3101 ALBEMARLE STREET NW

BY SOAPSTONE VALLEY VENTURES LLC

APPLICATION TO THE DISTICT OF COLUMBIA ZONING COMMISSION FOR REVIEW AND APPROVAL OF A CONSOLIDATED PLANNED UNIT DEVELOPMENT AND AMENDMENT TO THE ZONING MAP

NOVEMBER 20, 2017

ZONING COMMISSION District of Columbia CASE NO.17-22 EXHIBIT NO.2

DEVELOPMENT TEAM

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PREFACE

This statement and the attached documents support the application of Soapstone Valley Ventures LLC (the "Applicant") to the Zoning Commission for consolidated approval of a Planned Unit Development and Zoning Map Amendment ("PUD") for the property known as Square 2041, Lots 22 and 23 (the "Property"). The Property is located on the east side of Square 2041 and is bounded by Albemarle Street NW, Appleton Street NW, and 32nd Street NW in Ward 3. The Project will result in the conversion of an existing historic building on the Property for residential use and a residential development of one detached single family house and five row houses on the Property.

This PUD application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10A DCMR (Planning and Development) § 100 et seq. (2006) (the "Comprehensive Plan"), as well as numerous goals and policies of the District of Columbia. This Project will benefit the District through exemplary architecture, sustainable design, open spaces, and attractive, place-making development. The Project will also benefit the surrounding neighborhoods through streetscape improvements and other new benefits and amenities to be provided, commensurate with the increase in use and density resulting from the PUD process.

Submitted in support of this application are completed application forms, a copy of the notice of intent to file a PUD that was mailed to surrounding property owners and parties (with the certification of mailing and list of property owners), architectural drawings, plans, and elevations of the proposed project, and a map depicting the Zone Districts for the Property and surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a PUD application under Chapter 3 of Subtitle X and Chapter 3 of Subtitle Z of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

This statement and the attached documents support the application of Soapstone Valley Ventures LLC (the "Applicant") to the Zoning Commission for consolidated approval of a Planned Unit Development and Zoning Map Amendment ("PUD") for the property known as Square 2041, Lots 22 and 23 (the "Property"). The Property is located on the east side of Square 2041 and is bounded by Albemarle Street NW, Appleton Street NW, and 32nd Street NW in Ward 3, within the jurisdiction of Advisory Neighborhood Commission ("ANC") 3F.

The Property is bounded by Albemarle Street NW, Appleton Street NW, and 32nd Street NW, and consists of property known as 3101 Albemarle Street NW. The Property is owned by the Applicant. The Property is in the Forest Hills neighborhood of Ward 3 and consists of approximately 47,626 square feet, or approximately 1.09 acres, of land area. The Property is currently located in the R-8 Zone District; the Applicant seeks to rezone the Property to the R-3 Zone District.

The Property is currently improved with one building, the former Polish Embassy. The existing building and a portion of the Property (the "Landmark Building") was designated an historic landmark by the Historic Preservation Review Board ("HPRB") on April 27, 2017. The remainder of the Property, which is unimproved, was not designated historic. The Applicant intends to retain and convert the Landmark Building to use as a single family house, and to develop the remainder of the Property with one detached single family house along Appleton Street NW and five row houses (collectively, the "Project").¹ The Project will also contain at least one parking space for each house. The total new gross floor area included in the Project is

¹ Initially the Applicant proposed to convert the Landmark Building into non-profit office use but after further consideration, the Applicant has decided to retain the use as residential.

approximately 20,780 square feet, while the Landmark Building has a gross floor area of approximately 7,731 square feet. The Project will occupy approximately 25.00% of the entire Property. The Project will have building heights of approximately 30 feet for the new detached single family house and 34 feet for the row houses. The existing Landmark Building will maintain its 44 foot height.

The Future Land Use Map of the Comprehensive Plan locates the Property in the Low Density Residential land use category. The Applicant will use the PUD process and the Zoning Map Amendment to permit detached and row houses on the Property consistent with the Comprehensive Plan.

