

**WASHINGTON, DC
PLANNED UNIT DEVELOPMENT**

**STATEMENT
OF THE APPLICANT**

**TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION
FOR A
CONSOLIDATED PLANNED UNIT DEVELOPMENT
AND
ZONING MAP AMENDMENT**

January 3, 2007

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ZONING COMMISSION
District of Columbia

CASE NO. 07-02
EXHIBIT NO. 3

PREFACE

This statement and the attached documents are submitted by Donatelli Development on behalf of the RLA Revitalization Corporation, owner of the Subject Property (collectively referred to herein as the "Applicants"), in support of their application to the Zoning Commission of the District of Columbia for the consolidated review and one-step approval of a Planned Unit Development ("PUD") and related Zoning Map Amendment.

The property that is the subject of this application consists of Lot 726 in Square 2672 (the "Subject Property"). The Subject Property has a land area of approximately 25,415 square feet, and is located in the northwest quadrant of the District. The Subject Property is generally bounded by Irving Street, N.W. to the north, 14th Street, N.W. to the east, a 20 foot public alley to the south, and 15th Street, N.W. to the west. The Subject Property is currently split-zoned R-5-B and C-3-A. The western portion of the Subject Property is zoned R-5-B, and the eastern portion of the Subject Property is zoned C-3-A.

The Applicants are seeking to have a portion of the property rezoned from R-5-B to C-3-A so that the entire property will be zoned C-3-A. The Applicants seek approval for the development of an approximately 69 unit condominium building and 104 unit SRO/dormitory building on the Subject Property. A community-based residential facility is permitted as a matter-of-right in the C-3 District. The project will contain approximately 80,920 square feet of gross floor area dedicated to the condominium building, and approximately 33,663 square feet of gross floor area dedicated to the dormitory building. The project will have an overall FAR of 4.5.

The buildings will be constructed to a maximum height of approximately 82'-4". The project will include a total of 84 off-street parking spaces.

The condominium building and dormitory will be constructed as a single building for zoning purposes. The Applicants will not be constructing or operating the dormitory. However, the Applicants are dedicating a portion of the Subject Property for the SRO/dormitory, and are bearing the costs associated with developing and obtaining the necessary zoning approvals required for the SRO/dormitory building. The SRO/dormitory building will be constructed under the auspices of the District of Columbia with the Office of Property Management being the District's representative.

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.

DEVELOPMENT TEAM

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B	Zoning Map
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D	Building Plat
E	Generalized Land Use Map and Generalized Land Use Policies Map
F	Traffic Impact Memorandum
G	Economic Analysis Memorandum
H	Executed First Source Employment Agreement
I	Certificate of Notice, Notice of Intent, and Property Owner's List

I. INTRODUCTION

This statement and the attached documents are submitted by Donatelli Development on behalf of the RLA Revitalization Corporation, owner of the Subject Property (collectively referred to herein as the "Applicants"), in support of their application to the Zoning Commission of the District of Columbia for the consolidated review and one-step approval of a Planned Unit Development ("PUD") and related Zoning Map Amendment.

The property that is the subject of this application consists of Lot 726 in Square 2672 (the "Subject Property"). The Subject Property has a land area of approximately 25,415 square feet, and is located in the northwest quadrant of the District. The Subject Property is generally bounded by Irving Street, N.W. to the north, 14th Street, N.W. to the east, a 20 foot public alley to the south, and 15th Street, N.W. to the west. The Subject Property is currently split-zoned R-5-B and C-3-A. The western portion of the Subject Property is zoned R-5-B, and the eastern portion of the Subject Property is zoned C-3-A.

The Applicants are seeking to have a portion of the property rezoned from R-5-B to C-3-A so that the entire property will be zoned C-3-A. The Applicants seek approval for the development of an approximately 69 unit condominium building and 104 unit SRO/dormitory building on the Subject Property. A community-based residential facility is permitted as a matter-of-right in the C-3 District. The project will contain approximately 80,920 square feet of gross floor area dedicated to the condominium building, and

approximately 33,663 square feet of gross floor area dedicated to the SRO/dormitory building. The project will have an overall FAR of 4.5. The buildings will be constructed to a maximum height of 82'-4". The project will include a total of 84 off-street parking spaces.

