

TO: Joseph Snider, Surveyor for the District of Columbia
Mamadou Ndaw, Acting Zoning Administrator, DOB

FROM: *JLS*
Jennifer Steingasser, Deputy Director, Development Review & Historic Preservation

DATE: March 22, 2023

SUBJECT: Office of Planning Report for Large Tract Review Case No. 2022-01
2650 Woodley Road, N.W. and 2601 Calvert Street, N.W.

I. SUMMARY

Section 2300.1 (a) of Title 10 of the District of Columbia Municipal Regulations (DCMR) directs the Office of Planning to “[r]eview, prior to the filing of applications for building permits or construction permits, (for) all large tract development projects comprising three (3) acres or more and any commercial or mixed-use commercial development of fifty-thousand square feet (50,000 ft²) or more gross floor area (above grade) and cellar area (below grade); ...”. This otherwise by-right development proposal is subject to Large Tract Review (“LTR”) because it involves the development of more than three acres.

LTR is not a process that results in an “approval” or “denial”. It is an administrative review by District agencies and the community to identify issues and provide feedback to the developer of a by-right project prior to applying for building permits. The Office of Planning (OP) completed the administration of this process, and its own review of the LTR application. The application addresses the LTR regulations, as outlined in DCMR Title 10, Chapter 23, § 2300.2 to:

- Minimize adverse environmental, traffic, and neighborhood impacts;
- Avoid unnecessary public costs in terms of new services or facilities required of city agencies; and
- Carry out the policies of the District Elements of the Comprehensive Plan.

II. LOCATION AND SITE DESCRIPTION

Address	2650 Woodley Road, N.W. and 2601 Calvert Street, N.W
Applicants	CP VII Wardman, 1-A, LLC and CP VII Wardman, 1-B, LLC
Legal Description	Square 2132, Lots 855 and 856
Ward, ANC	Ward 3, ANC 3C
Zones	RA-2 and RA-4
Historic Resource	None. Adjacent associated property at 2660 Woodley Road, N.W. (Wardman Park Hotel) is an historic landmark.
Lot Characteristics	Unusually shaped lot with frontage on Woodley Road, 24 th Street and Calvert Street, N.W.
Existing Development	Former hotel building, partially demolished

Adjacent Properties	North: Across Woodley Road, apartment buildings and institutional uses South: Across Calvert Street, apartments and hotels East: Apartments West: Apartments and a private school
Surrounding Neighborhood Character	Medium to high-density residential and hotel development, including retail and office uses along Connecticut Avenue



Source: Large Tract Review Application, Exhibit F

III.PROJECT SUMMARY

The application is consistent with the type and scale of development permitted in the RA-2 and RA-4 zones for each of the two buildings, as shown below.

Development Standard	Regulation	Proposed
Height F § 302		
-RA-2	50 feet max., 90 feet with setback equal to building height above natural or finished grade max.	90 feet with a 90-foot setback from all RA-2 lot lines

Development Standard	Regulation	Proposed
-RA-4	90-foot max.	90 feet
Lot Width		
-RA-2	None Prescribed	N/A
-RA-4	None Prescribed	N/A
Lot Area		
-RA-2	None Prescribed	619,723 sq. ft.
-RA-4	None Prescribed	82,571 sq. ft.
Floor Area Ratio F § 302		
-RA-2	1.8 max. 2.16 (IZ) max.	1.79
-RA-4	3.5 max. 4.2 (IZ) max.	3.49
Lot Occupancy F § 304		
-RA-2	60% max.	22.3%
-RA-4	75% max.	29.7%
Rear Yard F § 304		
-RA-2	Rear yards not required for through lots (see C § 317.3)	Not applicable
-RA-4	Rear yards not required for through lots (see C § 317.3)	Not applicable
Side Yard F § 306		
-RA-2	None Required, but 4-foot min. if provided	4 feet
-RA-4	None Required, but 4-foot min. if provided	4 feet
Vehicle Parking C § 701		
-Residential, multiple dwelling unit	1 per 3 in excess of 4 units or 289 spaces min.	852 spaces ¹
-Lodging	0.5 spaces per 1,000 sq. ft. in excess of 3,000 sq. ft.	21 spaces
Bicycle Parking C § 802		
-Long Term	Long Term: 1 space for each 3 dwelling units (310 spaces required) Short Term: 1 space for each 20 dwelling units (44 spaces required)	376 spaces, including 18 electrical vehicle parking spaces with access to charging stations
-Short Term		57 spaces

¹ The applicant proposes mitigation pursuant to C § 707, Mitigation for Parking Significantly in Excess of the Minimum Requirement.

Development Standard	Regulation	Proposed
Loading C § 901.1	1 berth and 1 service space per building min., or 2 berths and 2 service spaces	4 berths 12 feet wide and 38 feet, 4 inches long per building, or 2 per building
GAR F § 307		
-RA-2	0.4 min.	0.38 average
-RA-4	0.3 min.	
Use U § 400		
-RA-2	Multiple dwellings in an apartment house as a matter-of-right	Multiple dwellings in an apartment house
-RA-4	Multiple dwellings in an apartment house as a matter-of-right	Multiple dwellings in an apartment house

IV. ANALYSIS OF COMPLIANCE WITH 10 DCMR, CHAPTER 23, LTR PROCEDURES

This proposal is for the development of 9.51 acres. Therefore, it is subject to the large tract review and the scope of the review as set out in section 2302.1. There are no specified submission requirements when a review does not include a subdivision or mixed-use project but the standards of Sections 2301.2 are typically used and are used in this case.

2301.2 Applicants for subdivision review shall submit ... the following documents for subdivisions of three (3) acres or more:

- (a) A completed certification form (forms shall be provided by the Office of Planning);
Submitted. (See Exhibit O)
- (b) A study of site characteristics and conditions, containing the following:
 - (1) A description of existing topography, soil conditions, vegetation and drainage consisting of written material, plats, maps and photographs;
Submitted. (See Exhibit I)
 - (2) Proposed topography including street grades and other grading contours;
Submitted. (See Exhibit F)
 - (3) Identification of mature trees to remain and percent of site to be covered by impervious surface;
Submitted. (See Exhibit J)
 - (4) Proposed drainage and sewer system and water distribution;
Submitted. (See Exhibit K)
 - (5) Proposed treatment of existing natural features such as steep slopes, ravines, natural watercourses, etc.;
Submitted. (See Exhibit L)
 - (6) Proposed method of solid waste collection;

Submitted. (See Exhibit M)

- (7) Estimated water consumption (gallons per year)

Submitted. (See Exhibit N)

- (c) A transportation study, containing the following:

- (1) Proposed circulation system including general location of roadways, driveways and sidewalks;

Submitted. (See Exhibit F)

- (2) Relationship of the proposed circulation system to the District's street system;

Submitted. (See Exhibit G)

- (3) Estimated number and type of trips assumed to be generated by project, and assumed temporal and directional distribution;

Submitted. (See Exhibit G)

- (4) Accommodations for and use of parking and loading areas;

Submitted. (See Exhibit G)

- (5) Traffic management requirements (lights, stop signs, one-way streets, etc.)

Submitted. (See Exhibit G)

- (6) Relationship of the proposed project to the mass transit system (nearest bus stops and routes, nearest Metrorail stations, etc.);

Submitted. (See Exhibit G)

- (d) A site plan or plans including, in addition to pertinent site condition and circulation information, the following:

- (1) Subdivision plan;

A subdivision plan is not required because the property will not be subdivided further and will not consist of easements. An Assessment and Taxation Plat of Lot A&T Lots 855 and 856 within Lot 32 and Square 2132 has been provided in Exhibit C, part 2, page 7.

- (2) Approximate location and description of all structures;

Submitted. (See Exhibit F)

- (3) Type of ownership and management arrangement (fee simple, cooperative, condominium, etc.);

This was not included in the application. However, the applicant confirmed by email to the Office of Planning on March 3, 2023 that it will be fee simple.

- (4) Staging plan describing the phasing of construction if the project is not to be carried out all at one time;

Not applicable. The project would be constructed in one phase.