B. The Applicant

Soapstone Valley Ventures LLC is a single-member limited liability company formed by Robert A. Gottfried. Mr. Gottfried grew up in Forest Hills directly across from the Soapstone Valley. He currently resides nearby and spends considerable time in the neighborhood, which he still considers home. His parents, Margery and Philip Gottfried, still live in Forest Hills, where they have lived in the same home for more than 35 years. Philip Gottfried has undertaken several real estate projects in Forest Hills for the purpose of preserving the character of the neighborhood, and is working closely with Robert on this project. His knowledge and input has been and will continue to be an integral part of the overall project.

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

Consistent with the goals of the District as outlined in the Land Use Element of the Comprehensive Plan, the Applicant intends to redevelop the Property with residential houses on the Property. The Project will provide attractive houses with significant open, green space that is compatible with surrounding buildings and uses. The PUD process outlined in Chapter 3 of Subtitle X of the Zoning Regulations serves as the appropriate means of achieving the above objectives, because the PUD process provides the community and District agencies with the tools needed to ensure that the Project is well-designed and best meets the needs of the community while making sure that the density and use are appropriate and the architecture is compatible with the surrounding neighborhood.

D. Development Timetable

The Applicant intends to begin construction of the Project in 2018 and construction will take approximately twelve months. The Project is expected to be completed in 2019.

II. THE PROPOSED PUD PROJECT

A. Site Location

The Property consists of approximately 47,626 square feet of land located on the east side of Square 2041 and is bounded by Albemarle Street NW, Appleton Street NW, and 32nd Street NW. The Property is approximately four blocks from the Van Ness-UDC Metrorail Station. The Property is currently improved with the Landmark Building, a historic resource that used to house the Polish Embassy. The remainder of the site is vacant. The Property is located entirely in the R-8 Zone District.

The Property is located in the Forest Hills neighborhood of DC, with the Van Ness neighborhood to the south and the Chevy Chase neighborhood to the north. The surrounding area consists of primarily residential uses, varying from single family houses to apartment buildings. To the north and east are single family houses, while to the west are larger apartment buildings. To the south is Soapstone Valley Park. Properties to the north, east, and south are also located in the R-8 Zone District. Immediately to the east, properties are located in the RA-4 Zone District, and properties to the southeast along Connecticut Avenue are located in the MU-7 Zone District.

B. Project Description

The Project involves two major components: (1) the retention of the approximately 7,731 square foot Landmark Building and use as a single family house (any renovation to the exterior of the Landmark Building anticipated as part of the Project will be coordinated with the Historic Preservation Office ("HPO")); and (2) the construction of six new single-family houses, including one detached house on the northeast corner of the site, two row houses on the northwest portion of the site, and three row houses on the southwest portion of the site.

The detached single family house on the northeast corner of the site will be three stories and be approximately 30 feet in height. The detached house will include approximately 4,280 square feet of gross floor area. The row houses will each be approximately 34 feet in height and will each contain three stories. The row houses will each consist of an average of approximately 3,300 square feet of gross floor area. Overall, the Project will occupy approximately 25% of the entire Property. The new houses will comprise approximately 20,780 square feet of gross floor area.

The design of the row houses is sensitive to the Landmark Building and compatible with the surrounding area. The neutral palette of materials which includes stone accents will blend well into the park-like setting of the Property. The introduction of the row houses into the Property will take into consideration the unique topography of the Property as well as the existence of the Landmark Building. Most of the east side of the Property will remain intact with the Landmark Building on its grassy knoll, while the open, more level west portion of the Property will be the ground for the new row houses. Rather than building multiple large detached single family houses or a monolithic row of houses as is typical with many row houses, the row houses being constructed as part of the Project will have staggered footprints front to

back, so as to avoid creating an uninterrupted building façade. All of the row houses will share a common design aesthetic and will form a central, shared garden with an open sitting area. The preservation of this common green space area is a result of the Applicant's commitment to respecting the boundaries of the root systems of the heritage trees on the Property. The Project's adjacency to the large apartment buildings lining Connecticut Avenue to the west will place the new row houses squarely within the definition of a transitional zone between high and low density.

