

**United House of Prayer
For All People
625 Rhode Island Avenue, NW**

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

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ZONING COMMISSION
District of Columbia

CASE NO. 09-05
EXHIBIT NO. 4

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B	Portion of Zoning Map
C	Portion of Sanborn Map and Baist Atlas
D	Building Plat
E	Portion of Future Land Use Map
F	Portion of Generalized Policy Map
G	Traffic Impact Study
H	Certificate of Notice, Notice of Intent, and Property Owner List

I. INTRODUCTION

This statement and the attached documents are submitted by the United House of Prayer for All People (the "Applicant" or "House of Prayer"), as owner of Lots 115, 116, 117, 118 and 119 in Square 442 (the "Subject Property"), in support of its applications to the Zoning Commission for the District of Columbia (the "Commission") for the consolidated review and approval of a Planned Unit Development ("PUD") and a zoning map amendment to rezone the Subject Property from the R-4 District to the C-2-B District.

The Subject Property has a land area of approximately 16,320 square feet and is located on the north side of Rhode Island Avenue, N.W., between 6th and 7th Streets, N.W. The Subject Property is located in the R-4 District. The property has approximately 93 feet of frontage on Rhode Island Avenue, N.W.

Square 442 is bounded by S Street, N.W. to the north, 6th Street, N.W. to the east, Rhode Island Avenue and R Street, N.W. to the south, and 7th Street, N.W. to the west. The site is within walking distance of the Shaw-Howard University Metrorail Station, which has an entrance located on the north side of R Street, between 7th and 8th Streets, which is approximately 450 feet from the Subject Property, and an entrance located at the northeast corner of 7th and S Streets, which is approximately 600 feet from the Subject Property.

As shown on the area photographs and existing conditions survey included in the Architectural Plans and Elevations attached hereto as Exhibit A, a large portion of the Subject Property is unimproved and the remaining portion is improved with four, two-story row dwellings which the Applicant proposes to raze in connection with

redevelopment of the Subject Property. A small parcel of land owned by the District and a 15-foot wide public alley are located to the immediate west of the Subject Property. A 20-foot wide public alley abuts the northern portion of the Subject Property. An approximately 3-story building is located to the immediate east of the Subject Property. The District's tax records indicate that this building is used for "hotel/motel" uses.

Although not included in this application, the Applicant also owns the following properties in the square:

- 1713 7th Street N.W., which is a mixed-use building that includes 32 residential units, including 12 assisted living units, and 3,290 square feet of retail use;
- 1721 7th Street N.W., which is the Applicant's church building and can accommodate up to 400 parishioners in the main sanctuary;
- 1731 7th Street N.W., which is a mixed-use building that includes 8 residential units and 1,160 square feet of retail use;
- 1739 7th Street N.W., which is a mixed-use building that includes 8 residential units and 3,500 square feet of retail use;
- 628 S Street N.W., which is a single family residential building; and
- 626 S Street, N.W., which is a mixed-use building that includes 15 residential units and 1,070 square feet of retail use.

The eastern portion of the Subject Property is designated in the Moderate Density Residential land use category and the western portion of the Subject Property is designated in the Medium Density Commercial/Medium Density Residential categories on the District of Columbia Comprehensive Plan Future Land Use Map. The Subject

Property is designated in a Neighborhood Enhancement Area on the District of Columbia Comprehensive Plan Generalized Policy Map.

The area surrounding the Subject Property is characterized by a mix of residential and commercial uses. In Square 442, the property to the east of the Subject Property and along 6th Street, N.W. includes single-family row dwellings that range from two to three stories in height and a three-story building. There are commercial uses and some vacant property located in the square along S and 7th Streets, N.W. Square 444, which is located across Rhode Island Avenue and to the south of the Subject Property, includes single-family row dwellings, flats, and a five-story multiple dwelling building. Additional multiple dwelling buildings are located to the west and northwest of Square 442.

Square 442 is split-zoned R-4 and ARTS/C-2-B, with the ARTS/C-2-B zoning running north-south along 7th Street and the R-4 zoning located generally to the east of the public alley which divides the square. The property to the east of Square 442 is also zoned R-4 zoning, while the area to the south is zoned R-4 and C-2-A, the area to west is zoned ARTS/C-2-B and R-5-D, and the area to the north is zoned R-4 and ARTS/C-2-B.

