

April 10, 2017

VIA IZIS

Chairman Anthony Hood  
District of Columbia Zoning Commission  
441 4th Street NW, Suite 200  
Washington, DC 20001

Re: ZC Case No. 14-18A – Post-Hearing Submission of Mid-City Financial Corporation (the “Applicant”)

Dear Chairman Hood and Members of the Commission:

This letter and attached materials are the Applicant’s post-hearing statement which fully addresses the requests for additional information that were made during the Public Hearings of February 23 and March 16, 2017 in the above-mentioned case.

**Affordable Housing Commitment**

On June 8, 2015, the Applicant provided its post-hearing submission in the First-Stage PUD application to the Zoning Commission regarding the redevelopment of Brookland Manor. In that submission, the Applicant clearly articulated its affordable housing commitment as follows:

1. The Applicant will retain the project based Section 8 Housing Assistance Payment contracts on the property, which provide deep rental assistance to 373 extremely low income families (incomes below 30% of AMI); and
2. All households in good standing that reside at Brookland Manor at the commencement of the redevelopment in early 2018 will be provided the opportunity to remain at the property through and following the redevelopment process. (See ZC Case No. 14-18, Exhibit 104, p.6)

These two commitments of the Applicant have not changed. In fact, this Second-Stage PUD application helps bring these commitments to fruition.

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**Snapshot of Brookland Manor Current Occupancy and Block 7 Occupancy**

As of April 10, 2017, there are 431 occupied units at Brookland Manor. Currently, 98% of Brookland Manor's residents receive Section 8 assistance through the project based contract or through a District of Columbia Housing Authority (DCHA) Housing Choice Voucher (HCV) program. As of April 3, 2017, there is one occupied unit in Block 7 and these residents have been assigned a comparable three bedroom apartment across the street.

As requested by Chairman Hood, the Applicant has provided, as Exhibit A, a "one-page" document which provides this information as simply and comprehensively as possible.

**Satisfaction of Affordable Housing Commitment and Updated Status of Tenant Relocation Plan**

This Second-Stage PUD application will create up to 331 replacement affordable housing units. Regardless of when and how the first two buildings in Block 7 are occupied, the Applicant's affordable housing commitment to retain the 373-unit project-based Section 8 contracts is intact.

The Applicant expects that the 200-unit senior building will ultimately be 100% occupied by residents who will be assisted by the project based and voucher Section 8 programs. Resident demographics indicate that upon the anticipated completion of the senior building at least 167 Brookland Manor residents will be 62 and older and eligible to live in the new senior building. To the extent that the 200-unit senior building is not 100% occupied by current Brookland Manor Section 8 program residents, the Applicant will open units to outside seniors utilizing DCHA vouchers supported by the Section 8 program.

The Applicant has always anticipated that non-Brookland Manor residents might occupy some of the units in the senior building. Flexibility as to the overall number of senior affordable units to be occupied by Brookland Manor residents is contemplated in the First-Stage Order and the Applicant's initial statement, both of which note that the units in the senior building will likely not all be occupied by Brookland Manor seniors. (*See* paragraph 96 of the Findings of Fact of ZC Order No. 14-18 and page 45 of the Applicant's Statement in Support of this second-stage Application.) The Applicant has described the 200-unit Building B as being designated for Brookland Manor residents to assure residents that long-standing members of the community will have the first opportunity to move into a brand new building before that opportunity is offered to those from outside of Brookland Manor. The Applicant finds it unfortunate that Mr. Merrifield and many of the community organizers have unhelpfully distressed residents (by neglecting to do their own homework). The claims of Mr. Merrifield and his attorney colleagues about the numbers not adding up are simply hollow. To this end, the Applicant has been as unambiguous in this application as it was in the first-stage process: the effective affordable housing commitment for the redevelopment will likely be greater than the 373 units required under Condition B.1 of the First-Stage Order.

