

**STATEMENT IN SUPPORT OF  
APPLICATION FOR LARGE TRACT REVIEW**



**FOR SUBDIVISION OF  
LOT 134 IN SQUARE 3977  
INTO 170 NEW RECORD LOTS**

**APPLICATION OF  
URBAN ATLANTIC DEVELOPMENT LLC**

**JULY 14, 2025**

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## **DEVELOPMENT TEAM**

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<b>CIVIL ENGINEER:</b>	Wiles Mensch Corporation 510 8 <sup>th</sup> Street SE Washington, DC 20004
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## **I. SUMMARY**

This statement and the attachments hereto comprise the application (the “**Application**”) of Urban Atlantic Development LLC (the “**Applicant**”) for Large Tract Review (“**LTR**”) by the District of Columbia Office of Planning (“**OP**”) for subdivision of Lot 134 in Square 3977 (the “**Property**”), comprised of just over twelve (12) acres of land, into approximately 170 new record lots (the “**Subdivision**”). The Subdivision will facilitate the construction of approximately 166 new single-family semi-detached houses as well as related streets, sidewalks, and open spaces on the Property (“**Project**”).

## **II. JURISDICTION, SCOPE OF REVIEW, AND COMPLIANCE WITH FILING REQUIREMENTS**

The Subdivision is subject to LTR because it is the subdivision of a record lot greater than 10 acres. *See* 10-B DCMR §2300.1(b) (10-B DCMR § 2300, et seq. are hereby referred to as the “**LTR Regulations**”). The Subdivision is shown on Exhibit E, and other plans depicting the Project are included as Exhibit F and Exhibit G. The scope of review for this Application is limited to consistency with District laws, regulations, and the Comprehensive Plan for the National Capital (“**Comprehensive Plan**”) and traffic, neighborhood and design, quality of life, and environmental impact. *Id.* § 2302.1.<sup>1</sup> The Subdivision is consistent with all applicable District laws and regulations (including without limitation 11 DCMR, the District of Columbia Zoning Regulations (hereinafter the “**Zoning Regulations**”)) and is consistent with applicable elements of the Comprehensive Plan. None of the Subdivision’s impacts, as described herein, are adverse to the surrounding neighborhood or the District as a whole. In fact, the Project is an

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<sup>1</sup> All statutory references herein shall be to the LTR Regulations, unless otherwise indicated.

enhancement to the Property and the surrounding neighborhood. Accordingly, the Subdivision satisfies the review criteria of Section 2302.1 of the LTR Regulations.

As set forth below, this narrative and accompanying exhibits satisfy the filing requirements of Section 2301.2 of the LTR Regulations:

- Section 2301.2(a): A completed certification form/application is attached as Exhibit A.
- Sections 2301.2(b)(1)-(7): A study of site characteristics and conditions is included in Exhibit F and this Statement as follows:
  - 1) A description of existing topography, soil conditions, vegetation and drainage consisting of written material, plats, maps and photographs (Exhibit F);
  - 2) Proposed topography including street grades and other grading contours (Exhibit F);
  - 3) Identification of mature trees to remain (Exhibit F);
  - 4) Proposed drainage and sewer system and water distribution (Exhibit F);
  - 5) Proposed treatment of existing natural features (Exhibit F);
  - 6) Proposed method of solid waste collection (Statement);
  - 7) Estimated water consumption (gallons per year) (Exhibit F and Statement);
- Sections 2301.2(c)(1)-(7): A Comprehensive Transportation Review is included in Exhibit H and contains the following:
  - 1) Proposed circulation system including general location of roadways, driveways and sidewalks;
  - 2) Relationship of the proposed circulation system to the District's street system;
  - 3) Estimated number and type of trips assumed to be generated by the project, and assumed temporal and directional distribution;
  - 4) Accommodations for and use of parking and loading areas;
  - 5) Traffic management requirements (lights, stop signs, one-way streets, etc);
  - 6) Relationship of the proposed project to the mass transit system (nearest bus stops and routes, nearest Metrorail stations, etc.); and
  - 7) Before and after capacity analyses and level of service at critical intersections.
- Section 2301.2(d)(1)-(6): A site plan and other supporting information is included in Exhibit E, Exhibit F, Exhibit G, and this Statement, and includes the following:
  - 1) Subdivision plan (Exhibit E);
  - 2) Approximate location and description of all structures (Exhibit E, Exhibit F, Exhibit G);
  - 3) Type of ownership and management arrangement (Statement);
  - 4) Staging plan describing the phasing of construction (Exhibit F);
  - 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 (Statement); and

6) Relationship of the proposed structures to public space, both developed and redeveloped (Exhibit F).