- (5) Information concerning any required new public facilities and estimated impact on existing public facilities other than streets or sewers (schools, recreation, police, fire, etc.) to assist in an assessment of such factors to be prepared by the Office of Planning; and
 - (6) Relationship of the proposed structure(s) to public space, both developed and redeveloped.
- Submitted (See Exhibit I)

On March 6, 2023 the applicant submitted the following to OP via email:

Schools

A student's in-boundary school is based solely on the student's home address. DC Public Schools (DCPS) provides that all students eligible for grades K-12 have a guaranteed right to enroll in their in-boundary school. The Property is in-bounds for the following schools:

Elementary School

- Oyster-Adams Bilingual School (Oyster) located at 2801 Calvert Street NW
- Oyster-Adams Bilingual School (Adams) located at 2020 19th Street NW

Middle School

- Oyster-Adams Bilingual School (Adams) located at 2020 19th Street NW

High School

- Jackson-Reed High School located at 3950 Chesapeake Street NW

The Department of General Services (DGS) is currently managing a school modernization project for the Oyster-Adams Bilingual School (Adams Campus) that would involve modernizing the building to meet the school's programmatic needs and DCPS Educational Specifications. The scope of the modernization will address capacity needs based on ten-year enrollment projections from the Master Facility Plan, and may include: new building layout, new building systems (HVAC, plumbing, etc.), and new furniture and technology. During a presentation to the school community on April 26, 2022, it was indicated that construction would begin during the 2023-24 school year and should be completed for the 2025-26 school year.

Recreation

As noted in the Application Statement, the Property is located near several high-quality recreational amenities, including the expansive Rock Creek Park, the Smithsonian National Zoological Park, and Woodland-Normanstone Terrace Park, and is within close proximity to the Georgetown Waterfront. The Project itself will consist of approximately 175,000 square feet (4 acres) of lushly landscaped open space. The Project will also provide residential amenities that include a fitness center, three swimming pools, and rooftop amenity space. Future residents will have access to nearby recreation centers in Kalorama, Adams Morgan, and Cleveland Park. Given the generous recreation space located within proximity to the Property and within the Project, the Project should not have a negative impact on recreational facilities.

Police

The Property is located within Police Service Area 204 of Police District 2. DGS has no ongoing capital improvement projects for DC Metropolitan Police Department (MPD). Additionally, MPD has not provided comments concerning the Large Tract Review to date.

The hotel that previously occupied the Property consisted of approximately 1,152 rooms and approximately 195,000 square feet of event space, whereas the proposed Project will provide 868 new dwelling units. Unlike the previous hotel building, the Project will not include extensive event space, significantly reducing the density and number of activities on the Property. The replacement of transient accommodation with permanent housing provides the opportunity for neighbors to develop social cohesion and trust. It is not anticipated that the Project will negatively impact MPD's ability to support the neighborhood.

Fire

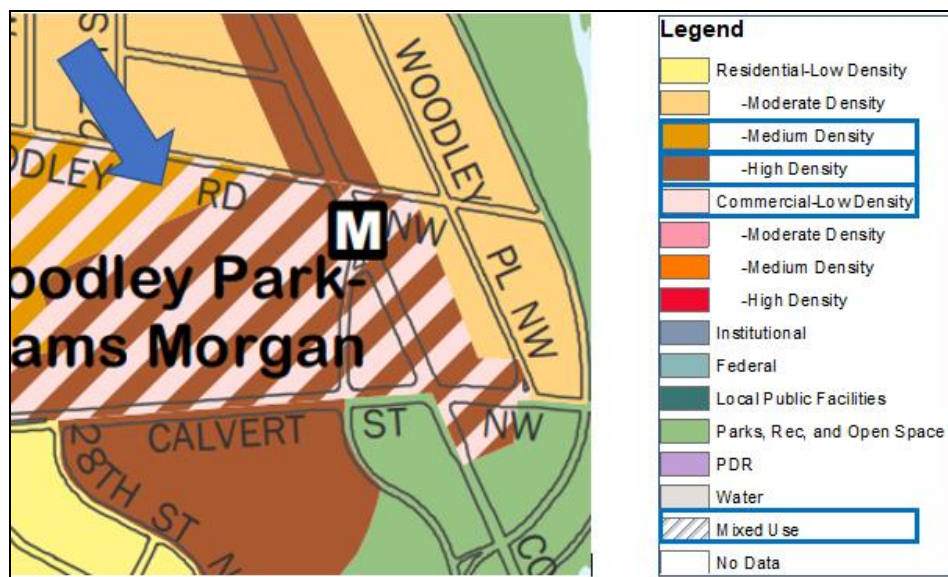
Information provided by DC Fire and EMS (FEMS) indicates that Engine Company 21, located at 1763 Lanier Place NW, is the nearest fire station to the Property. There are no public safety modernization projects scheduled for this station or others in Ward 3. To date, FEMS has not provided comments concerning the LTR.

The Project will replace a hotel with a residential building having a smaller building footprint. The residential use will change the nature of how the site is used, and unlike a hotel, it will no longer provide event space or regularly host events, which can complicate the logistics of accessing the Property in the event of an emergency. Additionally, the Property will continue to be accessible from Calvert Street and 24th Street. The Project will comply with all fire safety requirements and the Applicant will continue to coordinate with FEMS to ensure that future residents of the building can receive essential life safety services. As such, the Project will not have a negative impact on FEMS's ability to serve the neighborhood.”

V. SCOPE OF REVIEW: Consistency with the Comprehensive Plan (Section 2302.)

Future Land Use Map

Medium Density Residential: *This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent Low Density Residential open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-3 Zone District is consistent with the Medium Density Residential category, and other zones may also apply. (§ 227.7)*



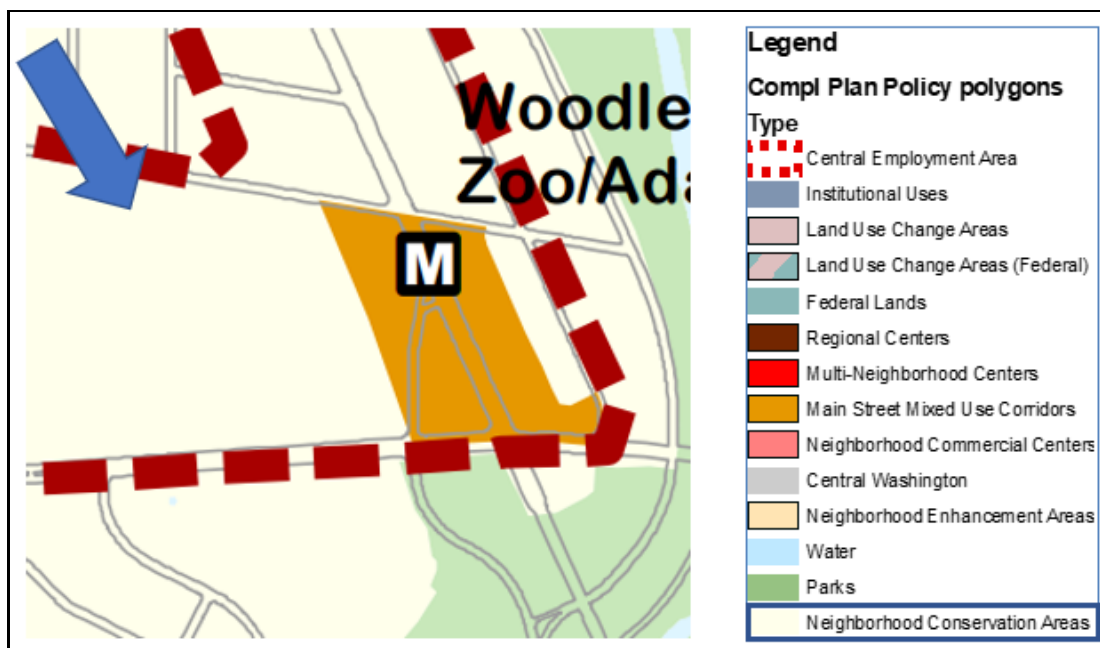
High Density Residential: This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. (227.8)

Low Density Commercial: This designation is used to define shopping and service areas that are generally lower in scale and intensity. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts that draw from a broader market area. Their common feature is that they are comprised primarily of commercial and mixed-use buildings that range in density generally up to a FAR of 2.5, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The MU-3 and MU-4 Zone Districts are consistent with the Low Density category, and other zones may also apply. (§ 227.10)

Mixed Use Categories: The Future Land Use Map indicates areas where the mixing of two or more land uses is especially 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. A Mixed Use Future Land Use Map designation should not be confused with the Mixed Use (MU) zoning districts, although they frequently apply to the same area or parcel of land. (§ 227.20)

The existing residential zone designations on the subject property do not permit commercial uses although the addition of the Low Density Commercial stripe on the FLUM would permit a mixed-use zone should the applicant file for one. The Office of Planning has encouraged the applicant to seek such a map amendment for the subject property to allow for commercial uses on the site in acknowledgment of the land use recommendations of the current Comprehensive Plan.