The Applicant is seeking consolidated PUD approval to develop a multiple-family dwelling building on the Subject Property in accordance with the C-2-B PUD zoning requirements. The project will contain approximately 57,120 square feet of gross floor area, with an overall FAR of 1.97 and a maximum building height of approximately 48.6 feet. The project will include a total of 16 residential units, 8 of which will be affordable to households earning 60 – 80% of the area median income ("AMI"). The project also includes 11 surface parking spaces which will be accessed from the public alley adjacent to the Subject Property.

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.

II. PROJECT DESCRIPTION

A. Background

The House of Prayer is a non-profit organization dedicated to establishing, maintaining and perpetuating the doctrine of Christianity and the Apostolic Faith throughout the world among all people. In an attempt to encourage its members, especially those with families, to maintain residence in the city, the House of Prayer has been committed to providing affordable quality housing opportunities for its members and the community. Over the past several years, the House of Prayer has constructed three very successful multi-family buildings within Square 442. A number of these buildings offer urban amenities such as beautifully landscaped outdoor spaces as well as spacious, family-sized apartments, some of which include three bedroom units. Similar to the House of Prayer's other developments in the square, the proposed PUD includes quality urban housing, open green space, covered bike storage and shared parking on a currently under-utilized urban site.

The project has been designed to incorporate a number of architectural and urban design standards and best practice principles appropriate for a project on a major corridor, including:

- Augmenting existing diverse neighborhood resources with an affordable housing product and an open green space.
- Creating a streetscape environment that is pleasant, safe and effective as a pedestrian experience for walking, socializing and recreation.

- Designing according to smart growth principals with increased density on an underutilized site and in close proximity to the Metro, shopping and the workplace.
- Integrating architecture that is appropriate in scale and character for a mixed-use corridor, but respectful of the adjacent lower scale residential fabric.

The project sets an example of quality urban life by employing living roofs, family-oriented dwelling units with private outdoor spaces, natural ventilation and day-lighting, and an innovative shared parking solution - all with economy and environmental efficiency. Four stories of apartments increase efficiency of structural and mechanical systems. Large two and three bedroom apartments provide options to encourage families with children to stay in the city. Setting a good example for 21st century urban architecture, clean lines and straight-forward design allow the building to be compatible with the surrounding architecture. A review of the design and materials will reflect that, as is the case with all of the other United House of Prayer developments, this also will be a quality project.

B. Matter of Right Development under Existing R-4 Requirements

The Subject Property is currently zoned R-4. The Applicant is seeking to rezone the Subject Property to C-2-B in connection with this Application. The R-4 zoning classification is designed to include areas developed with row dwellings and dwellings for two or more families. 11 DCMR § 330.1. R-4 Districts permit residential uses, child/elderly development centers, hospitals, churches, public and charter schools, and other similar uses as a matter-of-right. 11 DCMR § 330.5. The maximum permitted matter-of-right height in the R-4 District is 40 feet with a maximum of three stories. 11 DCMR § 400.1. The R-4 District requires a minimum lot area ranging from 1,800 square feet to 9,000 square feet (depending on the use), and a minimum lot width ranging from

18 feet to 120 feet (depending upon the use). 11 DCMR § 401.3. There is no prescribed maximum floor area ratio ("FAR") in the R-4 District. 11 DCMR § 402.4.

The maximum percentage of lot occupancy in the R-4 District ranges from 40% to 70%, depending upon the use. 11 DCMR § 403.2. Moreover, pursuant to Section 404.1 of the Zoning Regulations, a rear yard with a minimum depth of 20 feet must be provided for each structure in the R-4 District. Side yards generally are not required in the R-4 District. However, if a side yard is provided, it must be at least three inches wide per foot of building height, but not less than eight feet. 11 DCMR §405.6.

Where an open court is provided in the R-4 District for anything other than a one-family dwelling, the court must have a minimum width of four inches per foot of height of court, but not less than ten feet. 11 DCMR §406.1. Where a closed court is provided in the R-4 District for anything other than a one-family dwelling, the court must have a minimum width of four inches per foot of height of court, but not less than fifteen feet, and an area of twice the square of the required width of court dimension based on the height of court, but not less than 350 square feet. Id.

An apartment house or multiple dwelling in the R-4 District is required to provide one parking space for each three dwelling units. 11 DCMR §2101.1. The loading requirement for an apartment house or multiple dwelling with 50 or more dwelling units in all zoning districts is one loading berth at 55 feet deep, one loading platform at 200 square feet, and one service/delivery loading space at 20 feet deep. 11 DCMR §2201.1.