As indicated previously, the senior building is being created for residents 62 and older and qualified aides. Eligible senior Brookland Manor residents shall have the option to live in the senior building or in another multifamily building based on their personal preference. Except for the senior building, each of the other buildings will have an affordable component of no less than 10% and it is understood that the location and composition of the 373 affordable units will not be set until the final rental building is constructed and occupied, approximately 10-15 years from now, (and except for the 25 (minimum) permanent affordable units that will ultimately be provided in Building A on Block 7).

As noted above, the Applicant also reiterates its commitment to allow all households in good standing that reside at Brookland Manor at the time that redevelopment starts (early 2018) the opportunity to remain in the renewed community. This includes households that currently have more than six residents in their apartment unit and may need a 4-bedroom accommodation (based upon the HUD occupancy standard of 2 people per bedroom). As indicated previously, the preponderance of large units on site are in Blocks 1 and 4 and these are in the final phase of the project, where construction is not expected to commence until 2023 at the earliest. Therefore, all large households will be able to continue to live in one of Brookland Manor's existing 80-year old buildings until at least 2023. The Applicant will continue to work with these households in the future to ascertain their needs and preferences, and will house them appropriately according to Section 8 program requirements. The Applicant will provide updates to the Zoning Commission on the status of these households in each subsequent Second-Stage PUD Application.

With respect to large households, it is important to note the townhome component of the overall RIA project will contain only three and four bedroom style housing and will be subject to the District's Inclusionary Zoning requirements. The Applicant has begun an effort to identify resources to support first-time homeownership opportunities for current residents and has received positive feedback from residents regarding this housing option. The Resident Association has indicated that this is an area of agreement they have with the Applicant and provides an opportunity to work collaboratively in the future to support residents who desire home ownership opportunities.

The Applicant does not anticipate any development related tenant relocation activity will occur prior to the occupancy of the Block 7 buildings, which is expected to occur in late 2019 or early 2020. As noted in the First-Stage PUD application and has occurred to date, all resident relocations have been completed on site and at the Applicant's expense.

It is important to remember that the Applicant's relocation plan is based on the number, demographics and preferences of today's Brookland Manor residents forecasted for expected future conditions based on the best available information. The Applicant requires some flexibility, within the context of the two affordable housing commitments reiterated above, in order to accommodate individual residents' preferences as to housing type. The party opponent and community activists do not speak for all residents of Brookland Manor, as evidenced by the more than 180 individual expressions of support from existing residents for the Applicant's plan.

The housing preferences of existing residents are numerous, complex, dynamic, and occasionally contradictory. There is no single consensus or voice as to what all residents desire. The voices and preferences of the application's opponents are important, but no more so than those of the application's supporters.

The mission of the Ford family has always been to support District families with housing options and social services to allow individual residents to make the choice that is best for themselves and their families. This Second-Stage PUD application, and the overall redevelopment plan approved in the First-Stage PUD application, furthers that mission but requires flexibility to accommodate residents' future choices.

#### Potential Location of Temporary Affordable Units in Block 7 Multi-Family Building

The multi-family building on Block 7 will ultimately provide 25 permanently affordable housing units. The breakdown of those permanent units is provided in the following chart. Note that the unit mix percentage mirrors that of the overall building:

Unit	Unit Mix (of 131 total units)	Permanently Affordable Units (of 25 total units)
Studio	3	1
1-Bed	60	12
2-Bed	50	9
3-Bed	18	3

These units will not be overly concentrated on any floor of the building in accordance with the objectives of the District's Inclusionary Zoning requirements. As noted previously, during the years immediately following the construction of Block 7, the multi-family building is intended to be used to accommodate residents who are impacted by construction on other blocks, so the effective number of affordable units in the building will be much higher. The Applicant will allocate such units as is necessary to accommodate on-site relocation from other Brookland Manor blocks during future phases of construction, without overly distinguishing between market rate and affordable units in any area of the building.

The Applicant expects that for the next 10-15 years, until the entire project is completed, the remainder of this building will serve as an interim relocation source for existing Brookland Manor residents. Temporary affordable units will comprise nearly the entire building for the first 8-13 years of the occupancy of the building.