Generalized Policy Map



Neighborhood Conservation Areas: Neighborhood Conservation areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist

primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. 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. (§ 225.4)

The site is also identified on the Generalized Policy Map as being in a Future Planning Analysis Area, which are “large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable development...” (§ 2503.2). It is intended that the planning analysis “shall precede any zoning changes in the area.” This study, called the Connecticut Avenue Development Guidelines planning process, is currently underway. For this development, the applicant is not requesting a zoning change and therefore may proceed before the Connecticut Avenue Development Guidelines are complete.

Land Use Element

Policy LU-1.4.2: Development Around Metrorail Stations

In developments above and around Metrorail stations emphasize land uses and building forms that minimize the need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. (§ 307.10)

Policy LU-1.4.3: Housing Around Metrorail Stations

Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. (§ 307.11)

Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations

Explore and implement as appropriate mechanisms, which could include community land trusts, public housing, and shared appreciation models, to encourage permanent affordable rental and for-sale multi-family housing, adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. (§307.12)

Policy LU-1.4.5: 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 sidewalks, bicycle lanes, 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 or low-density housing. (§ 307.13)

Policy LU-1.4.6: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District’s broader need for housing. (§ 307.14)

Policy LU-1.4.7: Parking Near Metro Stations

Encourage the creative management of parking around transit stations, ensuring that multimodal needs are balanced. New parking should generally be set behind or underneath buildings. Parking should be managed and priced to focus on availability and turnover rather than serving the needs of all-day commuters, while considering the commuting characteristics of District residents, such as access to transit stations and mode use, to provide equitable outcomes. As existing parking assets are redeveloped, one-for-one replacement of parking spaces should be discouraged, as more transit riders will be generated by people living, working, and shopping within walking distance of the transit station. (§ 307.15)

Policy LU-1.5.1: Infill Development

Encourage infill development on vacant land within Washington, DC, particularly in areas where there are vacant lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. Such development should reflect high-quality design, complement the established character of the area and should not create sharp changes in the physical development pattern. (§ 308.6)

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to preserve historic resources, advance environmental and sustainability goals, and further Fair Housing. The overarching goal to create vibrant neighborhoods in all parts of the District requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, including inclusive and integrated growth and meeting communities and public facility needs. All neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. (§ 310.10)

Policy LU-2.1.10: Multi-Family Neighborhoods

Maintain the multi-family residential character of the District's medium and high-density residential areas. Limit the encroachment of large-scale, incompatible commercial uses into these areas. Make these areas more attractive, pedestrian-friendly, and transit accessible, and explore opportunities for compatible commercial development which provides jobs for nearby residents. (§ 310.17)

Policy LU-2.1.11: Residential Parking Requirements

Parking requirements for residential buildings should respond to the varying levels of demand associated with different unit types, unit sizes, unit locations (including proximity to transit), and emerging transportation trends and new technology (such as the sharing economy and autonomous vehicles (AVs)). 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 demonstrated. (§ 310.18)

The two new residential buildings would replace a vacant and closed hotel building that was determined by the applicant to not be suitable for conversion to housing due to building code issues. The new multi-family structures will be consistent with the high-density residential development of the FLUM.

Although located close to a Metrorail station and on a major corridor, the applicant proposes to provide significantly more on-site parking than required by the Zoning Regulations, which is not conducive to the

encouragement of transit use. However, the applicant proposes to utilize 289 existing below-grade spaces for parking, which would lessen construction and excavation impacts. Because proposed vehicle parking would be below-grade, its visibility and streetscape impact would be minimal.

Transportation Element

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. (§ 403.14)

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. (§ 411.5)

OP encourages the applicant to consider reducing the amount of on-site parking in place of providing for mitigation of the number of parking spaces proposed, to encourage the reduction of vehicle trips to the network generated by this site. OP also supports the applicant working with DDOT through the Public Space Permitting process, to adjust the curb cuts as currently designed by the applicant to improve pedestrian circulation through a safer and more accessible network of sidewalks.

Housing Element

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. (§ 503.3)

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District 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. (§ 503.5)

Policy H-1.1.8: Production of Housing in High-Cost Areas

Encourage development of both market rate and affordable housing in high-cost areas of the District, making these areas more inclusive. Develop new, innovative tools and techniques that support affordable housing in these areas. Doing so increases costs per unit but provides greater benefits in terms of access to opportunity and outcomes. (§ 503.10)

Policy H-1.1.9: Housing for Families

Encourage and prioritize the development of family-sized units and/or family-sized housing options which generally have three or more bedrooms, in areas proximate to transit, employment centers, schools, public facilities, and recreation to ensure that the District's most well-resourced locations remain accessible to families, particularly in areas that received increased residential density as a result of underlying changes to the Future Land Use Map. Family-sized units and/or family-sized housing options include housing typologies that can accommodate households of three or more persons and may include a variety of housing types including townhomes, fourplexes and multi-family buildings. To address the mismatch between meeting the needs of larger households and the financial feasibility of developing family-sized housing, support family-sized housing options through production

incentives and requirements that address market rate challenges for private development that may include zoning, subsidies or tax strategies, or direct subsidy and regulatory requirements for publicly owned sites. (§ 503.11)

The proposed development is not inconsistent with the existing zoning. On balance, it is also not inconsistent with the Comprehensive Plan and will implement many of the Plan's objectives, including the provision of housing and affordable housing.

The proposed two multi-family buildings, located adjacent to the Woodley Park/Adams Morgan Metrorail station, would provide both market rate and affordable housing in a high-cost, high opportunity area. In conformance with the Inclusionary Zoning Regulations, the proposed buildings would provide approximately 62,750 square feet of affordable housing at 60% MFI (Median Family Income), or approximately 8% of the proposed residential square footage. Larger units would also be provided, with 43 percent of the units containing two-bedrooms, and 8 percent of the units having three-bedrooms. The proposed development would provide approximately 868 new dwelling units. OP continues to encourage the applicant to increase the number of three-bedroom units.

OP also continues to encourage the applicant to work with relevant District agencies to take advantage of existing programs that would increase the number of dedicated affordable units. The Housing Equity Report (October 2019) set a goal of 36,000 new housing units, including 12,000 affordable units, by 2025 to increase housing affordability and opportunity for all residents. It also examined the location of existing dedicated affordable housing units and set production goals for new affordable housing by Planning Area. The Rock Creek West Area, which includes this site, was identified as the area in the city with the fewest number of existing affordable housing units, and therefore the area with the highest affordable housing production goal.

Rock Creek West Roadmap, (August 21, 2021), which notes that:

“Only 1% of Rock Creek West’s housing units are dedicated affordable housing – the fewest of the District’s 10 Planning Areas. In addition, only 40% of the total rental supply in Rock Creek West is affordable to low-income households compared to 64% across the District. However, because these units are not dedicated affordable units, many of them are occupied by higher income households.”...

“When high-opportunity neighborhoods, such as Rock Creek West, lack affordable housing or when areas with affordable housing lack neighborhood services and amenities, residents in low-income households are excluded from important social and economic opportunities.” (Page 9)

Environmental Protection Element

Policy E-1.1.2: Urban Heat Island Mitigation

Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives. (§ 603.6)

Policy E-2.1.2: Tree Requirements in New Development

Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. Tree planting and landscaping

required as a condition of permit approval should include provisions for ongoing maintenance. (§ 605.6)

Policy E-3.3.2: Construction and Demolition Recycling

Support the recycling of construction and demolition debris as a key strategy for reducing the volume of waste requiring landfill disposal. To carry out this policy, encourage the deconstruction of obsolete buildings rather than traditional demolition. Deconstruction dismantles buildings piece by piece and makes the components available for resale and reuse. (§ 613.6)

Policy E-4.1.1: Maximizing Permeable Surfaces

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce runoff. (§ 615.3)

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, 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. (§ 615.4)

The project would be generally not inconsistent with the policies of the Environmental Protection Element. The site plan includes considerable open landscaped space, including the preservation of trees, which help to address stormwater management and resilience. The applicant has been encouraged to examine ways that portions of the existing building could be re-used or recycled on-site, in accordance with E-3.3.2. The applicant is encouraged to continue to work with DOEE to fully address environmental issues, such as the provision of solar panels, through the permitting process.

