applicant proposes to make use of the entire square that had previously been used as a gasoline station. In this case, the site measures only 8,720 square feet and will be developed with a residential building that would significantly increase the amount of affordable housing within Central Washington.

(e) Housing and Affordable Housing

The entire proposed building would consist of affordable units, or 115 new affordable units. All of the apartments would be for individuals and families at or below fifty percent MFI, with fifty percent of the units at thirty percent MFI.

The figures in the following table are based on information supplied in the application.

Residential Unit Type	Floor Area	Percentage of Total Units	Units	Affordable Control Period
Total Res. Floor Area (Net SF)	87,771	100	115	
IZ – 50% MFI or below (Net SF)	87,771	100	115	Perpetuity
Affordable large family sized units (3-BR)	30,234	47	24	Perpetuity

In summary, OP finds that the benefits, amenities and proffers are commensurate with the related map amendment and other requested flexibility through the PUD. As a building that would be 100% affordable, including the provision of family-sized units and areas set-aside for children within the common areas of the building, OP recommends that the benefits and amenities package be determined to be commensurate with the flexibility requested.

VIII. AGENCY COMMENTS

OP circulated project information to District agencies, arranged an agency meeting on April 21, 2022, and invited representatives of all notified agencies to participate. These discussions are reflected in this report.

The Department of Housing and Community Development (DHCD) informed OP by email on April 22, 2022 that it had no comments.

Department of Environment and Energy submitted a report to OP (see Attachment 1).

No other agencies submitted comments to either the record or OP as of the date of the filing of this report with the Office of Zoning.

IX. ADVISORY NEIGHBORHOOD COMMISSION COMMENTS

No comments from ANC 6C were submitted to the record as of the date of the filing of this report to the record.

X. COMMUNITY COMMENTS

No community comments were submitted to the record as of the date of the filing of this report to the record.

XI. ATTACHMENTS

Attachment 1: DOEE Comments

DOEE Development Review Comments

ZC 21-26: 301 Florida Ave NE

DOEE applauds the applicant for pursuing certification under the 2020 Enterprise Green Communities rating system at the new plus-level of certification (EGC+). This rating system caters specifically to affordable housing projects and incorporates building standards that will benefit future tenants. The EGC+ level of certification is reserved for projects that go above and beyond the base-level certification to achieve net-zero energy or near-net-zero energy, by achieving, at minimum, certification under DOE's Zero Energy Ready Homes (ZERH) program.

DOEE encourages the applicant to pursue environmental benefits beyond the EGC rating system. The following recommendations are intended to assist the applicant with incorporating sustainable design and construction strategies that will yield higher EGC scores and minimize the project's impact on the environment.

Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) and the [DC Sustainable Energy Utility](#) (DCSEU) also offer innovative financial products and technical assistance to help projects gain access to capital. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Energy Performance and Electrification

DOEE applauds the applicant's current energy efficiency and renewable energy strategies and encourages the applicant to continue exploring options to reduce the project's energy consumption and increase its energy generation. Maximizing energy efficiency at the time of construction will more cost effectively assist in meeting [Building Energy Performance Standards](#) (BEPS) in the future. The BEPS program was established in Title III of the Clean Energy DC Omnibus Act of 2018. The Act states that starting in 2021, owners of buildings over 50,000 square feet that are below a specific energy performance threshold will be required to improve their energy efficiency over the next 5 years. Projects below the performance threshold will be able to choose between a performance pathway, which requires that they document a 20% reduction in energy usage over the 5-year compliance period, or a prescriptive list of required energy efficiency measures. The next BEPS will be established in 2027 and again every six years, and the compliance threshold will increase each cycle. New projects are encouraged to maximize energy efficiency during the initial design and construction in order to meet BEPS upon completion.

In line with the District's goal of carbon neutrality and the objectives of the [Sustainable DC 2.0](#) and [Clean Energy DC](#) plans to reduce greenhouse gas emissions, DOEE recommends that the applicant design the project to be fully electric (i.e., no on-site combustion of fossil fuels). DOEE and DCRA are evaluating options to include building electrification requirements in future code updates. Building

electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., natural gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for new construction to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate

electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit [this resource page](#) created by the Building Innovation Hub.