The Project's vehicular access will come through the existing drive that bifurcates the site. The Project will incorporate significant green space and landscaping, as well. The Project makes use of the Property's existing topography, designing the new houses to be located at the site edges, creating ample opportunity for open green space in the middle of the Property. The Project also includes significant green space that will be open to the neighborhood for public enjoyment. The entire site will contain approximately 25,000 square feet of green space.

C. Community Outreach and Response

The Applicant has engaged in numerous community outreach efforts, including city meetings, ANC meetings, and meetings with individuals in the community regarding the Project. First, the Applicant has been engaged in numerous meetings with HPO regarding the Project and was actively involved in having the Landmark Building designated as a historic landmark by HPRB on April 27, 2017. The Applicant also met with the Office of Planning on August 16, 2017. Finally, the Applicant presented at four ANC 3F meetings – first on February 21, 2017, again on June 20, 2017, on September 19, 2017, and finally on October 17, 2017.

As a result of all of these meetings, the Applicant has revised the general site plan to incorporate significant amounts of green space and, provide a public green open space for neighbors to enjoy. The Applicant will continue to work with the community and government agencies regarding the Project.

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 procedures. The minimum land area for a PUD in any R Zone District is two acres pursuant to 11-X DCMR § 301.1. However, 11-X DCMR § 301.2 allows the Zoning Commission to waive up to 50% of the minimum land area requirement for a PUD in an R Zone District provided that the development is of exceptional merit and meets one of three requirements, including that 80% of the gross floor area will be used exclusively for residential dwelling units for a Project outside of the Central Employment Area. The Project will be built within the PUD Zoning Regulations for height and density and the Property is over one acre and is located outside of the Central Employment Area. As detailed throughout this statement, the Project is of exceptional merit given the historic preservation component, the open space, and the new residential houses of high quality on an underutilized parcel in the District. Additionally, all of the new construction and renovation that is part of the Project will be for residential use. Therefore, the Applicant requests the Zoning Commission waive less than 50% of the minimum land area of two acres for a PUD in an R Zone District for the Project.

Additionally, the Applicant requests flexibility from the theoretical lot development standards of Section 305.3 of Subtitle C of the Zoning Regulations. The unique features of the Property, including variation in topography, and the existence of heritage trees, together with the Applicant's efforts to preserve and maintain the existing Landmark Building, constrain the development of the Project and result in noncompliance with certain development standards. In addition, the group of three row houses along Albemarle Street NW are not in full compliance

with the front setback requirements for an R-3 District set forth in Section 305 of Subtitle D of the Zoning Regulations. Therefore, the Applicant requests relief from the strict application of the Zoning Regulations for the lot width and area, side yard and front setback requirements for the Project.

III. PLANNING ANALYSIS

A. Land Use Impact

As detailed in Section V, the proposed PUD project is fully consistent with the goals and policies of the Comprehensive Plan for the District of Columbia. Specifically, the Project will create prime residential houses on an underutilized site near a main avenue in the District. Also, the project will retain significant open space. The height and density of the Project are appropriate given the surrounding neighborhood, proximity to transit, and the avoidance of adverse impacts on nearby residential areas. The Project will also enhance the streetscape along Appleton, Albemarle, and 32nd Streets. The Project will have a positive land use impact that is consistent with the Comprehensive Plan and other planning goals of the District of Columbia.

B. Zoning Impact

As shown on the Proposed Zone District Plan included in <u>Exhibit I</u>, the Applicant requests a Zoning Map Amendment for the Property to the R-3 Zone District. This proposed zone plan is consistent with the Comprehensive Plan. As discussed more fully in Section V, the Future Land Use Map of the Comprehensive Plan locates the Property in the Low Density Residential category.