C. Matter of Right Development under Proposed C-2-B Requirements

The Applicant proposes to rezone the Subject Property to C-2-B in connection with this Application. The C-2-B District is designed to serve commercial and residential functions similar to the C-2-A District. 11 DCMR § 720.6. The C-2-B Districts are

compact and located on arterial streets, in uptown centers, and at rapid transit stops. 11 DCMR § 720.7. Buildings may be entirely residential or a mixture of residential and commercial uses in the C-2-B District. 11 DCMR § 720.8. The C-2-B District includes the following development requirements:

- A maximum matter-of-right height of 65 feet with no limit on the number of stories (§770.1), and a maximum height of 90 feet under the PUD requirements (§2405.1);
- A maximum matter-of-right FAR of 3.5, all of which may be devoted to residential use, but not more than 1.5 of which may be devoted to non-residential uses (§771.2);
- A maximum FAR of 6.0, all of which may be devoted to residential use, but not more than 2.0 of which may be devoted to non-residential uses under the PUD requirements (§2405.2);
- A maximum lot occupancy of 80% (§772.1);
- A minimum rear yard depth of 15 feet (§774.1);
- If provided, a side yard at least two inches wide per foot of building height, but not less than six feet (§775.5);
- If provided, a minimum court width of four inches per foot of height, but not less than fifteen feet (§776.3) and in the case of a closed court, a minimum area of at least twice the square of the width of court, but not less than 350 square feet (§776.4);
- For an apartment house or multiple dwelling, 1 off-street parking space for each 3 dwelling units (§2101.1); and

- For an apartment house or multiple dwelling with 50 or more dwelling units, one loading berth at 55 feet deep, one loading platform at 200 square feet, and one service/delivery loading space at 20 feet deep (§2201.1).

D. Tabulation of Development Data

The tabulation of the project's development data is included in the Architectural Plans and Elevations attached hereto as Exhibit A.

E. 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 the following provisions of the Zoning Regulations. As permitted under section 2403, the Commission may grant such flexibility in its discretion.

1. Flexibility From Roof Structure Requirements

The Applicant requests flexibility from the roof structure requirements of the Zoning Regulations because, as shown on the Roof Plan sheet included in the Plans, there will be multiple roof structures (§411.3 and §770.6(a)), and each roof structure cannot be setback from all exterior walls a distance equal to its height above the roof (§§ 411.2 and 770.6(b)).

Each roof structure is a necessary feature and the structures have to be separated due to the building code requirement to provide separate means of egress for buildings, as well as the desire to break up massing on the roof. Moreover, the location and number of structures on the roof is driven by the layout and design of the residential units within the building. In addition, the Applicant is providing the greatest setbacks possible given the size of the roofs and the internal configuration of the proposed building. The requested roof structure design will not adversely impact the light and air of adjacent buildings

since each element has been located to minimize its visibility. Therefore, the intent and purposes of the Zoning Regulations will not be materially impaired and the light and air of adjacent buildings will not be adversely affected.

2. Additional Areas of Flexibility

The Applicant has made every effort to provide a level of detail that conveys the significance and appropriateness of the project's design for this location. Nonetheless, some flexibility is necessary that cannot be anticipated at this time. Thus, the Applicant also requests flexibility in the following areas:

- a. To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, and mechanical rooms, provided that the variations do not change the exterior configuration of the building.
- b. To vary the final selection of the exterior materials within the color ranges and material types as proposed, based on availability at the time of construction without reducing the quality of the materials; and to make minor refinements to exterior details and dimensions, including curtainwall mullions and spandrels, window frames, glass types, belt courses, sills, bases, cornices, railings and trim, or any other changes to comply with the District of Columbia Building Code or that are otherwise necessary to obtain a final building permit.

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 2401.1

The Subject Property has a land area of 16,320 square feet. The Zoning Regulations require a minimum land area of 15,000 for a PUD to be located in the C-2-B District. 11 DCMR § 2401.1(c). Thus, the Subject Property meets the area requirement of Section 2401.1.

