

SAINT PAUL'S COLLEGE

EYA, LLC

April 18, 2008



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**Pre-Hearing Statement to the
District of Columbia Zoning Commission
For
Consolidated Review and Approval of a
Planned Unit Development
and Zoning Map Amendment**

ZONING COMMISSION
District of Columbia
CASE NO. 07-27
EXHIBIT NO. 16

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District of Columbia
CASE NO. 07-27
EXHIBIT NO. 16

DEVELOPMENT TEAM

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PREFACE

This document is the Pre Hearing Submission of EYA, LLC and the Missionary Society of Saint Paul the Apostle (“St. Paul’s College”), in support of an application for the consolidated review and approval of a Planned Unit Development, and a corresponding amendment to the Zoning Map (collectively, “PUD”), for a portion of the St. Paul’s College campus located in Square 3648 in Northeast Washington, D.C., bounded by 4th Street, N.E. to the west; Hamlin Street and Jackson Street, N.E. to the east; 5th and 6th Street, N.E. to the south; and the United States Conference of Catholic Bishops office building to the north (“Property”). The Property, which is the subject of these applications, is a portion of the Campus (Lot 808 in Square 3648).

Previously submitted in support of this Application, on September 14, 2007, were completed Application Forms, a Notice of Intent to File a PUD (with property-owners list and certification of mailing), a Zoning Map of the Property and surrounding area, and a Surveyor’s plat of the Property, a set of Plans and Engineering Drawings and a Statement in Support (“Previous Submission”). This Previous Submission, this Pre Hearing Submission and the attached documents meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

This document is the Pre Hearing Submission of EYA, LLC¹ (“Applicant”) to the Zoning Commission of the District of Columbia (“Commission”) for the consolidated review and one-step approval of a Planned Unit Development and a corresponding amendment to the Zoning Map (collectively “PUD”) for the site. The PUD Site consists of a portion of Lot 808 in Square 3648, east of 4th Street, N.E. across from Trinity University, immediately south of an office building occupied by the United States Conference of Catholic Bishops (a PUD approved by Zoning Commission Order No. 484) and west of the Holy Redeemer College-Redemptorists on 7th Street (“PUD Site”). The PUD Site is approximately 10.2 acres. The entire St. Paul’s Campus site, including the PUD Site, is approximately 19.68 acres. The proposed development will not impact the existing 4-story St. Paul’s College building that will remain on the adjacent remaining acreage of the Campus. The entire Campus is located in the Institutional Land Use Category as shown on the District of Columbia Comprehensive Plan Future Land Use Map.

The Applicant will build a 237 townhome community (“Project”), composed of three and four story, attached single-family homes constructed in two phases. The homes themselves, featuring front yards and optional front porches, will be oriented to create an active and pedestrian friendly streetscape, with vehicular access and garages located in the rear of the units accessed from private alleys. The Project will provide homeownership opportunities in an underserved part of the District, and provide 24 townhomes that will satisfy the requirements for affordable housing.

¹ St. Paul’s College is the current owner of the site. The Applicant is the contract purchaser of approximately 10 of the 20-acre campus.

The Campus is currently in the R-5-A Zone District. The Applicant requests a Zoning Map Amendment for the PUD Site from the R-5-A Zone District to the R-5-B Zone District to accommodate the proposed development plan. The Zoning Map amendment will allow for a more appropriate density given the Institutional Land Use designation in the Comprehensive Plan, the PUD Site's proximity to the Metrorail station, the size of the Property, and the urban character of the area. The proposed height of the townhomes will vary from approximately 38 feet to 48 feet, and the floor area ratio ("FAR") of the Project will be 1.27.

B. Current Owner and Applicant

St. Paul's College is the current owner of the property. St. Paul's College, established in 1914, is the house of studies for Paulist seminarians. The Paulist Fathers maintain their seminary program at St. Paul's College and seminarians attend either The Catholic University of America or the Washington Theological Union for graduate studies in theology. Additions to the existing St. Paul's College building were constructed in 1942 and 1955 and several renovations have been made to the College over the years. The Paulists invested significantly in the restoration of the College building which was recently completed. The Paulist Fathers have been outstanding stewards of the land and very accommodating to the surrounding neighborhood and the Brookland area. They have invested heavily in their own facility to maintain a presence in the District of Columbia.

