BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION

APPLICATION OF
THE ARCHDIOCESE OF WASHINGTON
AND
CATHOLIC COMMUNITIES SERVICES
(formerly known as Catholic Charities)

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PLANNED UNIT DEVELOPMENT
AND
MAP AMENDMENT

ST. MARTIN'S APARTMENTS
116 T STREET, N.W.
SQUARE 3531
LOTS 114-115

Submitted by:

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December 2, 2005

ZONING COMMISSION
CASE No. 05-39
EXHIBIT No.

ZONING COMMISSION
District of Columbia
CASE NO.05-39
EXHIBIT NO.3

PREFACE

This statement and the attached documents are submitted to the Zoning Commission of the District of Columbia in support of an application for a new residential development at 116 T Street N.E., in Ward 5 of the City. The site is located in Square 3531, the city block bounded by Summit Place on the east, Lincoln Road on the west, Todd Place on the north and T Street on the south in the northeast quadrant of the city. The site is owned by the Roman Catholic Archdiocese of Washington who, together with Catholic Community Services, is the Applicant for this project. The Applicant seeks consolidated review and approval of a Planned Unit Development ("PUD") and a related zoning map amendment in order to implement this redevelopment proposal.

Consisting of approximately 91,152 square feet of land area, the PUD site includes Lots 114 and 115 in Square 3531. The site is presently zoned R-4. The Applicant is seeking consolidated review and approval for the entire PUD site, and an amendment to the zoning map to classify the property in the R-5-B District.

The Applicant proposes to build a four-story residential development comprised of 184 affordable units and below-grade parking garage containing 120-140 spaces. The existing building on the property will be removed to allow for redevelopment of the site. The floor area ratio ("FAR") of the project will be 2.7.

As set forth below, this statement and the attachments meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

COMPLIANCE WITH CONSOLIDATED PUD REQUIREMENTS

The proposed project complies with the process and requirements set forth in Chapter 24 of the Zoning Regulations for the review of a Planned Unit Development ("PUD") in the District of Columbia. Because the Applicant seeks consolidated review of the proposed PUD, all of the materials required for review are being filed with this application.

1. Area Requirement

The project site encompasses approximately 2.09 acres of land. This area is greater than the 2 acres of land required for a PUD in the R-4 District (11 DCMR §2401.1(c)).

2. Notice

The certificate of counsel herein states that a Notice of Intent to File a PUD Application was mailed to Advisory Neighborhood Commission 5A and the owners of all property within 200 feet of the perimeter of the project site on November 12, 2005, as required by the Zoning Regulations (11 DCMR §§2406.7 -2406.10).

DEVELOPMENT TEAM

Applicant:	Catholic Community Services c/o Northstar Development and Consulting 2939 Van Ness Street, N.W., Suite 1107 Washington, D.C. 20008
Owner:	Archdiocese of Washington c/o St. Martin's Roman Catholic Church 1908 North Capitol Street, N.W. Washington, D.C. 20002-1326
Architect:	Grimm and Parker Architects 2 Bethesda Metro Center, Suite 1350 Bethesda, Maryland 20850
Civil Engineer:	Bowman Consulting 1295 Piccard Drive, Suite 240 Rockville, Maryland 20850
Structural Engineer:	Tadjer Cohen Edelson 1109 Spring Street Silver Spring, Maryland 20910
Traffic Consultant:	O.R. George and Associates 10210 Greenbelt Road Suite 310 Greenbelt, MD 20706-2218
Real Estate Economic Consultant:	Bolan Smart Associates, Inc. 900 19th Street, N.W., Suite 600 Washington, D.C. 20006
Land Use Counsel:	Holland & Knight LLP 2099 Pennsylvania Avenue, N.W., Suite 100 Washington, D.C. 20006

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I.
INTRODUCTION

This statement and the attached documents support the application of the Archdiocese of Washington and Catholic Community Services (collectively, the "Applicant") to the Zoning Commission of the District of Columbia for consolidated review and approval of a Planned Unit Development ("PUD") and related Zoning Map Amendment. The proposed PUD involves the construction of a new residential development in the Northeast quadrant of Washington, D.C.

The properties that are the subject of the application consist of Lots 114 and 115 in Square 3531. The site is presently improved with an existing building consisting of seventeen Single Resident Occupancy ("SRO") units, an aluminum Quonset hut, the City Lights Public Charter School building, and a surface parking lot.

Upon completion of the PUD, the site will consist of a new four-story apartment building containing 184 affordable units for low-income households, as defined in the Zoning Regulations. Approximately 134 units will serve families earning no more than 60 percent of the annual Area Median Income ("AMI"), or approximately $40,120 for a one-bedroom unit or $48,240 for a two-bedroom unit. The remaining fifty units will be set aside for individuals earning approximately 30 percent of AMI. The City Lights School will also continue to operate on the site in its existing building.