The condominium building and SRO/dormitory will be constructed as a single building for zoning purposes. The Applicants will not be constructing or operating the SRO/dormitory. However, the Applicants are dedicating a portion of the Subject Property for the SRO/dormitory, and are bearing the costs associated with developing and obtaining the necessary zoning approvals required for the SRO/dormitory building. The SRO/dormitory building is to be constructed under the auspices of the District of Columbia with the Office of Property Management being the District's representative.

The requested zoning change is fully consistent with the District of Columbia Comprehensive Plan ("Comprehensive Plan"), including the land use element which designates the Subject Property in the mixed-use, medium density residential and moderate density commercial land use category.

A. Background Information Regarding Developer

Columbia Heights Ventures Parcel 26, LLC is a subsidiary of Donatelli Development ("Donatelli"). Donatelli is a privately owned corporation engaged in the acquisition, development and ownership of real estate. Donatelli's primary emphasis has been in the real estate industry since its formation in 1973. The firm has successfully developed office buildings, apartment communities, shopping centers, industrial properties and

residential subdivisions in metropolitan Washington, D.C. Donatelli's approach to its projects is to acquire, develop and manage properties for long-term ownership and growth. The company engages the services of experienced, outside consultants while maintaining a hands-on approach supervising the development of its projects.

Since its inception, Donatelli has syndicated, acquired and developed over 4,400 multifamily residential units; 2,700,000 square feet of industrial space; 2,400,000 square feet of office space; 246 hotel rooms; 200,000 square feet of retail space; and over 1,500 acres of undeveloped land. Some of Donatelli's recent projects in the District include:

- The Ellington Apartments, located near the U Street Metro Station at the corner of 13th and U Streets, is a mixed-use development that includes 190 residential units, 17,000 square-feet of retail space, and 177 underground parking spaces.
- Park Place, located at the Georgia Avenue/Petworth Metro Station, is a mixed-use development to include 148 condominiums, 17,000 square-feet of retail space, and underground parking.
- Highland Park, located at the southwest corner of 14th and Irving Street adjacent to the Columbia Heights Metro station, is a mixed-use development including 229 residential units, 22,000 square-feet of retail space, and underground parking.
- Kenyon Square Condominiums, located at the corner of 14th and Irving Street adjacent to the Columbia Heights Metro station, is a mixed-use development to include 153 condominium units, 21,000 square-feet of retail space, and underground parking.

II. PROJECT DESCRIPTION

A. Site Location and Description

1. Site Description

The Subject Property consists of Lot 726 in Square 2672. The Subject Property contains approximately 25,415 square feet of land area. The Subject Property is situated in Ward 1 and is to the west of the Columbia Heights Metrorail Station. The Generalized Land Use Map of the Comprehensive Plan designates the Subject Property in the mixed-use, medium density residential and moderate density commercial land use category. The Subject Property is also located in the Columbia Heights housing opportunity area. The LaCasa Shelter, a District-owned shelter, is presently located and operating on a portion of the Subject Property.

2. Description of Surrounding Area

The Subject Property is bounded to the immediate north and east by property C-3-A, to the immediate west by property zoned R-5-B, and to the immediate south by property zoned C-2-B. The area to the immediate north, east and south of the Subject Property is also designated in the mixed-use, medium density residential and moderate density commercial land use category. The area to the west of the Subject Property is designated in the mixed-use, medium density residential and moderate density commercial land use category. The area to the west of the Subject Property is designated in the local public facilities land use category, which is indicated as land and

facilities occupied by the District government, excluding parks, recreation centers and open space.

The eastern portion of the site abuts the Highland Park residential and retail development, which is situated next to the Columbia Heights metro station and features 229 residential units, underground parking, and a first-floor area with shops and restaurants.

The Columbia Heights community has long been admired for its appealing architecture and proximity to many of the city's leading attractions and landmarks. Over the past few years, the neighborhood has experienced an exceptional renaissance, sparked by the restoration of the historic Tivoli Theatre and the addition of many new restaurants, cafes, and shops—including a gourmet Giant located just a block away from the Subject Property. In addition, under construction is the exciting new 500,000 square foot DC USA retail and entertainment center, to be located adjacent to the Columbia Heights Metro Station, will feature a 173,000 square foot Target, Best Buy, Washington Sports Club, Bed Bath & Beyond, many other retailers, and a 1,000-car below-grade parking garage.