#### Occupancy of the Senior Building and Discussion of Plans for Families with Multiple Generations

All residents in the senior building must be 62 and older except for qualified live-in aides who may be younger. Current Brookland Manor residents will make their own elections about

which building they will reside in. The Applicant is not requiring any multi-generational households to change household formation. For example, those existing households with seniors and grandchildren, or with seniors and adult children who have special needs will have the opportunity to choose which housing option best suits their circumstances.

The Applicant engaged a not-for-profit organization to survey current residents to ascertain their housing preferences and to assist the Applicant with the design of enrichment programs that will maximize professional, educational, and life opportunities for existing residents in the future redevelopment. For example, residents expressed a desire for an expanded food pantry and employment programming which the Applicant will incorporate into the robust social services offered at RIA. Additionally, residents expressed strong interest in a fitness center as well as a community computer lab which the Applicant will design into available amenity space. Many of these activities will be funded privately by the Applicant and related interests.

While existing Brookland Manor residents will certainly have the first opportunity to occupy the new senior building, the new senior building is a response to demographic trends and significant market demand in Washington, DC for senior housing over the next 25+ years as the “baby boomer” cohort’s housing needs change. For these reasons, the proposed senior building is truly an amenity to not only the existing Brookland Manor residents, but also to low income senior residents throughout the District of Columbia.

#### Discussion of Plans for Existing Residents that Currently Utilize Housing Choice Vouchers

Beyond the project based Section 8 contract units and nine units that are occupied by unassisted market rate residents, the balance of the existing units in Brookland Manor are market rate units that are occupied and assisted by DCHA Section 8 HCV holders where the resident has a portable subsidy that allows them to relocate anywhere in the Washington, DC Metropolitan Statistical Area with their voucher<sup>1</sup>. The Applicant will retain these residents on site through the build-out and is committed to work with the Resident Association, DCHA and DC public officials to ensure that the future HCV payment standard for the Brentwood neighborhood is sufficient to cover the future market rate rent levels for these residents.

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<sup>1</sup> These are market rate units that are occupied by DCHA voucher holders. If these units were counted as “affordable”, the Applicant’s affordable commitment would be far greater than the 22% (373 units) of the total number of units that was identified in Zoning Commission Order No. 14-18.

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Discussion of Status of the Section 8 Contract and Qualified Tenant Criteria

The Applicant is not proposing any changes to the status of the Section 8 contracts<sup>2</sup>. As noted Zoning Commission Order No. 14-18 (p. 18 n. 3):

The 373-unit Section 8 contract will be renewed during build out, and 373 units will be maintained, initially in a smaller number of buildings than will ultimately be the case. The final redistribution of the existing Section 8 contracts will take place at the start of occupancy of the last building constructed, and at that time the actual distribution of affordable units will be finalized.

The current Section 8 contracts expire in the Fall of 2017 (one in October 2017 and the other in November 2017) and the Applicant has the right to opt out of the contracts with one year notice. However, the Applicant remains committed to retaining the Section 8 contracts on the Property.

The qualified tenant criteria or “good standing” criteria, utilized by the Applicant, is as follows: (i) the resident must be in compliance with the terms of their lease agreement; and (ii) if subsidized, the resident must be in compliance with HUD or DCHA program requirements. The Applicant has committed to provide the Resident Association with additional clarity regarding the good standing criteria to address concerns raised by residents regarding their status. Currently, the Applicant is reviewing the tenant infraction documentation to ensure that communications are clear and fair. It is important to note that no resident of the property will be dispossessed without compliance with D.C. Code §42-3505.01. As residents of Brookland Manor are not leaving the property during the development, the only manner in which a resident would be involuntarily removed from housing at Brookland Manor is pursuant to an action for possession before a court of competent jurisdiction due to a violation of the terms of their lease.

In response to a question from the Chairman, the Applicant has researched whether seniors were being removed from the property. Since January 1, 2014, only one eviction of a Brookland Manor resident who was a senior citizen (62 or older) has occurred, excluding evictions in the case of death of the resident<sup>3</sup>.