2. Height and FAR Requirements under Sections 2405.1 and 2405.2

The PUD regulations permit a maximum building height of 90 feet and a maximum FAR of 6.0 in the C-2-B District. 11 DCMR §§ 2405.1 and 2405.2. The project has a maximum building height of approximately 48.6 feet and a FAR of 1.98, and thus meets the PUD height and FAR requirements.

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 which carefully considers the nearby uses and accordingly, will have a minimal impact on the area. Moreover, as indicated in the Traffic Impact Study attached hereto as Exhibit G, the proposed development will not have an adverse impact on existing or future traffic conditions and will, in fact, positively affect traffic operations in the area.

4. Not Inconsistent with Comprehensive Plan under Section 2403.4

As discussed at length in Section IV below, the PUD project is not inconsistent with the Comprehensive Plan.

C. Public Benefits and Project Amenities

1. Overview

The PUD guidelines require the evaluation of specific public benefits and project amenities for a proposed project. Public benefits are defined as “superior features of a proposed planned unit development that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from the development of the site under the matter of right provisions....” 11 DCMR 2403.6. 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.

This project will help to achieve a number of the goals of the PUD process by creating a residential development with thoughtful, high-quality, environmentally-friendly design, including a significant affordable housing component, and landscaping and open space areas. These and the other significant public benefits and amenities, as

described in more detail below, reflect and implement the goals of the PUD process, the surrounding community and the District.

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

As shown on the Architectural Plans and Elevations, the project architect has designed a building that will have a positive impact on the visual character of the immediate neighborhood, and will thus further the goals of urban design and enhance the streetscape. Moreover, the project includes a significant amount of landscaping, garden and open space features.

3. First Source Employment Agreement (Section 2403.9(j))

Expanding employment opportunities for residents and local businesses is a priority of the Applicant. Therefore, the Applicant will enter into a First Source Employment Agreement with the Department of Employment Services.

4. 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 includes 29,144 square feet of residential gross floor area, half of which will be designated as affordable housing units for households earning 60 – 80% of the AMI. This substantially exceeds the amount of affordable housing that would be required under the Inclusionary Zoning requirements set-forth in Section 2603.1 of the Zoning Regulations. The affordable housing units will be distributed throughout the building in a ratio and locations consistent with the ratio and locations of the market rate units.

5. Environmental Benefits (Section 2403.9(h))

The Applicant is fully-committed to providing high-quality affordable housing in the District of Columbia. Through the development of this project, the Applicant will expand its commitment by ensuring the environmental, economic and social sustainability of the residents through the implementation of sustainable design features including:

- Design and construction of a compact development of at least 20 units per acre;
- The enhancement of a walkable neighborhood;
- The inclusion of bicycle parking in the project;
- Installation of water conserving fixtures;
- Use of Energy Star appliances and lighting fixtures;
- Installation of individual electricity meters;
- Use of an extensive green roof and paving to reducing the heat-island effect;
- Use of Energy Star-compliant and High-emissive roofing; and
- Use of low/no VOC (Volatile Organic Compounds) paints, primers, adhesives and sealants.

IV. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use Map and Generalized Policy Map, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

A. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District; and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. D.C. Code §1-245(b) (§ 1-301.62).

The PUD project significantly advances these purposes by promoting the social, physical and economic development of the District through the provision of a high-quality residential development on the Subject Property, without generating any adverse impacts.

B. Future Land Use Map

The Subject Property is on the boundary of an area designated in the Moderate Density Residential land use category and another area designated in the Medium Density Residential/Medium Density Commercial land use category on the District of Columbia Comprehensive Plan Future Land Use Map. The Moderate Density Residential designation is used to define the District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, and R-5-A Zone

districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations.

The Applicant's proposal to rezone the property from the R-4 District to the C-2-B District to construct a residential development on the Subject Property is consistent with the Comprehensive Plan designation of the Subject Property. The Applicant proposes to construct 1.97 FAR of residential use on the Subject Property, which is consistent with the amount of residential density permitted in moderate density zones (i.e., a PUD in the R-5-D District may have an FAR of up to 3.0). The project's height of 48.6 feet, with 4-stories, is also consistent with other low-rise residential uses in moderate density residential areas. Albeit a commercial zone, the proposed C-2-B zoning classification is specifically identified as a moderate density zone district, and the proposed project is all residential.

