



**STATEMENT OF
DOUGLAS DEVELOPMENT CORPORATION
IN SUPPORT OF AN APPLICATION
FOR CONSOLIDATED REVIEW OF A PLANNED UNIT DEVELOPMENT**

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**ZONING COMMISSION
District of Columbia**

CASE NO. 06-21 **ZONING COMMISSION**
EXHIBIT NO. 3 **District of Columbia**
CASE NO.06-21
EXHIBIT NO.3

PREFACE

This statement and the attached documents are submitted to the Zoning Commission for Douglas Development Corporation, on behalf of Jemal's Judge LLC (the "Applicant"), in support of its request for consolidated review and approval of a planned unit development ("PUD") and related Zoning Map Amendment on that certain property consisting of approximately 8,612 square feet located at the northwest intersection of 6th and L streets, N.W. in the Mount Vernon Square area of the District of Columbia (the "Property"). The PUD will consist of approximately 22,047 square feet of residential area; including approximately 20 condominium units housed in three sections: the historic James Essex House at the corner of 6th and L Streets; a three-story addition to the rear of the James Essex House; and three, three-story infill additions on 6th Street. The maximum allowable FAR for a PUD in the C-2-C District is 6.0. However, the FAR for the PUD is only 2.56, recognizing the historic property involved and the historic character of the area.

The PUD is located in the Mount Vernon Square Historic District, and includes the rehabilitation of the James Essex House, a three-story residence built in 1855, located on the west side of 6th Street, which will house 3 of the 20 proposed condominium units. The concept design of the proposed PUD was reviewed and approved by the Historic Preservation Review Board (the "HPRB") on January 26, 2006.

Notice of intent to file this application was mailed on December 20, 2005, to Advisory Neighborhood Commission 2C and to the owners of all property owners within 200 feet of the Property, in accordance with Section 2406.7 and Section 2406.9 of the Zoning Regulations.

DEVELOPMENT TEAM

Applicant:	Douglas Development Corporation 702 H Street, N.W. , Suite 400 Washington, D.C. 20001
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Civil Engineers:	A. Morton Thomas & Associates, Inc. 12750 Twinbrook Parkway Rockville, MD 20852-1700
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LIST OF EXHIBITS

<u>Description</u>	<u>Exhibit</u>
Architectural Plans and Drawings (including zoning map)	A (submitted separately)
Completed Zoning Commission Application Forms	B
Legal Description of Subject Property	C
Plat of Survey	D
Notice of Intent to File, Certificate of Service, and List of Property Owners within 200 Feet of Project	E
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I. **INTRODUCTION**

A. Project Overview

The proposed PUD is a residential development consisting of approximately 20 condominium units located at the northwest corner of the intersection of 6th Street and L Street in Mount Vernon Square. The dynamic, multi-faceted design of the project includes the rehabilitation of the historic James Essex House, which would house 3 dwelling units. To the rear of the James Essex House, a three-story addition with a mezzanine will house 5 dwelling units (referred to as "New Construction West" on the PUD plans). Three, three-story, bay-fronted additions along 6th Street will house 12 dwelling units (referred to as "New Construction East" on the PUD plans). The combined 20 condominium units will total approximately 22,047 square feet. Additional site amenities include a landscaped courtyard, and below grade parking. The PUD would significantly benefit the District by rehabilitating a historic property, the James Essex House, removing the existing blight caused by the abandoned buildings currently on the Property, and providing additional housing in an area designated as a Housing Opportunity Area on the District's Generalized Land Use Policies Map. The continued redevelopment and revitalization of Mount Vernon Square, in general, is consistent with several policies of the Comprehensive Plan, including support for the continued growth and economic development of Downtown and the Convention Center.

B. The Applicant

Since its inception in 1985, Douglas Development has tallied numerous redevelopment successes in the District of Columbia, as well as suburban Maryland and Virginia. Douglas Development has earned a reputation for creating value and a "sense of place" in underdeveloped

yet emerging areas. Douglas Development continues to win praise from the press, community leaders, and neighbors for its pioneering enhancing communities.

Douglas Development has earned a reputation for trusted stewardship in the redevelopment of historic buildings. All members of Douglas Development's design and construction teams are handpicked by Douglas Jemal, President of Douglas Development, for their abilities to appreciate and preserve the legacy of each historic building. Douglas Development's project teams include nationally recognized architects, leading historical consultants, and proven construction managers.

