

July 26, 2020

To: Ward 5 Councilmember Kenyan McDuffie and the DC City Council CC: DC Mayor Muriel Bowser; DC Office of Planning; ANC 5B

Re: Future Land Use Map Designations for Certain Properties adjoining Reed Street Northeast

The following analysis and recommendations were adopted as the official position of the Brookland Neighborhood Civic Association (BNCA), by resolution enacted by the membership at our July 21, 2020 regular meeting. These were developed by Brookland residents, including BNCA members, residing on the 900 block of Evarts and the 2700 block of 10th Street NE, in anticipation of proposed mixed-use development on a series of adjoining parcels along Reed Street. This resolution supersedes any prior BNCA proposals regarding Comprehensive Plan designations for these parcels.

In particular, BNCA recommends that the Future Land Use Map (FLUM) be amended as shown in the attached Exhibit A, as follows: the "East Lot" should be designated for **moderate** density mixed residential and commercial use, corresponding to a 40 foot height limit; the "West Lot" should be designated for **medium** density mixed residential and commercial use, corresponding to a 60 foot height limit; and the "South Lot" should be designated for **high** density mixed residential and commercial use, corresponding to an 80 foot height limit.

The City Council should adopt these changes into the FLUM when it takes up the Comprehensive Plan later this year. BNCA also has several other outstanding recommendations for the Comprehensive Plan, which are not addressed by this resolution.

In addition to these recommendations, BNCA supports the use of a Planned Unit Development (PUD) process for any development of the Reed Street parcels. BNCA looks forward to continuing to collaborate with the representatives of the site owner, ANC 5B, the Office of Planning, and the Councilmember's office, to ensure that development in the area of Reed Street NE is done in an appropriate manner.

We would like to engage in follow-up discussions with your offices regarding this matter. I will follow up accordingly.

On behalf of the membership of the BNCA and its board,

Daniel Schramm

President, BNCA

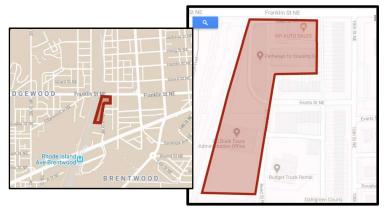
Brookland Neighborhood Civic Association P.O. Box 4457, Washington, DC 20017 www.brooklandcivic.org

ANALYSIS AND RECOMMENDATIONS FOR REED STREET NORTHEAST

I. Background

Brookland residents have recently engaged in conversations with representatives of the owner of the property highlighted in red on the map below and located south of

Franklin Street between railroad tracks and 10th Street NE (Square 3841 Lots: 38, 825, 828, 829, 832, 834, Square 3846 Lots: 82, 846, 856). A residential and commercial mixed use development called Reed Street Development is proposed for this site. The proposed Reed Street Development includes nine (9) parcels equalling approximately four (4) acres or 150,000 square feet. Currently the Amended Future Land Use Map of the



Comprehensive Plan as submitted to Council for approval shows this area as PDR/RHD. We, the residential neighbors immediately adjacent to the subject property, oppose this change. We request that the Council revise the Future Land Use Map in the Comprehensive Plan to accommodate the proposed development in a way that provides for an appropriate transition to the existing homes and integration into this family-oriented neighborhood.

II. The Comprehensive Plan Supports a Gradual Transition to Existing Homes

We support and recognize the importance of "Promoting more housing proximate to transit and linking new housing to transit" (500.2); however we must consider how these developments not only provide additional housing but also "[strengthen] neighborhood quality of life while accommodating growth and change" (900.2). Brookland has long been known as a family-friendly neighborhood. We should encourage any new developments to maintain this important characteristic and provide housing for families. This aligns with the Comprehensive Plan's desire to increase housing for families throughout the city¹. New developments in Brookland "should prioritize individual, ground-level entrances to units that open up to the street in addition to interior access to units through a shared private lobby" (916.3).



The comprehensive plan does not provide a basis for the proposed change to the FLUM for this property from the current PDR to RHD. The Future Land Use Map currently identifies the entire property slated for the new Reed Street Development as Residential-High Density and Production, Distribution & Repair. We can find no record of this request for the change in the Future Land Use Map², and can only assume it was made by the Office of Planning given its proximity

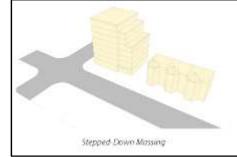
¹ 913.7 "Action UD 2.4.A: Design Guidelines for Higher-Density, Family-Sized Housing - Develop design guidelines for higher-density, family-sized housing with the intent to address key design issues at the scale of the neighborhood, site, building, and unit that relate to residential livability for families with children."

² Part of the property under previous owners "Old Town Trolley tours of Washington, Inc." requested a zoning change to MU-6 that was not acted on, based on our understanding.