EYA, LLC, formerly Eakin/Youngentob Associates, was established in 1992 by Terry Eakin and Bob Youngentob, with the vision of building innovative urban neighborhoods to the highest standards. The company has made its name and reputation by creating high quality, lifestyle friendly, residential communities throughout the Washington Metropolitan Area. Working closely with local citizen groups, property owners, and governmental planning and

architectural review boards, EYA has developed communities that enhance and become a part of existing neighborhoods.

C. Project Goals and Objectives and Benefits of Using the PUD Process

The Applicant's goals are to invest in the community, create new homeownership opportunities for residents of the District and Ward 5 in an area that is easily accessible to mass transit, invigorate the neighborhood, and encourage nearby retail. The Project will infill a currently vacant portion of Lot 808, which will strengthen the surrounding neighborhood of Brookland. The PUD process is the appropriate means of making this happen in that it gives the community and District agencies the tools to ensure that the Project is well-designed and best meets the needs of the community while making sure the density is appropriate and the architecture is compatible to both St. Paul's College campus and the surrounding neighborhood.

D. Development Timetable

The Applicant hopes to start construction by summer of 2009 and expects that the total construction period will last approximately 60 months.

II. THE PROJECT SITE

A. Site Location

The PUD Site, as shown on Sheet No. C-42 prepared by VIKA, Inc. and dated April 2, 2008 (Exhibit A) of this PreHearing Submission, is composed of approximately 10.2 acres, approximately 444,312 square feet. It is situated in the Brookland/Edgewood neighborhood and is currently improved with St. Paul's, four story College building, constructed in 1914. The Campus is irregularly shaped and is bounded by 4th Street, N.E. to the west; Hamlin Street and Jackson Street, N.E. to the east; 5th and 6th Street, N.E. to the south; and the office building of the United States Conference of Catholic Bishops site to the north.

The Campus is located in the R-5-A Zone District (see Exhibit A) which is the predominant zone in the area north, west, and immediately east of the property. Directly to the south of the property, there are properties in the R-4 and R-5-D Zone Districts. The PUD Site is currently undeveloped and the Project will have no impact on the existing 4-story brick St. Paul's College building which is located in the middle of Lot 808. The PUD Site is approximately one-half mile from the Brookland/Catholic University Metrorail Station.

The site topography has its high point at the St. Paul's College building, with an approximate elevation of 200 feet, sloping away in all directions to a low elevation of 167 at Hamlin Street. The area southwest of the St. Paul's College building is mainly characterized as pastoral (open grass field with gentle slopes in the 0-6% range immediately adjacent to the terminus of 5th and 6th streets). To the southeast and east of the St. Paul's College building, the slopes are gradually increasing to the 10-15% range. The area is largely open fields interspersed with mature trees, typical of a campus setting. Two large open fields with slopes in the 2-4% range are located to the north and northeast of the St. Paul's College building. These fields are located at elevations 190 and 180 respectively and are separated from each other by an area of 15% slopes.

B. Project Description

The architectural drawings and plans depicting the design and layout of the Project are attached as Exhibit B. Detailed Architectural, Engineering and Landscaping Plans are contained in a separate Appendix to this Pre Hearing Submission. The Project will be a 237 unit townhome community built in two development phases.

As shown on the attached Exhibit B, a new street system will be created to serve the clusters of the townhomes and to link the development to the surrounding roadway network. Connecting Hamlin and Jackson Streets will eliminate the dead ends that currently exist, create

an urban connectivity within the community and provide alternative access to the PUD Site and the adjacent offsite properties. These private roadways will be a minimum of 25 feet, without parking, and 27 feet with parking on one side. The private alleys will have a 20 foot minimum actual pavement width. Additionally, the existing alleyway between 5th and 6th Street will be widened to provide circulation and access to the development from the south.