The Applicant seeks consolidated review and approval for the proposed project, and a related zoning map amendment from the R-4 to the R-5-B District for the site. The map amendment will allow for the construction of the apartment house, which is a use first permitted in the R-5 District, and the additional density necessary to bring this project to fruition.

A. Summary of Project.

The Applicant proposes to replace an under-utilized SRO building, Quonset hut, and surface parking lot with 184 desperately needed affordable rental housing units. Approximately 120-140 parking spaces will be provided in a partially below-grade garage, which exceeds the minimum requirement of 92 spaces, or one for every two units.

This project grew out of the Applicant's successful operation of the SRO building on the site for very low income men. The SRO building currently houses seventeen formerly homeless men who completed the Applicant's self-sufficiency training program and are gainfully employed. The Applicant and the local parish church (St. Martin's), were committed to expanding affordable housing resources by adding 50 housing units to the site for individuals of the same very low income group, which would be permitted as a matter-of-right under the existing R-4 zoning. However, after extensive study and consultation with the community, the Applicant determined that a more socially and economically stable residential development could be created by devoting apartments to a mix of income levels.

Households making 30% of Area Median Income ("AMI") are classified as "very low income" by HUD. Many people earning 60% of AMI (from $37,500 to $57,840) would consider themselves of middle class. However, in a city where housing costs are spiraling upwards, this income group is severely challenged to find decent affordable housing. Therefore, in contrast to HUD's national standards, the local Zoning Regulations recognize households below 80% of AMI as low income and treat developments serving households below 80% of AMI as deserving of special considerations.

The Zoning Regulations define low income households as those:

> whose incomes do not exceed eighty percent (80%) of the median income for the area, as determined by the U.S. Department of Housing and Development (HUD), with adjustments for smaller and larger families, except that HUD may establish

> income ceilings higher or lower than eighty percent (80%) of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

11 DCMR § 2499.1 (2003).

Best practices in the housing industry indicate that an affordable housing development is most successful when the mix of units for very low and other income levels is at a ratio of one to four. The PUD therefore limits the 30% AMI units to 27 percent of building, or approximately fifty units. The remaining 134 units will be devoted to 60% of AMI households. The 60% AMI units will allow longtime renters in the neighborhood, many of whom are being displaced as their homes are converted into for-sale housing, to stay in the community. The building's income limits would allow households earning from $37,500 (1 person) to $57,840 (4 people) to rent in the building (see charts in Section III.C.2. below). The residential composition of the project is designed to create an atmosphere that encourages interaction among different income levels and provides a cooperative model of social responsibility. According to the 2000 census, the median income for the Eckington neighborhood is approximately $40,000 annually.

In order to attract low income individuals, it is essential to provide a building that is constructed to market-rate standards, particularly with respect to parking and architectural design, to avoid any adverse impacts on the community. The parking, which will be provided in a partially below-grade garage, is a considerable expense for the project, as is the level of architectural detailing that will be provided. In particular, it raises the operating cost of the 30% AMI-income units beyond that which an affordable rent can cover. Therefore, the Applicant has proposed rezoning the property to the R-5-B District, which will allow the density and type of residential development necessary to construct the project.

B. The Applicant.

Catholic Community Services is the social service agency of the Roman Catholic Archdiocese of Washington, which is dedicated to fulfilling the Church's mission to serve the poor and vulnerable in the community. Each year, Catholic Community Services' four divisions, Anchor Mental Health, Catholic Charities, Lt. Joseph P. Kennedy Institute and the Spanish Catholic Center, provide over 120,000 children, adults and families with a wide range of services that include physical and mental health care, legal assistance, immigration, employment, early childhood services, education, counseling, adoption, emergency shelter, housing and more. In furtherance of the Applicant's housing goals, the proposed PUD will provide affordable housing to 184 of the city's low income households. The planning for this project has been guided by a Community Steering Committee, sponsored by the nearby St. Martin's Roman Catholic Church, including representatives from area churches and the community at large. St. Martin's Church has been a neighborhood institution for over 100 years.

II.
PROJECT DESCRIPTION

A. Site Location and Description

1. Site Description

The PUD site is located in the Eckington neighborhood, two blocks east of North Capitol Street, N.E., and three blocks south of Rhode Island Ave., N.E., at Lots 114 and 115 in Square 3531. Containing 91,152 square feet of land area, the site is currently located in the R-4 District. The property is characterized by steep slopes along the street frontages, with the highest elevation located at roughly the center of the site. The outer edges of the site are significantly sloped on all sides and are characterized by significant grade changes, with the center of the

property being almost 20 feet higher than the edge of the property, which is at the approximate level of the sidewalk.

The land is improved with a surface parking lot, a Quonset hut and an SRO building, which is presently used by Catholic Community Services to house seventeen formerly homeless men. Known as St. Martin's House, the program assists men with the transition from homelessness to independent living through structured activities, such as substance abuse counseling, parenting education, and financial classes. The City Lights Public Charter School is also located on the western portion of the site, and will continue to operate during and after completion of the PUD project.