Urban Design Element

Policy UD-1.2.1: Respecting Natural Features in Development

Respect and perpetuate the natural features of Washington, DC's landscape as part of new development. In wooded or hilly areas, new construction should preserve natural features rather than alter them to accommodate development. Development in such areas should be clustered to protect topography and provide setbacks as needed to protect natural features, such as large trees, rock outcroppings, streams, and wetlands. (§ 904.3)

Policy UD-2.2.1: Neighborhood Character and Identity

Strengthen the visual qualities of Washington, DC's neighborhoods as infill development and building renovations occur by encouraging the use of high-quality and high-performance architectural designs and materials. In neighborhoods with diverse housing types, or when introducing more diverse infill housing types, use design measures to create visual and spatial compatibility. (§ 909.5)

Policy UD-2.2.2: Areas of Strong Architectural Character

Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development, additions, and renovations within such areas do not need to replicate prevailing architectural styles exactly but should be complementary. (§ 909.6)

Policy UD-2.2.3: Neighborhood Mixed-Use Centers

Undertake strategic and coordinated efforts to create neighborhood mixed-use centers that reinforce community identity and form compact, walkable environments with a broad mix of housing types, employment opportunities, neighborhood shops and services, and civic uses and public spaces. New buildings and projects should support the compact development of neighborhood centers and increase the diversity of uses and creation of public spaces where needed. (§ 909.8)

Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. (§ 909.10)

Policy UD-2.2.8: Planning for Large Sites

Urban design plans for large sites shall consider not only the site itself but also the context of surrounding neighborhoods, including the continuation of and connection to existing street grids. (§ 909.14)

Policy UD-2.3.1: Play for Every Age

Create appealing plaza spaces that incorporate play and welcome multiple generations, such as playable fountains, skateboarding facilities, climbable sculptures, chess tables, and other interactive elements. In particular, attention should be paid to elements that can encourage social play and interaction among community members, play between parents and children, and opportunities for engaging teenagers. (§ 910.3)

Policy UD-2.3.5: Shared Play Spaces

Promote the incorporation of play spaces in the common outdoor areas of new multi-family buildings, with a focus on spaces for less mobile infants and toddlers. Courtyards, terraces, and roofs can serve as outdoor spaces for children's play. (§ 910.7)

Policy UD 3.2.1: Buildings that Enable Social Interaction

Residential building design should provide opportunities and spaces for interaction, such as open-air porch entrances, balconies, front stoops, and shared yards. Large multi-family buildings should prioritize individual, Crossing the Street is a series of events designed to engage communities by using arts and culture to activate neighborhood spaces. ground-level entrances to units that open up to the street in addition to interior access to units through a shared private lobby. (§ 914.3)

Policy UD-3.3.3: Plazas for Diverse Uses

Design plazas to accommodate physical activities like dancing or ball play, passive activities like sitting and chess, and cultural events like concerts, exhibits, and historical celebrations. Plazas can also provide space for café style seating and farmers markets. When programming plazas, consider the needs of users with varying mobility levels. 915.5

The proposed development would be of a scale and height that is generally compatible with the immediate surroundings and the overall design and siting would complement the existing neighborhood character. Significant open space would be maintained and improved for the enjoyment of the residents of the new building and surrounding neighborhood. The application is described as incorporating “high quality materials” and “architectural elements that provide variety and visual interest”. Although the current proposal

does not include a commercial / retail component (consistent with existing zoning on the site, which does not allow commercial uses), the new residents on the site would support existing businesses along this section of Connecticut Avenue in Woodley Park, strengthening this important, historic retail corridor.

The applicant is encouraged to incorporate comments from the Urban Design Division of OP (provided in this report under District Agency Responses) in the final design of the buildings and the site, including the provision of kid and family-friendly amenities in the open space design in accordance with UD-2.3.5, the incorporation of artwork, and the inclusion of sustainable and resilient design features.

Historic Preservation Element

Policy HP-2.5.3: Compatible Development

Preserve the important historic features of the District while permitting compatible new infill development. ... Ensure that new construction, building additions, and exterior changes are in scale with and respect their historic context through sensitive siting and design, and the appropriate use of materials and architectural detail. 1014.9

The subject property is proximate to the Wardman Park Hotel, an historic landmark, so was subject to review by the Historic Preservation Review Board (HPRB). HPRB considered the proposal in early 2022, finding the concept “compatible with the adjacent landmark” and delegated final construction approval to Historic Preservation Office staff. See also Historic Preservation Office comments under District Agency Responses below.

Infrastructure Element

Policy IN-2.2.1: Improving Stormwater Management

Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process, with clear lines of responsibility with regard to oversight, guidelines, and sources. 1307.3

Policy IN-2.2.2: Decrease Stormwater Runoff

Reduce stormwater runoff through a variety of approaches, such as rain gardens, bioswales, green roofs, trees, cisterns, and pervious pavement. By 2032, capture, retain, or reuse stormwater from at least 10 percent of Washington DC’s land area. Focus on areas that flood regularly, have steep topography, or have known drainage capacity issues. (§ 1307.4)

Policy IN-6.2.2: Developer Contributions

Require that private developers fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to infrastructure, including water and wastewater, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project. (§ 1320.4)

The LTR application was referred to District agencies who were invited to provide comments. Both DC Water and DPW indicated no concerns at this time; other agencies such as DDOT, DOEE and DPR provided detailed comments. Infrastructure needs and developer requirements will be addressed through the building permit process with the appropriate DC agencies. All comments from agencies have been provided to the applicant and are included in this report under the District Agency Responses section, below.

Rock Creek West Area Element

Policy RCW-1.1.4: Infill Development

Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage mixed-use projects that combine housing, including affordable housing, neighborhood-serving retail, and commercial uses. Design transitions between large- and small-scale development to ameliorate the appearance of overwhelming scale and to relate to context of lower-scale surrounding neighborhoods. (§ 2308.5)

Policy RCW-1.1.6: Metro Station Areas

Recognize the importance of the area's five Metro stations to the land use pattern and transportation network of Northwest Washington and Washington, DC as a whole. Each station should be treated as a unique place and an integral part of the neighborhood around it. Mixed-use redevelopment at the area's Metro stations should prioritize the production of affordable and moderate-income housing and retail uses in a manner consistent with the Future Land Use Map, the Generalized Policy Map, and the policies of the Comprehensive Plan. Design context-specific transitions to be more aesthetically pleasing from development along the avenues to nearby low-scale neighborhoods. (§ 2308.7)

Policy RCW-2.1.1: Connecticut Avenue NW Corridor

Sustain the high quality of the Connecticut Avenue NW corridor. The positive qualities of the corridor, particularly its architecturally appealing, older apartment buildings; green spaces; trees; and walkable neighborhood shopping districts, should be conserved and enhanced. Continued efforts to improve traffic flow and parking should be pursued, especially in the commercial districts. (§ 2311.5)

Policy RCW-1.1.9: Conserving Common Open Space

Conserve the large areas of green space and interior open spaces that are common in and around the community's institutional uses and its older apartment buildings. Where these open spaces are recognized to contribute to the integrity of the site or structure, consideration should be given to reconcile infill with these open spaces. (§ 2308.10)

Connecticut Avenue Policy Focus Area (RCW-2.1)

Policy RCW-2.1.2: Infill Development

Recognize the opportunity for additional housing, including new affordable and moderate-income units, with some retail and limited office space along the Connecticut Avenue NW corridor. (§ 2311.6)

Action RCW-2.1. A: Large Hotel Sites

Future development and operational proposals for the Omni-Shoreham hotel should include analyses of impacts on adjacent residential and commercial areas and appropriate mitigating measures, prepared by the property owner. Proactively address ongoing issues at the hotels, such as a motor coach and visitor parking. The redevelopment of the Wardman Park hotel site should be studied and included in neighborhood planning efforts. (§ 2311.8)

The proposal would create additional housing, including new affordable housing as required by the Inclusionary Zoning regulations of the Zoning Regulations. The infill residential development on this site, adjacent to a Metro station and the Connecticut Avenue corridor, includes the preservation of considerable open space for use by residents of the buildings and the neighborhood.

VI. EQUITY

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity. The subject property is currently developed with a closed hotel building; as such displacement is not an issue.

The Comprehensive Plan Analysis through a Racial Equity Lens

The Comprehensive Plan update recognizes that advancing equity requires a multifaceted policy approach. Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. The property is within the Rock Creek West Planning Area.

Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (§ 205.3). Scarcity of land increases the cost of building new housing, limits the availability of housing, and intensifies housing cost burdens, especially for lower and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (Framework Element § 206.4).