The proposed townhomes will vary in width from 14 feet to 18 feet, with a typical depth of 36 feet with either one or two parking spaces accessed from alleys. Each unit will be either three or four stories. Almost all of the homes will have the potential for outdoor living space with an optional roof terrace on the upper level. Approximately one-third of the homes will have private yards. The facades of the majority of the townhomes have been designed in a traditional brick porch-front vernacular that is predominant to the area, with siding used on loft and alley facades; a variety of color schemes will be predetermined for the entire site to ensure an appealing streetscape. The roofs will be constructed with architectural grade asphalt shingles (with rubber membrane used on flat roof areas). The homes located near the existing historic St. Paul's College building have been designed in a complimenting architectural style, in an effort to provide for a cohesive environment and a seamless transition to the more traditional architecture. The facades of these homes will be detailed and constructed with stone veneer and precast materials for all the public facades, with siding being used in the private alleys in the rear.

The total gross floor area included in the PUD is 565,851 square feet which equates to a FAR of 1.27, below the matter-of-right FAR (1.8) of the R-5-B Zone District. The townhomes will have heights of between 38 feet and 48 feet, less than the 50-foot height permitted in the R-5-B Zone District. The R-5-B District requires one parking space for every dwelling unit, resulting in a need for 237 spaces. The PUD will contain a total of 403 parking spaces.

C. Tabulation of Development Data

Site Area: 444,312 square feet

Requirement	R-5-B Matter of Right Guidelines	PUD Guidelines	Project Design
FAR	1.8	3.0	1.27
Building Height	50 feet	60 feet	38 feet – 48 feet
Lot Occupancy	60%	60%	31%
Gross Floor Area	799,762 square feet	1,332,936 square feet	565,851 square feet
Rear Yard	4 inches per foot of height, but not less than 15 feet	4 inches per foot of height, but not less than 15 feet	Varies 3.5 – 13.5 feet
Side Yard	Not required, but if provided, shall be at least 3 inches per foot of height, but not less than 8 ft wide	Not required, but if provided, shall be at least 3 inches per foot of height, but not less than 8 ft wide	Varies 1 – 30 feet
Parking	251 spaces	251 spaces	403 spaces

D. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning constraints. The PUD Regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require the approval of the Board of Zoning Adjustment (“BZA”). The Applicant is requesting relief from the strict application of the rear and side yard requirements of the Zoning Regulations in some cases and approval of a theoretical lot subdivision, see Exhibit A.

III. PUD EVALUATION STANDARDS

This PUD will achieve the goals of the PUD process by providing high quality residential development on the Property with significant public benefits to the neighborhood and the District as a whole.

A. Urban Design and Architecture

The Project employs the basic elements that have characterized urban form in Washington, D.C. for decades. Pedestrian friendly streets are defined by elements such as buildings close to the street, front porches, street trees, on-street parking, residential garages accessed from alleys, and narrow, low-speed travel lanes. The high quality pedestrian network and public realm makes walking pleasurable. There will be no gates or barriers preventing members of the public from gaining access to the site. An interconnected street grid network disperses automobile traffic and facilitates pedestrian movement, connecting the homes to the public streets and integrating the entire development into the existing neighborhood. The plan incorporates a mix of housing types and price ranges.

The proposed townhomes are designed to complement and elevate the level of architectural quality and design in this area of the District, and aim to set a design standard for new construction in the community. The facades of the majority of the townhomes have been designed in a traditional brick porch-front vernacular that is predominant in the area, with siding used on loft and alley facades; a variety of color schemes will be predetermined for the entire site to ensure an appealing streetscape. The roofs will be constructed with architectural grade asphalt shingles (with rubber membrane used on flat roof areas). The homes located near the existing historic St. Paul's College building have been designed in a complementing architectural style, in an effort to provide for a cohesive environment and a seamless transition to the more traditional architecture. The facades of these homes will be detailed and constructed with stone veneer and precast materials for all the public facades, with siding being used in the private alleys in the rear.