2 Description of Surrounding Area

The area surrounding the PUD site is characterized by moderate density residential uses, with row dwellings and flats, as well as supporting community and institutional services, as the predominant uses. Across T Street to the south is McKinley Public High School and Hyde Leadership Public Charter School. A large field used for recreational purposes is located behind the schools to the south.

B. Project Design

The PUD project has been expertly designed to achieve a high quality composition of residential uses in a cohesive urban setting. The architect for the project, Grimm and Parker Architects, has created a successful residential design that breaks down the street elevation to blend with the small-scale character of the surrounding area. Projecting bays of varying palettes modulate the length of the building along Todd Place, while variegated materials accent the different elements of the structure. The four-story building will be constructed to an overall height of 55 feet, as measured from Todd Place. The building will contain approximately

246,484 square feet of gross floor area, which equates to a 2.7 FAR, significantly less than the 3.0 FAR permitted under the PUD guidelines for the R-5-B District. The apartment building will include community service and recreational space, consisting of a library, computer room, a café and lounge, game rooms, two interior courtyards and passive recreational space on two roof terraces. The building will have 1,200 square feet of space that will be used by the adjacent City Lights Charter School as a shop and storage space.

The building is composed of two square masses with central courtyards in each square. The main entrance to the building will be located in the center of the T Street elevation, which is broken down into three large bays, each four stories in height, that are connected by two-story bays. Several of the first floor units along T Street will have separate entrances accessed by individual exterior stairs, which reference the rowhouses in the neighborhood. Individual entrances are also located along the Summit Avenue (east) elevation. The building is finished with a gable roof that emphasizes the residential quality of the project.

The garage entrance is located at the western end of the T Street elevation. The service and delivery area for the building is also located off T Street just west of garage. At the request of the community, there are no pedestrian or garage entrances on Todd Street. The garage entrance was strategically located away from the drop-off point for Hyde Elementary School across the street to prevent any traffic conflicts or safety hazards for children and to generally minimize adverse impacts on Todd Place.

The interior courtyard will be extensively landscaped to provide expansive outdoor living space for residents of the building. The west courtyard will be treated as passive, formal rectilinear garden with a gazebo and movable tables and chairs. In contrast, the eastern courtyard will be developed as an active informal garden with play areas for children. Large

shade trees, ornamental trees, and evergreen shrubs will be planted in the landscaped panels surrounding the building. Details of the landscaping plan are shown at Sheets L-1 through L-6 of the architectural plans submitted separately as Exhibit A. Two roof terraces will be located on the two-story portions of the building fronting on T Street, which will be accessible to neighborhood residents to view Fourth of July fireworks, a community activity that currently takes place from the high vantage point of the existing parking lot.

C. Matter of Right Development Under Existing Zoning

The subject site is located in the R-4 District. The R-4 District is a moderate height and density zone that permits one- and two-family row dwellings and similar residential uses. The maximum height permitted in the R-4 District is 40 feet with a limitation of three stories. There is no prescribed maximum FAR for residential development in the R-4 District.

D. Matter of Right Development Under Proposed Zoning

The Applicant seeks to rezone the PUD site from R-4 to R-5-B. The R-5-B District is a moderate height and density area that permits all types of urban residential development, including single family dwellings, semi-detached houses, row dwellings, and apartments. The maximum height in the R-5-B District is 50 feet with no limitation on the number of stories. The density for all buildings and structures on a lot may not exceed 1.8 FAR.

The PUD standards for the R-5-B District allow a height increase to a maximum of 60 feet and a maximum density of 3.0 FAR. Pursuant to section 2405.3 of the Zoning Regulations, the Commission may also authorize an increase of not more than five percent in the maximum height or FAR of the building.

E. Tabulation of Development Data

	R-5-B PUD Standards	Project
Lot Area	1 acre	91,152 s.f. (2.09 acres)
Lot Width	None prescribed	249.5 ft.
TOTAL FAR	3.0	2.7
Gross Floor Area	273,456 s.f.	246,484 s.f. total (including school bdg.)
Height	60 ft.	55 ft.
Penthouse Height	18.5 ft.	0 ft.
Lot Occupancy	60%	60%
Rear Yard	20.0 ft (4" for each for of vertical ht or not less than 15 ft.)	33 ft. (center of T St.)
Side Yard	Not Required	None Provided
Parking	1 for each 2 dwelling units or 92 spaces	120-140 spaces
Loading:		
Berth	1 @ 55 ft. deep	1@ 30 ft. deep
Platform	1 @ 200 s.f.	1@ 120 s.f.
Delivery Space	1 @ 20 ft. deep	1@ 20 ft. deep

F. Flexibility Under PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than may otherwise be possible under conventional zoning procedures. The applicant seeks flexibility from the minimum requirements for loading facilities. As permitted under section 2405.8, the Commission may grant such flexibility without the need for special exception approval from the Board of Zoning Adjustment or compliance with the special exception standards that might otherwise apply.