Douglas Development's projects in the District include The Historic Row, located at 800 F Street, N.W., a mixed use project containing residential, retail, and office uses, which is home to the International Spy Museum; the Woodies Building at 1025 F Street, N.W., which fills an entire city block bounded by 10th and 11 Street and F and G Streets and consists of 497,268 square feet of office and retail uses; and Historic 7th Street at 700-738 7th Street, N.W., a project that involved the renovation of 8 small-scale commercial buildings originally constructed between 1866 and 1881, and in 2004 was awarded the Washington Chapter of the American Institute of Architects, Merit Award Under Architecture Historic Resources category. Douglas Development is currently redeveloping the property at 910-916 F Street for the construction of a twelve story mixed-use project, to be known as Ventana, that includes 62 dwelling units totaling 79,135 square feet and 11,580 square feet of retail use; and the Atlantic Building property presently under construction to the west of the Ventana Site.

II.

PROJECT DESCRIPTION

A. Site Location and Description

The Property consists of 8,612 square feet located at the northwest corner of the intersection of 6th and L Streets, N.W., and is more particularly described as Square 449, Lots 800, 859, 50, and 51. It is improved with three abandoned buildings - the James Essex House, located at the corner of 6th and L Streets (Lot 800); a one-story rear addition to the James Essex House (Lot 800); and a one-story commercial building on 6th Street, on the north side of the James Essex House (Lot 859). Two vacant parcels on the north side of the commercial building are also part of the Property (Lots 50 and 51).

The District of Columbia Comprehensive Plan Generalized Land Use Map designates the Property in the Medium Density Residential category, where multiple-unit housing and mid-rise apartment buildings are the predominant uses. Also, the District of Columbia Generalized Land Use Policies Map includes the Property within the UDC/Mount Vernon Square Development Opportunity Area and the Mount Vernon Square Housing Opportunity Area. The current zoning for the Property is the Downtown Development (DD) Overlay /R-5-B District.

B. Description of Surrounding Area

The Property is situated just north of the Central Employment Area and the Downtown Plan Area, as said areas are defined on the Generalized Land Use Policies Map. It is located within two blocks of the Mount Vernon Square Metrorail Station located at M and 7th Streets and within three blocks of the Convention Center located between 7th and 9th Streets and N Street and New York Avenue.

The area immediately north and east of the Property, on 6th and L Streets, consists primarily of rowhouses. There are more intensive commercial uses to the south and west on L Street. The west side of 6th Street is primarily designated in the Medium Density Residential land use category on the Land Use Map. The east side of 6th Street and the north side of L Street are designated in the Moderate Density Residential land use category. The lots immediately south and west of the Property are designated in the High Density Commercial land use category.

The Property is located within the Mount Vernon Square Historic District, which is bounded, generally, by New York Avenue on the south; 1st Street on the east; N Street between 1st and 5th streets and M Street between 5th and 7th streets on the north; and 7th Street between M Street and New York Avenue on the west. This district includes approximately 420 properties, 408 of which are contributing buildings constructed between 1845 and 1945.

The Mount Vernon Square Historic District has a variety of building types and sizes including two-story, flat-fronted row houses, three- and four-story, bay-fronted row houses, small apartment buildings, corner stores, and an unusually intact row of 19th century commercial buildings fronting on the 1000 block of 7th Street, N.W. and the 600 block of New York Avenue, N.W. Although exhibiting a diversity of styles and types, the neighborhood's building stock is united by a common sense of scale, size, and use of material and detail. The variety of architectural expression and overall cohesiveness of the building stock is an important character-defining feature of the Mount Vernon Square Historic District.

C. Project Design and Components

The overall design intent for the PUD is to develop an architectural solution that is consistent in size, scale, massing and architectural detailing with structures traditionally found in the Mount Vernon Square Historic District and, more specifically, along 6th Street; retains the

James Essex house as a prominent architectural feature of the 6th Street corner; and develops a façade for the infill additions along 6th Street and the western addition that will complement the historic façade of the James Essex house.