Demographic and Socioeconomic Data for the Rock Creek West Area Element: 2017-2021

	Households	Median Income	Unemployment Rate	Owner Occupied	Renter Occupied	Median Age (years)
White Alone	68,502	\$159,110	3.6%	57.7%	42.3%	42.8
Black or African American Alone	8,045	\$63,653	8.9%	30.4%	69.6%	38.1
American Indian & Alaska Native	92	\$42,500	0.0%	0%	100%	46.8
Asian Alone	5,992	\$107,935	77/7%	44.8%	55.2%	41.8
Native Hawaiian & Other Pacific Islander	60	\$137,500	27.80%	100.0%	0.0%	Not Available
Other Race	1,690	\$79,113	1.1%	28.6%	71.4%	30
Two or More Races	6,077	\$105,150	3.8%	46.7%	53.3%	28.3

PLANNING AREA TOTAL	90,457	\$138,665	3.9%	53.5%	46.5%	40.6
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Source: opdatahub.dc.gov

The table depicts homeownership and unemployment rates, and median income of households within the Rock Creek West Planning Area during the years 2017-2021 by racial group. The data shows that unemployment, income and homeownership rates are not equally divided across racial lines. The addition of new housing, accessible to public transportation and within a development that could include employment and business opportunities and access to employment throughout the region, would have the potential to reduce the disparities as shown in the table.

The proposed development would not result in the displacement of any residents as there are no residential uses on the site. The property is serviced by multiple Metrobus routes and located within one-half mile of the Woodley Park Zoo/Adams Morgan Metrorail station. The increase in permitted uses would create an opportunity to establish additional land uses not currently permitted on the site, including workforce development and employment opportunities not permitted under the existing zone designation. The combination of residential and commercial uses on this site could potentially diversify the uses of this neighborhood to include an increase in housing and potential workforce development opportunities on a long vacant property currently improved with only an abandoned accessory building.

(b) Potential traffic, neighborhood and design impact;

As noted below, the Urban Design Division within OP, DDOT, other agencies, and the community raised a number of issues related to traffic, neighborhood, and design impacts which the applicant should seek to address. OP encourages the applicant to continue to work with DDOT, including the Public Space Committee, on the refinement of the vehicular access design, including curb cuts, and all issues as enumerated in the DDOT report submitted by its Planning and Sustainability Division.

(c) Quality of life and environmental impact.

As noted below, the Urban Design Division within OP, DOEE, other agencies, and the community raised a number of issues related to quality of life and environmental impacts which the applicant should seek to address. The proposed building would add new residential units, including affordable units as required by the Zoning Regulations. OP urges the applicant to follow up with the Urban Forestry Administration of DDOT regarding the pruning of trees on site and the care of the street trees adjacent to the property and with DOEE on the many environmental issues raised in their report (attached below).

VII. DISTRICT AGENCY RESPONSES

Application materials were distributed to the following District departments for their review and comment:

- DC Public Library (DCPL)
- DC Water
- Department of Transportation (DDOT), including DDOT Urban Forestry Administration
- Department of Housing and Community Development (DHCD)
- Department of Parks and Recreation (DPR)
- Department of Public Works (DPW)

- Department of Small and Local Business Development (DSLBD)
- Department of Energy and Environment (DOEE)
- Department of Buildings (DOB)
- Department of Employment Services (DOES)
- DC Public Schools (DCPS)
- Fire and Emergency Medical Services (FEMS)
- Metropolitan Police Department (MPD)
- Office of Zoning Legal Division (OZLD)
- Historic Preservation Office within the Office of Planning (HPO)
- Urban Design Division within the Office of Planning (UD)

In addition, OP coordinated a technical conference including District agencies and the applicant, in accordance with Section 2306.4 of the Large Tract Review regulations, held on February 6, 2023.

All Agency responses were forwarded to the applicant upon receipt. Copies or a summary of comments are provided below.

DC Public Libraries: February 2, 2023

“DCPL has no comments.”

DC Water: February 6, 2023

DC Water informed OP that it had no comments on the application.

DDOT-Urban Forestry Administration: February 6, 2023

1. UFD does not have any formal comments for the February 1st deadline, however, the DDOT Arborist has been working closely with the design team at Wardman Park. Since September 2022 there have been pre-construction and site logistics site meetings to discuss tree preservation and tree removals. And I have asked DDOT Arborist Janet Miller to attend the February 6th meeting to provide the most up-to-date tree-related information that can be used for the Large Tract Review.

In the meantime, below is a summary of items that are in the process of or have been addressed -

- DDOT Special Tree permit (on-site) - application #90733 is under UFD review.
- DDOT Special Tree permit (neighbors) – requires written permission from neighboring property owner. Apply under a separate permit application. If permission to remove cannot be obtained, pruning of private trees is allowed under the Right to Self Help; no TOPS permit required.
- Tree Preservation Plan – submit an advanced TPP for the entire project (includes Heritage sized American Elm street tree + private property trees), no phasing. If changes are needed, TPP can be reviewed and amended as needed.
- DDOT Tree Pruning (PA409630) – public space construction permit issued for canopy clearance pruning of street tree (American Elm)

- DDOT Construction permit (#400989) – for curb cut/projections only. UFD review status - revisions needed due to the 2 street tree removals, at least 3 new street tree plantings, protection of remaining street trees abutting the LOD, preservation plan for Heritage-sized American Elm street tree, as well as protection/preservation plan & removal of Special Trees.
- 2. New Special Tree applications for Tree Removals and Tree Preservation Plans submitted due to owner info needing update. Old applications were updated to denied to prevent duplicate permitting. These three applications have been reviewed and approved, pending payment to tree fund. Tracking #s 90812, 90738, and 90733.

Please have pruning of Calvert elm street trees completed prior to staging of equipment for clearances as discussed and on pending application. Pruning has been completed as of 1/30/23.

Preserve Ulmus americana 33.00 103.67 80.00 Heritage Tree – Non Hazardous (over 100") Approved 12/14/2022 jmler Tree 104. DDOT street tree; not tagged. Compacted Soils, Surface Roots, Trunk Decay, Small deadwood (1-2") Move of utility supports the preservation efforts.

Pruning is necessary for demo clearance. PS Tree landscape pruning permit needed. Obtained and pruning work completed.

Ulmus americana 14.00 43.98 90.00 Non-Hazardous Approved 12/14/2022 jmler Tree 103. DDOT street tree; not tagged. Compacted Soils, Surface Roots PS /tree permit for landscape, removal to be applied for street tree removal. protect until removal of tree is permitted and scheduled. Pruning is necessary for demo clearance. PS Tree landscape pruning permit needed. obtained, and pruning work has been completed.

PS Tree Removal permit and PS Tree Planting permits need to be applied for street trees being removed and added along Woodley Rd NW to accommodate proposed curb cut changes on Calvert and Woodley.

12/14/22 Tree fences on Calvert St NW inspected and meet preservation plan requirements.

For TPP, Please schedule pre-con inspections as indicated in checklist to coincide with stages of construction.

12/20/22 TPF has been erected as per TPP for trees immediately near Raze activities and meet the specification.

TPP Commitment letters need to be updated with Arborist info for construction monitoring ASAP.

DDOT-Planning and Sustainability Division


Government of the District of Columbia Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: Joel Lawson
DC Office of Planning

FROM: Anna Chamberlin 
Associate Director

DATE: February 28, 2023

SUBJECT: Large Tract Review 2022-01 – Wardman Park

PROJECT SUMMARY

CP VII Wardman 1-A, LLC and CP VII Wardman 1-B, LLC (jointly, the “Applicant”) seeks to construct a 414,382 SF residential project in the RA-2 and RA-4 zones on a property located in Square 609 (Lot 804) and Square 2132 (Lots 855 and 856). The site is bounded by Woodley Road NW to the north, 24th Street and Connecticut Avenue NW to the east, Calvert Street NW to the south, and residential property to the west. The site is currently under demolition but was most recently occupied by a 1,152 room Marriot hotel. The Applicant proposes to redevelop the site with two (2) buildings with 868 residential units and 913 vehicle parking spaces. The project is proposed in two (2) phases with Phase 1 on the southern half and Phase 2 on the northern half.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life in the nation’s capital by encouraging sustainable travel practices, constructing safer streets, and providing outstanding access to goods and services. As one means to achieve this vision, DDOT works with the DC Office of Planning (OP) through the Large Tract Review (LTR) process to ensure that impacts from new developments are manageable within, and take advantage of, the District’s multimodal transportation network.

The purpose of DDOT’s review is to assess the potential safety and capacity impacts of the proposed development on the District’s transportation network and, as necessary, propose mitigations that are commensurate with the action. Through the LTR process, DDOT identifies potential transportation issues, mitigation, and public realm design guidance that the Applicant should expect to resolve as part of the public space permitting and Environmental Impact Screening processes.