The zoning regulations require an apartment building with more than 50 units to provide a truck loading berth with a depth of 55 feet. Instead, the PUD proposes a loading berth of 30

feet. The Zoning Commission has previously found in other larger PUDs that, based on reports of traffic engineers, a 55-foot loading berth has proved unnecessary for a residential building of this size. *See, for example,* Z.C. Order No. 03-26, 14th & V PUD, August 5, 2004; *see also* Z.C. Order No. 04-13, 1200 R Street PUD, May 13, 2005. The units in the proposed PUD are modest in size, averaging approximately 560 to 1180 square feet each. Based on statistics submitted for much larger PUDs, such households will only generate a need for smaller trucks or transport vehicles. Surveys of condominium projects ranging from 58 to 300 units indicate that the arrival of a large tractor-trailer is a rare occurrence and that the absence of a 55-foot loading berth for residential use did not create any adverse impacts. Further, truck rental facilities have confirmed that a 14- or 15-foot van or small truck is most frequently used for moving purposes. Consequently, a smaller loading berth will not adversely affect traffic circulation patterns or loading issues in the immediate vicinity.

III.
THE PROJECT MEETS THE STANDARDS OF THE ZONING REGULATIONS AND PUD REQUIREMENTS

A. PUD Process is the Appropriate Mechanism for the Project

The PUD process is the appropriate mechanism for guiding the development of the site. It allows the Applicant to replace outmoded facilities and an underutilized site with an exceptional planned community that creates 184 new affordable housing units for District residents and 120-140 parking spaces. Through the PUD process, the Zoning Commission can ensure the appropriate development of this large area of the city by encouraging the participation of the affected community and District agencies and soliciting their comments.

For the past several months, the Applicant has engaged local residents and community representatives in all aspects of the project's design. The Office of Planning has also been intimately involved in discussions with the Applicant regarding salient points of development

including traffic, affordable housing, and amenities for the community. Thus, the Applicant has, and the PUD process continues to give, the local residents, community at-large and District agencies ample opportunities to work with the Applicant to ensure a well-planned development.

B. PUD Requirements Under Chapter 24 of the Zoning Regulations

1. Area Requirements Under Section 2401

The minimum area requirement for a PUD in the R-4 District is one acre, or 43,560 square feet. The PUD site contains 91,152 square feet of land area, or over two acres, and thus complies with the minimum area requirement.

2. Height Limitations Under Section 2405.1

The proposed development meets the height and FAR requirements under sections 2405.1 and 2405.2 of the Zoning Regulations. The maximum building height within the proposed R-5-B District is 60 feet for PUDs. Here, the project will be constructed to a height of 55 feet and thus is in full compliance with the PUD development guidelines.

3. FAR Limitations Under Section 2405.2

The total density of the project is 2.7 FAR, and thus falls within the permitted maximum density of 3.0 for PUDs in the R-5-B District.

4. Impacts of the Project Under Section 2403.3

The impacts of the Project will not be unacceptable on the surrounding area or upon the operation of city services and facilities. The development of an affordable housing apartment building at the site will, in fact, complement the surrounding area and help revitalize this sector of Ward 5.

Furthermore, the Project will have no unacceptable impact on traffic. Based on the traffic impact study prepared by O.R. George and Associates, the existing road network can accommodate the proposed new development, with acceptable Levels of Service at all study area

intersections. The study concludes that the proposed development would satisfy the District's transportation adequacy requirements and would not be objectionable either to the adjacent properties or the general public. A copy of the report is attached as Exhibit I. Additionally, the development will provide approximately 120-140 parking spaces for building residents, thus exceeding the minimum requirement of 0.5 spaces per unit. Thus, the project will adequately serve the parking needs for residents of the building.

Finally, the project will not have an adverse impact on the light and air. The building is surrounded on three of its four sides by public rights-of-way and it has been sensitively designed with attractive landscaping to ensure the livability and quality of the residential use. Shadow studies have shown that the building will not cast shadows on the adjacent residential townhouses.

C. Public Benefits and Project Amenities

1. Overview

The PUD guidelines require the evaluation of specific public benefits and project amenities for a proposed project. Public benefits are defined as "superior features of a proposed planned unit development that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from the development of the site under the matter of right provisions." 11 DCMR § 2403.6 (Feb. 2003). A project amenity is further defined as "one type of public benefit, specifically a functional or aesthetic feature of the proposed development, that adds attractiveness, convenience or comfort of the project for occupants and immediate neighbors." 11 DCMR § 2403.7. Additionally, when deliberating the merits of a PUD application, the Zoning Commission is required to "judge, balance and reconcile the relative value of the project amenities and public benefits offered, the degree of development

incentives requested, and any potential adverse effects according to the specific circumstances of the case." 11 DCMR § 2403.8.

