



July 8, 2022

Zoning Commission
for the District of Columbia
441 4th Street, NW, Suite 210-S
Washington, DC 20001
zcsubmissions@dc.gov

**Re: Z.C. Case No. 22-04
Application for Consolidated PUD and Related Map Amendment
Support Letter**

Dear Members of the Commission:

I am writing on behalf of the Brookland Neighborhood Civic Association (BNCA) to express our support for the above-referenced Planned Unit Development (PUD) application filed by Hanover R.S. Limited Partnership. The PUD would provide a substantial number of new housing units in the Brookland neighborhood and transform an underutilized site that currently has several outdated industrial/office buildings. The site is appropriate for infill development because of its immediate proximity to the Rhode Island Avenue Metro Station, lack of green space, and the current light-industrial land usage, which is inconsistent with the otherwise residential character of the immediate area. The applicant's benefits package is also commendable, particularly the affordable housing proffer (15% of the project's residential gross floor area (GFA)). We also support the street and alley closing and dedication application, which results in significant improvements to the surrounding road network, including the realignment of Reed Street and the creation of sidewalks and a pedestrian-friendly streetscape.

BNCA is an all-volunteer non-governmental organization dedicated to serving and bettering the Brookland community of Northeast Washington, DC.¹ BNCA advocates that any development in Brookland must be thoughtful, involve the community, and ultimately serve the public interest. Given the neighborhood's remarkable history and its continuing charm as a close-knit, family-oriented, creative, green, and artistic community, Brookland is a special place that demands care in city planning. For BNCA, the protection and expansion of existing green space and tree canopy, the preservation of historical structures, support for local and minority-owned businesses, and the maintenance of a diverse, inclusive, welcoming community are paramount

¹ See www.brooklandcivic.org.

objectives. Brookland faces tremendous development pressure, so it is essential that the Commission, other agencies, and our elected representatives ensure that development balances the many needs and interests of our storied neighborhood. For the reasons set forth in this letter, we believe Hanover's PUD proposal for Reed Street is a rare and exemplary model of just such a development.

BNCA has been closely involved in the evolution of this project for several years, beginning with our support for an amendment to the Future Land Use Map (FLUM) in the DC Comprehensive Plan, to recognize the subject properties as suitable for mixed-used, moderate to high density development.² Working with the Office of Planning and Councilmember Kenyan McDuffie, we achieved this last year, although the City chose to retain a mixed-use designation of PDR rather than commercial/retail. At the time, we were also involved with neighbors in early conversations with the property owner about what kind of development would be appropriate and supported by the community.

In September of 2021, after they had been selected as the developer by the property owner, Hanover reached out to former BNCA president Dan Schramm and ANC SMD 5B04 Commissioner Ra Amin, wanting to begin conversations in earnest with the community on the PUD. Through the fall of 2021 a series of meetings were held involving the immediately affected neighbors, the ANC, BNCA, and relevant agencies and stakeholders.

This project was the primary agenda item of three separate BNCA meetings. At BNCA's October meeting, Hanover gave a presentation on the project.³ At BNCA's November meeting, the immediately affected neighbors shared their perspectives on the project with the larger BNCA membership, and we discussed what position BNCA should adopt with respect to the project.⁴

In December of 2021, BNCA held a special meeting as permitted by our by-laws, specifically to take a vote of the membership on whether BNCA should support the PUD, including the Community Benefits Agreement (CBA) and the Construction Management Plan, as it was currently configured.⁵ Membership heard from Hanover, as well as from local organizations identified in the CBA. After deliberation, and determination of a quorum, BNCA voted a unanimous resolution in support of the project by a vote of 14-0, worded as follows:

Subject to the satisfactory resolution of any outstanding issues including without limitation traffic safety and affordable housing, the Brookland Neighborhood Civic Association recommends that Advisory Neighborhood Commission (ANC) 5B adopt the attached Community Benefits Agreement and associated Construction Management Plan and that ANC 5B vote to support the proposed Planned Unit Development, related zoning map amendment, and other approvals necessary to effectuate the Hanover/Reed Street Project (Zoning Commission Case No. 21-XX), in light of renderings provided to the community on Dec. 6, 2021.