B. Project Design

The proposed PUD reflects the careful consideration given by the Applicants and the architects to the unique location of the Subject Property and the proposed uses on the site. The proposed PUD and requested rezoning are consistent with the surrounding uses and intensity of uses. The proposed PUD design results from the challenge of incorporating the existing

LaCasa Shelter, which sits at the northwest corner of the site, into the proposed development of the 69 unit condominium building.

In order to provide ample natural light to the east side of the proposed SRO/dormitory building, the proposed condominium building is setback approximately sixty feet from the Subject Property's northern property line. In addition, the Applicants and design team focused on making the north elevation of the condominium building very sculptural and captivating. The goal was to design the front elevation into a "landmark" which would intrigue passers-by. The design solution is a glass and metal bay with a very organic form. The dramatic impact of this form is heightened by the manipulation of the ground floor plane. A narrow entry gallery which connects to the entry lobby hugs the west side of the site and allows for a direct view of the bay. Below the gallery sits a community room which opens onto a terrace garden that is one story below street level. From the street level the pedestrian sees the bay rise out of this lower level garden. The remainder of the façade is a stark contrast: vertical masonry bands surround long rectangular windows.

The SRO/dormitory was designed as the third piece of a tri-partite composition forming the overall front elevation of the site. Its grid of windows is set into a masonry wall articulated by horizontal bands and vertical panels. The windows themselves are divided into vision/operable lights alongside panels of colored glass. By rearranging these elements within the window units, the façade gains a lively pattern of alternating

colors. The base of the SRO/dormitory is light beige masonry which links it to the east side of the market rate building. It also gives the building a more formal street presence by differentiating the public portion of the building from the residential function above.

The major portion of the condominium building is a tiered block that stretches from behind the SRO/dormitory to the back of the Subject Property, while also maintaining a rear yard loading and delivery. At the rear of the condominium building, the first through third floors have a projected bay. The entire building mass steps back above the fifth floor which delineates the 6th and 7th floors into a penthouse. This articulation is reinforced by the change in exterior cladding: the upper 2 floors are sheathed in vertical metal panels 18" in width. The building also includes balconies for most of the units. The shape and treatment of the balconies recalls the organic curved form of the sculptural bay at the front of the building. The primary material for the rear façade of the condominium building is a beige masonry unit. Narrow bands of the same material demarcate floor levels and the top of fenestration.

The front of SRO/dormitory is setback 12 feet from the northern property line to allow for a front yard of planters and hardscape. The condominium building has a lowered garden terrace at the front of the building which will feature bamboo and hardscape to create a beautiful area to view from above. Landscaped courts are located on either side of the rear

of the building to augment the design of the building. On the east side, the green space is being designed to take advantage of the side yard garden of the Highland Park building by making the spaces appear as one. This will create an enhanced green space for occupants of both buildings to enjoy. The west court will provide a green buffer between the condominium building and its neighboring property and alley.

C. Matter of Right Development under Existing Zoning

The Subject Property is split-zoned R-5-B and C-3-A. The R-5-B and C-3-A zoning requirements are summarized in the following chart.

	C-3-A	R-5-B
Purpose	Permit medium density development, with a density incentive for residential development within a general pattern of mixed-use development (§740.4).	Protect quiet residential areas now developed with one-family detached dwellings and adjoining vacant areas likely to be developed for those purposes (§200.1).
Height/Stories	65 feet/no limit (§770.1)	50 feet/no limit (§400.1)
FAR	4.0, all of which may be residential, but not more than 2.5 of which may be used for other permitted uses (§771.2).	1.8 (§402.4)
Maximum Lot Occupancy	75% (§772.1)	60% (§403.2)
Rear Yard	2½ inches per foot of height, but not less than 12 feet (§774.1).	4 inches per foot of vertical distance from the mean finished grade at the middle of the rear of the structure to the highest point of the main roof or parapet wall, but not less than 15 feet. (§404.1)
Side Yard	None required, but if provided, must be at least 2 inches wide for each foot of height, but not less than 6 feet (§775.5).	None required, but if required, must be at least 3 inches wide for each foot of height, but not less than 8 feet. (§405.9)