- Section 2302.1: A narrative addressing the scope of review is included in this Statement and includes the following:
  - 1) Evaluation of consistency with the Comprehensive Plan;
  - 2) Evaluation of potential traffic, neighborhood and design impact; and
  - 3) Evaluation of quality of life and environmental impact.

A full list of exhibits in support of this Application is included at the end of this Statement. Upon review of this Statement and the enclosed materials, the Applicant requests that OP find that this Application satisfies the requirements of LTR.

### **III. DESCRIPTION OF THE PROPERTY AND SURROUNDING NEIGHBORHOOD**

The Property is comprised of approximately 524,349 square feet, or just over twelve acres of land. The Property is located in Ward 5 in the North Michigan Park neighborhood and is within the boundaries of Advisory Neighborhood Commission 5A (“**ANC 5A**”). The Fort Totten Metrorail station is approximately one mile northwest of the Property, and Metrobus routes connect the Property to the Metro station and to downtown via the C71 Line, which runs along Sargent Road and the D30 line (former 80 line), a priority corridor route that runs along South Dakota Avenue.

The Property is located in the R-2 Zone District, as shown on the map attached as Exhibit D. Property to the north and west is also located in the R-2 Zone District and is generally developed with single-family semi-detached houses as well as institutional and community uses, such as the North Michigan Park public recreation center and a church. Land to the south and east is owned by the Benedictine Foundation and includes both St. Anselm’s Abbey and St. Anselm’s Abbey School; it is located in the R-1-B Zone District. The Queens Chapel neighborhood is further to the southeast.

The Property was originally farmland. In September 1927, a portion of the Property was purchased by for use as a new school for girls with mild developmental disabilities, known as the St. Gertrude’s School of Arts and Crafts. Located adjacent to St. Anselm’s Abbey, the site was improved in 1928 with the construction of a Tudor Revival-style school building designed by Murphy & Olmstead (“**1928 School Building**”). Operated by the Benedictine sisters, the school remained in use for nearly seven decades. A multi-purpose addition was added to the rear of the 1928 School Building in 1977. Significant changes occurred in the late 1980s and early 1990s, when large quantities of fill from the nearby Fort Totten Metro construction were deposited on the Property. In the early 1990s, the Property was sold to Father Flanagan’s Boys Town, which redeveloped the site with facilities focused on child and family services. Boys Town wound down its operations in 2024.

#### **IV. DESCRIPTION OF THE SUBDIVISION AND PROJECT**

The Applicant is under contract to purchase the Property and intends to develop the Property by right with approximately 166 single-family semi-detached houses. To facilitate the development of the Project the Applicant proposes to subdivide the Property into approximately 170 new record lots,<sup>2</sup> each of which will have frontage on a series of public access easements that will overlay the proposed streets and alleys on the Property pursuant to Subtitle C, Section 303.1 of the Zoning Regulations. Plats depicting the proposed subdivision and related public access easement and sidewalk network (“**Subdivision Plans**”) are attached as Exhibit E. As a part of the site work to prepare the Property for development, the Applicant will remove the fill and demolish many of the existing structures. The existing 1928 School Building and open space

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<sup>2</sup> 166 lots will correspond to the 166 new houses, one lot will correspond to the retained 1928 School Building and related open space, and the remaining lots will correspond to other open spaces.

around the building will be maintained in the center of the Property, as will approximately 10 existing mature trees along the allee leading along the main vehicular drive.

As shown on the Subdivision Plans, each lot will meet the minimum requirements for R-2 development pursuant to Subtitle D of the Zoning Regulations, including a minimum lot width of 30 feet and a minimum lot area of 2,500 square feet. The proposed new homes will be arranged on the lots to meet the minimum bulk and yard requirements of the Zoning Regulations, including a minimum rear yard of 20 feet, a minimum side yard of 8 feet, a minimum lot occupancy of 40%, and a minimum pervious surface of 30%. All proposed homes will fall within the height limit of 40 feet and 3 stories set forth in the Zoning Regulations.

The Applicant intends to offer the proposed housing as for-sale homes and expects to create a homeowners' association to manage the common areas and elements of the Project. Consistent with the inclusionary zoning requirements of the Zoning Regulations, 10% of the gross floor area devoted to residential use will be set aside for households earning up to 80% of the Area Median Income.