At the March 16, Public Meeting, there was discussion regarding resident “attrition”. The Applicant notes that Brookland Manor is an apartment community which has residents that come and go for a variety of reasons – just like every apartment community in the District. Residents move out of the District, purchase homes, get married, move for employment reasons or even pass away, and these instances are what the Applicant refers to when referencing the natural attrition at this property. The industry standard multi-family rental attrition rate is that

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<sup>2</sup> There are two separate Section 8 contracts that comprise the 373-unit total – one of them assists 333 households and the other assists 40 households.

<sup>3</sup> During this period, there were 6 instances in which a senior citizen passed away without family to remove the deceased’s possessions. In these cases, it is customary for property management to seek a right of possession through the evictions process.

approximately 50% of units turn over annually, with subsidized properties averaging 39% of units turning over annually. To imply that such turnover is not a natural element of rental housing demonstrates a troubling lack of understanding of the multi-family housing industry<sup>4</sup>.

The Applicant anticipates that many existing residents will remain in the new RIA community, but anticipates others may hope to move to other neighborhoods or into home ownership opportunities. The Applicant will continue to assist residents with their individual housing goals and needs. However, the Applicant strenuously objects to any argument that it is undertaking a concerted campaign to remove or displace its current residents. It is true that the Applicant had ceased leasing units for a period of years to new residents, but this was done in anticipation of creating the new RIA community. The Applicant has foregone the operating income from these units for years to provide for the opportunity for resident relocations to take place on-site.

### **ARCHITECTURAL COMMENTS**

#### **Contextual Images**

In response to a question from Chairman Hood regarding the context of the existing neighborhood and how these new buildings will relate to the surrounding buildings, the Applicant's design team has prepared additional images (pages A10a and A14a of Exhibit F) which show that relationship. As shown in these images, with views from the southwest (from Brentwood Road) and from the southeast (from 14<sup>th</sup> Street), the proposed new buildings have been seamlessly integrated into the existing neighborhood from both a massing and size, as well as an architectural context.

#### **Bricks, Siding, and Landscaping Modifications/Information**

In response to questions raised from ANC 5C Commissioners regarding the brick color of the senior building, as well as from the Commissioners regarding the texture of the brick of the senior building, the Applicant and its design team engaged in further analysis of the proposed exterior treatment of the senior building. In response to those comments, the Applicant has refined the color of the proposed brick on the senior building to a warmer shade of red (which remains in the same general color range), as shown on page A33 of Exhibit F. In addition, the Applicant will be utilizing a brick that has a texture which is more crisp and finished compared to the brick that was previously presented to the Zoning Commission.

The Applicant has also provided greater detail on the cementitious siding that will be used on the rear facades of the buildings. As shown on pages A30 and A33, this siding will have a six inch reveal, which the Applicant believes is consistent with Commissioner May's comment

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<sup>4</sup> See <http://www.nchm.org/Resources/Operation-Insights/Review/ArticleId/117/A-50-turnover-rate-Its-not-high-its-the-average>; see also <https://www.naahq.org/news-publications/units/august-2016/article/2016-naa-survey-operating-income-expenses-rental>.

that “thinner is better”. In addition, the Applicant has also included an updated Landscape Plan (page L04 of Exhibit F) which notes that the hornbeams have been removed from the plan and are replaced with a “bosque of ornamental trees such as Honeylocust”.

### Balconies and Cornice Studies

In response to a question regarding the FRP corners for the balconies, the Applicant’s design team has prepared page A27a of Exhibit F. These images show how the FRP treatment of the balconies are able to provide a high quality and attractive appearance. The Applicant also noted Commissioner Miller’s request to analyze the possibility of incorporating full-size balconies along the building facades rather than the Juliette balconies that are proposed. The Applicant ultimately concluded that the significant costs associated with adding such balconies can not be absorbed by this project. However, the Applicant notes that each of these buildings have large shared outdoor spaces on their roofs and in courtyards, and that the facades of these buildings are of a very high quality and are very aesthetically pleasing. In response to Commissioner Turnbull’s comment, the cornice treatment has been extended along the south façade to align with the cornice on the north and east facades. (See pages A17, A, 24, A25, and A30 of Exhibit B.)