The Applicant proposes a residential development with six new single family houses comprised of a mix of row houses and a detached single family home. In addition, the existing Landmark building will be used as a single family house. The proposed R-3 zoning is necessary to allow row houses at the Property. The Comprehensive Plan notes that while R-1 and R-2 Zone Districts are traditionally considered Low Density Residential zones, "other zones may apply." § 225.3. Here, the R-3 Zone is needed only to allow row houses. Low Density Residential explicitly includes semi-detached houses and notes that yards are a common feature in Low Density Residential neighborhoods. The Project includes significant yards and open space. Accordingly, the proposed rezoning of the Property to the R-3 Zone District is consistent with the Comprehensive Plan. In fact, the row houses, in particular, will allow for significant open space.

C. Environmental Impact

As more specifically detailed in <u>Exhibit F</u>, no adverse environmental impact will result from the construction of the Project. The Project will include features such as the adaptive reuse existing structure at the Property. The Project will also meet the pervious surface and stormwater management requirements.

D. Facilities Impact

The proposed Project will not have an adverse impact on the facilities that it will rely on for service. The Van Ness-UDC Metrorail station is a short walk from the Property. Numerous Metrobus lines also service the site via Connecticut Avenue, which is one block away, and it is expected that some of the Project's occupants will use public transit. The Project also contains at least one parking space for each house at the Project.

IV. PUD EVALUATION STANDARDS

A. Public Benefits and Project Amenities

Section 305 of Subtitle X provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage highquality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning. The proposed Project will achieve the goals of the PUD process by providing new housing and preservation of a historic resource in a well-designed project that incorporates new public gathering spaces and enhances the surrounding public space. This furthers several goals set forth by the District of Columbia.

1. <u>Housing</u>

Pursuant to Section 305.5(f) of Subtitle X of the Zoning Regulations, the PUD guidelines state that the production of housing is a public benefit that the PUD process is designed to encourage. The Project will create six new single family houses and convert the existing Landmark Building to a single family house. The western part of the site is currently vacant and does not provide any housing. Additionally, the current zoning would not allow row house units to be provided at the Project. These smaller single-family houses will provide more housing opportunities in a neighborhood including housing for some long-time residents of the neighborhood who intend to downsize. The homes will include design features to support seniors who wish to age in place, including elevators. Therefore, the new housing proposed as part of the Project is a public benefit.

2. <u>Superior Urban Design and Architecture</u>

Section 305.5(a) of Subtitle X lists urban design and architecture as categories of public benefits and project amenities for a PUD. As shown on the detailed plans, elevations, and renderings included in <u>Exhibit I</u>, the proposed Project exhibits many characteristics of exemplary urban design. The design is extremely compatible with the Landmark Building and the general area. Specific features include the addition of public open green space at the Project, streetscape improvements including a new sidewalk along 32nd Street NW and infill development that is compatible with the surrounding neighborhood in density and development pattern. The Project also features exceptional architectural design that creates high-quality houses of varying sizes.

3. <u>Streetscape Plans</u>

Section 305.5(1) of Subtitle X states that streetscape plans are considered to be public benefits and project amenities of a PUD. The Project includes significant streetscape improvements that will benefit the public. Most importantly, the Project includes the addition of a sidewalk along 32nd Street NW, improving the sidewalk network in the neighborhood and increasing pedestrian safety. The Applicant is committed to working with the District Department of Transportation to introduce a crosswalk at 32nd Street NW and Albemarle Street The Project also includes landscaping and improvements to the public space areas NW. surrounding the Project, which will improve these areas of 32nd Street NW, Appleton Street NW, and Albemarle Street NW in close proximity to Connecticut Avenue. By increasing the sidewalk connectivity and creating improved public space, the Project includes streetscape plans that benefit the District. The Applicant is also committed to improving the design of the existing barricade at the park south of the Property and plans to offer attractive redesigned fencing to enhance the appearance of this public area. The applicant will provide parking on site and will not introduce new curb cuts. Further, the residents of the Project will be prohibited from securing residential permit parking privileges.