As shown on the site study and development plans attached as Exhibit F ("**Site Plans**"), the redevelopment of the Property is organized around the retained 1928 School Building, which includes a large open space that serves as the center of the new neighborhood. The redevelopment also retains the existing main roadway and allee of trees that is currently on the Property, which terminates at the central open space. In addition to 166 new single-family semi-detached homes, the Applicant expects to adaptively reuse the 1928 School Building, though a use has not yet been identified.<sup>3</sup> Conceptual renderings of the proposed Project are provided in

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<sup>3</sup> Such use will either be a use requiring some form of a zoning approval, in which case the zoning process will allow for an evaluation of its impacts, or a by-right use, in which case its impacts are presumed to be compatible with the surrounding R-2 zoning.



the drawings attached as Exhibit G (“**Concept Renderings**”) and convey the anticipated design and arrangement of the proposed buildings and open spaces within the Project, including the central open space around the retained 1928 Building and the pedestrian mews that will serve as the front doors for the proposed new homes.

Access to the Property is currently provided from Sargent Road NE, and the Applicant proposes to reuse the existing access point, which aligns with the alley described above. The Applicant’s Comprehensive Transportation Review (“**CTR**”), attached as Exhibit H, confirms that the existing entrance is sufficient to support vehicular transportation demand. The proposed houses are generally oriented as rear-loaded homes (that is, with garages at the rear of each lot); as a result, the road network through the Property is supported by a network of sidewalks that provide pedestrian access to the fronts of the homes. Many of the roadways are also expected to include sidewalks and street trees, further enhancing pedestrian connectivity throughout the site. The Applicant is also currently studying a pedestrian connection to the North Michigan Park Recreation Center to the north.

The Project will provide significant improvements to existing site conditions. For one, the Applicant will remove two large berms created by the deposit of fill in the late 1980s and early 1990s and design the Project to meet current stormwater management requirements. For another, the Project expects to maintain a number of existing trees along the alley as well as install approximately 225 new trees across the Property. Large open spaces are also maintained at the north and southwest portions of the Property, maintaining a buffer from existing single-family development.

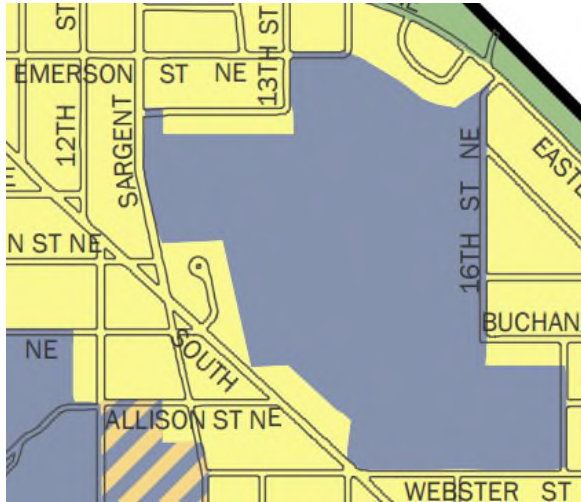
## **V. RELATIONSHIP OF SUBDIVISION TO THE COMPREHENSIVE PLAN**

The Subdivision and resulting Project are consistent with the Comprehensive Plan and therefore satisfy Section 2302.1(a) of the LTR Regulations.

a. **Future Land Use Map and Generalized Policy Map**

The Subdivision and resulting Project are consistent with the designation for the Property on the Comprehensive Plan's maps.

**Future Land Use Map**



**Generalized Policy Map**



As shown above, the Comprehensive Plan's Future Land Use Map ("FLUM") and Generalized Policy Map ("GPM") each place the Property in the Institutional land use category. The FLUM does not show density or intensity on Institutional sites, but the FLUM notes that changes in use should be "generally comparable in density or intensity to uses in the vicinity." Here, the proposed development of semi-detached single-family housing is consistent with the Low Density Residential designation of land to the north and west of the Property. The GPM is silent on changes in use to sites noted as Institutional use, but the development of the Property with single-family housing is consistent with the Neighborhood Conservation Area designation of adjacent land, which expressly states that it does not preclude development to address city-wide housing needs, provided such development is compatible with the existing scale and character of the area. 10-A DCMR § 225.5.

**b. Citywide Elements of the Comprehensive Plan**

The Subdivision and resulting Project directly advance relevant District Elements of the Comprehensive Plan. Identified below is the Subdivision's relationship to policy objectives of the Comprehensive Plan.