1. James Essex House

The existing façade of the James Essex house will be restored to its original character in accordance with the guidelines established by the Department of Interior. This will include the repair and/or replacement of wood headers and sills, windows and doors, and decorative cornice to their original character and quality. The existing masonry façade will be cleaned and tuckpointed as required. Site improvement details, such as lighting and railing detail, will also be designed to embrace the historic character of the house. The interior of the building will be renovated to include a 1 or 2 bedroom unit and two duplex—1 bedroom units.

2. Western Addition on L Street

The western addition of the project, to the rear of the James Essex House, will be accessed along L Street, through a landscaped courtyard. It will also have below grade parking accessible from L Street. The façade of this section of the PUD is designed in a modern style as a contrast to the historic façade of the James Essex House. The design elements include an all masonry façade with cast stone along the base, and face brick above. The floor plan for the rear building consists of three – 1 bedroom units, and two duplex – 1 bedroom units at the 3rd level that will include a bedroom on the mezzanine level overlooking a double height living space. Each of the 5 units in the western addition will have oversized metal clad windows with balcony projections toward the courtyard.

3. Infill Units on 6th Street

The infill units along 6th Street will have an all masonry façade, projecting bays, and a strong cornice element with Victorian inspired gable projections at the roof line. This new construction will also have face brick with cast stone detailing, double hung windows, and a raised stoop entry with transoms above all main entry doors. The brick detailing at the façade will include Flemish bond pattern work, and banding at projecting bays. A soldier course will be provided at the head of all third-story windows. This section of the PUD will contain six duplex—1 bedroom units along the 6th Street face, three duplex – 1 bedroom units, and three efficiency units along the courtyard. The height of the row houses will be consistent with the adjacent structures on 6th Street.

D. Matter of Right Development Under the Existing Downtown Development Overlay/R-5-B District Regulations

The Property is located within the Downtown Development ("DD") Overlay/R-5-B District. The DD Overlay District and the underlying zoning, together, constitute the zoning regulations for the Property, and where there are conflicts between the DD Overlay District Regulations and the underlying zoning, the provisions of the DD Overlay District govern. 11 DCMR §1700.4.

The R-5-B District permits residential development of moderate height and density. 11 DCMR §350.2. As a matter of right, property in the R-5-B District can be developed with a maximum FAR of 1.8 and a maximum lot occupancy of 60%. 11 DCMR §402.56, §403.2. The maximum permitted building height in the R-5-B District is 50 feet; the minimum depth of a rear yard is 15 feet. 11 DCMR §400.1, §404.1. For structures other than a one family dwelling or hotel, the minimum width of an open court is 10 feet, the minimum width of closed court is 15

feet, and the minimum area of the closed court is 350 square feet. 11 DCMR §406.1. A roof structure, among other requirements, must be setback from all exterior walls at a distance at least equal to its height above the roof upon which it is located, and shall not exceed 18 feet 6 inches in height above the roof upon which it is located. 11 DCMR §400.7(b) – (c).

E. Matter of Right Development Under the Proposed DD/C-2-C District Regulations

The Applicant seeks a Zoning Map amendment in order to change the Property from DD Overlay /R-5-B District to the DD Overlay/C-2-C District. The DD Overlay District and the underlying zoning, together, constitute the zoning regulations for the Property, and where there are conflicts between the DD Overlay District Regulations and the underlying zoning, the provisions of the DD Overlay District govern. 11 DCMR §1700.4.

1. C-2-C District

The maximum permitted height of a building in the C-2-C District is 90 feet. 11 DCMR §770.1. Housing for mechanical equipment of a stairway or elevator penthouse on the roof of a building shall not extend above 18 feet 6 inches in height of the housing, and shall be setback from all exterior walls a distance at least equal to its height above the roof upon which it is located. 11 DCMR §770.6. The maximum FAR permitted in the C-2-C District is 6.0, of which 2.0 may be for commercial use. 11 DCMR §771.2. Under the Zoning Regulations, the maximum lot occupancy for the C-2-C District is 80%. 11 DCMR §772.1. An area equal to not less than 15% of the gross FAR devoted to residential use shall be provided for residential recreation space, but may be reduced to 5% in the DD/C-2-C District. 11 DCMR §773.3; 11 DCMR 1706.4(f). The zoning regulations require that each structure located in the C-2-C District have a rear yard with a minimum depth of 15 feet. 11 DCMR §774.1. While a side yard

is not required under the C-2-C district, where one is provided, it shall be at least 6 feet wide. 11 DCMR §775.5. The Schedule of Requirements for Parking requires that apartment houses or multiple dwelling units in the C-2-C District have 1 parking space for each 4 dwelling units. 11 DCMR §2101.1.

