



Government of the District of Columbia Advisory Neighborhood Commission 4B

By Electronic Mail

January 22, 2024

Office of Zoning, District of Columbia Government
441 4th Street, NW, Suite 200-S
Washington, DC 20001
DCOZ-ZCSubmissions@dc.gov

RE: Supporting and Providing Feedback on Proposed Map Amendment from MU-4 to MU-10
for 7709-7723 Georgia Avenue, NW (Case No. 23-11)

Dear Office of Zoning Representative:

Advisory Neighborhood Commission 4B, at a duly noticed public meeting, with a quorum being the “majority of the total number of commissioner positions currently filled in Commission 4B,” at its January 22, 2024, meeting voted with _ Yeas, _ Nays, and _ Abstentions to send this letter supporting and providing feedback on the proposed Map Amendment from MU-4 Zone to MU-10 Zone for 7709 Georgia Avenue, NW, in [Case No. 23-11](#).

The owners of the property, Gragg Cardona Souadi, via 7709 Georgia Avenue NW, LLC (the Applicant) submitted an application on June 9, 2023, for a Map Amendment to amend the Zoning Map of the District of Columbia to rezone the property located at 7709-7723 Georgia Avenue, NW, (Square 2961, Lot 810) from the MU-4 Zone to the MU-10 Zone. The Zoning Commission considered the application at a public meeting on November 30, 2023, where it voted to schedule the application for a public hearing. The Zoning Commission has scheduled a public hearing on this matter for February 22, 2024. This Letter reflects the Commission’s consideration of and engagement with the Applicant, the materials that are a part of the record, and Commission residents.

The Property currently consists of a one-story commercial building (with multiple retail tenants) and a surface parking lot. It is located within Advisory Neighborhood Commission 4B, Single Member District 4B01, and the Rock Creek East planning area. As part of their application, representatives from Gragg Cardona Souadi presented to the full Advisory Neighborhood

Commission 4B at the Commission's June 26, 2023, meeting. Representatives from Gragg Cardona Souadi also presented and had detailed discussions with Advisory Neighborhood Commission 4B's [Housing Justice Committee](#) at the Committee's May 3, 2023, and January 3, 2024 meetings. They are scheduled to present again to the full Advisory Neighborhood Commission 4B at the Commission's January 22, 2024, meeting, where the Commission will vote on this Letter. In addition to these meetings, Advisory Neighborhood Commission 4B Commissioners have communicated with the District's Office of Planning regarding their November 20, 2023, [Memorandum](#) to the Zoning Commission regarding this application; the last Executive Director of the Upper Georgia Avenue Main Street regarding the Applicant's engagement with the existing retail tenants and the corridor's retail needs; and Commissioners from Advisory Neighborhood Commission 7D regarding their experiences with regard to a similar development by the Applicant within that Commission's boundaries.

The Applicant has proposed an Affordable Assisted Living Community that would provide approximately 179 apartments (via a mix of studio and one-bedroom units) for low- and moderate-income elderly residents. The facility would serve individuals who are 60 years old or older and/or disabled and 55 years old or older who are covered by Medicaid with a maximum annual income of \$30,276 or are privately covered with a maximum annual income of \$49,000 (2018). The project would include supportive services, including on-site meals, housekeeping and laundry, social and recreational activities, medication supervision, and transportation. According to the Applicant, the proposal will "serve the unmet need for housing and assisted living services for low to moderate income elderly residents," thereby filling a gap in senior housing, while also "creat[ing] good paying jobs and other significant social and economic impacts to the community."

In reviewing this application, the Zoning Commission will consider whether the proposed map amendment is "not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs." The District's [Comprehensive Plan](#) sets priorities for the District's land use, public services, infrastructure, and capital investments, as well as guides the use, density, and design of buildings. There are two maps associated with the Comprehensive Plan: The [Generalized Policy Map](#) categorizes how the land use of areas in the city may change between now and 2025, and the [Future Land Use Map](#) provides a general view about how land is intended to be used, not necessarily how it is used today. The [Upper Georgia Avenue Great Streets Redevelopment Plan](#) provides further policy guidance and a vision for the redevelopment of the northernmost portion of the Georgia Avenue corridor. Approval of this application is largely not contingent upon or related to the proposal's specifics, but rather relates to the property's zoning designation. Stated differently, if a map amendment is approved a project can be built by-right on the site subject to the development standards under the amended zone.