**1. Land Use Element**

The Subdivision and resulting Project advance the following policies of the Land Use Element:

***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-2.1.5: Support Low-Density Neighborhoods*** Support and maintain the District's established low-density neighborhoods and related low-density zoning. Carefully manage the development of vacant land and alterations to existing structures to be compatible with the general design character and scale of the existing neighborhood and preserve civic and open space. 310.12

***Policy LU-2.2.4: Neighborhood Beautification*** Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. 311.5

***Policy LU-2.3.7: Nonconforming Institutional Uses*** Carefully control and monitor institutional uses that do not conform to the underlying zoning to promote long-term compatibility. In the event such institutions are sold or cease to operate, encourage conformance with existing zoning and continued compatibility with the neighborhood. 312.9

The Land Use Element generally calls for the development of land within low-density residential neighborhoods in a manner that is consistent with the character and scale of the existing neighborhood. The Project calls for compatible semi-detached housing that matches the housing type and level of density in the surrounding neighborhood, and it also furthers other

policies by providing such housing on a former institutional site that is located near a priority transit corridor and by including landscaping and tree planting that will further beautify the neighborhood.

## **2. Transportation Element**

The Subdivision and resulting Project advance the following specific objectives of the Transportation Element of the Comprehensive Plan:

***Policy T-1.1.2: Land Use Impact Assessment*** Assess the transportation impacts of development projects using multimodal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment of land use impacts. 403.8

***Policy T-2.2.2: Connecting District Neighborhoods*** Improve connections among District neighborhoods by upgrading transit, auto, pedestrian, and bike connections, and by removing, ameliorating, mitigating, or minimizing existing physical barriers, such as railroads and highways. Recognize where transportation infrastructure has separated communities, particularly low-income residents and communities of color, and encourage strategies that rebuild connections. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan and that plan's approval by the District government. 409.7

***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

In furtherance of the Transportation Element, the Applicant's transportation consultant has prepared a CTR assessing the impacts of the Project using multimodal standards, and the Applicant has integrated pedestrian facilities within the Project and proposed a connection through the Property to the North Michigan Park Recreation Center.

## **3. Housing Element**

The Subdivision and resulting Project advance some specific policies of the Housing Element of the Comprehensive Plan. In particular, the Subdivision and resulting Project is consistent with the following objective:

***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-1.1.9: 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

***Policy H-1.3.1: Housing for Larger Households*** Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail. 505.8

***Policy H-1.3.2: Tenure Diversity*** Encourage the production of both renter- and owner-occupied housing, including housing that is affordable at low-income levels, throughout the District. 505.9

The Project provides approximately 166 new for-sale, family-sized housing opportunities on a previously underutilized 12-acre parcel, located in an existing neighborhood adjacent to an existing recreation center and a half-mile from its in-boundary elementary school, which furthers multiple Comprehensive Plan policies in support of housing production.

#### 4. Environmental Protection Element

The Subdivision and resulting Project advance certain sustainable building policies of the Environmental Protection Element of the Comprehensive Plan. Specifically:

***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-2.3.1: Preventing Erosion*** Public and private construction activities should not result in soil erosion or the creation of unstable soil conditions. Support the use of retaining walls and other best management practices on new and existing properties that reduce erosion hazards. Erosion requirements should be implemented through building permit and plan reviews and enforced through the permitting and regulatory processes. 607.2

***Policy E-2.3.2: Grading and Vegetation Removal*** Encourage the retention of natural vegetation and topography on new development sites. Prevent or require mitigation of construction practices that result in unstable soil and hillside conditions. Grading of hillside sites should be minimized, and graded slopes should be quickly revegetated for stabilization. 607.3

***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 incorporates meaningful open spaces into the Project, maintains existing mature trees in and adjacent to the Project, and calls for approximately 225 new tree plantings. Site planning will also eliminate prior artificial berming and otherwise meet District best practices for soil and erosion control.

## 5. Parks Recreation and Open Space Element

The Subdivision and resulting Project advance the following objective of the Parks, Recreation, and Open Space Element of the Comprehensive Plan:

***Policy PROS-1.2.2: Improving Accessibility*** Improve accessibility to and within the major park and open space areas through pedestrian safety and street crossing improvements, wayfinding signage, bike lanes and storage areas, perimeter multiuse trails within select parks, and adjustments to bus routes where appropriate. All parks should be accessible by foot, and most should be accessible by bicycle. Seek to provide access within parks for all ages and abilities consistent with park use and recognize that paved trails are accessible to wheelchair users, whereas dirt, cinder, and wood chip trails can present challenges for these users. 805.8

***Policy PROS-4.3.3: Common Open Space in New Development*** Work with developers for new and rehabilitated buildings to include green roofs, rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. 819.5

***Policy PROS-4.3.5: Residential Yards*** Recognize the value of residential yards as a component of the District's open space system and discourage increased coverage of such areas by buildings and impervious surfaces while balancing that value against other District priorities such as the creation of affordable housing. 819.7

The Project integrates both common open spaces and individual yards to provide its residents with access to meaningful outdoor space, and the Project also contemplates a pedestrian connection to the North Michigan Park Recreation Center to further increase recreational access for the Project and the neighborhood as a whole.

