

July 15, 2022

Mr. Anthony Hood
Chairman, DC Zoning Commission of the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

RE: Support for Z.C. Case No. 21-26 (NRP Properties, LLC – Application for a Consolidated PUD and Map Amendment @ Square 772-N, Lot 3)

Dear Chairman Hood and Commissioners:

Please accept these comments on behalf of the Coalition for Smarter Growth, the leading non-profit organization in the D.C. region advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

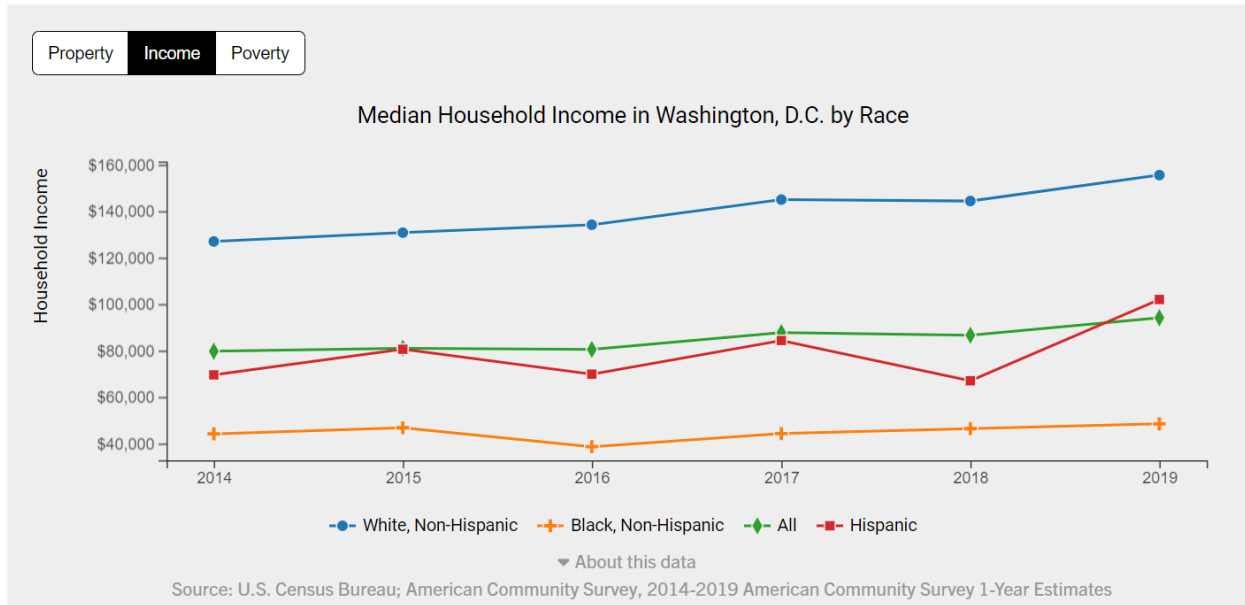
We wish to express our strong support for NRP's proposed PUD, Case Number 21-26. We are excited to support a 100% deeply affordable building of 115 homes in a 12-story mixed use, centrally located, job-rich environment next to the NoMa Metro station, and down the street from Union Station. With all homes affordable to households earning 30% and 50% median family income, this project greatly exceeds IZ plus requirements. Twenty-four of the units will be three-bedroom units, accommodating families. These affordable homes will be preserved for low-income households in perpetuity.

The site is awkward – a triangular parcel. This makes off-street parking and loading infeasible. We ask the Zoning Commission to support the needed relief, given the benefits of this deeply affordable housing located in a highly accessible neighborhood. Lower income residents on average rely less on costly personal vehicle ownership, and more on public transit. This location not only offers great transit access, but enables walking and bicycling as especially practical modes of travel. These zero emissions, low cost, or free travel options provide access to thousands of jobs and services. We commend the plan for bicycle parking that includes electric charging for e-bikes. We also recognize the plan's improvements to public sidewalks, by widening them, and closing up multiple curb cuts. We do want to ask that attention be given to the bus stop at N and Florida Ave. The plans show a protected bike lane but do not indicate the existing bus stop. The streetscaping plans should include accommodation of a comfortable bus stop at its current location, recognizing this is in public space.

The proposal does justice to the opportunity of the site – it takes full advantage of fulfilling DC Comprehensive Plan objectives of providing very low and extremely low income housing in a highly accessible location. The proposal maximizes the housing opportunity with 115 homes, while also appropriately fitting into the neighborhood with ground floor retail and bike-friendly streetscaping.

Racial Equity Analysis Tool

Theme	Original	CSG Comments
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The site is vacant. No one lives at the site.
Housing	Will action result in changes to: Market rate housing? Affordable housing? Replacement Housing?	The proposal for all affordable homes at deeply affordable levels is impressive. The 115 homes will serve households at the 30% MFI and 50% MFI. 24 will be 3 bedroom units. These affordability levels are greatly needed to serve lower income DC households, who are disproportionately African American. On average, White households earn 3 times the income of Black DC households (see figure below). Over 25% of Black residents experience poverty compared to 6% of White residents . This project expands access to affordable housing in a growing neighborhood where most of the new housing is market rate and out of reach for a large share of Black DC households.
Physical	Will the action result in changes to the physical environment such as: Public space improvements; Infrastructure Improvements Art and culture; Environmental changes; Streetscape improvements?	The proposed public space improvements will widen sidewalks and close up curbcuts. The project will provide increased connectivity to the Metro station and improve the streetscape along Florida Ave. and at a Metrobus stop in front of the property. This is a benefit to bus riders, of which a vast majority are people of color .
Access to Opportunity	Job training/creation? Healthcare? Additional retail/access to new services?	The location is within walking distance to thousands of jobs, healthcare facilities, full service grocery stores, and schools. The site is also located next to a Metrorail station, the 90s Bus Priority corridor, and the Metropolitan Branch Trail, and Capitol Bike Share stations.



From: A Systems Analysis of the Black-White Racial Wealth Gap in the District of Columbia, December 2021. For DC Council Office on Racial Equity. <https://sjp.mitre.org/racial-wealth-gap>

Overall, we commend this project as an ambitious proposal to provide a large number of homes for the DC individuals and families who need them most. The site location offers walk, bike, and transit access to jobs, services, and amenities. This 12-story mixed use building on an awkward triangular lot will help DC achieve its affordable housing and sustainability goals.

Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director