The property is within the Main Street Mixed Use Corridor on the Comprehensive Plan's Generalized Policy Map, which provides that "[c]onservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs" and "[a]ny development that occurs should support transit use and enhance the

pedestrian environment.” The Future Land Use Map designates the property as appropriate for two land use categories: Medium Density Residential (generally, but not exclusively, mid-rise apartment buildings) and Medium Density Commercial (shopping and service areas somewhat greater in scale and intensity than moderate density). Medium Density Commercial is described as consistent with the MU-10 Zone requested here. Further, the property’s current MU-4 Zone is not consistent with the Future Land Use Map, as that Zone is described as moderate density.

The proposed change in zoning would provide an increase in permissible height from 50 feet to 90 feet; an increase the permissible Floor Area Ratio from 3.0 with Inclusionary Zoning to 7.2 with Inclusionary Zoning; and an increase in permissible lot occupancy from 75 percent to 80 percent with Inclusionary Zoning. [Inclusionary Zoning](#) requires affordable units to be affordable to households earning no more than [60 percent of Median Family Income](#) for rental housing and 80 percent of Median Family Income for ownership housing. Under [Inclusionary Zoning Plus](#), establishing an affordable unit set-aside requirement higher than regular Inclusionary Zoning, there would be approximately 31 Inclusionary Zoning units (compared to approximately 17 Inclusionary Zoning units under regular Inclusionary Zoning) for this project. The Applicant has indicated the redevelopment would include approximately 179 units overall and that they would easily exceed the affordability requirements of Inclusionary Zoning Plus via their model of service to those covered by Medicaid, who have a maximum annual income close to [30 percent of Median Family Income](#).

The District’s Office of Planning has [concluded](#) that “[t]he uses and development types generally permitted by the MU-10 Zone would be compatible with the surrounding community and the Georgia Avenue corridor, and the remapping would also not be inconsistent with the written policies of the Comprehensive Plan, including when viewed through a racial equity lens.” Members of the Zoning Commission have similarly [recognized](#) that the application is not inconsistent with the Future Land Use Map.

As Advisory Neighborhood Commission 4B has repeatedly stated, housing is a human right, and all District residents are entitled to safe, stable, and secure housing. See [Letter](#) re: Advisory Neighborhood Commission 4B Housing Justice Budget Priorities; [Letter](#) Supporting Affordable Housing in High-Needs Areas Tax Abatement for Takoma Metro Station Development (May 23, 2022); [Letter](#) re: Advisory Neighborhood Commission 4B FY2023 Budget Priorities (Apr. 25, 2022); [Letter](#) re: Advisory Neighborhood Commission 4B Fiscal Year 2022 Budget Priorities (Mar. 22, 2021). Advisory Neighborhood Commission 4B’s Housing Justice Committee was created to assist “in doing our fair share regarding deeply affordable housing within our Commission boundaries” and with an explicit goal of “maximiz[ing] affordable housing” within the Commission area. [Resolution 4B-23-0103](#), Expanding Membership of Advisory Neighborhood Commission 4B’s Housing Justice Committee (Jan. 23, 2023); [Resolution 4B-22-0104](#), Reauthorizing Advisory Neighborhood Commission 4B’s Housing Justice Committee (Jan. 24, 2022); [Resolution 4B-20-0205](#), Establishing Housing Justice Committee (Feb. 24, 2020). The Commission has lived its values in supporting and advocating to maximize affordable housing within the Commission area.

Advisory Neighborhood Commission 4B has noted “that the affordable housing crisis requires the District to use every tool available to ensure affordable housing” and that “the increased supply of housing – while important – will not alone solve the affordable housing crisis, particularly as related to extremely-low and very low-income households, and must be accompanied by active and robust City goals and policies to ensure affordability, including affordability for extremely low- and very low-income households, in relation to increased supply.” [Resolution 4B-20-0104](#), Providing Feedback on Proposed Changes to the Comprehensive Plan (Jan. 27, 2020). The Commission has consistently advocated that increases in density should be linked to value recapture to maximize affordable housing. *Id.* (calling for “link[ing] any increased density in the Elements and/or the Future Land Use Map to affordable housing set-asides that capture a significant portion of the value provided through any re-zoning”). Specifically with regard to the area around Georgia Avenue, NW, and Eastern Avenue, NW, the Commission has called for clearly defined goals reflecting “the production of affordable housing, including deeply affordable housing.” *Id.*