## 6. Urban Design Element

The Subdivision and resulting Project advance the following objectives of the Urban Design Element of the Comprehensive Plan:

***Policy UD-2.1.2: Neighborhood Streetscapes*** Neighborhood streetscapes should be designed to visually reflect the character and level of intensity of the adjacent land uses. For instance, narrow sidewalks may be appropriate for narrow streets with low scale buildings, while sidewalks with more trees and vegetation may be appropriate for large-scale development. Pedestrian-oriented lighting should be designed to enhance walkability for all users, as well as visually reflect the character of neighborhood. 908.4

***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-2.2.5: 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-2.2.6: Large-Scale Development*** New developments on parcels that are larger than the prevailing neighborhood lot size shall be carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. Incorporate existing assets, such as historic buildings and significant natural landscapes, into the design of redeveloped large sites. For sites that were originally planned as integrated complexes of multiple buildings, historic groupings of structures should be conserved where possible. (see Figure 9.17 for examples of breaking up the massing of development on lots larger than the prevailing neighborhood lot size). 909.11

***Policy UD-2.2.7: Preservation of Neighborhood Open Space*** Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to minimize the loss of sunlight and maximize the usability of neighborhood parks and plazas. Buildings adjacent to parks or natural areas should orient their entrances or other community-serving functions toward these shared resources. 909.13

***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-2.2.9: Resilient and Sustainable Large Site Development*** Site plan large sites to minimize the risk of flooding to buildings and extreme heat and other climate impacts. Preserve natural resources and implement stormwater management best practices, while maintaining active building frontages and pedestrian-focused streetscapes. 909.15

***Policy UD 3.2.2: Social and Community Meeting Spaces*** New planned unit developments (PUDs) and other large-scale developments should provide for a mix of social and third spaces—for example, schools, retail stores, cultural and community spaces, and recreational facilities. 914.4



***Policy UD 3.2.3: Recreational Space Design for Large Site Development*** Design open spaces conducive to physical activity as part of large-scale developments or create new recreation spaces (such as parks, walking paths, trails, and waterfront recreation) in neighborhoods lacking access to public open spaces. 914.5

On balance, the Subdivision and the resulting Project is not inconsistent with the Urban Design Element. Broadly, the proposed development furthers many of the Element's policies, as it replicates a similar pattern and scale of semi-detached development across the Property and integrates open spaces and other recreational elements such as extensive walking pathways through the site. While the Subdivision does not seek to replicate or extend the street grid through the Property, this is because the Property's siting and configuration precludes such an extension, which reflects the Property's location on Sargent Road, a long-established road with an irregular alignment that predates later highway plan efforts. To the extent that the Property alters the existing topography or tree cover, much of this is to remove existing fill that was added to the site and is otherwise necessary to achieve the housing production that is needed to meet District goals.

## **7. Historic Preservation Element**

The Subdivision and resulting Project advance the following objective of the Historic Preservation Element of the Comprehensive Plan:

***Policy HP-1.5.4: Voluntary Preservation*** Engage property owners and communities in designation efforts, and encourage voluntary preservation. Seek consensus on designations when possible, and apply designation criteria with sensitivity to the rights of property owners and the interests of affected communities. 1007.10

***Policy HP-2.5.3: Compatible Development*** Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, respect the established form of development as evidenced by lot coverage limitations, height limits, open space requirements, and other standards that contribute to the character and attractiveness of those areas. 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

***Policy HP-2.5.4: Suitability to the Historic Context*** Apply design standards in a manner that accounts for different levels of historic significance and types of historic environments. Encourage restoration of historic landmarks while allowing enhancements of equivalent design quality, provided such enhancements do not damage the landmark. Exercise greater restraint in residential historic districts and areas with a clear prevailing development pattern or architectural style. Allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more dramatic new design, such as non-residential zones and areas without a significant design pattern. 1014.10

This application is not inconsistent with the Historic Preservation Element. The Applicant has worked with staff at the Historic Preservation Office to identify and retain features of the Property that reflect the Property's history as one of Ward 5's many institutional campuses and is currently evaluating the formal designation of the 1928 School Building and its immediate environs. Like other similar developments of nearby institutional campuses, the preservation of the 1928 Building as well as the open space around it will serve as the physical and ceremonial center of the Project yet not preclude the development of the Project around it.

