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March 26, 2007

VIA HAND DELIVERY

Zoning Commission  
for the District of Columbia  
441 4<sup>th</sup> Street, N.W., Suite 210S  
Washington, D.C. 20001

RECEIVED  
D.C. OFFICE OF ZONING  
MAY 26 PM 2:58

Re: ZC Case No. 05-39  
St. Martins Apartments PUD

Dear Commissioners:

On behalf of the Applicants, the Archdiocese of Washington and Catholic Community Services, we are submitting the following information requested by the Zoning Commission at the conclusion of its March 12 meeting granting preliminary approval to the above-referenced planned unit development and related map amendment.

1. Parking Needs of the 50 Very Low-Income Residents. The Zoning Commission requested clarification of the parking needs of the 50 very low-income residents of the project to ensure that they were not under-represented in the parking projections. Catholic Community Services reviewed the car ownership records for all its current Single Resident Occupancy facilities, which it believes is the best indicator of the actual parking needs of these residents. The records indicate that only ten percent of the residents own a vehicle. Applying that percentage to this project, the 50 very low-income residents would generate a parking demand for five spaces. The proposed PUD, however, provides a minimum of 25 spaces for this population. As noted in the Applicant's supplemental submission dated February 8, 2007, the parking for the project is allocated as follows:

Total standard/regulations spaces provided	109 spaces
Parking Requirement for 178 units (includes 50 very low income units)	-89 spaces
City Lights School spaces	<u>-16 spaces</u>
Excess standard spaces	4 spaces
Excess stacked spaces	+20 spaces
<b>TOTAL EXCESS SPACES</b>	<b>24 spaces (4/)</b>

ZONING COMMISSION  
District of Columbia  
CASE NO. 05-39  
EXHIBIT NO. 75  
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Based on the car ownership statistics for renters in this census tract, it is likely that there will be a significantly greater number of excess spaces available. As shown in the census information submitted to the record previously, only 33 percent of renters in this area own cars. This translates to projected demand of only 59 spaces for the new residential building, whereas the PUD will provide more than twice as many spaces. Thus, whether using the Zoning Regulation's formula or the projected demand based on census tract information, there will be ample parking for the residents, the City Lights School and the community.

2. Parking Fee for Very Low-Income Residents. The Commission expressed concern that the very low-income residents may not be able to afford the \$45.00 monthly parking fee and may resort to on-street parking instead. To help ensure that this population uses the available off-street parking, Catholic Community Service will discount the monthly rate to the extent necessary to make it affordable to these residents.

3. City Lights School Visitor Parking. The Zoning Commission also requested clarification on the parking needs of the City Lights School and its daily visitors. As shown in the Memorandum of Agreement which City Lights School previously submitted to the record, 16 spaces will be provided to the school to meet its parking needs. Significantly, the school is not required to provide parking because it is a non-conforming structure whose intensity of use is not increasing. The provision of 16 spaces exceeds what might otherwise be required by the Zoning Regulations. Under Chapter 21, two spaces must be provided for every three faculty and staff members. Here, if the school were not "grandfathered" the 20 faculty and staff would generate a requirement for 13 spaces. With respect to visitors, no more than four to five social workers visit the school on an average day, and not all at the same time. Thus, these visitors can be easily accommodated within the 24 excess spaces noted above. Even so, there would also be on-street parking available for visitors. This is confirmed by the testimony of ECRD, which indicated that the majority of residents drive to work, such that there is no lack of street parking during school hours. Anyone visiting the school would be gone before the homeowners returned from work.

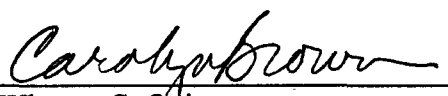
4. Administration of Affordability Restrictions. The affordability restrictions on this project will be regulated by three District agencies. The very low-income units will be governed by an investment agreement with the D.C. Housing Authority, with affordability restrictions lasting for at least 40 years. The remaining units will be regulated by financing agreements with the D.C. Housing Finance Agency and the D.C. Department of Housing and Community Development, which will impose affordability restrictions lasting between 15 and 40 years.

5. Use of Brick in the Courtyard. Finally, the Commission questioned the extensive use of vinyl siding in the courtyard of the building and whether brick could be used instead. Because of cost constraints, the Applicant will not be able to substitute brick at the interior courtyards. As the Applicant's architect testified, brick adds an additional \$5 to \$8 per square foot to the project costs. Given the unanticipated \$1.5 million cost of relocating the convent, the Applicant does not have the resources in its budget to accommodate this additional expenditure. However, the quality of the siding, which will not be visible from the street, will nevertheless create an

attractive backdrop for the courtyards. Given the extensive landscaping in these courtyards, the residents will primarily experience the active and passive recreational features of these spaces, rather than the materials of the building in the background. Consequently, the absence of brick at these elevations of building will not impair the visual qualities of the courtyards.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By:   
Whayne S. Quin  
Mary Carolyn Brown

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of March, 2007, a copy of the foregoing letter was sent by electronic or first-class mail, postage prepaid, to the following:

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