Open Court Width	Minimum of 4 inches per foot of height, measured from the lowest level of the court to that elevation, but not less than 15 feet (§776.3).	4 inches per foot of height of court, but not less than 10 feet (§406.1).
Residential Recreation Space	15% of the gross floor area devoted to residential purposes (§773.3).	Not applicable.
Parking (§2101.1)	Apartment house or multiple dwelling - 1 parking space for each 2 dwelling units. Dormitory – 1 for each 5 beds	Apartment house or multiple dwelling - 1 parking space for each 2 dwelling units. Dormitory – 1 for each 5 beds
Loading § 2201.1	Apartment house or multiple dwelling with 50 or more dwelling units - 1 loading berth at 55 feet deep; 1 loading platform at 200 square feet; 1 service/delivery loading space at 20 feet deep. § 2201.1	Apartment house or multiple dwelling with 50 or more dwelling units - 1 loading berth at 55 feet deep; 1 loading platform at 200 square feet; 1 service/delivery loading space at 20 feet deep.
PUD Height §2405.1	90 Feet	60 Feet
PUD FAR §2405.2	4.5, all of which may be residential, but not more than 3.0 of which may be used for commercial uses.	3.0

D. Matter of Right Development under Proposed Zoning

Under the proposed PUD, the zoning of the entire Subject Property would become C-3-A, and subject to the Zoning Regulations outlined above.

E. Tabulation of Development Data

See tabulation of development data included with Architectural Plans and Drawings attached hereto as Exhibit A.

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. Thus, the Applicants seek flexibility from several provisions of the Zoning Regulations. 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.

1. Flexibility From Residential Recreation Space Requirements

The Zoning Regulations provide that when all or a portion of a building in the C-3-A zone is devoted to a residential use, an area equal to not less than 15% of the residential gross floor area must be provided as residential recreation space.¹ The project includes a total of approximately 114,368 square feet of gross floor area devoted to residential use, and is thus required to provide approximately 17,155 square feet of residential recreation space. However, the project can only provide a total of approximately 13,247 square feet of qualifying residential recreation space. The Applicants are also providing additional residential recreational space which does not meet the zoning requirements. Specifically, Applicants propose to provide a number of

¹ On November 6, 2006, the Zoning Commission voted 4-0-1 to take proposed action to repeal all existing provisions requiring residential recreation space in the SP, CR and C zones. Final action is scheduled for early 2007. Therefore, the Applicants will not need flexibility from the residential recreation space requirements assuming they are repealed.

balcony and terrace units, totaling approximately 7,974 square feet. Therefore, the total amount of useable residential recreation space provided is approximately 21,241 (13,247 + 7,994) square feet, which is approximately 19% of the gross floor area devoted to residential use and exceeds the requirement. Hence, although the Applicants are not complying with the technical requirements of Section 773, the nature and quality of the recreation areas that the Applicants are providing is consistent with the intent, purpose and integrity of the Zoning Regulations.

2. Flexibility From Court Width Requirements

As shown on Sheet 6 of Exhibit A, there are nine courts located at various points throughout the project. Pursuant to Section 776.3 of the Zoning Regulations, where a court is provided for a building or portion of a building devoted to residential uses, at any elevation in the court, the width of court shall be a minimum of 4 inches per foot of height, but not less than 15 feet. The proposed courts meet the minimum width requirements when measured to the building's main massing. However, a number of pinch points are created due to the proposed balconies and bays.

The building has been designed to comply with as many of the Zoning regulations as possible, and the court width has been increased as much as possible to meet the spirit of the regulations and provide open space, while at the same time providing a reasonable interior configuration. However, due to the configuration of the site and its uses, increasing the various court widths

would severely impact the unit layout, count and stacking of utilities and MEP equipment.