**c. Area Element**

The Property is located within the boundaries of the Upper Northeast Area Element. The Area Element notes that "institutional and local public facilities land make up 11 percent of the Planning Area" (10-A DCMR § 2402.5), with which the Subdivision and Project are directly in line. Further, the Subdivision and Project further the following specific policies of the Area Element:

***Policy UNE-1.1.1: Neighborhood Conservation*** Encourage growth while enhancing the neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond-Riggs, and Arboretum. The residential character of these areas should be preserved while allowing new housing opportunities for all incomes. Places of historic significance, gateways, parks, and important cultural and social places should likewise be preserved and enhanced. 2408.2

***Policy UNE-1.2.3: Highlighting Local Cultural Resources*** Develop new means to highlight the historic and cultural resources in Upper Northeast, such as improved signage and trails connecting the Fort Circle Parks, organized tours of the area's

religious landmarks, and tours of historic homes in Brookland and other parts of the community. 2409.3

***Policy UNE-1.2.7: Institutional Open Space*** Recognize the particular importance of institutional open space to the character of Upper Northeast, particularly in and around Brookland, Woodridge, and Gallaudet University/Trinidad. Opportunities also exist for connections between the Gallaudet campus and the network of open spaces to the west, including the Metropolitan Branch Trail and the Burnham Spine, which lead to Union Station and the National Mall. In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces. Connections between Upper Northeast open spaces and the network of open space between McMillan Reservoir and Fort Totten should also be pursued. 2409.7

The Subdivision will continue the same general land use and development pattern at the Property in an area with many single-family homes. The Project will also provide new housing opportunities, maintain significant open space, and highlight a historic resource, all in furtherance of the Comprehensive Plan's Upper Northeast Planning Area Element.

**d. Racial Equity Analysis**

A primary focus of the Comprehensive Plan is racial equity. As stated in the Framework Element, equity is both an outcome and a process. 10-A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. It is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is conveyed throughout the Comprehensive Plan. Further, the Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality” 10-A DCMR § 213.6. The Comprehensive Plan gives specific examples of ways a project can work toward eliminating racial inequity, including “transportation, housing, employment, income, asset building, geographical change, and socioeconomic outcomes.” 10-A DCMR § 213.10. The Framework Element specifically calls for equitable development to “create[] access to education.” 10-A DCMR § 213.7.

The Subdivision and resulting Project furthers the goals of the Comprehensive Plan when viewed through a racial equity lens. Specifically, the Subdivision and resulting Project will create new homeownership opportunities for families on land that will not displace any existing residents and in a location that is proximate to public facilities and connection with multi-modal access to employment centers, all consistent with the Comprehensive Plan when read as a whole through a racial equity lens. The Applicant's community engagement process, which included multiple community presentations and conversations with both neighborhood and agency stakeholders, has resulted in meaningful changes to the Subdivision and Project responding to feedback that has been received.

## **VI. SUBDIVISION IMPACTS**

Section 2302.1(b) and (c) of the LTR Regulations requires OP and the other District departments and agencies engaging in the LTR process to review the Subdivision's potential neighborhood, design, quality of life, environmental, and traffic impact. The Subdivision will not have adverse impacts for the reasons summarized below.

### **a. Neighborhood, Design, and Quality of Life Impact**

The Project will have positive impacts on the surrounding neighborhood and its quality of life through the addition of new family-sized, owner-occupied housing and affordable housing opportunities within a site plan that emphasizes communal open space and pedestrian development. The Subdivision proposed to divide the lot in a manner that is consistent with by-right zoning in keeping with the character and scale of the surrounding community.

- **Housing and Affordable Housing Impact.** The Subdivision will result in positive housing impacts through 166 new for-sale homes that are sized for families. Consistent with the Inclusionary Zoning requirements, 10% of the proposed gross floor area (or approximately 17 homes) will be set aside for households earning up to 80% of the Median Family Income.