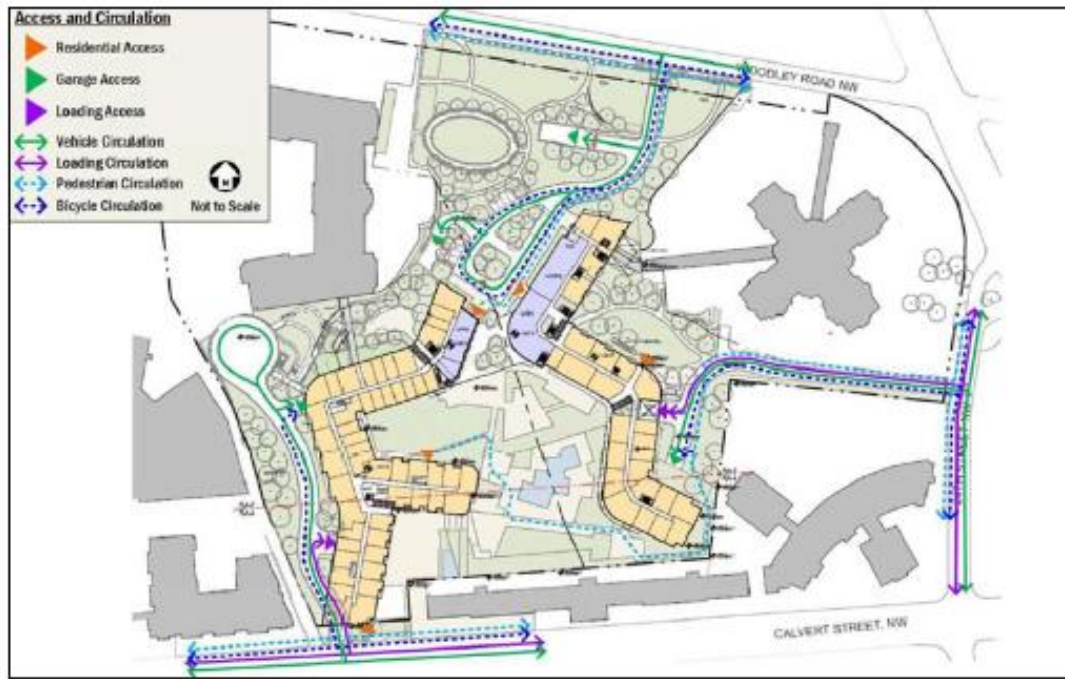
LTR 2022-01 – Wardman Park

DDOT conducted a thorough review of the Applicant's LTR application materials, including the proposed site plan in Figure 1 below, the December 6, 2022 Comprehensive Transportation Review (CTR), January 31, 2023 Supplemental Transportation Analysis, and February 24, 2023 Revised CTR prepared by Gorove/Slade.

The following is a summary of notable items pertaining to the site design, travel assumptions, traffic analysis, and proposed mitigations:

- The site is 1/8-mile walking distance to the Woodley Park-Zoo/Adams Morgan Metrorail Station;
- The project proposes to eliminate one (1) existing curb cut on Woodley Road NW and maintain three (3) existing curb cuts;
- The project does not have adequate vehicle or pedestrian connectivity across the site and requires walking around a large block to get from one side to the other;
- Older site plans for previous proposals show that connectivity for both modes can occur on this site despite existing grades;
- The current site layout creates barriers for non-auto modes. This project has demonstrated elevation challenges precluding this connectivity;
- The site plan show steps leading down from the Woodley building, in the northwest corner of the site, to the new circular drive which connects to Calvert Street NW. The Applicant should evaluate the feasibility of adding a pedestrian connection along the drive aisle extending from the steps at the north end to Calvert Street NW and install a sidewalk with staircases to connect across the site; ;
- A total vehicle parking supply of 913 spaces is proposed (624 new spaces and 289 existing spaces to remain in a below-grade garage), which greatly exceeds both the zoning minimum (145 spaces with 50% transit reduction) and zoning maximum (580 spaces);
- The parking supply is excessive for a project of this size and distance from Metrorail and triggers TDM mitigations in Subtitle C, 707.3 (e.g., CaBi, bike parking, street trees, EV stations);
- DDOT requests the Applicant complete additional bicycle safety improvements to mitigate the potential for induced demand for driving, specifically installing a protected bike lane along Calvert Street;
- The Applicant proposed a Transportation Demand Management (TDM) plan in the February 24, 2023 supplemental transportation analysis (see Attachment A), in conjunction with the analysis, design, and implementation of the protected bike lane on Calvert Street NW is robust enough to mitigate the excessive parking supply or support an adequate non-auto mode split; and
- Zoning requires a minimum of 292 long-term and 44 short-term bicycle parking spaces. The Applicant intends to exceed the requirements and provide 372 long-term and 64 short-term bicycle parking spaces, and two (2) 19-dock CaBi stations.

Figure 1 | Site Access and Circulation Plan



Source: Gorove/Slade 12/6/22 CTR, Figure 8

TRANSPORTATION DEMAND MANAGEMENT (TDM)

As part of all major development review cases, DDOT requires the Applicant to develop a comprehensive TDM Plan to help mitigate an action's transportation impacts. TDM is a set of strategies, programs, services, and physical elements that influence travel behavior by mode, frequency, time, route, or trip length to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of transit, bicycle, and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods. Failure to provide a robust TDM plan could lead to unanticipated additional vehicle trips that could negatively impact the District's transportation network.

The Applicant proposed a TDM Plan in the Revised February 24, 2023 CTR, that DDOT finds acceptable in conjunction with the requested pedestrian realm improvements: the protected bike lane improvements. This TDM plan is provided in Attachment A and will be included as a condition of approval in the public

LTR 2022-01 – Wardman Park

space permit applications for curb cut conceptual approval (TOPS #400989) and future curb public space construction permits. The TDM plan includes the zoning-required mitigations in Subtitle C, 707.3 for the site providing more than double the parking minimum.

STREETSCAPE AND PUBLIC REALM

In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines. This includes curb and gutters, street trees, landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site.

The Applicant must work closely with DDOT and OP to ensure that the design of the public realm meets current standards and will substantially upgrade the appearance and functionality of the streetscape for public users needing to access the property or circulate around it. In conjunction with Titles 11, 12A, and 24 of the DCMR, DDOT's 2019 version of the *Design and Engineering Manual (DEM)* and the *Public Realm Design Manual* will serve as the main public realm references for the Applicant. Public space designs will be reviewed in further detail during the public space permitting process.

The Applicant has an active public space application for conceptual approval of the curb cuts (TOPS #400989) and two (2) EISF applications (23-00437 and 23-00444). The Applicant has not yet filed a public space construction permit.

While the preliminary streetscape plans in the LTR submission are generally consistent with DDOT standards, there are several outstanding issues that need to be reviewed in greater detail and resolved prior to the issuance of a public space permit:

- DDOT cannot support approvals of the curb cuts, until the Applicant evaluates the feasibility of pedestrian access along the new drive aisle connecting to Calvert Street NW to improve circulation and access to pedestrians;
- Ensure all corners have current ADA-compliant curb ramps and connect across the street with high-visibility crosswalks. Receiving curb ramps on opposite corners must also be upgraded if out of compliance;
- Submit a detailed curbside management and signage plan, consistent with current DDOT policies. If multi-space meter installation is required, they will be at the Applicant's expense;
- Determine final locations of the zoning-required 32 inverted U-racks (64 total spaces) in the public realm or on private property in easily accessible locations. Both long- and short-term parking must meet the design requirements of Zoning and DDOT Bike Parking Design Guide;
- Determine final locations of two (2) 19-dock Capital Bikeshare Stations. If they will be located on private property and concrete pads will be needed;
- Any changes to roadway widths in the area must allow for WMATA bus service to continue operation unimpeded;
- Coordinate with the DDOT Active Transportation Planning Branch to convert the Calvert Street NW bike lanes to protected bike lanes that extend from 28th Street NW to Connecticut Avenue NW. The connection from 24th Street NW to Connecticut Avenue NW will likely require a lane reduction which will require further traffic analysis and possible signal modification;
- Update the Calvert Street NW roadway striping with contrast tape to make them more visible on the concrete surface; and

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- Continue to coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 3 arborist regarding the preservation of any Heritage Trees and Special Trees, removal of street trees, and planting of new street trees in bioretention facilities or a typical expanded tree planting space.
 - Schedule pre-construction inspections as indicated on the Advanced Tree Preservation Plan's Inspection Checklist to coincide with stages of construction.
 - Apply for street tree removal permit (Construction-Landscaping: Tree Removal) to remove trees impacted by proposed curb cut changes on Woodley Road and Calvert Street. Compensation for the loss of healthy assets shall be through payment at \$200 per inch diameter.
 - Apply for street tree planting permit (Construction-Landscaping: Tree Planting) to add new street trees on Woodley Road and Calvert Street as per DDOT Green Infrastructure Standards.