Notwithstanding the foregoing, in the Downtown Development Overlay District Regulations permit a maximum FAR of 8.0 in the DD/C-2-C District as a matter of right, and a reduction in the residential recreation space from 15% to 5% of the gross FAR devoted to residential use. 11 DCMR §1706.4(a) and 1706.4(f).

2. PUD Guidelines

Even with a rezoning to the DD/C-2-C District, the PUD would be governed by the provisions of Chapter 24 of the Zoning Regulations and the terms of the Zoning Commission Order.

Chapter 24 requires that a PUD have a minimum lot area of 15,000 square feet; except that the Zoning Commission may waive not more than 50% of the minimum area requirement, or 7500 square feet, provided:

- (a) the Zoning Commission shall find after public hearing that the development is of exceptional merit and in the best interest of the city or county; and
- (b) the Zoning Commission finds one of the following:
 - (1) if the development is to be located outside the Central Employment Area, at least 80% of the gross floor area of the development shall be used exclusively for dwelling units and uses accessory thereto; or

- (2) if the development is to be located in a portion of the Central Employment Area which is in an HR Overlay District, the development shall contain a minimum floor area ratio of 2.0 devoted to hotel or apartment house use.

The maximum permitted building height does not increase for a PUD in the C-2-C District; it remains at 90 feet. For a PUD in the C-2-C District, the maximum permitted FAR is 6.0, but the FAR that can be devoted to commercial use increases from 2.0 to 2.5. 11 DCMR §2405.1 – 2405.2.

The PUD complies with most of the above C-2-C District and PUD requirements. First, while the Property only consists of 8,612 square feet, where 15,000 square feet is required, the applicant submits that, after the public hearing on the PUD application, the Zoning Commission will concur that the PUD is of exceptional merit and in the best interest of the District, and 100% of the gross floor area of the development is to be used exclusively for dwelling units and uses accessory thereto. As such, the Zoning Commission may permit the PUD area to be 8,686 square feet. Second, the maximum height of the buildings will be 45 feet 11 inches, substantially below the permitted maximum of 90 feet. Third, the PUD will only have a maximum FAR of 2.56, again, substantially below the permitted maximum. Fourth, the PUD will have 1,424 square feet of residential recreation space, which is approximately 6.5% of the PUD area devoted to residential use. Finally, the project will have 10 parking spaces where the Zoning Regulations require 5 parking spaces for the C-2-C District.

F. Flexibility Under PUD Guidelines

The Applicant seeks flexibility under the PUD guidelines relating to the lot coverage and rear yard requirements. The Zoning 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. 11 DCMR §2405.8.

1. Lot Coverage

In order to enhance the PUD design and maximize the project amenities, the PUD will have 100% lot occupancy where a maximum of 80% is permitted. However, there will only be a lot occupancy of 86% on the plaza level.

2. Rear Yard

The Zoning Regulations require a rear yard of 15 feet. In this case, the project design effectively places the rear yard at the center of the PUD to create a larger open courtyard at the center of the project. This is not only aesthetically more desirable, but it also allows for a better use of the open space by all of the residents within the project. In lieu of the rear yard, the plan for the PUD proposes an 8-foot wide light well between the rear building and the adjacent structure to the west (shown as "Courtyard B" on the PUD plans).

G. Tabulation of Development Data

	Required/Allowed	Provided
Lot Area	15,000 s.f.	8,612 s.f.
Lot Width	None prescribed	80.98'
FAR Gross Floor Area: Residential	6.0	2.56
Lot Occupancy	80% max	100%
Building Height	90 feet	45' – 11" maximum
Residential Recreation Space	1,031 s.f.	1,424 s.f.
Rear Yard	15 feet	None
Side Yard	None req.	None
Open Court Width (Courtyard A)	10 feet	17' – 7"
Closed Court Width (Courtyard B)	13' – 7"	8'-0'

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

A. PUD Process is Appropriate Mechanism for the Project

The PUD process is the appropriate mechanism for guiding the development of the Property. It allows the Applicant to develop the Property with an exceptional planned residential community. Also, through the PUD process, the Zoning Commission can ensure the appropriate development of the Property by encouraging the participation of the affected community and District agencies and soliciting their comments. Thus, the PUD process gives neighborhood residents, the community at-large, and District agencies ample opportunity to work with the Applicant to ensure a well-planned development.