B. Site Planning

The proposed density of the Project is appropriate for the Property. The FAR (1.27) and lot occupancy (31%) of the Project are well within the matter-of-right standards for the R-5-B

Zone District. The Project makes efficient use of the site, employing a general pattern of orthogonal streets and blocks. The site is laid out in the tradition of older neighborhoods, with small blocks with housing types arranged to complement active streets, parks and landscaped courtyards. The PUD plan serves the broader community by using street and pedestrian networks to link adjoining neighborhoods, and by providing direct access to a central green. The plan provides sidewalks, street trees, and on-street parking, slowing automobile traffic and promoting pedestrian activity; this, in turn, encourages the casual meetings that form the bonds of community. Neighborhood streets are laid out to create efficient blocks for building sites and to shorten pedestrian routes.

C. Effective and Safe Vehicular and Pedestrian Access

The Project provides “effective and safe vehicular and pedestrian access,” which the PUD Regulations consider to be a public benefit and project amenity. The Project will provide four points of access: 5th, 6th, Hamlin and Jackson Streets, N.E. The connections to the surrounding streets allow pedestrians and vehicular traffic to enter and exit the development safely and efficiently. The new internal road system allows for two way traffic. Safe and ample sidewalks will be created along the surrounding public streets and throughout the site to encourage pedestrian activity and to mitigate pedestrian/vehicular conflicts.

Wells & Associates, LLC has analyzed the impacts of the proposed project on the surrounding street system. The full Transportation Impact Study is contained in the Previous Submission with the PUD application materials, a summary is attached as Exhibit C.

D. Housing and Affordable Housing

Production of housing and affordable housing is a public benefit that the PUD process is designed to encourage. In support of this important goal, the proposed PUD project will add 237 new, for-sale residential units to the Brookland neighborhood. As noted above, the Project will

include 24 townhomes of affordable housing, 12 at 80-120% median income and 12 at 50-80% median income.

E. Revenue for the District

The addition of 237 new households will result in the generation of significant additional tax revenues in the form of property, income, sales and employment taxes for the District.

F. First Source Employment Program

Section 2403.9(e) of the Zoning Regulations states that “employment and training opportunities” are representative public benefits and project amenities. The Applicant will enter into an agreement to participate in the Department of Employment Services (“DOES”) First Source Employment Program to promote and encourage the hiring of District of Columbia residents during the development and construction process.

G. Uses of Special Value to the Neighborhood

The Applicant consulted with various community members, ANC Commissioner Silas Grant, (5C-09) and representatives of Ward 5 Councilmember Harry Thomas’ Office to develop a community amenities package that addresses the needs and desires of the surrounding area. After several meeting with the ANC and the Councilmember Thomas’s staff, the Applicant proposes a contribution of approximately \$1.56 million dollars to the community in the form of improvements to public infrastructure in the area and the nearby Triangle Park.

1. *The “Triangle Park:”* The Applicant will make \$315,000 in improvements to the District of Columbia’s Department of Parks and Recreation’s “Triangle Park” bounded by 4th Street, Lincoln Road and Franklin Street, N.E. This park is within 150 feet of the Campus. The Applicant plans to plant street trees; install sidewalks, lights and outdoor furniture; construct a cast iron fence around the perimeter; and create a stone dust paths through the park. The beautification of

this park will create a more inviting open space for the enjoyment of the entire community of Brookland. A concept plan for this park is shown on Exhibit D as well as the proposed Agreement with the Department of Parks and Recreation for this work.

2. *Improvements to the Public Infrastructure:* The Applicant will spend approximately \$1.25 million dollars to improve the existing infrastructure (sidewalks, street trees, new curbs and gutters, water mains, storm sewers, etc) for 4th, 5th, 6th and Hamlin Streets, N.E. A location map of these improvements is attached as Exhibit E. Although some of this work is needed for the Project, approximately 80% of the work will directly benefit the surrounding community. These improvements will benefit, as well as beautify, the existing neighborhood.