Advisory Neighborhood Commission 4B supports the proposed Map Amendment to amend the Zoning Map of the District of Columbia to rezone the property located at 7709-7723 Georgia Avenue, NW, (Square 2961, Lot 810) from MU-4 Zone to MU-10 Zone, including the Office of Planning’s recommendation that Inclusionary Zoning Plus apply to the property. The DC government, through [Mayor’s Order 2019-036](#), has set a goal of 36,000 new housing units by 2025, of which 12,000 are to be affordable to households earning below 80 percent of Median Family Income. The Rock Creek East planning area includes a goal of 1,500 new affordable housing units and [has only produced 70.7 percent](#) of that goal so far. This project has the potential to provide significant additional units serving low-income residents (largely via Medicaid coverage), as well as binding the property to an Inclusionary Zoning Plus set aside, which would make additional progress toward meeting the remaining goal for the Rock Creek East planning area.

In addition, Advisory Neighborhood Commission 4B is supportive of efforts to bring new housing to transit accessible areas, including the Georgia Avenue corridor, which is serviced by some of the most heavily used bus lines in the District. The Commission has repeatedly supported efforts to provide new housing around transit hubs, with a particular emphasis on affordable housing. See [Letter](#) Supporting and Providing Additional Feedback on Application of TM Associates, LLC, and Washington Metropolitan Area Transit Authority for Consolidated Approval of Planned Unit Development and Map Amendment at Takoma Metrorail Station (ZC Case #22-36) (Jan. 23, 2023); [Resolution 4B-22-1006](#), Supporting Application for Map Amendment for Elm Gardens, 7050 Eastern Avenue, NW (Oct. 24, 2022); [Resolution 4B-20-1107](#), Supporting the Preliminary Design for 6928 Maple Street, NW (Nov. 23, 2020); [Resolution 4B-20-0905](#), Supporting the Provision of DHCD Funding for 218 Vine Street NW (Sept. 28, 2020); [Resolution 4B-20-0410](#), Supporting Proposed Design for 300-308 Carroll Street NW (Apr. 27, 2020); [Resolution 4B-19-0606](#), Supporting Proposed Design for 218 Cedar Street NW (June 24, 2019); [Resolution 4B-19-0504](#), Supporting Implementation of Bus Only Lanes along Georgia Avenue NW (May 20, 2019).

Advisory Neighborhood Commission 4B Commissioners have had detailed conversations with the Applicant regarding the importance of retail in this area and along the Georgia Avenue, NW, commercial corridor and creating good paying jobs for the local community, as well as support for the existing retail tenants at the property. See Comprehensive Plan, [Rock Creek East Area Element](#), RCE-2.3.2: Pedestrian and Transit Improvements to Upper Georgia Avenue NW (“The development of upper Georgia Avenue NW as one of Washington, DC’s prominent commercial gateways should encourage new retail and infill that is pedestrian and transit oriented.”); [Upper Georgia Avenue Great Streets Redevelopment Plan](#) (identifying the property as a “major development opportunity” and calling for new development at the site to “consist of moderate to medium density development, incorporating street level retail with residential or office uses above” that “enliven[s] the public realm by engaging the pedestrian at street level with vibrant retail or commercial uses”). The Applicant has recognized the importance of retail for this property and commercial corridor and committed to maintaining ground floor retail after discussions with the Commission. They have also indicated their proposed project will create 70-80 permanent, living-wage jobs.

As the Office of Planning has noted, the proposal could lead to the displacement of existing businesses currently located on the site. The Applicant has indicated they are working on strategies to mitigate business displacement that will provide assistance to the affected tenants. Advisory Neighborhood Commission 4B supports the Office of Planning’s request that the Applicant provide details of their assistance plan in the record prior to a hearing on this matter, as well as an update on the current status of any business move-outs or relocations, and how the businesses have utilized the assistance plan to date. The Commission has expressed to the Applicant that the Commission seeks to remain informed regarding both communications with and support for existing tenants and future retail.¹

Advisory Neighborhood Commission 4B strongly supports efforts to make this property and the surrounding area more pedestrian friendly to ensure a thriving streetscape along a critical commercial corridor. The Commission has repeatedly encouraged developers to incorporate