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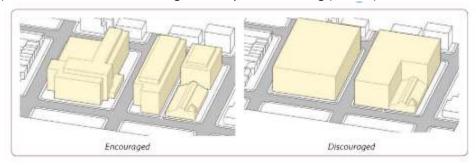
to the metro station. While we recognize that the Rhode Island Avenue Metro Station is not far from this collection of properties, it is not "near" the property as defined in the Comprehensive Plan. Map 24.1: Upper Northeast Policy Focus Areas (2410.3) shows that the area the city intends for high density residential development is near the Rhode Island Avenue metro station and the surface lots southeast of the station³. Therefore the Comprehensive Plan does not support identifying Residential-High Density for the entire Reed Street Development, which is adjacent to existing two-story row homes.

We agree that higher density is appropriate closest to the metro station. We also agree with the stated goals of the Comprehensive Plan to implement step-down or reduced height as the property moves away from higher density and towards existing lower density homes⁴. For example, section 909.8's visualization aligned to "Encouraged Transitions in Building Intensity and Scale".



The properties abutting a large section of the proposed Reed Street Development are 1920s, single-family row homes with lot sizes of less than 1,500 square feet, which are drastically smaller

than the four acres that will be part of the Reed Street Development. As this development is created it should take into consideration "Policy UD-2.2.85: Large- Scale Development - New developments on parcels that are larger than the prevailing neighborhood lot size should be carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades." (909.12). This is also visualized through Development Massing (909.18).



III. Our Ask

To align with the language of the Comprehensive Plan, we urge the Council to change the Future Land Use Map to provide the highest density (Residential/Commercial High Density) at the part of the

³ 2415.56 "Policy UNE-2.5.12: Rhode Island Avenue/-Brentwood Metro Station - Encourage the development of additional medium- to high-density mixed-use, pedestrian and multimodal-friendly development around the Rhode Island Avenue Metro station, particularly on the surface parking lots in the station vicinity. Review the Rhode Island properties west of and proximate to the Rhode Island Avenue Metro station for transit connections and appropriate land use recommendations."

⁴ 909.10 "Policy UD-2.2.4: Transitions in Building Intensity - Design 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 and gradual through a variety of context-specific design strategies, such as a slender massing of taller elements, stepping back the building at floors above its neighbors' predominant roof line, stepping a building's massing down to meet the roof line of its neighbors, or strategic placement of taller elements to mark corners, vista terminations, or large open-space frontages."

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property closest to the metro (South Lot) and transition to Residential/Commercial Medium Density for properties north of Evarts Street (West Lot) and Residential/Commercial Moderate Density for properties abutting the existing row homes (East Lot). Please see Exhibit A showing the proposed density map that we will support.

This change will better align the Future Land Use Map with the overall goals of the Comprehensive Plan and allow for a smoother transition of the new development to the existing homes⁵. It will also allow for a development that connects and builds upon the strengths of the existing neighborhood. Thirdly, this change will allow the property to be developed as a Mixed Use development, which is in alignment with what we understand to be under consideration by the owner's representatives.

IV. Going Forward

We appreciate the Council's consideration of our proposed change to the Future Land Use Map. We would be happy to meet to provide additional context, if helpful.

We know this is just the beginning of a much longer process, and we look forward to engaging with the nearby community and ANC-5B-O4 in a Planned Use Development process⁶.

We expect that part of this process, at a minimum, will include discussions on:

- New traffic patterns with any proposed road changes and alley closures
- Efforts to create a vehicle-independent lifestyle for residents in the new developments⁷
- Review and plan adjustments to account for the increased traffic, loading and trash access as a result of the community
- Documentation of existing conditions to identify any changes to the almost 100-year-old row homes as a result of the construction
- Environmental impact given the increase of air and noise pollution, as well as the
 potential risks associated with the demolition of old structures and their foundation to
 make way for new construction
- Integration of the development with the street through public green space⁸, bicycle lanes, and sidewalks
- Retail opportunities that align with community priorities

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⁵ 920.3 "Policy UD-4.2.1: Scale and Massing of Large Buildings - Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest."

⁶ 2415.91 "Action UNE-2.5.A: Rhode Island Avenue Station Area Planning - Work with WMATA, the local ANC, local businesses, and the community to encourage plans for the Rhode Island Avenue Metro area to enhance the surrounding neighborhoods and address issues such as traffic, parking, and station access."

⁷ 916.4 "Policy UD 3.2.2: Social and Community Meeting Spaces - New planned unit developments (PUDs) and other large-scale developments should provide for a mix of social and third spaces—for example, schools, retail stores, cultural and community spaces, and recreational facilities."

⁸ 916.5 "Policy UD 3.2.3: Recreational Space Design for Large Site Development - Design open spaces conducive to physical activity as part of large-scale developments or create new recreation spaces (such as parks, walking paths, trails, and waterfront recreation) in neighborhoods lacking access to public open spaces."