B. Impacts of the Project Under Section 2403.3

The PUD will have a favorable impact on the surrounding area for several reasons. It will improve the aesthetics and streetscape at the intersection of 6th and L Streets, specifically, and Mount Vernon Square, generally, and create new housing and redevelopment consistent with the objectives and policies of the Comprehensive Plan. Second, by replacing the blight caused by the current abandoned structures on the Property and bringing new residents into the area, the PUD supports the continued revitalization of Mount Vernon Square, Downtown and the Convention Center areas. Third, the PUD includes the rehabilitation of the James Essex House, a significant structure in the Mount Vernon Square Historic District. Fourth, the Project will not have an unacceptable impact on traffic. Preliminary traffic studies conducted by O.R. George Associates indicate that the key intersections studied would continue to operate at an overall acceptable level of service D or better during both the AM and PM peak hours. Further, as a downtown residential project, little or no traffic will be generated in the peak hours.

C. Public Benefits and Project Amenities

The PUD guidelines require the evaluation of specific public benefits¹ and project amenities² for a proposed project. 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.

As discussed below, the proposed development offers a number of the public benefits and project amenities that the PUD process encourages and the Applicant is not aware of any potential adverse effects from the project.

1. Urban design, architecture, landscaping and open space. 11 DCMR §2403.9(a). The PUD provides an appropriate urban design solution for the development of a new multi-unit residential development adjacent to a historic structure. Further, the overall design is consistent in scale, mass and architectural detailing with adjacent structures. The design of the interior landscaped courtyard provides an open space amenity for the project.

2. Site planning and efficient and economical land utilization. 11 DCMR §2403.9(b). The PUD provides an efficient design solution to planning a multi-unit residential project that is respectful of the adjacent historic James Essex House in terms of mass, scale and architectural character, while maximizing parking and creating additional open space.

¹ 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.

² 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.

3. Transportation features. 11 DCMR §2403.9(c). The Property has historically been used for residential and commercial uses, but is currently abandoned. Even without considering the increment in number of units proposed under the PUD, it is important to note that, based on the Property's proximity to the Central Employment Area and the Metrobus and Metrorail transportation services, the proposed residential use will generate fewer than 10 peak hour trips during the weekday, according to the preliminary traffic studies. This will not result in any appreciable adverse impact on the local roadways. Additionally, the area is fully served by pedestrian facilities, including sidewalks, crosswalks with pedestrian signals at intersections, and the Property is in proximity to specific City bicycle routes, further supporting alternative non-vehicular modes of travel.

4. Historic preservation. 11 DCMR §2403.9(d). The Property is situated within the Mount Vernon Square Historic District. The PUD includes the rehabilitation of the historically significant James Essex House. The structure, constructed in 1855, is prominently located at the northwest corner of 6th and L Streets, and will house 3 of the 20 proposed condominium units. The rehabilitation of the structure will be carefully coordinated with staff of the Historic Preservation Review Board.

5. Employment and training opportunities. 11 DCMR §2403.9(e). In order to further the District of Columbia's policies relating to the creation of employment opportunities, the Applicant will commit to make a bona fide effort to utilize local, small or disadvantaged business enterprises certified by the District of Columbia Local Business Commission in order to achieve, at a minimum, the goal of 35% participation in the contracted development costs in connection with the development of the Project. The Applicant will also enter into a First Source Agreement with the Department of Employment Services ensuring cooperation with the

Department for employee recruitment for jobs created by the PUD with the objective that 51% of the employees hired in connection with the development of the PUD are District of Columbia residents.

6. Housing and affordable housing. 11 DCMR §2403.9(f). Arguably, the single greatest benefit to the area, and the District as a whole, is the creation of new housing and home ownership opportunities consistent with the goals of the Zoning Regulations, the Comprehensive Plan and the Mayor's housing initiative. The PUD provides approximately 22,047 square feet of residential use on the Property. This new housing will be part of an urban living system that includes the Central Employment Area and Downtown retail, commercial, and entertainment establishments, and the public transportation system via the Mount Vernon Square Metrorail Station and Metrobus lines. Due to the small size of the project and nominal FAR achieved through the PUD process³ there is proposed to be one unit within the PUD reserved for affordable housing.

