

STATEMENT OF ECKINGTON CIVIC ASSOCIATION

February 23, 2007

The Eckington Civic Association ("ECA") is opposed to the PUD application 05-39. ECA is a neighborhood association within whose boundaries the proposed development is situated. The principal reasons for this opposition are size of the building, and the lack of a true mix of incomes in the proposed plan.

SIZE

The size and density of this proposed apartment building are of serious concern to the ECA. ECA supports housing that maintains the feel of existing rowhomes and smaller apartment buildings, rather than the large, high-density structure put forward by the applicant in the proposed PUD.

The design of the building, as proposed, creates an insular look and feel that is entirely outside the norms existing neighboring design. ECA feels that the applicant's design creates a fortress-like appearance, inaccessible to non-residents. This stands in contrast to the façades of existing rowhomes, which feature open, walk-up fronts and rear access by way of alleys.

ECA's concern with the development, as presented, is that St Martin's Apartments would not contribute to the sense of community that currently exists. Rather, the structure would segregate the residents from the greater community. The socialization would go on inside the walls of the building and in the inner courtyards rather than out the front door, across the street to the rowhome neighbors. The existing zoning of the site ensures that whatever is built will contribute to the social feel of the community. St. Martin's Apartments would permanently change that.

Not so long ago ECA appeared in front of this Commission in support of a proposal to rezone a site at Eckington Place and Harry Thomas Way. Just so that there is no confusion or charges of double standards, let us elaborate on the distinction. The site was zoned M. A new metro station opening very close to the site made it an ideal candidate for residential density near a transit node. It had direct access to two major roadways, both New York and Florida Avenue. The surrounding buildings were predominately warehouses and office space. ECA preferred dense residential to many of the allowable uses under the M Zoning Classification. The developer also drastically altered the architectural plans in response to community and Office of Planning concerns. It was also not fully market rate, opting to fall within the then-proposed Mandatory Inclusionary Zoning parameters. The end result was something ECA could support.

Importantly, it should be noted that the majority of the property owners that were notified do not support this rezoning. Also, door-to-door interviews with residents in the streets and blocks in the vicinity of the site revealed overwhelming opposition to the rezoning to allow a large apartment building. As a membership based organization, this type of information matters strongly to ECA. We hope that the Zoning Commission places

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special importance to that information in the midst of the huge amount of material submitted both for and against this proposal.

100% INCOME RESTRICTION

The North Capitol Corridor, of which this site is included, has a number of large, dense 100% income-restricted buildings. The District Government has proposed a New Communities Initiative at one of the largest income-restricted sites along the North Capitol Corridor. At DC's New Communities Initiative website, it is stated that:

The New Communities Initiative is a comprehensive partnership designed to improve the quality of life for families and individuals living in distressed neighborhoods in Washington, DC. The New Communities objective is District-sponsored redevelopment of the physical and human architecture of neighborhoods troubled by concentrations of violent crime and poverty. These neighborhoods are faced with many challenges, such as poor education, lack of access to quality job training, high unemployment, lack of housing opportunity, and an inability to support businesses and institutions needed to sustain the community.

The New Communities Initiative will fight these conditions by transforming highly concentrated low-income neighborhoods into healthy mixed-income neighborhoods that protect housing for the poor with a one-for-one replacement of existing affordable housing around improved community anchors like schools and recreation centers. Equally important, the New Communities Initiative focuses on the redevelopment of social needs through linkages to job training, asset building, counseling, and other supportive human services needs.

It is fair to state that the New Communities Initiative recognizes 100% income-restricted sites to be an outdated model, and its proposed solution is preserving the affordability one-to-one but increasing the density in order to remake it into a mixed income community. In the same North Capitol Corridor as the PUD site, the District Government is undergoing a broad new initiative to break up concentrations of poverty.

This PUD application attempts to do the opposite of the New Communities Initiative. That is, it endeavors to increase the density yet keep that increased density 100% income-restricted.

As an inclusive neighborhood association simply looking to improve the community in basic ways such as reducing trash, working to reduce crime, obtaining better responsiveness from city services, and improving neighborhood retail businesses offerings, ECA welcomes all Eckington residents, businesses, churches, and parishioners. A variety of ages, income levels, faiths, longevity in the community, and races participate in Eckington Civic Association.