- Urban Design and Architecture Impact. The Subdivision furthers urban design through a site plan that provides extensive pedestrian walkways to each home's front entrances and places the vehicular entrances off the rear of the homes. The Project's retention of the existing 1928 Building and related open space at the center of the Property as well as the incorporation of compatible materials such as stone into the architectural design of the proposed houses will provide high quality architectural and landscape design.
- Quality of Life Impact. The Subdivision will not negatively impact the quality of life in the surrounding neighborhood. The proposal calls for semi-detached housing that is compatible with the character and scale of surrounding development, and the site plan incorporates meaningful buffer areas along the portions of the Property that are adjacent to existing single-family housing. Significant tree planting and the reopening of the site to neighborhood access will also further improve the neighborhood quality of life.

**b. Environmental and Infrastructure Impact**

The Applicant has evaluated the potential environmental and infrastructure impacts of the Subdivision and concluded that they will not create adverse impacts.

- Water Demand. The average daily water demand for the Project is estimated to be approximately 37,848 gallons per day and will be able to be met by the existing District water system, as extended through the Property through a new eight-inch water main serving fire connection and domestic water service that will connect to the distribution system within Sargent Road, with individual combined connections and domestic meters to the individual homes. These plans will be coordinated directly with DC Water.
- Sanitary Sewer Demand. The sanitary sewer system for the Project will be designed to accommodate approximately 219,120 gallons per day, which represents the design standard that accounts for peak wastewater flow. The proposed sanitary sewer discharge for the Project will be made to the existing distribution system through connections at Sargent Road and within the public alley off Delafield Place and will be coordinated with DC Water during the permitting process.
- Pervious Surface and Stormwater Management. The Subdivision will be designed to achieve the minimum pervious surface requirement of 30% for each lot, and taken as a whole, approximately 40% of the Property will be maintained or developed as planted pervious surfaces after accounting for undeveloped open spaces. The Project will meet or exceed District Department of Energy and Environment ("DOEE")

stormwater management retention and detention requirements. The requisite inlets and closed pipe system are designed and will be constructed to meet the standards set by DOEE, DC Water, and DDOT, and bioretention areas will be spread throughout the Project to meet the stormwater requirements.

- Solid Waste Services. Solid waste and recycling materials generated by the Project will be collected regularly by a private trash collection contractor.
- Electrical Services. Electricity for the new Building will be provided by the Potomac Electric Power Company (“PEPCO”) in accordance with its usual terms and conditions of service. All electrical systems are designed to comply with the D.C. Energy Code.
- Energy Conservation. The Project is designed in compliance with the Energy Conservation requirements of the District of Columbia Building Code.
- Erosion Control. During excavation and construction, erosion on the Property will be controlled in accordance with District of Columbia law and will be managed to not adversely affect neighboring properties, the environment or District services and facilities.
- Other Environmental Impacts. On balance, the Subdivision does not have unacceptable impacts on the environment. The Project will minimize impervious areas through rear-loaded roadway design and the creation of meaningful shared open spaces, the proposed retention of approximately 10 mature trees along the alley, and the planting of approximately 225 new trees. The Applicant met with DDOT’s Urban Forestry Administration on site to review the existing trees on site and determine which trees are invasive, in poor condition, or should otherwise be removed as hazardous trees.
- Fire and Emergency Management Services. The Subdivision does not adversely affect emergency services in the District. The proposed private roadway network has been designed to provide fire and emergency access to all homes. The District has approximately thirty engine companies spread around the District, and the Property is served by Engine Co. 17.<sup>4</sup> The Project alone does not require any increase in the number of stations or FEMS personnel.

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<sup>4</sup> See Fire and EMS Department, *Fire and EMS Locations* <http://geospatial.dcgis.dc.gov/FEMSLocator/> (last visited July 10, 2025).

- Public Facilities Impact. The Subdivision will not adversely affect local public facilities.
  - The Property is located within the boundaries of Bunker Hill Elementary School, which is under capacity according to publicly available information<sup>5</sup> and is slated for a full modernization within the current five-year capital improvement plan.<sup>6</sup> Bunker Hill feeds into Brookland Middle School and Dunbar High School, each of which received full modernizations within the past 10-12 years.
  - The Property is adjacent to the North Michigan Park Recreation Center, which received ADA upgrades in 2021, and the Applicant is studying a potential pedestrian connection to the Recreation Center to further improve access to the Recreation Center.
  - The Property is proximate to the Lamond-Riggs/Lillian J. Huff Library, which is one of a handful of libraries that has space per capita that exceeds the District’s planning targets.<sup>7</sup>
- Public Space Impact. The Project is studying improvements to public space adjacent to the Property, including updated sidewalks and improvements to support existing mature trees.