IV. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The PUD advances the purposes of the Comprehensive Plan, is consistent with the Generalized Land Use Map, and supports the major themes and elements for the District and Ward 2 in the Comprehensive Plan.

³ The maximum FAR permitted on the Property, as a matter of right under the existing R-5-B zoning, is 1.8, or 15,501 square feet. The Applicant proposes a PUD with a maximum FAR of 2.56, or 22,047 square feet.

A. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold:

(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 and community in the District.

D.C. Code §301.62(b).

The PUD significantly advances these purposes by promoting the social, physical and economic development of the District, generally, and Ward 2, specifically, through the provision of quality residential development that includes the rehabilitation of a historic structure and architectural and design elements that embrace that of the existing neighborhood.

B. Generalized Land Use Map

The PUD is not inconsistent with the District of Columbia Comprehensive Plan Generalized Land Use Map, which designates the Property in the Medium Density Residential category. Multiple-unit housing and mid-rise apartment buildings are the predominant uses in this land use category.

C. Compliance with Major Themes of the Comprehensive Plan

The PUD supports several major themes of the Comprehensive Plan as follows:

1. Stabilizing and improving the District's neighborhoods. 10 DCMR §101.1(a). The PUD helps to stabilize and improve Mount Vernon Square by replacing the existing abandoned structures with a well-designed development that brings additional housing to the area. The design of the PUD includes the rehabilitation of the James Essex House and architectural

elements that are compatible with and complimentary to the existing rowhouses in the immediate area. The PUD will also buffer the existing residential neighborhood from the more intense commercial uses along L Street.

2. Developing a living Downtown. 10 DCMR §101.1(c). The PUD will create 20 additional condominium units, totaling 22,047 square feet, in the Downtown Development District, as that district is defined in the Comprehensive Development Plan, and a housing alternative to the rowhouses that currently exist in the immediate area.

3. Preserving and ensuring community input. 10 DCMR §101.1(f). The PUD process, including the notice requirements, review by the Historic Preservation Review Board and ANC 2C, meetings with neighborhood organizations, and public hearings ensure community input in the review and approval of the proposed PUD. The Historic Preservation Review Board approval of the PUD design will be discussed in the Office of Planning Report. A letter from ANC 2C is attached as Exhibit F of this statement. It states that at its public meeting held December 17, 2005, ANC 2C unanimously voted to support the PUD and related map amendment.

4. Preserving the historic character of the District. 10 DCMR §101.1(g). The PUD includes the rehabilitation of the James Essex House, a contributing structure to the Mount Vernon Square Historic District. Currently abandoned, the three-story residence was built in 1885, and is located on the northwest corner of 6th and L Streets. It will house 3 of the 20 condominiums proposed for the PUD. The façade of the structure will be restored through architectural elements and detailing that are reflect its original character and quality.

5. Reaffirming and strengthening the District's role as the economic hub of the National Capital Region. 10 DCMR §101.1(h). The Property is ideally located in proximity to

Downtown, the Mount Vernon Square Metrorail Station, New York Avenue and other major roadways, and, thus, allows for the maximum utilization of the District's urban infrastructure which includes employment, residential, transportation, social and cultural resources.

6. Promoting enhanced public safety. 10 DCMR §101.1(i). By removing the blight caused by the abandoned buildings currently on the Property and replacing it with a well-designed residential project, the PUD helps to enhance the public safety in the immediate area and promotes the safety of the general surrounding area, including Downtown and the Convention Center.

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

Among the policies established in support of economic development outside Downtown and the Central Employment Area is to promote the appropriate development of, among other areas, the Mount Vernon Square corridor. 10 DCMR §206.2(b). The PUD furthers this policy by providing new residences in Mount Vernon Square that are compatible with the existing residential development in the area and providing new housing opportunities close to Downtown and the Central Employment Area. The PUD also furthers policies promoting support for the Convention Center by improving public safety, aesthetics, growth, and redevelopment in Mount Vernon Square. 10 DCMR §203.2(b).