The proposed project will achieve the goals of the PUD process by providing high quality residential with significant public benefits and amenities to the neighborhood and the city as a whole. The project's affordable rental units, exceptional site planning, urban design, architecture and landscaping, and other uses of special value to the neighborhood are the exact types of public benefits the PUD process is designed to encourage, as set forth under section 2403.9 of the Zoning Regulations.

2. Housing and Affordable Housing (Section 2403.9(f))

The single greatest benefit to the area, and the city as a whole, is the creation of new housing opportunities consistent with the goals of the Zoning Regulations, the Comprehensive Plan and the Mayor's housing initiative. Additionally, the project will provide affordable units to both low and very low-income households to ensure an adequate supply of housing opportunities for existing area residents. The 134 units devoted to households earning 60 percent of AMI will be configured as one- and two-bedroom units. The remaining 50 units will be set aside for formerly homeless individuals who have completed the Applicant's self-sufficiency training program and are earning approximately $18,000 to $20,000 annually. Seventeen men in this very-low income bracket are currently living on the property, and this segment of the population will continue to be served at the site in greater numbers.

According to the 2000 US Census, the median income of this neighborhood (Census Tract 87.01) is $40,234 annually. The rent structure will make it unlikely that families earning less than $35,000 will live in the one- or two-bedroom units. The District of Columbia Housing Finance Agency rules allow families with annual incomes ranging from $37,500 to $53,480 to

live in the proposed PUD. Thirty-five percent of the residents of the surrounding area will be eligible to live in the low income units. An additional nine percent would be eligible to live in the very-low income units, provided they have completed the Applicant's self-sufficiency program. In order to qualify for a unit, the resident must be employed, unless otherwise retired from the workforce.

[*See Charts on Following Page*]

ECKINGTON CENSUS TRACT (87.01) ECONOMIC CHARACTERISTICS

DP-3: Profile of Selected Economic Characteristics		
Data Set: Census 2000 Summary File 4 (SF 4) - Sample Data		
Geographic Area: Census Tract 87.01		
Universe: Total population		
Subject	**Number**	**Percent**
Less than $10,000	131	16
$10,000 to $14,999	67	8.2
$15,000 to $24,999	74	9
$25,000 to $34,999	110	13.4
$35,000 to $49,999	124	15.1
$50,000 to $74,999	163	19.9
$75,000 to $99,999	79	9.6
$100,000 to $149,999	55	6.7
$150,000 to $199,999	0	0
$200,000 or more	17	2.1
Median household income (dollars)	40,234	100%

DCHFA RENT LIMITATIONS FOR LOW-INCOME HOUSEHOLDS

Unit Size	Assumed Occupancy	Assumed Income Limit @ 60% AMI	Rent Limit @ 30% of 60% AMI x (1/12)
Eff.	1.0	$37,500	$937.50
1-BR	1.5	$40,170	$1,004.25
2-BR	3.0	$48,240	$1,206.00

Household Size		60% of Area Median Income Limit
1		$37,500
2		$42,840
3		$48,240
4		$53,580
5		$57,840
6		$62,160
7		$66,420
8		$70,740

3. Urban Design, Architecture, Landscaping and Open Space (Section 2403.9(a))

The architectural firm of Grimm and Parker has created an outstanding urban design for low income housing that helps restore this segment of Northeast Washington. The proposed new building has been sensitively designed to complement and respect the surrounding neighborhood. The overall composition reinforces the broad and lively elements of the Eckington neighborhood. The design also includes extensive, lush landscaping in the two interior courtyards that provide separate outdoor rooms for active and passive uses. The west courtyard features a formal garden with hard and softscape elements, while the east courtyard includes active recreational spaces and play equipment for children. The verdant landscape features of these spaces are a significant amenity to residents of the PUD.

4. Social Services and Other Uses of Special Value to the Neighborhood (Sections 2403.9(g) and (j))

The proposed PUD project will provide new affordable housing for a segment of the City's residents and Ward 5 that have not benefited from the recent housing boom. As current market trends have priced a large portion of the population out of the city, this development promises to address the housing shortages for the low-income families of the District. This is a neighborhood that has been primarily rental housing for many years. As the homeownership boom has swept the District, many long time residents are being displaced as formerly rental rowhouses are being sold as homeownership units to newcomers. This project will allow some of these residents to remain in the neighborhood.

IV.
COMPLIANCE WITH COMPREHENSIVE PLAN

A. Purposes of the Comprehensive Plan

The provision of a mixed use development which includes residential, retail and community space fulfills specific goals and objectives of the Comprehensive Plan. The PUD

project is also consistent with and advances the major themes of the Ward 5 Element of the Comprehensive Plan. The purposes of the District of Columbia Comprehensive Plan Act are to:

> (1) Define the requirements and aspirations of District residents and accordingly influence social, economic and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in conservation, stabilization and improvement of each neighborhood in the District.

