

Application for an Amendment to the Comprehensive Plan Howard University East Campus / School of Divinity

1. Brief Description of the Proposed Amendment (Section 2 of the Application Form)

This application for an amendment to the Comprehensive Plan Generalized Policy Map (“GPM”) and Future Land Use Map (“FLUM”) is submitted by Howard University (the “University” or the “Applicant”) for the Howard University East Campus / School of Divinity (the “Site”), which is located in the northeast quadrant of the District in Ward 5. The Site is generally bounded by Taylor Street, NE to the north; Randolph Street, NE and the Mount St. Sepulchre Franciscan Monastery to the south; 18th Street, NE and South Dakota Avenue, NE to the east; and 14th Street, NE to the west (Figure 1).

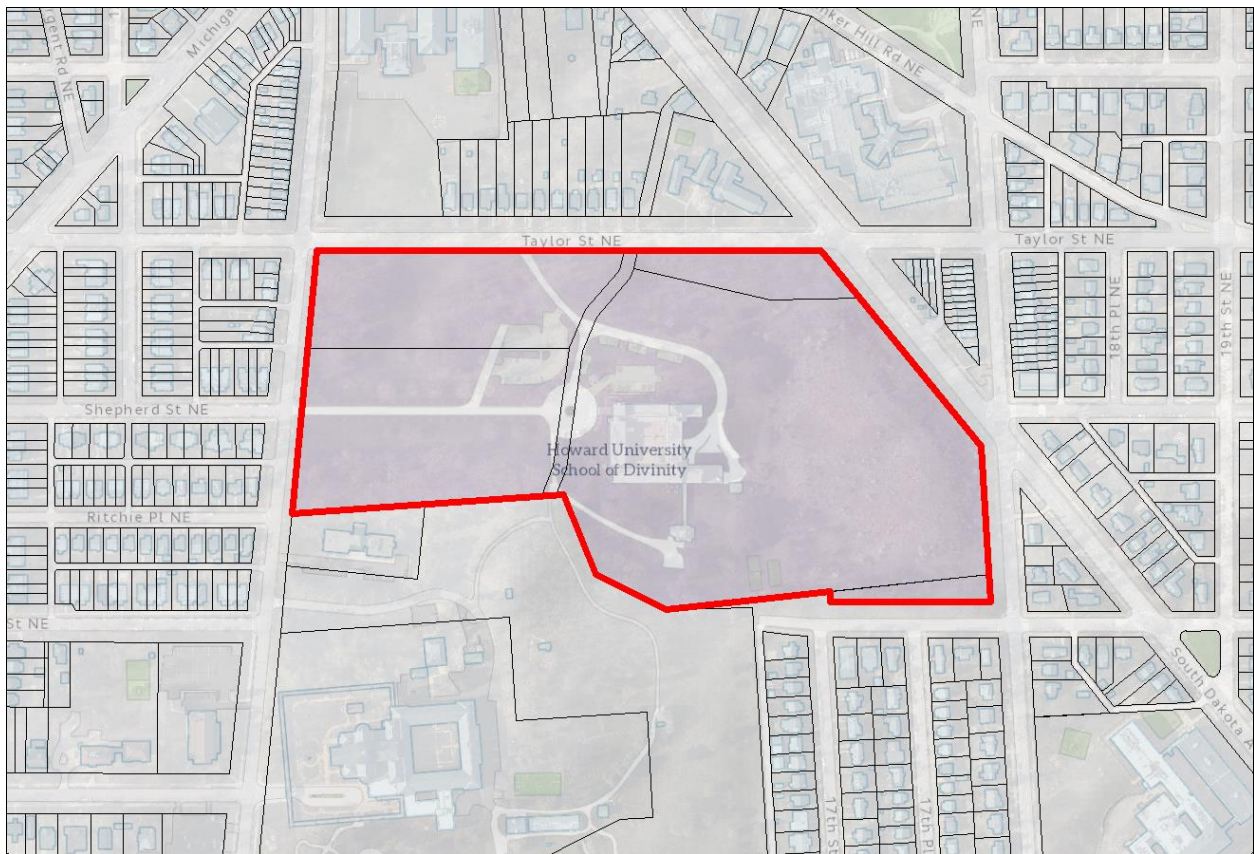


Figure 1: Site boundary

A. Proposed Amendment to the Generalized Policy Map.

As shown in Figures 2 and 3, the GPM currently designates the Site as Institutional. The Applicant proposes to amend the GPM so the Site is designated as a Land Use Change Area.