2. Housing Element

A central theme of the Housing element is that the District must stimulate a wider range of housing choices and strategies through the preservation of sound older stock and the

production of new units for a wide variety of housing types. 10 DCMR §300.2. Also, the Comprehensive Plan recognizes housing in the District as a key part of the 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. Several policies have been established in support of the Housing element, including: to encourage new housing at locations consistent with District land use policies and objectives; designate, as residential development opportunity areas, sites where significant housing development can appropriately occur and encourage multi-unit housing development near Metrorail stations, at locations adjacent to Downtown, and adjacent to proposed employment centers and office areas; and encourage the private sector to meet housing needs through the development infill housing. 10 DCMR §302.2(a), (d), (e), and (f).

The PUD supports the foregoing objectives and policies by providing new housing in Mount Vernon Square, which is designated as a Housing Opportunity Area on the Generalized Land Use Policy Map. Also, the PUD is compatible with the existing residential development in the surrounding area and is appropriately located within two blocks of the Mount Vernon Metrorail Station. Its proximity to the Mount Vernon Metrorail Station, as well as Downtown, the Central Employment Area, New York Avenue and other major roadways, supports the development of the District's total urban living system and allows for maximum utilization of the District's transportation, employment, social, and cultural infrastructure.

3. Environmental Protection Element

One objective of the Environmental Protection Element is improving air quality in the District and the region by promoting and transportation services that decrease reliance on

automobiles for commuting and other routine trips. 10 DCMR §403.2(c) This can be achieved through reducing dependence on automobiles, clustering of residences, shopping and work places where they can be served efficiently by Metrorail or frequent bus service. 10 DCMR §403.2(c). The PUD furthers this objective because it is located within two blocks of the Mount Vernon Square Metrorail and in immediate proximity to Downtown and the Central Employment Area, thereby minimizing dependence on private automobiles.

4. Transportation Element

Among the policies established to support the Transportation element objectives is supporting land use arrangements that simplify and economize transportation services, including mixed-use zones that permit the co-development of residential and non-residential uses to promote higher density residential development at strategic locations, particularly near appropriate Metrorail stations. 10 DCMR §502.2(a). The Comprehensive Plan also encourages reverse commute options that provide District residents with access to the regional job market that is essentially equal to that afforded to suburban residents commuting to the District. 10 DCMR §502.2(j). Measures to increase the use of mass transit in the District and the region and reduce dependence on the private passenger automobile are also major objectives of the Comprehensive Plan. 10 DCMR §503 – §504.

The policies and objectives of the Transportation element are supported by the PUD. First, the PUD, as a multi-unit development, is appropriately located within two blocks of the Mount Vernon Square Metrorail Station and will provide potential new riders for the Metrorail system at this location. Second, its proximity to Metrorail, Downtown, and the Central Employment Area help to reduce dependence on the private passenger automobile and allow residents to experience a live/work urban environment.

5. Urban Design Element

The Comprehensive Plan 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. One objective of this element is to maintain those areas of the District that have a positive physical image and to provide that new development and renovation within or adjacent to these areas is complimentary in scale and character. 10 DCMR §711.1. The Comprehensive Plan encourages new development or the renovation and the rehabilitation of older structures in areas with vacant or underused land or buildings to secure a strong, positive physical identity. 10 DCMR §712.1.

The foregoing policies and objectives of the Comprehensive Plan are supported by the PUD. The PUD provides for the restoration of the James Essex House. Furthermore, the PUD contributes to maintaining the positive physical image and neighborhood identity of the Mount Vernon Square Historic District. This is achieved through the design of a multi-unit residential development that is consistent in scale, mass and architectural detailing with adjacent and nearby structures. Finally, the PUD provides a design solution that complements the existing physical environment by providing additional open space within the neighborhood through the design of the landscaped interior courtyard.

6. Preservation and Historic Features Element

The preservation and historic features goal for the District is to preserve important historic features of the District while permitting new development that is compatible with those features. 10 DCMR §801.1. The PUD supports this goal because it includes the rehabilitation of

the historic James Essex House, including the restoration of the exterior façade through elements and details that reflect the original architecture of the house.. The scale and architectural elements of the new construction will be compatible with and complimentary to the James Essex House, as determined by the Historic Preservation Review Board, and the existing residential development in the immediate area.

7. Downtown Plan Element

The Comprehensive Plan recognizes Mount Vernon Square as a significant area of development. 10 DCMR §900.31. It is specifically identified as an area that should be a primary location for residential development. 10 DCMR §900.31(c). New residential development should be required and encouraged through mixed use and residential zoning. 10 DCMR §900.31(c). Existing housing and historic resources should be protected and enhanced in accordance with District law. 10 DCMR §900.31(c). The PUD supports the foregoing by increasing the new housing stock in Mount Vernon Square with a well-designed residential project.