C. Generalized Policy Map

The Subject Property is designated in a Neighborhood Enhancement Area on the District of Columbia Comprehensive Plan Generalized Policy Map. Neighborhood Enhancement Areas are neighborhoods with substantial amounts of vacant residentially zoned land. They are primarily residential in character. Many of these areas are characterized by a patchwork of existing homes and individual vacant lots, some privately owned and others owned by the public sector or non-profit developers. These areas present opportunities for compatible small-scale infill development.

The guiding philosophy in Neighborhood Enhancement Areas is to ensure that new development “fits-in” and responds to the existing character, natural features, and existing/planned infrastructure capacity. New housing should be encouraged to improve the neighborhood. The unique and special qualities of each area should be maintained

and conserved, and overall neighborhood character should be protected as development takes place. New development in Neighborhood Enhancement Areas should improve the real estate market, reduce crime and blight, and attract complementary new uses and services that better serve the needs of existing and future residents.

The proposed PUD is consistent with this designation. The Applicant proposes to redevelop the Subject Property, which is currently an underutilized residentially-zoned site, and to construct a residential development on the Subject Property. As shown on the Architectural Plans and Elevations, this new development includes a significant amount of green space, and is compatible with the surrounding uses. Moreover, the project's height of 48.6 feet, with 4-stories, is consistent with the Moderate Density Residential designation of the Subject Property.

D. Compliance with Guiding Principles of the Comprehensive Plan

The Project is consistent with many guiding principles in the Comprehensive Plan for managing growth and change, creating successful neighborhoods, and building green and healthy communities, as set-forth in the Comprehensive Plan.

1. Managing Growth and Change.

In order to manage growth and change in the District, the Comprehensive Plan encourages, among other factors, the growth of both residential and non-residential uses. The Comprehensive Plan also states that redevelopment and infill opportunities along corridors is an important part of reinvigorating and enhancing neighborhoods. (§ 2.3, ¶ 217.6). The proposed PUD is fully-consistent with each of these goals. Redeveloping the Subject Property into a residential development will further the revitalization of the neighborhood.

2. Creating Successful Neighborhoods.

One of the guiding principles for creating successful neighborhoods is getting public input in decisions about land use and development, from development of the Comprehensive Plan to implementation of the plan's elements. (§ 2.3, ¶218.8). The proposed PUD furthers this goal since, as part of the PUD process, the Applicant has worked with Advisory Neighborhood Commission ("ANC") 2C, the ANC within which the Subject Property is located, to ensure that the development provides a positive impact to the immediate neighborhood. Indeed, ANC 2C voted unanimously 4-0-0 to support the proposed development.

3. Building Green and Healthy Communities.

One of the guiding principles for building green and healthy communities is that building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. (§2.3, ¶221.3) As discussed in more detail above, the building will include a significant number of sustainable design features.

E. Land Use Element

For the reasons discussed above, the Project supports the following policies of the Land Use Element:

1. Policy LU-1.3 Transit-Oriented and Corridor Development

The project exemplifies the principals of Transit-Oriented Development. The Subject Property is steps from multiple MetroBus stops. The site is within walking distance of the Shaw-Howard University Metrorail Station, which has an entrance located at the north side of R Street, between 7th and 8th Streets, which is approximately 450 feet from the Subject Property, and an entrance located at the northeast corner of 7th and S

Streets, which is approximately 600 feet from the Subject Property. In addition, the project is located on Rhode Island Avenue, N.W., which the District has targeted as a revitalization area in need of increased density and neighborhood retail and services. The development includes residential uses, and an attractive, pedestrian-friendly design, both of which will help to increase the vitality of this portion of Rhode Island Avenue.

2. Policy LU-1.4.1: Infill Development

The project is consistent with the goal of encouraging infill development on vacant land within the city, particularly in areas where there are vacant or underutilized lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. The development complements the established character of the area and does not create sharp changes in the physical development pattern.

3. Policy LU-2.2.4: Neighborhood Beautification.

Policy LU-2.2.4 encourages projects to improve the visual quality of the District's neighborhoods. As shown on Architectural Plans and Elevations, the Applicant's architect has designed the building to improve the visual aesthetic of the neighborhood. Moreover, the development of the site will be an improvement to the current neighborhood condition and will help to revitalize the area. The project also includes a significant amount of landscaped and open spaces which will help to enhance the streetscape.

F. Environmental Protection Element.

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. This element provides specific environmental policies, including the following:

- Encouraging the planting and maintenance of street trees in all parts of the city (Policy E-1.1.1);
- Encouraging 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 (Policy E-1.1.3);
- Promoting the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses (Policy E-2.2.1); and
- Promoting tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction.