3. Flexibility From Rear Yard Requirements

Pursuant to Section 774.1 of the Zoning Regulations, buildings in the C-3-A District are required to provide a rear yard of a minimum depth of 2½ inches per foot of height, but not less than 12 feet. Thus, the project is required to provide a 17 foot rear yard. However, in order to accommodate the building's footprint and loading facilities, the project can only provide a 13 foot rear yard. However, the rear of the subsequent property abuts a 20 foot public alley, so there will be sufficient open space between the rear of the proposed building and the property to the south of the Subject Property, which is located across the 20 foot public alley.

4. Flexibility From Roof Structure Requirements

Section 411.3 requires that all penthouses and mechanical equipment be placed in one enclosure. However, as shown on the Roof Plan, the Applicants propose to provide two enclosures: one for the elevator penthouse and stair tower for the SRO/condominium building and one for the elevator penthouse and stair tower for the residential building. The roof structures have to be separated into two elements due to the different construction schedules for each component of the development. Moreover, the multiple roof structures will not adversely impact the light and air of adjacent buildings since the enclosures are located in a manner that minimizes their visibility.

5. Flexibility From Loading Requirements

The Applicants request relief from the loading requirements. Pursuant to Section §2201.1 of the Zoning Regulations, an apartment house or multiple dwelling with 50 or more dwelling units is required to provide 1 loading berth at 55 feet deep; 1 loading platform at 200 square feet; and 1 service/delivery loading space at 20 feet deep. However, due to the configuration of the site and the anticipated needs of the residents, the Applicants propose to provide 1 loading berth at 30 feet deep, 1 loading platform at 100 square feet, and a compliant delivery space for the condominium building use. The Applicants will be requesting a loading zone for the proposed SRO/dormitory building.

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 PUD Site. It allows the project to be developed within the purview of the Zoning Commission while at the same time providing opportunities for input from various agencies and parties. Through the PUD process, the Office of Planning and other District agencies will have the opportunity for greater participation in the fulfillment of the District's planning objectives for this area. Similarly, the adjacent property owners and area residents will have the opportunity to express their views about the proposed development. Accordingly, the use of the PUD process gives the

community and District agencies an opportunity to work with the Applicants to ensure a well-planned development.

B. PUD Requirements under Chapter 24 of the Zoning Regulations

1. Area Requirements under Section 2402.1(c)

The PUD Site area is approximately 25,415 square feet in land area, which exceeds the minimum area requirement of 15,000 for a PUD in the C-3-A District. 11 DCMR §2401.1(b).

2. Height and FAR Requirements under Sections 2405.1 and 2405.2

The proposed development has been evaluated under the PUD guidelines for the C-3-A District. As noted above, under the PUD guidelines for the C-3-A District, the maximum height of the project is limited to 90 feet. 11 DCMR §2405.1. The maximum FAR for a PUD in the C-3-A District is 4.5, all of which may be residential, but not more than 3.0 of which may be used for commercial uses. 11 DCMR § 2405.2. The project's overall height is approximately 82'-4" and the proposed FAR is 4.5, both of which are consistent with the PUD guidelines. The entirety of the project is residential FAR.

3. Impacts of the Project under Section 2403.3

The proposed PUD will have a positive impact on the surrounding area. Overall, the proposed development will significantly improve the existing area by virtue of the exceptional architectural design, as well as by replacing the current trailers on the Subject Property with a well-designed

building. The proposed PUD's design carefully considers the nearby residences and accordingly, will have significant positive impact on that area.

The proposed PUD will have no unacceptable impact on traffic. As indicated in the traffic impact memorandum, attached hereto as Exhibit F, there would be a favorable modal split in terms of trips that would be made via transit, walk, bicycle and automobiles; the Subject Property is favorably served by pedestrian facilities and transit appurtenances; and the proposed parking provisions will be adequate and not produce any adverse impacts on the neighborhood. Residential development will have less peak hour impact than a 3.0 FAR matter-of-right commercial development with 1.0 residential for the existing C-3-A portion of the site.

In addition, the economic analysis memorandum prepared by Bolan Smart Associates, Inc., attached hereto as Exhibit G, indicates that the development will provide a number of economic benefits, including direct annual District tax revenue, construction related benefits, direct employment opportunities, the provision of new housing, and that the conveyance of land, development entitlements and construction drawings for the SRO/dormitory represents a significant economic contribution.