D.C. Code § 1-301.62 (2001 ed.).

The Project significantly advances these purposes by promoting the social and economic development of District residents through the provision of quality affordable residential development at a location designated for housing, achieving the community goal of adequate parking, and enhancing the natural and architectural assets of the District.

B. Generalized Land Use Map

The proposed development is consistent with the Generalized Land Use Map, which designates the PUD Site for moderate density residential development. Rowhouses and garden apartments are the predominant uses in this land use category, and may also include low density housing.

C. Compliance with Major Themes of the Comprehensive Plan

The Project is consistent with many of the Comprehensive Plan's major themes as follows:

1. <u>Stabilizing and Improving the District's Neighborhoods</u>

The proposed conversion of an SRO to apartment building will serve to stabilize and improve the surrounding neighborhood. The development will increase the stock of affordable housing while providing a well-designed building that is both accessible and attractive. By

increasing the density and mixing households of 60% AMI with 30% AMI, this project can support a significant investment into the architectural design of the building and enhance the physical and aesthetic appearance of the neighborhood. A matter-of-right building devoted to only the lowest income levels, as originally envisioned for this site, would not support the type of architecture found in this application. A project comprised of a mixture of income levels will help stabilize a neighborhood experiencing displacement and gentrification by providing decent rental housing for low income families.

2. Respecting and Improving the Physical Character of the District

The PUD process will ensure the development of an exceptional design and appropriate density in this well-developed and established community. As demonstrated in the plans submitted separately as Exhibit A, the project replaces an existing shelter use with a vibrant residential development that is consistent with and complementary to the density and layout of the immediately surrounding neighborhood.

3. Reaffirming and Strengthening District's Role as the Economic Hub of the National Capital Region

The Comprehensive Plan encourages making maximum use of the District's location at the center of the region's radial Metrorail and commuter rail systems. See 10 DCMR §109.1(b). The Project takes advantage of this asset by its proximity to the Rhode Island Avenue Metrorail Station as well as numerous routes of Metrobus. The proposed development furthers the District's efforts to increase the supply of affordable housing and bring additional residents to the city.

4. Preserving and Ensuring Community Input

The Applicant has met with several community groups and immediate neighbors of the proposed redevelopment to solicit comments and respond to issues raised. The planning

for this project has been guided by a Community Steering Committee sponsored by the nearby St. Martins Roman Catholic Church, which includes approximately twenty-five church members, a representative of the local ANC, representatives from three to five other neighborhood churches, and other interested community members. The Applicant met with the Community Steering Committee four times prior to submitting this application. Additionally, the Applicant met twice with and was endorsed by the local Ecumenical Council, which represents five neighborhood churches. The PUD has also been supported by the Bloomington Civic Association, which represents the area within which the project is located.

As a result of these meetings, the Applicant made significant changes to the project, including a reduction in the building density, increased parking, the introduction of townhouse-like facades on Todd Place, exclusion of pedestrian or garage entrances on Todd Place, and location of the garage entrance past the Hyde school property. The Applicant also committed to allowing community access to the building's roof terraces for viewing Fourth of July fireworks as well as prioritizing the rental of parking space by residential neighbors if all the spaces are not used by the buildings.

Many in the community have expressed support for the project, as demonstrated by the letters attached as Exhibit I. The Applicant will continue to work with the community to address any other concerns as the project reaches fruition.

D. Compliance with Major Elements of the Comprehensive Plan

The Project furthers the objectives and policies of many of the Comprehensive Plan's major elements as follows:

1. Economic Development Element

According to the Economic Development element of the Comprehensive Plan, the District places a high priority on stimulating and facilitating a variety of commercial, retail and residential development investments appropriate to selected Metrorail station areas outside of the Central Employment Area, consistent with the Land Use element and ward plans, with sensitivity to the surrounding area. 10 DCMR § 204.2(m). The proposed development serves to attract and retain residents which further increases the tax base and creates revenue for the District of Columbia.

The Applicant retained Bolan Smart Associates, a national real estate consulting firm, to provide an overview of the economic impact to the District of Columbia of constructing this $28.0 million residential development comprising 184 rental apartments. Bolan Smart concluded that the proposed PUD represents a greatly expanded economic use of the site through the provision of an increased supply of new and affordable housing for an estimated 370 District of Columbia residents. According to Bolan Smart, the project will improve the economic well-being of the District, as follows:

a. Direct Annual District Tax Revenue: The principal direct tax revenues to the District of Columbia resulting from the completion of this project – calculated in $2005 – total $607,000 per year in terms of gross tax revenue generated. The primary components of the project generated taxes, as summarized in Tables 2 to 3, are estimated to be comprised of:

- $120,000 per year in real estate taxes. (This compares with no real estate taxes as currently owned and operated);
- $340,000 per year in DC resident income taxes derived from the development of 184 rental apartments. (See Tables 2 and 3);
- $110,000 per year in DC resident retail sales tax revenues, attributable to $2.25 million in DC based taxable sales (@ 65% to 70% DC capture of DC resident retail sales). (See Tables 2 and 3); and
- $34,000 in DC resident related use taxes and fees (residential building operation's, resident DMV fees, utility and telecommunications fees, etc.). (See Tables 2 and 3);

b. Construction Related Benefits: The combination of initial recordation fees, development processing fees and permits are estimated to generate well in excess of $800,000 of direct District of Columbia revenues. In addition, the purchase of $13.0 million of construction materials – while not explicitly quantified as part of this report – will obviously benefit the District.

c. Direct Employment Opportunities: Approximately 6 residential related jobs and project support jobs are estimated to be created. This job generation is in addition to the 109 construction related jobs estimated to be created spanning each month of the project's 18-month construction period.

d. Provision of a Mix of Housing for DC Residents: Per a broad-based District goal, the planned construction of 184 residential living units will provide needed homes for a range of households that are currently under housed or otherwise priced out of the marketplace. Adding the proposed housing will promote the productive health of the resident families, help offset the price pressures associated with neighborhood gentrification, and assist in retaining a middle income workforce within the District of Columbia. Moreover, creating an additional supply of new units at this location will free up needed inventory for other prospective DC residents.

2. Housing Element

According to the Housing element of the Comprehensive Plan, housing in the District is viewed as a key part of a total urban living system that includes access to transportation and shopping centers, the availability of employment and training for suitable employment, neighborhood schools, libraries, recreational facilities, playgrounds, and other public amenities. (10 DCMR § 300.4). The Site exemplifies the characteristics set forth in this element. The Site is in relatively close proximity to the Rhode Island Avenue Metrorail station and Metrobus lines on North Capitol and Rhode Island Avenues, and will further the total urban living system with its access to public transportation.

3. Transportation Element

A basic philosophy of the District's Transportation element is to provide for the efficient movement of people and goods within the District and its metropolitan area. (10 DCMR § 500.2). The policies established in support of the general transportation objectives include supporting land use arrangements that simplify and economize transportation services. (10 DCMR § 502.1(a)). The location of the Project near the Rhode Island Avenue Metrorail and Metrobus stations is appropriate and furthers this goal.

The traffic report prepared by O.R. George and Associates also demonstrates that the proposed project not generate any objectionable conditions with respect to parking or traffic. In fact, Levels of Service for area roadways will continue to operate in the A and B range.

4. Urban Design Element

The Urban Design element states that it is the District's goal to promote the protection, enhancement and enjoyment of the natural environs and to promote a built environment that serves as a complement to the natural environment, provides visual orientation, enhances the District's aesthetic qualities, emphasizes neighborhood identities, and is functionally efficient. (10 DCMR § 701.1).

The Project has been designed to greatly enhance the physical character of the area and complement the materials, height, scale and massing of the surrounding land uses. (10 DCMR § 708.2). The facades on Todd Place and Summit Streets are designed to emulate the townhouses that they face rather than appear as a large apartment house. In contract, the T Street elevation reflects its multi-unit character in deference to the size and scale of the institutional school buildings across the street. The project is designed so that a majority of the units have views to the south, affording residents spectacular views of the District's monumental core. The building

also incorporates two rooftop terraces to allow residents who do not face south to have access to these views. The new PUD will greatly enhance the architectural character of the site and surrounding area through its high-quality design and elimination of outmoded, underutilized buildings.

5. Land Use Element

The Land Use element encourages a substantial amount of new housing primarily in housing opportunity areas and near Metrorail Stations in order for the District to perform its role as the region's urban center providing the greatest density of jobs and housing. 10 DCMR § 1100.2(b). The Site furthers this goal due to its proximity to the Rhode Island Avenue Metrorail and Metrobus stops.

E. Compliance with Ward 5 Elements of the Comprehensive Plan

In addition to the overall planning considerations of the Comprehensive Plan, the proposed PUD advances many of the specific objectives and policies for the Ward 5 Plan, as set forth below.

1. Ward 5 Economic Development

Development is sought in Ward 5 which will enhance and expand existing businesses, create new ownership opportunities, increase retail services and opportunities for ward residents, and promote the vitality of ward neighborhoods. The Economic development potential in Ward 5 is perceived as particularly high in and around Ward 5's three metrorail stations. By increasing the density of the neighborhood this project will increase retail opportunities for local business owners and by increasing the number of new District residents increase the local tax base. The proposed development will create the demand to expand existing businesses, create new retail businesses, and provide residents of varying incomes who will increase the vitality of this

neighborhood

2. Ward 5 Housing Element

Primary housing objectives in Ward 5 include the protection and preservation of the Ward's housing stock, the production of new housing, the provision of incentives for housing at desired locations such as the Rhode Island Avenue Metrorail Station area, and the reduction of the overall cost of housing for low- and moderate-income Ward 5 residents. (10 DCMR §§ 1608.1(a)(b)(c)(e)). The Project, which is in proximity to the Rhode Island Avenue Metrorail Station area, responds to these important objectives through its significant contribution of new affordable housing stock.