### Bicycle Parking Spaces

The Applicant has also analyzed the ability to provide additional long-term bicycle parking spaces in the garage of the senior building and has determined that it can actually provide 22 long-term bicycle parking spaces (rather than the originally proposed 10 long-term bicycle parking spaces) in the below-grade parking garage. The Applicant does not believe that there will be demand for more than the 22 long-term bicycle parking spaces that are now proposed in this building. However, if there is sufficient demand for such bicycle parking spaces, the Applicant will convert a vehicular parking space to long-term bicycle parking spaces. Such a conversion would still allow the senior building to satisfy the matter-of-right vehicular parking space requirements of the Zoning Regulations.

### **Commitment to Success of First-Source Employment Agreement**

The Applicant has a long history of providing job-training and career development opportunities for its residents. On Wednesday, January 18<sup>th</sup>, 2017, the Applicant hosted an on-site Career and Community Resource Fair held in connection with the Academy of Hope Adult Public Charter School, The Department of Employment Services, The University of Maryland Educational Opportunity Center, the Brookland Manor Resident Association, and the Office of the State Superintendent of Education. The event focused on GED preparation, reconnecting young adults with educational opportunities, adult literacy, computer classes, and apprenticeship and training opportunities.

For years, the Applicant has provided computer access, resume building and interview preparation services for residents at the Brookland Manor Community Center. Additionally, the

Applicant has contributed significantly to the new Academy of Hope neighborhood campus and has continued to partner with the Academy of Hope to enroll current residents in adult GED programs. The Applicant and the Brookland Manor Residents Association agree that the redevelopment should bring economic empowerment and employment opportunities to current Brookland Manor residents, and the Applicant is committed to providing residents with employment and education opportunities as the Applicant has consistently done for years through the Community Center.

As the development process continues, the Applicant is committed to additional employment and education fairs to be hosted at the Applicant's expense. The Applicant will also be working with third party contractors to participate in these job fairs with a focus on providing employment opportunities to Brookland Manor residents and the Ward 5 community.

As a condition of approval for this Second-Stage PUD application, the Applicant will agree to a new condition that all future Second-Stage applications include information as to the Applicant's satisfaction of the terms of the First Source Agreement associated with approved Second-Stage PUD applications.

### **Community Engagement and Dialogue**

#### **Update on Additional Meetings with ANC 5C and Brookland Manor Tenants Association**

The Applicant made a presentation at a Special Public Meeting called by the Single Member District Commissioner of ANC 5C05, on March 9, 2017 regarding this application. At that meeting, the Applicant presented this application and answered questions from the ANC 5C Commissioners (all 7 Commissioners were present) and the community. In response to those questions, the Applicant is submitting an updated Development and Construction Management Plan, attached as Exhibit B, which will guide construction activity and address the specific issues related to the development of Block 7. The Applicant proposes that compliance with the attached Development and Construction Management Plan will be a condition of approval in Zoning Commission Case No. 14-18A, and replaces the requirements of Condition No. B.3 of Zoning Commission Order No. 14-18 for this case.

At the direction of Chairman Hood, the Applicant and the Brookland Manor Resident Association met on Wednesday, March 29, 2017 for a "Trust Meeting" hosted on-site. While there are multiple issues outstanding, the Applicant is very hopeful that the process can move forward with greater communication between the parties. The Applicant is highly supportive of first time homeownership opportunities for residents, job training and opportunity for current residents, improved communications between the Applicant and residents and minimizing concern related to redevelopment through intensified community engagement.

The Applicant engaged Community Preservation and Development Corporation in the fall of 2016 to facilitate Community Network Nights for the residents of Brookland Manor. These Network Nights included dinner, presentations from the development team, presentations

from Torti Gallas, and community networking and trust building activities. These Network Nights were open to all residents and were held on November 14, 2016, January 23, 2017, and March 27, 2017. The Applicant received feedback that some senior residents were unable to make the evening meetings and hosted a luncheon on March 29, 2017 with presentations by the development team and the senior building consultant. The residents were provided with a forum to ask questions as well as images of recently constructed senior living facilities in the D.C. area. A copy of the materials presented at the March 29, 2017 luncheon is attached as Exhibit C. All of these meetings were in addition to resident events such as the Turkey Raffle at Thanksgiving, holiday parties sponsored by the Applicant, and a National Reading Day event for all residents.