As discussed in both the Environmental Benefits and Building Green and Healthy Communities sections of this statement, the proposed project includes street tree planting, landscaping, energy efficiency, and methods to reduce stormwater runoff, and is therefore fully consistent with the Environmental Protection Element.

G. Housing Element

The overarching goal of the Housing Element is to "[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia." 10 DCMR § 501.1. The proposed project will help achieve this goal by advancing the policies discussed below.

1. Policy H-1.1.1: Private Sector Support

The project helps to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the project will contain approximately 29,144 square feet of gross floor area devoted to residential uses, half of which will be designated as affordable units.

2. Policy H-1.1.5: Housing Quality

As shown on the Architectural Plans and Elevations included with this application, the project has been designed to include high-quality materials and design elements. Moreover, as previously stated, half of the residential units will be devoted to affordable housing. Consistent with this policy goal, the affordable units will meet the same high-quality architectural standards provided for the market-rate housing and will be indistinguishable from market rate housing in their exterior appearance.

3. Policy H-1.2.1: Affordable Housing Production as a Civic Priority

The Applicant is committed to increasing the amount of housing for low and moderate income households in the District. Thus, half of the residential units included in the project will be designated as affordable units for households earning 60 – 80% of the AMI, which is fully-consistent with this policy.

H. Urban Design Element

The proposed PUD is also consistent with a number of the policies included in the Urban Design Element of the Comprehensive Plan. Consistent with Policy UD-2.2.1: Neighborhood Character and Identity, and Policy UD-2.2.7: Infill Development, the proposed development will help to strengthen the architectural quality of the immediate neighborhood by relating the project's scale to the existing neighborhood context, while also avoiding overpowering contrasts of scale, height and density. In addition, as shown on the Architectural Plans and Elevations, the project includes an attractive, visually-interesting and well-designed building façade. See Policy UD-2.2.5.

The project is also consistent with the goals of Policy UD-3.2.5: Reducing Crime Through Design, since the development will bring additional "eyes and ears" to the area,

as well as adequate lighting, clear lines of sight and visual access, all of which will help to minimize the potential for criminal activity in the immediate area.

I. Transportation Element

Action T-2.3-A: Bicycle Facilities.

This element encourages new developments to include bicycle facilities. The Applicant proposes to include covered bicycle parking racks as amenities on the Subject Property in order to accommodate and encourage bicycle use.

J. Near Northwest Area Element

The proposed PUD is consistent with a number of policies in the Near Northwest Area Element of the Comprehensive Plan. Policy NNW-1.1.1 provides that infill developments in Near Northwest neighborhoods should be architecturally compatible with their surroundings and positively contribute to the identity and quality of the neighborhood. Policy NNW-1.1.9 and Policy NNW-2.1.1 both call for the production of new affordable and market rate housing on underutilized sites. Policy NNW-1.2.10: Sustainable Development encourages the use of green building practices within the Near Northwest area, with a particular emphasis on green roofs as a way to create additional green space, reduce stormwater runoff, and provide an amenity for residents.

The Applicant proposes to redevelop the Subject Property, which is currently an underutilized residentially-zoned site, and to construct a residential development that is compatible with the surrounding uses in terms of scale and massing. Moreover, as stated above, half of the residential units will be devoted to affordable housing. In addition, consistent with Policy NNW-1.2.10, the Applicant's proposed development includes approximately 2,979 square feet of green space at the ground level and approximately 1,935 square feet of green roof area as amenities for residents of the building. Finally,

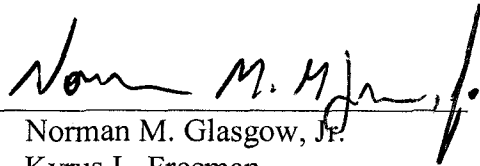
the project's height, FAR, and use are consistent with the Moderate Density Residential designation of the Subject Property.

V. CONCLUSION

For the reasons stated above, the Applicant submits that the PUD and zoning map amendment meets the standards of Chapter 24 of the Zoning Regulations and is consistent with the purposes and intent of the Zoning Regulations and Zoning Map. Accordingly, the Applicant requests that the Zoning Commission determine that the application has merit and that a public hearing on the application should be scheduled.

Respectfully submitted:

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