i. Current GPM Designations

The Institutional designation is not a specifically defined designation on the GPM. However, as stated in the Framework Element of the Comprehensive Plan, the fact that certain areas are not designated as Conservation, Enhancement, or Change does not mean they are exempt from the policies of the Comprehensive Plan or will remain static. 10-A DCMR § 223.22. Specifically regarding institutional land, the Framework Element further states that [m]uch of the institutional land on the [GPM] represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites

likewise may see new buildings or facilities added. Policies in the Land Use Element and the Educational Facilities Element address the compatibility of such uses with surrounding neighborhoods. Id.

ii. Proposed GPM Designation

The Land Use Change Areas designation on the GPM is assigned to areas where change to a different land use from what currently exists is anticipated. Land Use Change Areas represent many of the District’s large development opportunity sites, and other smaller sites that are undergoing redevelopment or that are anticipated to undergo redevelopment. Overall, these areas represent much of the District’s supply of vacant and underutilized land. 10-A DCMR § 223.9. The guiding philosophy for Land Use Change Areas is to encourage and facilitate new development and promote adaptive reuse of the existing structures. 10-A DCMR § 223.11



Figure 2: Existing GPM Designation

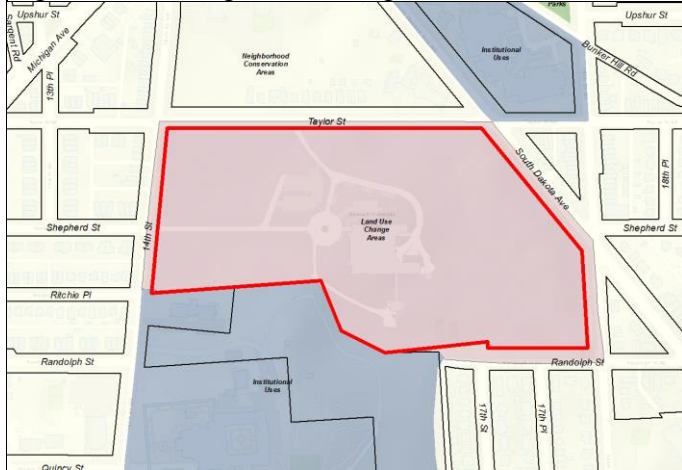


Figure 3: Proposed GPM Designation

B. Proposed Amendment to the Future Land Use Map.

As shown on Figures 4 and 5, the FLUM currently designates the Site as Institutional. The Applicant proposes to amend the FLUM so that the Site is designated as Mixed Use: Moderate Density Residential / Institutional.

i. Current FLUM Designation

As defined in the Framework Element, the Institutional land use designation is assigned land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. Smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size.

ii. Proposed FLUM Designation

The Applicant proposes to amend the FLUM so that the Site is designated as Mixed Use: Medium Density Residential / Institutional.