4. Not Inconsistent with Comprehensive Plan under Section 2403.4

As discussed below, the PUD project is not inconsistent with the Comprehensive Plan.

C. Goals and Objectives of the Proposed PUD

The proposed PUD is designed to achieve several important goals and objectives, as discussed below.

D. 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. 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. Public benefits and project amenities may be exhibited in a variety of ways and may overlap with furthering the policies and goals of the Comprehensive Plan. The proposed PUD includes a number of significant public benefits and project amenities, including: 1) enhanced urban design, architecture,

landscaping and the creation of open spaces (§2403.9(a)); 2) efficient site planning and land utilization (§2403.9(b)); 3) effective and safe vehicular and pedestrian access within close proximity to public transit service (§2403.9(c)); 4) employment and training opportunities (§2403.9(e)); 5) housing and affordable housing (§2403.9(f)); and 6) uses of special value to the neighborhood and the District of Columbia as a whole (§2403.9(i)).

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 consistent with the goals of the Zoning Regulations, the Comprehensive Plan and the Mayor's housing initiative. The proposed PUD will contain approximately 80,703 square feet of floor area devoted to residential use. Moreover, the Applicants are bearing the costs associated with contributing the land and obtaining the necessary zoning approvals required for the 33,665 square feet of floor area devoted to the SRO/dormitory building. The value of the contribution of these costs is estimated at approximately \$3.5 million dollars. Furthermore, the affordable component of the project comprises approximately 30% of the overall FAR contracted with 8% under the new inclusionary zoning regulations and for a population not reached by the inclusionary zoning regulations.

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

The high quality of architectural design in the proposed development exceeds that of most matter of right projects. The Applicants have

commissioned the exceptional architectural design firm of Hickok Cole to create buildings that will further the goals of urban design and enhance the streetscape and surrounding neighborhood. Moreover, as shown on the landscape plan included as Sheet 9 of Exhibit A, the project includes a number of enhanced features, such as planting areas, fountains, and special paving and seating areas.

4. Site Planning and Efficient Economical Land Utilization (Section 2403.9(b))

The proposed PUD is designed such that the site is fully maximized within existing Zoning Regulations. The building has been designed to be an asset to the community and minimize any potential adverse impacts on the adjacent residential community. For example, the development includes a number of setbacks, open spaces and ample use of glass to give the buildings an open feel. Moreover, the Applicants proposes a number of improvements to the streetscape as shown on the landscape plan. (See Exhibit A).

5. Transportation Features (§2403.9(c))

The proposed development is situated in proximity to the City's Employment Core, and is immediately accessible via number of principal arterial roadways. Moreover, the Subject Property is favorably served by pedestrian facilities and transit appurtenances; and the proposed parking provisions will be adequate and not produce any adverse impacts on the neighborhood. (See Exhibit F). The site is within a few feet of the Columbia Heights Metrorail Station. A significant proportion of the site trips would

therefore occur via transit, walk and other alternative modes. In addition, the proposed residential development will have less peak hour impact than a 3.0 FAR matter of right commercial development with 1.0 residential for the existing C-3-A portion of the site. Based on these factors, the proposed development would not be objectionable to the adjacent properties or have any appreciable adverse impacts, from the perspective of traffic and parking.

6. First Source Employment Agreement (Section 2403.9(e))

Expanding employment opportunities for residents of the District is a priority of the Applicants. Therefore, Donatelli has entered into a First Source Employment Agreement with the Department of Employment Services ("DOES") in order to ensure cooperation with DOES for employee recruitment for jobs created by the PUD with the objective that fifty-one percent (51%) of the employees hired in connection with the development of the project are District of Columbia residents. A copy of the executed agreement is attached hereto as Exhibit H.

7. Special Value to the Neighborhood and the District (§2403.9(i))

The LaCasa Shelter, a District-owned shelter, is presently located and operating on a portion of the Subject Property. The Applicants propose to replace the existing trailers on the site with a new residential use, as well as bear the costs associated with contributing the land and obtaining the necessary zoning approvals required for the development of a new 33,665 square feet SRO/dormitory building to replace the existing trailers on the

site. The value of the contribution of these costs is estimated at approximately \$3.5 million dollars. The construction of the new residential building and the SRO/dormitory building represent a significant improvement to the current site and community, and therefore are a benefit to the neighborhood and the District as a whole.