² See BNCA Reed Street Letter (July 26, 2020), available at https://cdn-610befd2c1ac181114e136f7.closte.com/wp-content/uploads/2021/01/brooklandcivic.org_bnca_reed_street_resolution.pdf.

³ <https://brooklandcivic.org/october-2021-minutes/>.

⁴ <https://brooklandcivic.org/november-2021-minutes/>.

⁵ <https://brooklandcivic.org/december-2021-special-meeting-minutes/>.

As noted in the resolution, we identified traffic- and parking-related issues, and the affordable housing proffer as key items on which BNCA members wished to have further discussion. While some BNCA members wished to see even greater affordable housing in the PUD, following subsequent discussions with Hanover, we believe the level of inclusionary zoning (IZ) in the PUD is satisfactory. We continue to support ensuring affordable housing for all income levels in Brookland, and particularly for families (i.e., through 2- and 3-bedroom units). Should the project see an increase in affordable housing, we would generally be supportive of that.

Regarding traffic and parking, BNCA supports all of the traffic-mitigation and safety measures that are proposed in the PUD, and would support even further traffic-reducing and safety measures. We believe a parking ratio of 0.4 is acceptable. While in general, we believe developers should build less parking in support of a future where there is less need for reliance on individual automotive transit, we also are concerned about the availability of street parking for existing residents, which may be impacted by a lower parking ratio in this particular instance. (We note, however, that residents of the new development will not be able to obtain residential parking permits, which we support. Nonetheless, experience has shown that illegal parking tends to go up with dense in-fill development. The City must rigorously enforce parking restrictions in this area as this project goes forward.)

We support the inclusion of a traffic light at the new intersection of Reed Street and Franklin, if DDOT concurs that it is the best way to enhance safety, particularly of pedestrians, bicyclists, and children. There are several schools in immediate proximity to this project, and current traffic-safety conditions are well below what is acceptable to the community. We strongly support the overall strategy of diverting existing and new traffic onto the reconfigured Reed Street. We support the measures proposed to stop the 10th Street Alley from being used as a cut-through to avoid the intersection at 10th and Franklin. In response to immediate neighbors raising this as a major issue, Hanover studied and confirmed that this cut-through behavior is excessive under current conditions. The proposed changes to this alley are thus much needed and appropriate.

We note that the traffic study conducted by Hanover indicates that increased traffic associated with the PUD can largely be addressed through signal optimization. We urge DDOT and the developer to work closely together to ensure such changes are made to ensure efficient and safe flow of traffic at all intersections impacted by the PUD. We also note the study did not assess the effect of installing a traffic light at the new Reed-Franklin intersection. It may be appropriate to update the study to assess the effect of this change in the project.

While the current measures in the PUD to promote multi-modal transit for the new residents and reduce car use are satisfactory, we would support any additional measures DDOT or others may advocate to be included in the PUD to further reduce car and truck traffic, ensure safety, and promote walking, biking, scooters, and public transit.

BNCA supports the CBA and all of the local Brookland organizations who stand to benefit. We heard from these organizations at our special meeting in December. We believe that in scope, project type, and location, the beneficiary projects under the CBA will advance equity,

sustainability, and community cohesion in the affected area of Brookland, and will help mitigate some of the adverse effects that can accompany large development projects.

BNCA encourages the Commission to approve this PUD application. Thank you for your consideration of this letter.

Sincerely,



Signature

Kathy Jacquart, President, BNCA
Print Name

July 8, 2022

Date

cc. Ward 5 Councilmember Kenyan McDuffie
Gayle Carley, Chair, Advisory Neighborhood Commission 5B
Ra Amin, Advisory Neighborhood Commission 5B-04

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