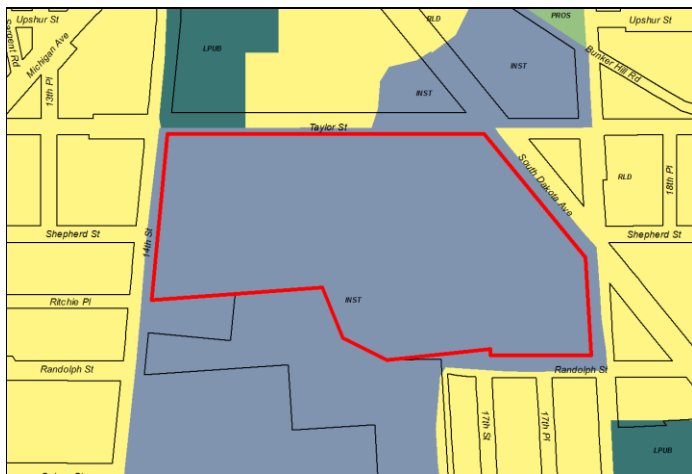


Figure 4: Existing FLUM Designation

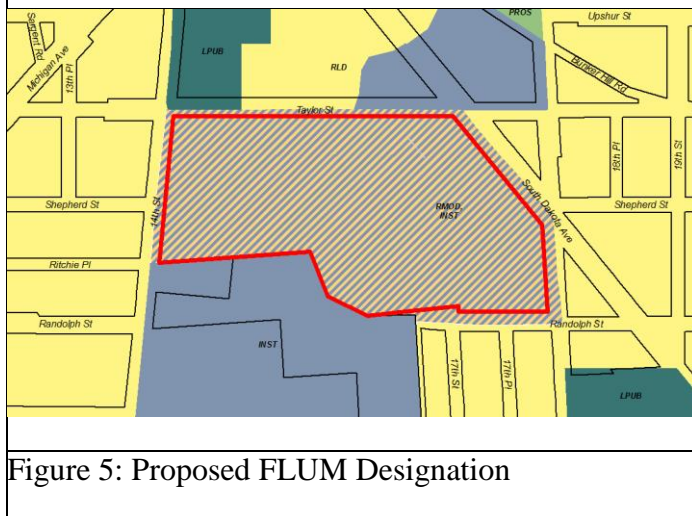


Figure 5: Proposed FLUM Designation

The Moderate Density Residential designation is used to define the District’s row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). 10-A DCMR § 225.4.

The definition of the Institutional land use designation is provided above.

2. Impacts of the Amendment (Section 3 of the Application Form).

The proposed GPM and FLUM amendments will benefit the areas surrounding Site and the District of Columbia as a whole by allowing appropriately-scaled mixed-use development that will provide additional housing, including affordable housing, which will help address the ongoing

demand for affordable housing and allow the District to achieve its housing goals. Moreover, as set forth below, the GPM and FLUM amendments are consistent with the following District plans and policies:

- a. The Comprehensive Plan’s Citywide Elements;
- b. The Comprehensive Plan’s Upper Northeast Area Element;

The benefits of the FLUM amendment are set forth below.

A. The proposed GPM and FLUM amendments are consistent with the Comprehensive Plan’s Core Themes and Guiding Principles

The Comprehensive Plan is based on 36 Guiding Principles within five Core Themes that acknowledge that the benefits and opportunities of living in the District are not available to everyone equally and that divisions in the city—physical, social and economic—must be overcome to move from vision to reality. 10-A DCMR § 216.3. The Guiding Principles are drawn from the Comprehensive Plan’s “vision for growing an inclusive city,” and express cross-cutting goals for the District’s future. 10-A DCMR § 2004.4. The Guiding Principles are grouped into five core themes: Managing Growth and Change, Creating Successful Neighborhoods, Increasing Access to Education and Employment, Connecting the City, and Building Green and Healthy Communities. 10-A DCMR § 216.2. The individual policies and actions within the Comprehensive Plan’s City Wide and Area Elements are based upon the city’s commitment to following these Core Themes and Guiding Principles. 10-A DCMR § 216.1.

The proposed GPM and FLUM amendments are consistent with the Comprehensive Plan’s Core Themes and Guiding Principles as follows:

i. Managing Growth and Change

The GPM and FLUM amendments acknowledge that change in the District is both inevitable and desirable, and that the key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives, such as poverty, crime and homelessness. 10-A DCMR § 217.1. Amending the GPM designation for the Site to Land Use Change Area will recognize the potential that future development on the Site has with respect to assisting the District in managing the city’s continued growth, especially as it relates to the continued demand for housing (market-rate and affordable). In addition, the proposed GPM amendment will provide guidance with respect to future land use decision making for the Site in conjunction with the text of Comprehensive Plan, the FLUM, and other applicable District plans and policies.