ACTION

DDOT looks forward to working with the Applicant to further refine the streetscape design with the feedback provided in this report. In the review of this LTR application, DDOT identified the following outstanding issues to be resolved during permitting:

- Revise the site plan to provide improved pedestrian access through the site including any needed staircases, specifically along the drive aisle which connects to Calvert Street NW and leads to an internal staircase at the edge of the circular drive. Ensure ADA accessible sidewalks are on all driveways connecting to public sidewalks. The proposal currently has no connections between Calvert Street and Woodley Road and require a pedestrian to walk around a mega-block to get to the other side. This is not acceptable for a transit-oriented development (TOD) site and until this is resolved, DDOT cannot support the proposed curb cuts and accompanying access to the roadway network;
- The on-site vehicle parking supply is significant, exceeding the Zoning parking maximums, especially for a project one (1) block from a Metrorail Station. To mitigate the potential for induced demand for driving, DDOT requests the Applicant implement the following mitigations:
 - Convert the current conventional bike lane to a protected bike lane on Calvert Street NW extending from 28th Street NW to Connecticut Avenue NW, subject to approval by DDOT, as well as install other missing pedestrian facilities around the perimeter of the site (i.e., curb ramps, crosswalks, curb extensions). Perform any traffic analysis and signal modifications to support the protected bicycle lanes.
- Provide design details of the long-term bicycle parking rooms. Ensure the storage rooms include a minimum of 370 spaces, per the TDM Plan, and meet the 2018 DDOT *Bike Parking Guide* with 50% of spaces located horizontally on the floor, 5% designed for larger cargo/tandem bikes (10 feet x 3 feet), 10% served by electrical outlets, and each storage room has a bike repair station;
- Determine final locations for the two (2) Capital Bikeshare stations and 32 inverted U-racks;
- Implement the TDM Plan included as Attachment A of this report. It will be included as a condition in the conceptual curb cut approval (TOPS #400989) and future streetscape construction permit;

LTR 2022-01 – Wardman Park

- Ensure all Zoning-required TDMs mitigations in public space (bikeshare, bike racks, street trees, etc.) are shown on the streetscape construction permit plans.
- Coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 3 arborist regarding the preservation of any Heritage Trees and Special Trees, removal of street trees, and planting of new street trees in bioretention facilities or a typical expanded tree planting space. Additional coordination will be needed with UFD to determine locations for street trees required by Zoning as TDM mitigation.

For further coordination throughout the LTR, EISF, and public space permitting processes, please contact the DDOT case manager, Kelsey Bridges, at kelsey.bridges@dc.gov or 202.438.8672.

ATTACHMENTS

- A) Transportation Demand Management (TDM) Plan, February 24, 2023 Gorove/Slade CTR

AC:bb

Department of Housing and Community Development (DHCD): Received January 12, 2023

“DHCD does not object to the LTR but we encourage the applicant to provide additional IZ square footage. It appears that they are only offering to meet the minimum requirement.

DHCD does not object to the LTR Application. It appears the applicant is only offering to meet the minimum inclusionary zoning (IZ) requirement and DHCD strongly encourages the applicant to provide additional IZ square footage to increase the amount of affordable housing units in the Rock Creek West planning area. DHCD is willing to discuss this further with the applicant, including explaining financial incentives offered by DHCD to increase the production of affordable housing, such as gap financing and/or tax abatements.”

Department of Energy and Environment (DOEE): Received March 7, 2023

DOEE commends the applicant for using the LEED for Homes: Multifamily Midrise rating system, which is best suited for this project and includes features that will specifically benefit residential tenants. DOEE encourages the applicant to pursue certification at the LEED Gold level, rather than the currently anticipated LEED Silver. The following recommendations are intended to assist the applicant with incorporating sustainable and resilient design and construction strategies that will further enhance the project's performance, improve occupant comfort, 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 encourages the applicant to continue exploring options to reduce the project's energy consumption and increase its renewable 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 DOB 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.

The applicant is planning to install electric vehicle charging stations for a portion of the parking spaces. DOEE notes that this applicant must also 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. Given the accelerating 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 [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 commends the applicant for designing some of its rooftop space to be solar-ready. DOEE encourages the applicant to install solar panels as part of the initial construction in order to maximize the project's lifetime renewable energy generation financial benefits. DOEE recommends consulting with an expert from DCSEU to learn about custom rebate options and other financial incentives for renewable energy and energy efficiency measures.

Maximizing solar energy production will contribute 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. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#).

Deconstruction, Reuse, and Embodied Carbon Reduction

Wherever possible, DOEE encourages the reuse of existing buildings and materials because the demolition of these buildings and construction of entirely new buildings is very carbon intensive. Given that this project involves razing the existing structure on-site, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing structure. In 2018, construction and demolition (C&D) activities in the US generated 600 million tons of waste. The reuse and rehabilitation of existing buildings can reduce waste and embodied carbon. When reuse is not possible, deconstruction or pre-demolition salvage can divert waste from landfill and incineration and allow for reuse of building materials. Deconstruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue. Organizations like [Community Forklift](#) collect donations of unwanted and salvaged building materials throughout the DC region. DOEE is also working to develop a Donation and Reuse program and may have additional resources and information available at the time of project construction. The applicant is encouraged to reach out to Connor Rattey at connor.rattey@dc.gov encouraged if they are interested in sustainable deconstruction of existing structures or donation and reuse of building materials.

DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impact of 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](#).

The US General Services Administration (GSA) recently [announced](#) new standards for the concrete and asphalt used in their projects. The GSA has published sample contract language that can easily be incorporated into an agreement with a general contractor to define procurement requirements for [low embodied carbon concrete](#) and [environmentally preferable asphalt](#). Additional guidance is available [here](#). DOE encourages the applicant to adopt the GSA standards, which can drastically reduce the project's embodied carbon emissions with little to no financial impact.

Department of Parks and Recreation (DPR): February 1, 2023

"Thank you for sharing this notification of the Large Track Review Application. I confirm that DPR will attend the meeting next Monday to discuss the case. While I am unfamiliar with the project and might be missing a few details because I am checking the project for the first time, I am particularly concerned about the provision of new recreational amenities within the project, which potentially would alleviate the increasing future demand on the existing ones offered by our parks nearby. Also, I would like to know if the applicant is considering offering publicly accessible spaces and rec amenities within the parcel or a community benefit to the surrounding parks and rec centers. In any case, please find below specific comments on the exhibits shared:

1. The project submission includes a general overview/description of the open spaces that the project will provide. However, it would be better to indicate, with more detail which areas will have public access, the times that these spaces will be publicly accessible, the size of areas that will be used for recreation, and the recreational amenities that will be provided. Additionally, it would be great to have a summary of the recreational amenities and open spaces only available for residents. While we acknowledge that this project is nearby existing parks and recreational facilities, our concern is that the change in land use will represent a significant increase in residents in the area, thus, also an intensification in demand for recreational programs and amenities, which will ultimately rise the need for more regular maintenance, repairs, and upgrades. The provision of public and private open spaces and recreational amenities will minimize the pressure of this development on the existing recreational amenities within walking distance of the development.

"Between the Building Segments is a heavily landscaped courtyard area of approximately 85,000 square feet of open space. The landscaped courtyard includes lush plantings as well as a pool, other gathering spaces, and several pedestrian walkways. Within the large interior courtyard, there are several retaining walls providing layered landscaping along the south property to accommodate grade changes in the southern portion of the Subject Property".

2. In the racial outcomes section, please encourage the applicant to share details about the "Significant landscape improvements that will beautify the site and provide gathering spaces for residents and neighbors" that will be included in the project.
3. In the Parks, Recreation, and Open Space Element Evaluation, while the project is generally consistent with the policies and goals of the Parks, Recreation, and Open Space Element, just by improving access to existing premium parks and open space and by including landscaped open space within the Project, it doesn't indicate if these spaces would be publicly accessible to the neighborhood or which recreational amenities will include (only mentions a high-level provision by including common gathering spaces and large courts open to residents in the description)."

Department of Public Works (DPW): February 18, 2023

“A review of your document indicates that development will be confined to privately owned property and therefore will not interfere with DPW collection and removal activities.
DPW has no reservations or objections to the development.”

Department of Small and Local Business Development (DSLBD): January 5, 2023

“Asks that the CBE Act apply, meaning the project must expend 35% of the project’s adjusted budget with CBEs. Let me know if you have any questions.”

Office of Planning-Historic Preservation Office (HPO): January 5, 2023

The Historic Preservation Review Board (HPRB) delegated final approval to HPO, as noted below.