The Applicant is very pleased to have extended an offer of employment to a Senior Vice President of Community Development. The new associate will be responsible for community development initiatives, resident communications, managing employees engaged in community networking and engagement, and the Applicant's continued efforts to bring in third party non-profits as social service providers for the residents of Brookland Manor. The individual who has received the employment offer is a Washington, DC native and has spent a lifetime helping to improve the lives of thousands of low and moderate income residents of Washington, DC. This individual is expected to join the Applicant's team this summer.

#### Discussion of Security Company Utilized by Brookland Manor

Providing appropriate security measures at Brookland Manor is a necessary and important function of the Applicant's property management team. In 2016, the Applicant received feedback from the Department of Housing and Urban Development, which expressed concerns that there was not enough security on the premises to meet the safety needs of the residents. (The Applicant was advised that HUD had received calls from residents who were concerned about negative activity on the property and wanted the owner to do more.) The issue of security is a complicated one and the Applicant is committed to find the right balance between safety and unfettered access.

The Applicant has heard the complaints of residents regarding the manner in which the security company was handling its security responsibilities and had begun an internal review of whether it was necessary to make a change from the current security firm. This process began prior to the public hearings in this case. Based on the community feedback and the results of the Applicant's internal review of these issues, the Applicant has contracted with a new security firm. The Applicant has informed the new security firm that their focus and policies need to make sure that security is a resource to the Brookland Manor residents. The new security firm will have a community policing approach and the Applicant looks forward to working cooperatively with its Resident Association to ensure that security works for both management and residents to create a safer and more secure environment. In connection with the installation of the new security company, the Applicant's property management company has committed to hold monthly community meetings with security, management, residents, and MPD 5D to ensure that the interests of all stakeholders are heard and addressed in a timely manner. This commitment has been communicated to the residents and the first meeting will occur on April

19, 2017 with representatives from MPD, property management and the new security company available to address resident concerns.

During the February 23, 2017 and March 16, 2017 Public Hearings, the presence of new fencing was raised by numerous witnesses. The Applicant wishes to clarify details regarding the location and rationale for the fencing. For safety and security reasons, Brookland Manor has had fencing in place for the past 25+ years. In recent years, new fencing has been installed in three areas: (1) around the demolished Brentwood Village Shopping Center site; (2) in Block 7 to minimize access to the rear of the buildings; and (3) to minimize access to an open courtyard in what will be Blocks 1 and 4. With respect to the fencing around the former shopping center and in Block 7, the Applicant installed the fencing to protect pedestrians from construction and demolition activities and to prevent trespassing, loitering and other issues in a portion of the property that is not needed to be accessed.

The fencing to minimize access to the courtyard in future Blocks 1 and 4 was installed as a security measure in response to multiple murders that occurred in that portion of the property in recent years. (For those who are familiar with the property, the courtyard was used as a cut-through by non-residents who were conducting “business” behind the old shopping center and this courtyard was used for easy in and out access.) Brookland Manor residents continue to have full access to this green space, but there are no longer multiple ways to access it. It should be noted that this security measure has been successful to date and that negative activity in that portion of the property is minimal at this time with no murders occurring since installation.

#### Process to Create New Name - RIA

The Applicant worked with community interests in 2016 to rename the overall development “RIA” in recognition of its location on Rhode Island Avenue. The Applicant engaged StreetSense, a marketing and branding company for overall project branding. A team from StreetSense came to the Brookland Manor community with representatives of the Applicant and interviewed individuals at Friends of Rhode Island Avenue, representatives from the Brentwood Civic Association and other community members in the naming process.

The overwhelming consensus of engaged parties felt that renaming the project was critical to signal a shift away from problems that have plagued Brookland Manor and the Brentwood Village Shopping Center in the past and towards a new and better future for residents and the community. RIA will be more than just an apartment community and a strip shopping center – the plans include neighborhood serving retail, park space, home ownership opportunities, and a number of new multi-family apartment buildings. It was important that the project name be able to encompass the place-making and community building nature of this large and varied real estate development.