4. <u>Site Planning, and Efficient and Economical Land Utilization</u>

Pursuant to Section 305.5(c) of Subtitle X of the Zoning Regulations, "site planning and efficient and economical land utilization" are public benefits and project amenities to be evaluated by the Zoning Commission. The site is currently underutilized and fails to capitalize on the amount of land and its prominent location near Connecticut Avenue. The proposed Project

has been designed to efficiently utilize the land to provide additional housing in high demand, to adaptively reuse the existing historic resource at the Property, and to increase the site's porosity and open space, including green space available to the public.

5. Environmental and Sustainability Benefits

Section 305.5(k) of Subtitle X states that environmental benefits are considered to be public benefits and project amenities of a PUD. The Project will provide a number of environmental benefits that improve sustainability of the site and contribute to the sustainability of the neighborhood. These features include use of the Property's existing topography and trees to create significant open spaces. These open spaces will include a green park open for general public access. This preservation of open space also includes the preservation and protection of trees, including some heritage trees, on the site. The Project will also involve extensive planting of trees and shrubs, as shown in more detail on Exhibit I, yielding a significant net gain of plantings. Finally, the extensive amount of green space at the Project of this kind. The conversion of the existing pond into a rain garden and utilization of permeable materials for the driveway will further enhance stormwater management.

6. <u>Historic Preservation</u>

Subtitle X, Section 303.5(e) lists historic preservation of private or public structures, places, or parks as public benefits and project amenities of a PUD. The proposed Project includes significant historic preservation benefits as part of the PUD. The Applicant has been actively involved in having the Landmark Building designated as historic through HPRB. As part of the Project, the Landmark Building will be devoted to residential use.

7. <u>Comprehensive Plan</u>

According to Section 305.5(r) of Subtitle X, public benefits and project amenities include "other ways in which the proposed planned development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan." As described in greater detail in Section V, the Project is consistent with and furthers many goals and policies of the Comprehensive Plan.

B. Public Benefits of the Project

Section 305.3 of Subtitle X requires the Applicant to demonstrate how the public benefits offered are superior in quantity and quality to typical developments of the type proposed. This application achieves the requirement of this provision by offering:

- Housing
- Superior Urban Design and Architecture
- Streetscape improvements
- Exemplary site planning, including a publicly accessible park
- Sustainable development features
- Historic preservation
- Significant public space improvements, including a new sidewalk along the Property's boundary of 32nd Street NW and redesign of park fencing

For the reasons set forth above, the Project contains numerous public benefits and project

amenities that are superior to typical developments.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies of the

Comprehensive Plan.

The purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and

architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District.

D.C. Code § 1-306.01(b) (2006). The proposed Project significantly advances these purposes by furthering the social, physical, and economic development of the District through the development of residential development with significant open space on the Property in close proximity to a major thoroughfare in a manner compatible with the surrounding community.

A. Citywide Elements

1. Framework Elements and Maps

The Framework Element provides guidelines for using the Future Land Use Map. This Element states that the Future Land Use Map should be interpreted "broadly" and notes that the zoning for an area should be guided by the Future Land Use Map interpreted in conjunction with the text of the entire Comprehensive Plan. The Framework Element also clearly provides that density and height gained through the PUD process are bonuses that may exceed the typical ranges cited for each category. Comprehensive Plan § 226(c).

On the Future Land Use Map the Property is mapped for Low Density Residential uses. The Low Density Residential designation characterizes neighborhoods with single-family houses, both detached and semi-detached. The Plan notes that "the R-1-A, R-1-B, and R-2 Zone Districts are generally consistent with the Low Density Residential category, *although other zones may apply*." §225.3 (emphasis added).

The Project is consistent with the Future Land Use Map because the proposed use will combine single family residential dwellings with significant open space, along with the existing Landmark Building. The R-3 Zone District is appropriate for the site as part of the Project given the Future Land Use Map designation. Here, the R-3 Zone permits row houses which are an important component of the site planning. Low Density Residential explicitly includes semidetached houses and notes that yards are a common feature in Low Density Residential neighborhoods. The Project includes one completely detached house, five row houses, the existing Landmark Building and significant yards and open space. Accordingly, the proposed rezoning of the Property to the R-3 Zone District is consistent with the Comprehensive Plan.