Amending the Site’s FLUM designation to Mixed Use: Moderate Density Residential / Institutional will support future mixed use development on the Site that will provide desired housing while still supporting an institutional presence on the Site. This type of mixed use development will benefit the Applicant by preserving land areas that can be utilized for uses that support Howard University, while also benefitting residents by creating jobs and employment opportunities and pathways for less affluent households to increase their income. 10-A DCMR § 217.4.

ii. Creating Successful Neighborhoods

Consistent with this Core Theme, amending the GPM and FLUM designations for the Site will facilitate a future land use change that will provide the Applicant flexibility to adapt its long-

term plans for the Site to continue to fulfill the future facility needs of Howard University, while also helping to avoid a deepening of racial and economic divides in the city by addressing a citywide need for increased housing production. 10-A DCMR § 218.3. The proposed FLUM amendment to Mixed Use: Moderate Density Residential / Institutional will maintain the Applicant's ability to strengthen its facilities, as necessary, in order to maintain competitiveness. Furthermore, Howard University's ongoing institutional presence in the neighborhood will continue to contribute to the character of the neighborhood as it has for many years. 10-A DCMR § 218.2.

iii. Increasing Access to Education and Employment

The proposed GPM and FLUM amendments will increase access to jobs for District residents by facilitating future development at the Site that will lead to both temporary construction jobs and full-time employment depending upon the mix of uses that are eventually developed. 10-A DCMR § 219.1. Further, consistent with the guiding principle related to college and universities, the proposed GPM and FLUM amendments will allow the Applicant to sustain its longstanding history of providing access to high-quality education to District residents, which in turn increases economic prosperity, and allow the Applicant to continue to be a positive contributor to the integrity of the neighborhoods surrounding the Site.

iv. Connecting the City

While the main focus of this Core Theme relates to the importance of increasing mobility and maintaining adequate transportation facilities across multiple modes of travel, it also addresses the role that place-making has in forging "connections" amongst District residents by creating places of "common ground" where people can gather. The proposed GPM and FLUM amendments are consistent with this guiding principle in that they will facilitate mixed use development on the Site that will improve access to the Site, create uses that bring people together, and provide opportunities for new parks, plazas, and other types of gathering places.

v. Building Green and Healthy Communities

Consistent with the principles within this Core Theme, amending the GPM to include the Site as a Land Use Change Area, and amending the FLUM to allow Mixed Use: Moderate Density Residential / Institutional development will support future sustainable development on the Site. 10-A DCMR § 221.4. Given the generous size of the Site, future redevelopment of the Site with institutional and/or moderate density residential uses can be achieved while also accommodating the Applicant's interest in conserving existing open space and providing appropriate buffering from surrounding neighborhoods.

B. The GPM and FLUM Amendments are Consistent with the Comprehensive Plan Citywide Elements

The Comprehensive Plan includes 13 Citywide Elements, each addressing a topic that is citywide in scope. 10-A DCMR § 104.4. The purposes of the Citywide Elements are to define the requirements and aspirations of District residents and influence development, guide executive and legislative decisions; promote economic growth and jobs for District residents; guide private

and public development to achieve community goals; maintain and enhance the District’s natural and architectural assets; and assist in the conservation, stabilization and improvement of each neighborhood. 10-A DCMR § 102.6. The proposed GPM and FLUM amendments are consistent with several of the policies contained with the Citywide Elements, as follows:

i. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District. 10-A DCMR § 300.1 These include enhancing neighborhood commercial districts, directing growth and new development to achieve economic vitality, and promoting and maintaining successful neighborhoods. 10-A DCMR § 300.2. The Land Use Element specifically prioritizes transit-oriented development, and notes that some of the existing zoning categories were drafted at a time when peak hour transit volumes were lower and regional congestion was less severe. Thus, the Land Use Element provides that “[c]hanges to the regulations may be needed to recognize the widespread desirability of transit use by those within walking distance, taking into consideration station and system wide capacity issues and the other factors listed above.” 10-A DCMR § 306.9.