In early summer 2016, the Applicant launched the RIA website and social media campaigns (RIA Facebook, Twitter and Instagram) and installed numerous large banners along Rhode Island Avenue at the former Brentwood Village Shopping Center parking lot displaying

the “RIA” name and project logo. The Applicant’s submission materials reference the “RIA Block 7” design and the Applicant’s materials for meetings with Brookland Manor residents, Brentwood Civic Association, Woodridge Civic Association, Brookland Neighborhood Civic Association, ANC5B, and ANC5C05, prominently display the “RIA” name and branding.

The feedback related to the name that was provided at the February 23, 2017 Public Hearing at the Zoning Commission was the first concern raised regarding the name. It is important to note that individual buildings will likely each have their own name – as is customary in the industry – for marketing purposes. The Applicant will continue to engage the community as each individual building is named through the Second-Stage PUD applications.

### **Additional Issues**

#### **Information Regarding Land Value Destabilization**

In response to a question posed by Mr. Merrifield regarding whether the Office of Planning had engaged in an analysis of whether the development of Block 7 would result in the destabilization of land values near Block 7, the Applicant engaged RCLCO to analyze the issues of whether the overall RIA development will cause gentrification, destabilization of land values, and displacement of neighborhood residents in the surrounding neighborhoods. A copy of that report is attached as Exhibit D. This report concludes:

Overall, not only will RIA not add in any significant way to the gentrification that has already been occurring in the surrounding neighborhoods, it will in fact mitigate many of the negative impacts of gentrification and deliver many positive impacts. The project will provide a significant increase in the total number of housing units, which will help to correct the imbalance between housing demand and supply; support a significant number of jobs at all income levels; provide neighborhood-serving grocery and other retail; and retain very deeply subsidized affordable housing on a significant scale that would otherwise likely be lost if the site were redeveloped by another owner. These are exactly the types of benefits that are vital to offsetting the negative impacts of gentrification.

The Applicant believes that this proposed development has been a stabilizing force for the existing Brookland Manor community and will continue to be a stabilizing force as the new community is created. While the larger area surrounding the existing Brookland Manor complex remains a transitioning neighborhood, the Applicant’s initiation of development related activities since 2014 seem to have reduced overall crime within the property and directly surrounding the property according to MPD crime statistics. Total violent crime and total property crime are both trending downward (See Exhibit E). The Applicant has also received commentary from civic groups and residents that there is a tangible difference in the perception of the amount of criminal activity over the last three years. The Applicant believes this overall reduction in crime can be attributed to the demolition of the Brentwood Village Shopping Center, increased neighborhood and property social programming, increased security presence, and greater partnership between the Applicant and MPD to improve safety in and around the property.

The Applicant contends that the development of Brookland Manor into RIA will continue to improve neighborhood safety conditions as the Applicant is able to redesign buildings and streets to meet modern conventions, build single entry buildings with security check-in, increase social program activities that integrate the property into the larger community and continue to work with MPD and local officials to improve public safety.

**Exhibits**

The following exhibits are attached to this supplemental statement:

Exhibit A – Brookland Manor – By the Numbers

Exhibit B - Development and Construction Management Plan

Exhibit C – Materials Presented at Senior Luncheon on March 29, 2017

Exhibit D – RCLCO Report

Exhibit E – Crime Statistics

Exhibit F – Architectural Materials

**Conclusion**

The materials included in this post-hearing submission address the comments and requests for additional information that were made during the public hearings before the Zoning Commission on February 23, 2017 and March 16, 2017. The Applicant looks forward to the Zoning Commission approving this Second-Stage PUD application on April 24, 2017.

Sincerely,



Paul A. Tummonds, Jr.



David A. Lewis

Enclosures

## Certificate of Service

The undersigned hereby certifies that copies of the foregoing document will be delivered by first-class mail or hand delivery to the following addresses on April 10, 2017.

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David A. Lewis