8. Land Use Element

The Comprehensive Plan objectives for residential neighborhoods include conserving and enhancing the essentially satisfactory qualities of the District's neighborhoods. 10 DCMR §1102.1(a). Some of the policies in support of this and other residential neighborhood objectives are: (i) to promote the conservation, enhancement, and revitalization of residential neighborhoods for housing and neighborhood related uses; (ii) to encourage the retention and expansion of residential uses in mixed use neighborhoods to help maintain the residential character of these areas; (iii) to protect low and moderate density residential neighborhoods that are also designated for commercial uses from uses that are incompatible with residential

neighborhoods and from activities, particularly those of a commercial nature that generate excessive traffic, noise, litter, and other damaging environmental impacts; and (iv) to support the retention of established residential neighborhoods adjacent to the Central Employment Area. 10 DCMR §1104.1 (a), (g), (j), (o).

The PUD helps to strengthen the residential neighborhood along the 6th and L Street corridor, specifically, and Mount Vernon Square, generally, as previously discussed. Also, the PUD will serve as a buffer between the existing residential uses and the more intense commercial uses south and west of the Property on L Street.

E. Compliance with Ward 2 Elements of the Comprehensive Plan

The PUD fulfills and furthers the specific objectives for Ward 2, as set forth in the Comprehensive Plan.

1. Ward 2 Economic Development. The Ward 2 objectives for economic development include enhancing the image of the Ward as a place to do business and reside and to rebuild and develop areas of the Ward where economic development actions are needed. 10 DCMR §1301.1(a) – (b). The PUD offers the potential to do business and reside in the District because it is ideally located just outside of the Central Employment Area and Downtown, and within two blocks of the Mount Vernon Square Metrorail Station.

2. Ward 2 Housing. The Comprehensive Plan Generalized Land Use Policies Map designates the Property as being within a Housing Opportunity Area. The PUD offers new housing opportunities encouraged for the area. 10 DCMR §1303.10; §1304.1(a).

3. Ward 2 Transportation. One transportation concern in Ward 2 is the availability of off-street parking so that cars do not have to compete for limited on-street spaces. 10 DCMR

§1309.11. In response, the PUD provides 10 parking spaces where 5 are required in the C-2-C District under the Zoning Regulations.

4. Ward 2 Urban Design. The overall urban design goal is to promote the protection enhancement and enjoyment of the natural environs and to promote an environment that provides visual orientation, enhances the District's aesthetic qualities, emphasizes neighborhood identities, and is functionally efficient. 10 DCMR §1315.8.

5. Ward 2 Preservation and Historic Features. Among the objectives for Ward 2 is to designate and preserve buildings in Ward 2 meeting historic landmark or historic district protection. 10 DCMR §1319.1(a). The PUD includes the rehabilitation of the James Essex House.

6. Ward 2 Land Use. The objectives for residential land use in Ward 2 include conserving and enhancing existing residential neighborhoods. 10 DCMR §1326.1(a). The PUD will help maintain the existing residential neighborhood by providing additional housing stock and buffering the residential area from the more intense commercial uses on L Street. Additionally, the Property is within two blocks from the Mount Vernon Metrorail Station, which encourages the optimum development of the station area in terms of land use, transportation, and urban design related to the development of the surrounding area. 10 DCMR §1350.1.

V. CONCLUSION

The Applicant proposes the development of a well-designed residential PUD consisting of approximately 20 condominium units and totaling 22,047 square feet of residential use in Mount Vernon Square. The PUD meets the standards of the Zoning Regulations, specifically those for PUDs in the DD/C-2-C District as set forth in Chapter 24, and provides a number of

public benefits and project amenities, including the rehabilitation of a historic structure, providing new housing opportunities in proximity to the Mount Vernon Metrorail station, Downtown, and the Central Employment Area. Finally, the PUD is consistent with the objectives and policies established in the District of Columbia's Comprehensive Plan. Accordingly, the Applicant respectfully requests that the Zoning Commission determine that this PUD application has merit and schedule a hearing on the application.

[Signature Page Follows]

Respectfully submitted:

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