IV. RESPONSES TO ZONING COMMISSION AND OFFICE OF PLANNING

This Pre Hearing Submission reflects revisions made to the original application filed on September 14, 2007. It responds directly to comments by members Zoning Commissioners made at the November 19, 2007 Set Down Meeting and those of the Office of Planning as noted in its November 9, 2007 Preliminary Hearing Report and in subsequent meetings with staff.

A. Density

Concerns were raised that the plan appeared “a bit tight” and “too crammed”. In response, the site plan has been revised and 14 townhomes have been eliminated from the project. This reduction allowed for an increase in the size of the Corner Park by approximately 5,000 square feet, or 50%. It also afforded the opportunity to significantly widen the natural buffer along the eastern property line, and increase the setbacks of the homes to the new streets to create a more pedestrian friendly experience.

In addition, the new plan eliminates the large homes that were used to close off the courtyards and instead have opened those courtyards to the surrounding neighbors creating better visual connections and cohesion with the surrounding community. Lastly, the 5th and 6th Street connections to the site have been redesigned in response to community input we received. This resulted in a number of important advantages to the plan. First, the new plan now maintains the existing alignment of 5th and 6th Streets, allowing for a seamless transition between the existing neighborhood and the new homes. Second, the alleyway was redesigned and homes were reoriented so that the existing neighbors have views of the fronts or sides of the new homes, not the rear elevations. Third, the surface parking area has been eliminated. Finally, a sizable triangular open area was created to serve as a buffer and suitable for a play structure.

B. Affordable Housing

Notwithstanding the reduction in the total number of units by 14, the plan adds an additional affordable unit to a total of 24 affordable for-sale, single-family homes at income levels of between 50% and 80% of area median income adjusted for family size. This represents a significant contribution to affordable housing by the Applicant. Further, the affordable homes will match the market rate homes proportionally in the number of bedrooms (two and three bedrooms standard). Lastly, the affordable homes will be disbursed throughout the community as shown on Exhibit F and their exteriors will be of a design and materials standard of quality equal to the market rate homes.

C. Parking

The Office of Planning expressed a concern with the amount of parking that was proposed in the original application (542 spaces) given the proximity of the site to Metrorail service. Thus, the Applicant has reduced the parking to 403 spaces, approximately 1.7 spaces per dwelling unit.

D. Environmental Impacts

The Applicant has worked closely with its consultant team to improve the environmental impact of the Saint Paul's development and commits to building a community that meets the current standard for LEED ND Certification (Exhibit G). The Applicant notes that the PUD has been recognized by the Washington Smart Growth Alliance (Exhibit H) as a Smart Growth Project.

E. Public Improvements:

The Applicant has worked closely with community groups, the ANC 5C-09 Commissioner, Councilmember Thomas' staff, and the Department of Parks and Recreation to develop a plan for creating a vibrant and inviting urban park on what is now an unkempt and underutilized space (Exhibit D). Specifically, EYA has agreed to plant trees; install lights, sidewalks, and outdoor furniture; construct an iron fence around the perimeter; and maintain these improvements for one year from completion of their installation. This contribution of materials and labor is estimated to be \$315,000.

F. Streetscape Improvements

In addition to commitments to affordable housing and Triangle Park, the Applicant will make infrastructure improvements in the blocks proximate to the development site (Exhibit E). The improvements proposed include new and separate storm water lines, important water connections to create a looped system improving both water quality and flows, repairs to roads, curb and gutters, and sidewalks, and the replacement of street trees. While this scope requires additional input from WASA, the cost is estimated to be approximately \$1.25 million.

G. Community Participation

The Applicant has worked closely with single member ANC 5C Commissioner Silas Grant and Councilmember Thomas and his staff to ensure that the community is fully informed

on the plan and has had ample opportunity to provide input and feedback. The plan has been greatly enhanced through the comments received in the 10 public presentations that have been made over the past nine months (Exhibit I). This outreach will be continued to ensure that the plan is implemented in a way that is least disruptive to our neighbors and that ultimately enhances the community.