IV.

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD advances the purposes of the Comprehensive Plan, is consistent with the Generalized Land Use Map, and furthers and complies with the major themes and elements for the District and Ward 1 in the Comprehensive Plan.

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 §1-245(b).

The PUD project significantly advances these purposes by promoting the social, physical and economic development of the District through the provision of a quality residential development and the replacement of a

primarily unimproved property with development that will enhance the built environment.

B. Generalized Land Use Map

The proposed rezoning is consistent with the Generalized Land Use Map, which designates the Subject Property in the mixed-use, medium density residential and moderate density commercial land use category. The project will have an overall FAR of approximately 4.5, which is consistent with this land use designation.

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. Stabilizing and Improving the District's Neighborhoods

The proposed PUD will significantly increase the availability and variety of housing in the District. Moreover, the proposed residential use will create a stable and vibrant neighborhood. Finally, the inclusion of a number of affordable housing units will increase housing opportunities in Ward 1 and the District. Approximately 30% of the FAR of this project will be devoted to affordable dormitory style housing for very low income D.C. residents. In addition, the existing temporary trailers on the site will be removed, which will assist in improving the aesthetics of the neighborhood.

2. Increasing the Quantity and Quality of Employment Opportunities in the District

The Applicants are committed to expanding employment opportunities for residents, and Donatelli has entered a First Source Employment Agreement with the Department of Employment Services ("DOES") agreeing to use DOES as its first source to fill new jobs created as a result of this project, as well as agreeing to fill at least 51% of the nearly created jobs by District residents. (See Exhibit H.)

3. Respecting and Improving the Physical Character of the District

The Applicants' proposal respects and improves the physical character of the District through the construction of a well-planned and carefully designed development that provides a mix of housing types and includes affordable housing units.

4. Reaffirming and Strengthening the District's Role as an Economic Hub

The Comprehensive Plan encourages maximum use of the District's location for both private and public growth to promote economic development. Housing construction for all income levels is paramount to the success of the economic goals of the District. This mixed-income, mixed-housing type project furthers this theme by incorporating residential development to promote the economic health and well-being of the region.

D. Compliance with Major Elements of the Comprehensive Plan

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

1. **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. *See* 10 DCMR § 300.4. Also as stated in the Housing element of the Comprehensive Plan, the District recognizes its obligation to facilitate the availability of adequate, affordable housing to meet the needs of current and future residents. The District strives to stimulate a wider range of housing choices and strategies through the production of new units for a variety of household types. A priority under the District's housing element of the Comprehensive Plan is to maintain and upgrade the District's affordable rental stock, a goal that is supported by the proposed PUD. *See* 10 DCMR §§ 300.1 – 300.3. The proposed PUD meets this goal by providing 80,703 square feet of floor area devoted to residential use, as well as bearing the costs associated with contributing the land and obtaining the necessary zoning approvals required for the 33,665 square feet of floor area devoted to the SRO/dormitory building.

2. 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. *See* 10 DCMR § 701.1.

The Urban Design element also has an objective of encouraging new construction or renovation/rehabilitation of older buildings in areas with vacant or underused land or structures in order to create a strong, positive physical identity. *See* 10 DCMR § 712.1.

The proposed PUD has been designed to enhance the physical character of the area and complement the materials, height, scale and massing of the surrounding development. *See* 10 DCMR § 708.2. Moreover, the proposed PUD will be replacing vacant/underused land with new construction that will be a positive addition to this revitalizing neighborhood.

3. Land Use Element

The Land Use element encourages a substantial amount of new housing 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. Policies designed to support residential neighborhoods include promoting the enhancement and revitalization of District neighborhoods for housing and related uses; ensuring a broad range of residential neighborhood options, and

providing wide-ranging assistance for neighborhoods for relatively poor quality by joint public and private action and concentrated governmental attention and resources. 10 DCMR §§ 1104.1 (a), (c), and (e), and 1118.6. The proposed PUD responds to these goals with the development of a high-quality residential project that includes new housing opportunities for residents of the condominium building and the SRO/dormitory building.