¹ Advisory Neighborhood Commission 4B recognizes the inherent difficulty of retaining existing retail tenants during the redevelopment of a property. The Commission has rarely, if ever, seen tenants remain following redevelopment, in part due to the need to relocate during the redevelopment. For this reason, the Commission has called for more proactive legislative and policy efforts that connect retail businesses located at a property subject to redevelopment with new locations for their businesses and/or financial assistance in relocation. See [Resolution 4B-23-0906](#), Calling for Reform to Vacant & Blighted Property Laws and Regulations for Residential and Commercial Properties (Sept. 26, 2023) (“Advisory Neighborhood Commission 4B has experienced the displacement of several longstanding small local businesses that have been strong members of our community due to the redevelopment of their properties. While the Commission has supported redevelopments that offer substantial affordable housing to mitigate the District’s housing crisis and advocated for supports for existing businesses to remain on these properties, this is not always feasible due to changes in the space layout, cost, or length of construction time. Connecting these businesses with opportunities to purchase or lease vacant or blighted commercial property nearby could both support these businesses and bring vacant and blighted properties back into use.”).

plaza spaces or wider sidewalks into new developments, recognizing their critical role in connecting communities. See [Resolution 4B-22-1006](#), Supporting Application for Map Amendment for Elm Gardens, 7050 Eastern Avenue, NW (Oct. 24, 2022); [Letter](#) re: Application for a Planned Unit Development at the Takoma Metro Station (June 27, 2022); [Resolution 4B-20-0410](#), Supporting Proposed Design for 300-308 Carroll Street NW (April 27, 2020); [Resolution 4B-19-0606](#), Supporting Proposed Design for 218 Cedar Street NW (June 24, 2019). The Commission also acknowledges the important role that these pedestrian connections provide for residents: “we are all safer with robust sidewalk and pedestrian infrastructure.” [Resolution 4B-12-0101](#), Calling for Greater Transparency and Action to Address Sidewalk Repairs, Sidewalk Gaps, and Pedestrian Infrastructure (Jan. 23, 2023).

The proposed map amendment to the MU-10 Zone uniquely furthers a thriving streetscape by requiring a “[plaza comprising eight percent \(8%\) of the lot.](#)” “[These spaces are intended for public use ... and shall be open and available to the general public on a continuous basis.](#)” This emphasis on public space and pedestrian access furthers many of the goals in Upper Georgia Avenue Great Streets Redevelopment Plan, which recognizes that in addition to development along the corridor “an equally important objective is to link the nodes with safe, pedestrian-friendly streets and to improve the overall quality of the existing urban fabric – business storefronts, residential structures, and open spaces” due to Georgia Avenue, NW, being “a challenging, and often dangerous environment for pedestrians.” Here, the MU-10 Zone offers the specific benefit of a plaza requirement furthering pedestrian access and safety. The Commission notes that other mixed-use zones do not have the plaza requirement, so amending the map to a different zone will effectively eliminate this substantial community benefit, and urges approval of the MU-10 Zone here to ensure that this underserved area receives important and necessary changes associated exclusively with the MU-10 Zone.

Advisory Neighborhood Commission 4B appreciates that the Applicant has indicated their continued interest in engagement with the community and encourages further discussion regarding financing and affordability; leasing and occupancy; support for current retail tenants and possible future retail; hiring of neighborhood residents for both construction and services offered as part of the assisted living facility; and maximizing design and utility of public space and pedestrian infrastructure. The Commission welcomes these continued conversations and the opportunity to provide feedback and insights from the neighborhood perspective.

Advisory Neighborhood Commission 4B has voted with _ Yeas, _ Nays, and _ Abstentions to appoint the Commissioner for Single Member District 4B01, T. Michelle Colson, the Commissioner for Single Member District 4B02, Erin Palmer, the Commissioner for Single Member District 4B08, Alison Brooks, the Commissioner for Single Member District 4B03, Zurick T. Smith, and the Commissioner for Single Member District 4B04, Evan Yeats, to be authorized to communicate this letter and represent Advisory Neighborhood Commission 4B in communication with you or any DC government entity regarding this matter.

Sincerely,

T. Michelle Colson, ANC 4B01 Commissioner
Erin Palmer, ANC 4B02 Commissioner
Alison Brooks, ANC 4B08 Commissioner
Zurick T. Smith, ANC 4B03 Commissioner
Evan Yeats, ANC 4B04 Commissioner

cc: Sharon Schellin, Secretary to the Zoning Commission, Office of Zoning

Councilmember Janeese Lewis George, Ward 4
Kelly Hunt, Chief of Staff

Haaziq Gragg, Gragg Cardona Souadi
Oussama Souadi, Gragg Cardona Souadi
Saman Zomorodi, Gragg Cardona Souadi

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