DOEE notes that this applicant should design the project to comply with the [electric vehicle make-ready parking requirements of the Green Building Act](#), which requires the project to include electric vehicle make-ready infrastructure to accommodate the future installation of an electric vehicle charging site at least 20% of the parking spaces. DOEE encourages the applicant to go beyond this requirement and install EV charging stations for a portion of the residences. Given the current rate of EV adoption, DOEE encourages the applicant to consider and account for a greater prevalence of electric vehicles at time of occupancy. One [study](#) found that the cost to install EV capable infrastructure during new construction is four to six times less expensive than during a standalone retrofit. The [2017 DC Green Construction Code](#) provides some suggested thresholds for the provision of supply equipment and make-ready infrastructure. EV resources and information about available incentives are available at doee.dc.gov/service/electric-vehicles-resources.

Net-Zero Energy

Clean Energy DC, the District's detailed plan to reduce greenhouse gas emissions, calls for net-zero energy (NZE) building codes by 2026. DOEE encourages the project to explore net-zero energy construction/certification ahead of this planned code requirement. An NZE building is a highly energy-efficient building that generates enough on-site, or procures acceptable offsite, renewable energy to meet or exceed the annual energy consumption of its operations. NZE buildings can benefit both owners and tenants through significantly lower operating costs, improved occupant comfort and improved indoor air quality. Under the [2017 District of Columbia Energy Conservation Code](#), projects can use Appendix Z as an alternative compliance pathway, which provides a working definition and guidance for NZE.

DOEE has published a *Net-Zero Energy Project Guide*, a *Multifamily Guide*, and an *Integrated Design Charrette Toolkit* to assist project teams with planning, designing, constructing and operating NZE buildings. These and other resources can be found at doee.dc.gov/service/greenbuilding.

For the past few years, DOEE has offered grants to projects exploring NZE design and other innovative green building approaches. Case studies and final reports from some of these projects are available at [here](#).

If the applicant is interested in NZE construction, either on this project or future projects, DOEE can be of assistance. Please reach out to Connor Rattey at connor.rattey@dc.gov for more information.

Solar

DOEE applauds the applicant's efforts to maximize the project's rooftop solar energy generation capacity and commends the applicant for combining the solar array into the project's green roof. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#). Maximizing solar energy production contributes to achieving the District's goals to rely on 100% renewable electricity by 2032 and increase local solar generation to 10% of total electricity by 2041.

Climate Resilience

In order to prepare for the impacts of climate change, including increased flooding and extreme heat, DOEE encourages the team to assess how climate change will affect the project and to incorporate resilient design strategies. As part of the [Climate Ready DC Plan](#), DOEE released [Resilient Design Guidelines](#) to assist project teams considering climate resilient design. Additional DOEE Climate Adaptation and Preparedness resources are available at doee.dc.gov/climateready.

Green Area Ratio and Stormwater Management

DOEE commends the applicant for combining a solar and green area on its rooftop. These systems work well together and help maximize the benefits from the building's roof space. DOEE encourages the applicant to exceed the minimum GAR and stormwater requirements and is prepared to meet with the project team to discuss GAR and stormwater opportunities on the project site. To set up a review meeting with the stormwater team at DOEE, please contact Ayende Thomas at ayende.thomas@dc.gov.

Embodied Carbon Reduction

DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impacts from the proposed project's structural and envelope design. An LCA is an effective tool to measure the embodied carbon, or global warming potential (GWP), of a building and its materials. An LCA can inform decisions about the selection and quantity of materials used, and can assist with dematerialization (i.e., reducing the amount of a given material). Dematerialization reduces environmental harm and saves money.

Embodied carbon is the sum of all greenhouse gas emissions resulting from the construction of buildings, including materials and construction activities. It is estimated that 23% of the world's GHG emissions result from construction. Most of these embodied emissions are associated with the production and use of concrete and steel, common structural elements. The energy savings of a high-performance building can take decades to offset the impacts of the building's construction.

DOEE recently funded two grant projects focused on reducing embodied carbon through LCAs. The lessons learned by these grantees may help the applicant identify simple ways to reduce the project's embodied carbon and understand how to conduct a basic LCA. The reports from these projects are available here: [LCA for St. Elizabeth's Building 2 Commercial Office by Hickok Cole](#) and [Embodied Carbon Life Cycle Assessment Assistance for Southeast Neighborhood Library by Quinn Evans](#).

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