Throughout the discussion regarding this development, ECA has had to fend off charges of classism and worse. Let us be clear. ECA sees St. Martin's Church as a positive partner in our community. We think highly of the work they do in the community and

think highly of their intentions and motivations. We hope to continue working positively with St. Martin's Church regardless of the outcome of this hearing.

Let's also be clear about affordable housing. ECA recognizes that the District has an affordable housing problem. ECA applauds the Zoning Commission for making a difficult and contentious decision to adopt the Mandatory Inclusionary Zoning program. Mixing affordable units into new developments throughout the District is a forward-thinking decision.

ECA's issue is not with the residents that will move into the building, nor is it with its expansion from a 17-unit program to a 50-unit program at the lowest income level, nor is it with the church's positive and mission-focused intent. The issue is with the proposed model of providing this housing. It is outdated. If this were a matter-of-right development, we would not be here. But this is not. This is a rezoning for more density, and as such, the community is allowed to weigh in.

ECA's position is simple: If you are going to rezone for more density, then we would like you to use a more sophisticated urban model for providing affordable housing. We want true mixed-income. Just like Ellen Wilson Townhomes on Capitol Hill. Just like New Communities Initiative further down North Capitol. The land is free. The project is well subsidized and has the support of numerous agencies in the District Government. Whatever is built there will remain for more than a generation. All that we have been asking is to be creative in designing this development and give us something that we can all be proud of.

The response to our request has, unfortunately, been a stark lack of creativity.

We stated that we would like to see the new building reflect the existing rowhome community. We did not want this apartment building to represent an island within our community where all the interaction went on inside of the building's walls. The response to that was a more "articulated" design of brick/vinyl mix to *resemble* rowhomes.

There was an offer of up to 10% market-rate units, but we quickly realized that negotiating was going to result in minor modifications of the existing financial and building structure. ECA was looking for a true mixed-income community in exchange for the increased density, and we were not coming close to that in negotiations.

What we were being told was that by making a tax credit unit into a market rate unit, there was a loss of \$50,000 in subsidy. We understood the problem, but we were discouraged that this was being analyzed iteratively rather than holistically. There are creative solutions in urban area being done all over the country; best practices, as the Fenty Administration frequently says. This, however, is not a best practice. This is a 100% income-restricted building in a part of the city where a number of 100% income restricted buildings exist and are slated to be torn down for the simple reason that they are 100% income restricted. This is an easy deal, and we want to challenge the applicant to do a more creative, difficult deal. They needed our support, so we thought it was a fair

challenge. However, the applicant did not move from the essence of the original, easy plan.

The applicant has reported to you that most mixed-income projects in the country are either 80/20 (80% market-rate, 20% affordable) or HOPE VI 50/50 deals, and what we are requesting is infeasible. We challenge that assertion.

For an example of land donated by a church and a true mixed-income building, one needs to look no further than Arlington, Virginia. The First Baptist Church of Clarendon donated a site for a proposed 116-unit building a half block from the Clarendon metro where 70 units are affordable and 46 are market rate, with a 180-unit childcare center. The developer is currently trying to rezone, and there is a contentious legal battle with neighboring condominium buildings. ECA would welcome a paradigm shift in the discussion to a mix along those lines.

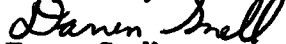
Mixed-income can be done and is being done successfully all over the country. The applicant is correct in that it is not easy, but it is definitely not impossible.

Therefore, our position is to ask that the Zoning Commission deny the request, and enable the applicant to do their good work within our existing zoning rules. Rowhome construction in a rowhome community.

If the Zoning Commission agrees that the goal of more density than the site's zoning currently allows in order to provide affordable housing is a good one, then we ask that they deny the PUD now and ask the developer to structure a development more in line with the New Communities Initiative, which is occurring less than a mile away. The building blocks are there: Free land, a large site, strong support from DC Housing Authority, Office of Planning, DC Housing Finance Agency, to name a few.

At a time when the national focus on providing affordable housing in urban areas is on finding creative solutions using existing federal subsidies to deconcentrate poverty, this PUD does the opposite.

Respectfully Submitted on behalf of Eckington Civic Association,



Darren Snell

President, Eckington Civic Association

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