V. COMPLIANCE WITH COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies enumerated in the new Comprehensive Plan, adopted in 2006 (the “Plan”).

The Project significantly advances these purposes by furthering the social and economic development of the District through the creation of 237 new residential units on currently vacant land, with a significant affordable housing component, enhancing the urban environment in the immediate neighborhood.

A. Compliance with Citywide Elements

The Project serves the goals of several of the citywide elements of the Comprehensive Plan.

1. Land Use Element

The Plan cites the importance of transit-oriented development. (§306.1). The Project will be located one-half mile, a ten minute walk, from the Brookland/CUA Metrorail Station. As such, it fulfills the Plan’s desire for infill development. Furthermore, the Project has been designed to be completely complementary to the surrounding neighborhood. The townhomes with the front yards, front stoops, and projecting bays adorning each townhome and sidewalk system, creates an attractive and intrinsically walkable community with usable green space.

2. Transportation Element

The Plan states that “although the District has already developed walkable, transit-oriented neighborhoods, future opportunities will arise to strengthen the linkage between land use and transportation as new development takes place.” (§403.2). The development of 237 townhouses close to the Brookland-CUA Metrorail Station, will encourage people to live within the District and utilize public transportation resulting in a decrease in automobile traffic. The Plan promotes smart growth as a regional solution, “a regional strategy of promoting infill, mixed-use and transit-oriented development in urbanized areas is needed to ensure transportation efficiency both in the District and the region.” (§405.3). This site is also well served by the Metrobus service.

The Applicant will enhance the existing road network of the District by creating an effective and safe internal street system. Furthermore, the sidewalks of the proposed development will be connected to the existing sidewalk system on 5th, 6th, Hamlin and Jackson Streets, N.E. The sidewalks on these streets will be safer and more user-friendly with the integration of a complete pedestrian sidewalk system for the surrounding neighborhood.

3. Housing Element

The Housing Element of the Plan seeks to ensuring housing affordability; [f]ostering housing production [and] [p]romoting home ownership. The Comprehensive Plan’s primary residential neighborhood objectives include the enhancement and stabilization of the District’s neighborhoods and the protection of residential neighborhoods from non-residential and disruptive uses. The Property is located in a residential and institutional neighborhood. A new development of townhomes in this neighborhood will not be disruptive, and in fact provides a new type of residential opportunity for existing residents of the neighborhood. No displacement of residents will occur as a result of this application.

4. Environmental Protection Element

The Plan seeks to encourage the planting of street trees and the “use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity.” (§603.6, 603.7). There is an extensive landscape plan providing for abundant trees comprehensive and creative stormwater treatment. The Low Impact Development (“LID”) strategy included in this project will both reduce stormwater runoff and help treat stormwater prior to it leaving the Property.

The Project proposes elements to improve water quality through the following initiatives:

- a. The proposed development will construct four structural underground storm water management devices (either storm filters or sand filters) in addition to utilizing the existing facility at the northwest corner of St. Paul’s College. These underground facilities will improve the water quality and reduce the peak flows from the site;
- b. This proposed development will have a rain garden to treat the roof and paved parking areas of some of the buildings;
- c. The Project proposes a vegetative swale (bio-filtration) along the private roadway in front of some of the buildings;
- d. The existing neighborhood water mains that terminate at the limits of the site will be looped and interconnected throughout the site to help to improve the overall water system;
- e. On-site, the Project will separate the storm water and sewer into separate systems; and
- f. The Project will construct new storm drains in Hamlin Street, Jackson Street, and 5th Street for approximately one block to locations where sufficient capacity is available in the existing infrastructure to accommodate the storm water run-off from the Project.