The proposed GPM and FLUM amendments will advance the following policies within the Land Use Element:

- Policy LU-1.4.1: Infill Development - Encourage infill development on vacant land within the city, 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 complement the established character of the area and should not create sharp changes in the physical development pattern. 10-A DCMR § 307.5
- Policy LU-2.1.1: Variety of Neighborhood Types - Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. 10-A DCMR § 309.5
- Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods - Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. 10-A DCMR § 309.8

ii. Housing Element

The overarching goal of the Housing Element is to develop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia. 10-A DCMR § 501.1. The proposed GPM and FLUM amendments will support this goal by supporting a future land use change on the Site to permit new housing, which is in demand within the Upper Northeast area and throughout the District.

The proposed GPM and FLUM amendments will advance the following policies within the Housing Element:

- Policy H-1.1.1: Private Sector Support - Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 10-A DCMR § 503.2
- Policy H-1.1.3: Balanced Growth - Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city 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. 10-A DCMR § 503.4
- Policy H-1.1.4: Mixed Use Development - Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. 10-A DCMR § 503.5
- Policy H-1.2.3: Mixed Income Housing - Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. 10-A DCMR § 504.8

C. The GPM and FLUM Amendments are Consistent with the Comprehensive Plan Upper Northeast Area Element

The Site is located within the Upper Northeast Area Element of the Comprehensive Plan. The Upper Northeast area is principally known as a residential community, with stable single family neighborhoods. 10-A DCMR § 2400.2. However, the area is also one of the most diverse in terms of land uses compared to other parts of the city. Specifically, the area contains the largest concentration of industrial land uses in the District, includes three major institutions of higher learning, and numerous other institutions serving other missions. In addition, the Upper Northeast area contains two hospitals and several large federal properties. 10-A DCMR § 2400.3.

The Upper Northeast area shares some of the same challenges facing other parts of the District. Many parts of the area lack access to open space, parks, and retail services. The area has a large population of seniors, many with special transportation, housing, and health care needs. The Planning Area also faces the challenge of an increasingly unaffordable housing market. A

new generation of homeowners has “discovered” Upper Northeast—driving up prices and increasing housing demand. The greatest future challenge will be to respond to change in a way that keeps Upper Northeast a socially, culturally, economically diverse community. 10-A DCMR § 2400.8. During the previous Comprehensive Plan revision process, residents of the Upper Northeast area recognized the need to conserve existing housing stock and to address the issue of increasing housing costs. 10-A DCMR § 2406.1.

The proposed GPM and FLUM amendments will help address the issues described above by advancing a number of the policies within the Upper Northeast Area Element, as follows:

- Policy UNE-1.1.2: Compatible Infill - Encourage compatible residential infill development throughout Upper Northeast neighborhoods, especially in Brentwood, Ivy City, and Trinidad, where numerous scattered vacant residentially-zoned properties exist. Such development should be consistent with the designations on the Future Land Use Map. New and rehabilitated housing in these areas should meet the needs of a diverse community that includes renters and owners; seniors, young adults, and families; and persons of low and very low income as well as those of moderate and higher incomes. 10-A DCMR § 2408.3
- Policy UNE-1.2.5: Increasing Economic Opportunity - Create new opportunities for small, local, and minority businesses within the Planning Area, and additional community equity investment opportunities as development takes place along New York Avenue, Bladensburg Road, Benning Road, and around Metro stations. 10-A DCMR § 2409.5

3. Conclusion

Based on the foregoing, the proposed GPM and FLUM amendments for the Site will allow for development at the Site that is fully consistent with the Comprehensive Plan.