E. **Compliance with Ward 1 Elements of the Comprehensive Plan**

1. **Ward 1 Housing Element**

A major objective for housing in Ward 1 is to stimulate the production of new housing. 10 DCMR § 1205.1(a). In addition, the Comprehensive Plan calls for streamlining that approval process as a means of encouraging housing projects in the Columbia Heights area. 10 DCMR §1207.1(d)(2). The proposed PUD meets these objectives by providing approximately 80,703 square feet of gross floor area dedicated to residential uses, as well as bearing the costs associated with dedicating the land and obtaining the necessary zoning approvals required for the 33,665 square feet of floor area devoted to the SRO/dormitory building. Moreover, processing this project as a PUD will enable the Office of Planning and other District agencies to be involved and have the opportunity for greater participation in the planning process for this project and the area.

2. Ward 1 Transportation Element

The Comprehensive Plan recognizes the importance of public transportation in Ward 1 and acknowledges that the metrorail subway system is having the greatest positive impact on land use in the District 10 DCMR § 1216.6, 1212.15. Thus, primary objectives and policies for transportation in Ward 1 are to reduce the ward's dependence on cars in order to improve air quality and reduce congestion, as well as to promote the increased use of mass transit in Ward 1. 10 DCMR § 1213.1(c), 1214.1(d).

The proposed PUD is consistent with these objectives and is a great example of transit-oriented development in the Columbia Heights area. The proposed development will assist in the emergence of a walkable, transit-accessible dynamic and diverse mixed-use neighborhood, as well as provide a strong connection between the project and the Columbia Heights metrorail station. Moreover, as detailed in the traffic impact memorandum attached as Exhibit F, there would be a favorable modal split in terms of trips that would be made via transit, walk, bicycle and automobiles; the Subject Property is favorably served by pedestrian facilities and transit appurtenances; and the proposed parking provisions will be adequate and not produce any adverse impacts on the neighborhood.

3. Ward 1 Urban Design Element

The objectives for urban design in Ward 1 include the following:

- a) To strengthen and enhance the physical image and symbolic qualities of Ward 1 that establish its character as an urban center in the nation's capital;
- b) To design new residential, commercial, and other buildings to complement or enhance Ward 1's physical character; and
- c) To design Ward 1's buildings to include the use of appropriate arrangements of building materials, height, scale, massing, and buffering to complement the immediate areas.

10 DCMR § 1222.1 (a), (b) and (c).

The proposed PUD meets each of these goals. The development ties into the Columbia Heights fabric, and reflects the character of the neighborhood. The elevations respond to their Columbia Heights context in their scale, proportion and detail.

4. Ward 1 Land Use Element

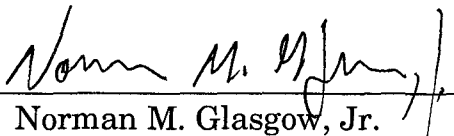
The Ward 1 objectives for land use include concentrating planning and development attention on metrorail station areas, including Columbia Heights, and promoting the revitalization of Ward 1's neighborhoods for housing uses. 10 DCMR § 1229.1(f) and 1230.1(a). The proposed project meets these objectives with the development of new residential and SRO/dormitory uses near the Columbia Heights Metro Station, which is in an area of the District currently experiencing an exceptional renaissance.

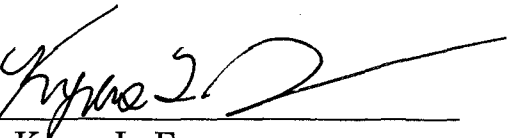
V.
CONCLUSION

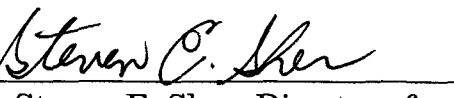
For the reasons stated above, the Applicants submit that the PUD and related map amendment meet the standards of Chapter 24 of the Zoning Regulations and are consistent with the purposes and intent of the Zoning Regulations and Zoning Map. Accordingly, the Applicants request that the Zoning Commission determine that the applications have merit and that a public hearing on the applications should be scheduled.

Respectfully submitted:

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