In addition, the Project will promote environmental sustainability by complying with the U.S. Environmental Protection Agency and the U.S. Department of Energy’s Energy Star Program for new homes and the equivalent of the LEED – ND certification from the U.S. Green Building Council. For example, the homes will have low-e glass on all windows, third-party

certified duct leakage performance, third-party certified building envelope air filtration performance, Energy Star appliances, Energy Star HVAC equipment, Energy Star front doors, just to name a few. Energy Star qualified homes offer homebuyers all the features they want in a new home, plus energy-efficient improvements that deliver better performance, greater comfort, and lower utility bills.

5. Parks, Recreation, and Open Space Element

The Comprehensive Plan specifically recognizes the value of functional open space. It goes on to state that “such spaces are particularly important in neighborhoods like Brookland, where conventional parks are in short supply. There and elsewhere in the District, the grounds of seminaries, hospitals, and cemeteries are informally serving some of the functions usually associated with a neighborhood park.” (§817.1).

Many of the townhomes will open onto shared courtyards of varying width and length. These courtyards will feature outdoor seating areas and panels of lawn surrounded by lush and diverse plantings of flowering and evergreen shrubs, herbaceous perennials, and ornamental grasses. The Project will have a primary public open space, a 14,000 square foot park with a relatively level expanse of lawn punctuated by shade trees and surrounded by masonry seat walls and retaining walls, benches, and mixed border plantings of ornamental trees, shrubs, herbaceous perennials, and ornamental grasses. The park will be suitable for both active and passive recreational activities. In the southeast corner of the park a paved plaza will serve as a community gathering place, with stadium-style seating surrounding the plaza and a focal feature consisting of a specimen tree or sculpture.

In addition, one of the public amenities, as discussed above, is the improvement of the existing public Triangle Park located a short distance away.

6. Urban Design Element

The Urban Design Element of the Plan seeks to, among other goals, strengthen civic identity through a renewed focus on public spaces and boulevards; designing for successful neighborhoods and large site reintegration; improving the public realm, particularly street and sidewalk space; and promoting design excellence throughout the District.

The proposed development will reflect the beneficial architectural qualities of the surrounding residential neighborhoods, including St. Paul's College. In site planning and architectural detailing, the Project will emphasize and help strengthen a neighborhood identity for this area while still creating a new development that is in harmony with the strong architectural character of St. Paul's College. The Project proposes an appropriate number and density of residential units, while allowing for sufficient private and public open space for the residents. The townhomes are oriented towards the street at the front, yet also have automobile access through the rear alleys.

B. Compliance with Area Element

The Comprehensive Plan also contains ten area elements, with the Campus and PUD Site located in the Upper Northeast Area Element. The Project is consistent with this Element of the Plan.

1. Guiding Growth and Neighborhood Conservation

The Upper Northeast Area Element lists as a priority, future development around certain Metrorail Stations, such as the Brookland/CUA Station and instructs to "capitalize on the presence of the Metro stations . . . to provide new transit-oriented housing, community services, and jobs." (§2408.4). The creation of 237 new townhouses so close to this Metrorail Station will capitalize on the presence of this Metro Station and will improve transit ridership on both Metrorail and Metrobus.

2. Conserving and Enhancing Community Resources

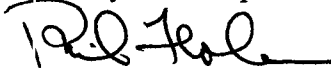
The Upper Northeast Area Element recognizes the importance of institutional open space to the character of this area. "In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces." (§2409.7). As explained above, the development's primary public open space will be a 14,000 square foot on-site park. In addition, the Applicant is proposing to make improvements to the landscaping of the nearby, off-site Triangle Park.

VI. CONCLUSION

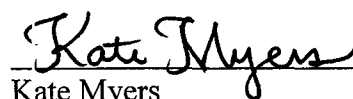
For the foregoing reasons, the Applicant submits that the consolidated PUD and Zoning Map amendment application, together with this Pre Hearing Submission meet the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, and safety and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment; provide significant public benefits; and advance important goals and policies of the District of Columbia.

Accordingly, the Applicant respectfully requests the Zoning Commission set the PUD and accompanying Zoning Map amendment applications down for a public hearing at the earliest possible date.

Respectfully submitted,
Pillsbury Winthrop Shaw Pittman LLP



Phil Feola



Kate Myers

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