3. Ward 5 Transportation Element

Two of the primary objectives for transportation in Ward 5 are to increase the use of mass transit and to improve the pedestrian environment on major streets and roadways. (10 DCMR §§ 1614.1(a)(e)). The residents of the proposed PUD will be able to take advantage of the PUD Site's proximity to the Rhode Island Avenue Metrorail and Metrobus stations. On both Summit and T Streets, this project will provide units that have individual access to the street. Additionally, it will create a significantly improved pedestrian environment. The site is essentially a hill that rises to approximately twenty feet above the surrounding sidewalk. The current SRO is located at the top of the hill. By essentially removing the hill and building from street level, this project will put "eyes on the street" in a neighborhood that is still experiencing significant amounts of crime and drug trafficking. This is particularly important on T Street since there is no residential or commercial activity on this block once the adjacent schools close for the day.

As recommended in the Ward 5 Transportation element (10 DCMR § 1615.1(a)(2)), the Applicant has prepared an analysis of potential traffic impacts on the surrounding streets and neighborhoods that concludes the Project will create no significant impact. As demonstrated by the traffic report prepared by O.R. George and Associates, the project will not create any objectionable conditions with respect to traffic or parking. The property is providing 120-140 parking spaces where only 92 spaces are required. Of the 184 units, 50 will be for very low income (formerly homeless) individuals making approximately $18,000 to $20,000, who are not expected to own or afford an automobile. Consequently, the 120-140 spaces will be available to the remaining 134 low income units, or approximately one space for every unit.

The Applicant projects that the development would be built-out by the year 2008. The future traffic conditions included the application of a 2.0% growth factor to through traffic along Lincoln Road, as well as the projected traffic assignment for approved/pending planned developments and the subject PUD. The study has concluded that the existing study area road network can accommodate the Applicant's development proposal, based on the following principal considerations:

a) The subject development would generate an average of fifty *(50)* peak hour trips. This trip generation is quite low and would be well distributed, resulting in quite minimal traffic impacts on the local area.

b) The projected site trip distribution would have minimal impacts on the student drop-off and pick-up activities associated with the adjacent Hyde Leadership Charter School, and McKinley High School. This would be due primarily to the location of the garage entrance, and the orientation of trips primarily to the west and south.

c) The morning peak hour trip generation for the proposed development would only partially coincide with that for student drop-off at the noted schools, and the afternoon peak hour for the subject site would not coincide with that for the student pick-up activities.

d) The dominant trip orientation, for the proposed development, would be to the west

along T Street and southwest toward the City's Downtown Area.

e) The projected year 2008 total traffic situation, including the proposed development, would be accommodated by the existing roadway network, with acceptable Levels of Service at all study area intersections.

f) The subject PUD would be provided with adequate off-street parking spaces, well in excess of the City's requirements, and should not result in any adverse impacts on the neighborhood. The income restrictions cited in the introduction would strongly support the assessment.

Based on these considerations, the proposed development would satisfy the City's transportation adequacy requirements; and would not be "objectionable" either to the adjacent properties or the general public from the perspective of traffic and parking.

4. Ward 5 Urban Design Element

The PUD Project specifically and substantially addresses the objectives in the Ward 5 Urban Design element, including: the promotion of a physical environment that upgrades the ward's aesthetic qualities, enhances neighborhood stability, emphasizes neighborhood identity and function, and physically enhances the gateways and entrance ways into the District (10 DCMR § 1620.1(a)); and the provision of special design attention to those areas in the ward that maintain a poor physical image, where new development can improve the neighborhood's visual qualities while providing needed services (10 DCMR § 1620.1(b)). The PUD Project provides a well designed residential development that will help to physically revitalize the Ward 5 area.

As discussed in detail above, the Project conforms to the goals, objectives, and policies of the Comprehensive Plan, including the ward plan.

V.
CONCLUSION

For the reasons stated above, the Archdiocese of Washington and Catholic Community Services submit that the PUD meets the standards of Chapter 24 of the Zoning Regulations and is consistent with the purposes and intent of the Zoning Regulations and Zoning Map. Furthermore,

the project is consistent with the land use objectives of the District of Columbia, will revitalize the economic, residential and social fabric of the community and, therefore, satisfies the requirements for PUD approval. Finally, the project provides significant public benefits and amenities and furthers the goals and policies of the District of Columbia. Accordingly, the Archdiocese of Washington and Catholic Community Services respectfully request that the Zoning Commission determine that the application has merit and schedule a hearing on the PUD application.

Respectfully submitted:

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