**c. Traffic Impact**

As concluded in the Applicant’s CTR, the Project will not have a detrimental effect on traffic in the surrounding neighborhood. Prior to undertaking the study, the Applicant scoped the study area, scope, and methodology with DDOT and performed the analysis based on parameters recommended by and agreed to by DDOT. The methodology follows both national and DDOT guidelines on the preparation of transportation impact evaluations of site development. The results of the CTR are summarized below.

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<sup>5</sup> Source: District of Columbia Public Schools, FY26-31 Capital Improvements Plan: PACE Annual Supplement (March 2025), page 20, available at <https://acrobat.adobe.com/id/urn:aaid:sc:US:a6c61c89-50fa-4a41-83eb-0c9f5e283d63>.

<sup>6</sup> Source: DC Public Education Master Facilities Plan 2023 (March 2024), page 119, available at <https://dcgov.app.box.com/v/mfp2023report>.

<sup>7</sup> Source: DC Public Library, Next Libris: Facilities Master Plan 2021-2030, page 28, available at [https://www.dclibrary.org/sites/default/files/files/2023-04/DCPL\\_NextLibris\\_111020-Web\\_IMLS.pdf](https://www.dclibrary.org/sites/default/files/files/2023-04/DCPL_NextLibris_111020-Web_IMLS.pdf).

Parking and Loading Impacts. The Project will provide one parking space per unit as well as 16 additional surface parking spaces, which exceeds the zoning minimum and falls within DDOT's preferred maximum. Each home will also contain space for bicycle parking within the home, and the Project will also include bike racks providing 10 additional spaces for visitors. The Project itself does not generate a loading berth or space requirement because of its character.

Vehicle Trips and Traffic. The CTR evaluated the average delays and queues at nearby impacted intersections, accounting for not only additional demand from the Project but also from typical background growth, and concluded that Project would not significantly impact the surrounding roadway network or trigger a requirement for mitigation measures based on established DDOT standards. The CTR also evaluated potential safety concerns at study intersections and concluded that none were considered to be hazardous to vehicular, pedestrian, or bicycle use.

Pedestrian and Bicycle Infrastructure. The CTR concluded that on balance there is a connected pedestrian network surrounding the site and noted that the Applicant is studying potential improvements to existing conditions through both pedestrian connections to the Property as well as improvements in public space along Sargent Road. The CTR concluded that the existing bicycle facilities in the area can accommodate new bicycle trips associated with the Project.

## **VII. AGENCY AND COMMUNITY OUTREACH**

Over the past two months, the Applicant has engaged with the surrounding community regarding the proposed Subdivision and Project. These efforts include presentations to ANC 5A, the North Michigan Park Civic Association, and the Queens Chapel Civic Association as well as informal discussions with ANC 5A Commissioners, neighbors, and representatives of other nearby stakeholders such as the adjacent St. Anselm's. Following these discussions, the



Applicant returned to ANC 5A and, at ANC 5A's June 25 regular public meeting, secured a vote in conceptual support of the proposed Project. A copy of ANC 5A's letter in support is attached as Exhibit I. Also included in Exhibit I is a letter of support from the Queens Chapel Civic Association. The Applicant intends to continue such outreach and coordination with the community throughout the LTR and Project processes.

Over the past two months, the Applicant has also met with representatives from the Office of Planning, Historic Preservation Office, District Department of Transportation, and District of Columbia Zoning Administrator to review the proposed Subdivision and Project, and will continue such engagement with these and other affected agencies as the LTR Subdivision review process progresses and Project plans are further developed.

#### **VIII. LIST OF EXHIBITS**

<u>Exhibit A</u>	LTR Certification Form
<u>Exhibit B</u>	Letters of Authorization
<u>Exhibit C</u>	Property Owners List
<u>Exhibit D</u>	Zoning Map
<u>Exhibit E</u>	Proposed Subdivision Plat, Public Easement, and Site Layout Plats (" <b>Subdivision Plans</b> ")
<u>Exhibit F</u>	Site Development Plans for the Proposed Project (" <b>Site Plans</b> ")
<u>Exhibit G</u>	Concept Renderings of Proposed Project (" <b>Concept Renderings</b> ")
<u>Exhibit H</u>	Comprehensive Transportation Review (" <b>CTR</b> ")
<u>Exhibit I</u>	Letters in Support from ANC 5A and the Queens Chapel Civic Association

#### **IX. CONCLUSION**

For the reasons stated herein, the proposed Subdivision satisfies the requirements of the LTR Regulations, and the Applicant requests affirmation from OP of such satisfaction.

Respectfully Submitted,

GOULSTON & STORRS PC

/s/  
David Avitabile

July 14, 2025