HPRB:

Due to the proximity of the subject property to an Historic Landmark, the Wardman Park Hotel at 2660 Woodley Road, N.W., the Historic Preservation Review Board took the following actions:

February 24, 2022: *“The Board expressed their support for the building mass and site plan but cited the extent of glazing on Building A, the irregular ends of the buildings facing Woodley Road, and the landscaping fronting Woodley Road as areas that should be revised in order to improve their compatibility with the landmark. The Board deferred taking a formal action and vote in order to allow the ANC and community further opportunity to understand and provide comments on the design compatibility of the proposed project.”*

April 28, 2022: *“The Board found the revised concept compatible with the adjacent landmark and final construction approval was delegated to staff. Vote: 8-0.”*

Note: Pursuant to the above:

1. “Staff” refers to the Historic Preservation Office in OP; and
2. “The Board” refers to the Historic Preservation Review Board.

Office of Planning-Urban Design (UD)

“Building Form:

- UD suggests the applicant ensure that the proposal is compatible with the general design character and scale of the existing historic neighborhood. UD recognizes that the site plan concept of towers placed in an open park-like setting is consistent with the spirit of original hotel’s site plan and the Wardman Tower.

Public Realm:

- Open space above the below grade parking garage fronting Woodley Road would be enhanced with additional pedestrian paths inserted between the historic gate posts and supplemental plantings and the site would remain open (unfenced) for public access. UD suggests that public open space can be programmed to better serve intergenerational community. The open space amenities should be able to accommodate a variety of activities and promote social interaction. UD recommends the applicant incorporate kid-friendly and family-friendly amenities into the open space design.

- Public artworks create important landmarks and orient visitors, and they are an opportunity to project community heritage. UD suggest that t applicant identify opportunities for public arts in additional to enhancing the historic gate posts.
- UD recommends the open space design incorporate sustainable and resilient design features and implement stormwater management best practices.”

Other Agencies

No other agencies provided comments on this application. The large tract review regulations identify the Departments of Consumer and Regulatory Affairs (now the Department of Buildings), Public Works, Fire Department, Metropolitan Police Department as affected agencies; the Office of Planning has expanded the list of agencies to gather the broadest range of comments. It is not uncommon for some agencies to not respond to the review of a large tract application. Some agencies will review the application during building permit stage administered by the Department of Buildings, and work with the applicant as necessary. OP extended the review process by a few weeks to give agencies and the public more time to provide comments.

VIII. ANC AND COMMUNITY REVIEW

Application materials were distributed to the following for their review and comment, in accordance with Section 2306.2 of the LTR regulations:

- ANC 3C,
- Woodley Park Community Association, and
- Property owners within 220 feet of the site.²

ANC 3C: Comments from the regularly scheduled meeting of February 22, 2023 are attached below.

Community Comments:

As of March 2, 2023, OP received emails from forty-one individuals or couples, five of which were in support and thirty-six in opposition. Some sent more than one email. However, each individual or couple was counted only once for tallying purposes. The following is a summary of the comments received from those in opposition to the proposed redevelopment of the site.

Opposition

The general message supported by these individuals is that the exisitng hotel structure on the property should be repurposed for use as affordable housing, and that the District should purchase the site by means of Eminent Domain.

Many of the community members in opposition stated that the pro-growth and pro-development strategies of the District have resulted in gentrification and a loss of affordable housing District-wide. They argue that there is a scarcity of land upon which to construct affordable housing, and that not all homeless people desire to remain so, especially women with young children. Providing affordable housing on the subject property would benefit the people that provide services to the City, such as teachers and fire fighters, and for young professionals and senior citizens,advancing economic diversification.

² The applicant notified property owners within 220 feet of the site, in excess of the 200 feet required.

Support

Those in support of the construction of a residential building on the site stated that it would contribute to the revitalization of the Woodley Park business district, but many also indicated that they would prefer the architecture to be more consistent with the surrounding neighborhood.



ADVISORY NEIGHBORHOOD COMMISSION 3C
GOVERNMENT OF THE DISTRICT OF COLUMBIA
CLEVELAND PARK • WOODLEY PARK •
MASSACHUSETTS AVENUE HEIGHTS

Single Member District Commissioners

01-Hayden Gise; 02-Adam Prinzo; 03-Janell Pagats
04-Roric McCorristin; 05-Sauleh Siddiqui; 06-Tammy Gordon
07-Gawain Kripke; 08-Rick Nash

P.O. Box 4966
Washington, DC 20008
Website <http://www.anc3c.org>
Email all@anc3c.org

February 22, 2023

Mr. Stephan Mordfin
District of Columbia Office of Planning
1100 4th Street, SW
Washington, DC 20024

Via E-Mail: stephan.mordfin@dc.gov

RE: Comments on Large Tract Review Application of CP VII Wardman 1-A, LLC and CP VII Wardman 1-B, LLC Square 2132, Part of Lot 32 (A&T Lots 855, 856)

Dear Mr. Mordfin:

At a regularly scheduled and properly noticed public meeting on February 22, 2023 with a quorum present, a quorum being five commissioners, Advisory Neighborhood Commission (ANC) 3C voted 8-0-0 to provide written comments to the Office of Planning (OP) on Carmel Partners' Application for Large Tract Review of the redevelopment of 2660 Woodley Road, NW (Wardman Park).

This site, when completed, will convert the existing Marriott Wardman Park Hotel into two residential buildings consisting of approximately 900 apartment homes. Mayor Bowser's [housing goals](#) call for adding 36,000 new homes over the next five years, including 12,000 income-restricted affordable homes, 1,990 of them in Rock Creek West, where currently less than 1% of the District's existing affordable housing inventory can be found.

The community engagement meeting was held virtually on January 26, 2023 before a special meeting of ANC 3C, where Carmel Partners, The Office of Planning (OP) and members of the affected community were present.

ANC 3C has taken comments from the community, and would issue the following suggestions to the Office of Planning, Carmel Partners, and other District agencies for addition into the Large Tract Review:

Lastly, ANC 3C would like to ask Carmel Partners to consider retaining the “Wardman” name in some form for the [ties the name](#) has to Woodley Park and the District of Columbia.

On a separate note, Some listserv posters have advocated for the DC Government seizing the property by exercising eminent domain. Whatever the merits were of the government acquiring the property in the bankruptcy proceeding, it would be a mistake to try to use eminent domain at this point for a variety of reasons, mainly it would be long process during which the property would sit idle and unused, creating a hole in the neighborhood as well as a lingering safety hazard that would benefit no one.

The Commission authorizes the Chair and the Commissioner for 3C02 and/or their approved designees to represent the Commission on this matter.

Consistent with DC Code § 1-309, only actions of the full Commission voting in a properly noticed public meeting have standing and carry great weight. The actions, positions, and opinions of individual commissioners, insofar as they may be contradictory to or otherwise inconsistent with the expressed position of the full Commission in a properly adopted resolution or letter, have no standing and cannot be considered as in any way associated with the Commission.

ANC 3C thanks the OP for the opportunity to express our interest and concerns. **We ask that our comments be given great weight in the Office of Planning’s considerations.**

Attested by



Janell Pagats

Chair, on February 22, 2023

This resolution was approved by voice vote on February 22, 2023, at a scheduled and noticed public meeting of ANC 3C at which a quorum (a minimum of 5 of 8 commissioners) was present.

IX. LARGE TRACT REVIEW APPLICATION FINDINGS

The project proposed by this Large Tract Review Application is consistent with the purposes and goals of the LTR regulations and is generally not inconsistent with the Comprehensive Plan.

The Office of Planning recommends that the applicant consider the following:

- Work with relevant District agencies to take advantage of programs and opportunities that would increase the affordable housing component of the development.
- Consider filing a map amendment to a mixed-use zoning category consistent with the Future Land Use map mixed-use striping of the subject property, which includes the Low Density Commercial Land Use Category, to permit retail uses on the site and potentially additional residential units, including additional affordable residential units.
- Increase the number of three-bedroom or family sized units to better serve District of Columbia families;
- Consider retaining use of the name “Wardman” on the site, to acknowledge the ties the name has to the previous use on the site, and to the Woodley Park neighborhood and the District of Columbia;
- Reduce the number of on-site vehicular parking spaces in light of the proximity to transit, including of the site to the Woodley Park/Zoo/Adams Morgan Metrorail station on the Red Line and Metrobus service on Calvert Street and Connecticut Avenue, N.W.;
- Incorporate kid-friendly and family-friendly amenities into the open space design;
- Investigate adding public artwork which creates important landmarks, orients visitors, and are an opportunity to project community heritage.
- Incorporate sustainable and resilient site and building design features and implement stormwater management best practices.

cc: Holland & Knight LLP
District Agencies
ANC 3C
Councilmember Frumin

Attachments:
Attachment 1