On the Generalized Policy Map, the Property is designated as a "Neighborhood Conservation Area." Neighborhood Conservation Areas are designed "to conserve and enhance established neighborhoods" and development "should be compatible with the existing scale and architectural character of each area." § 223.5. The proposed Project on the Property is a quintessential Neighborhood Conservation Area development. The Project will re-use an existing historic resource and provide additional housing stock in a high-demand area in a development designed to fit within the surrounding neighborhood.

2. Land Use Element

The proposed Project advances several policies of the Land Use Element. First, the Land Use Element encourages infill development on land that is underutilized in a manner consistent with the surrounding neighborhood. §§307.2 and 307.5. Specifically, the Land Use Element notes that infill development sites in residential neighborhoods "present some of the best opportunities in the city for 'family' housing and low- to moderate-density development." §307.2 (LU-1.4 Infill Development). Infill development "should complement the established character of the area and should not create sharp changes in the physical development pattern." §307.5 (LU-1.4.1 Infill Development). The Project provides the exact kind of infill development anticipated by the Land Use Element. The Property includes a significant amount of vacant land that is not efficiently utilized. The Project also involves maintaining the Landmark Building and the Landmark Building's conversion to residential use. The Project fulfills these goals by re-

using the Landmark Building, providing additional family housing on underutilized land, and constructing housing in a compatible pattern and density with the surrounding neighborhood.

Second, the Project furthers the Element's goals of neighborhood beautification. §310.5 (LU-2.2.4 Neighborhood Beautification). The Element calls for "projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting . . . [and] street and sidewalk repair." *Id.* The Project provides beautification of an existing neighborhood by creating compatible residential development on underutilized land consistent with the surrounding community. Additionally, the Project includes landscaping and improvements to the public realm adjacent to the Project, which will improve existing conditions at the Property and in the neighborhood.

3. <u>Other Elements</u>

This PUD application is also consistent with policies in the Transportation, Housing, Environmental Protection, Park, Recreation, and Open Space, Urban Design, and Historic Preservation Elements of the Comprehensive Plan. The Transportation Element encourages pedestrian-oriented development around major bus corridors, § 403.1 (T-1.1.4 Transit-Oriented Development) and discourages auto-oriented uses such as "drive-through" business, and large surface parking lots, § 404.8 (T-1.2.3 Discouraging Auto-Oriented Uses). The Project is a model transit-oriented development and adds none of the auto-oriented features the Comprehensive Plan seeks to discourage. As discussed, the Project is located in close proximity to the multiple bus lines on Connecticut Avenue and is a short walk from the Van Ness-UDC Metrorail station. Therefore, the site encourages residents and employees to take public transit based on the convenient location and opportunity to do so. The Project also furthers the Element's goal of "improving the sidewalk system" to "improve safety and security at key pedestrian nodes." §§410.5-6 (T-2.4.1 Pedestrian Network T-2.4.2 Pedestrian Safety). By constructing the new 32nd

Street NW sidewalk, the Project will improve the pedestrian connectivity and safety of the Property.

The Project also promotes both the Housing Element and the Historic Preservation Element. By having multiple new single family houses, the Project "provide[s] new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives." § 503.2 (H-1.1.1 Private Sector Support). The Project provides this new housing on "underutilized land" fulfilling a need for additional "low- and moderate-density single family houses". §503.4 (H-1.1.3 Balanced Growth). The Project also promotes the Historic Preservation Element through the work on the Landmark Building. The Applicant was actively involved in the designation of the Landmark Building. Further, the Project includes the "appropriate preservation of [a] historic building", creating a new "adaptive use" for the Project, and "preserving the important historic features . . . while permitting compatible infill development." §§1011.6-8 (HP-2.4.1 Rehabilitation of Historic Structures; HP-2.4.2 Adaption of Historic Properties for Current Use; HP-2.4.3 Compatible Development). The Project includes an appropriate residential use for a historic building with surrounding new residential development.

Additionally, the Project promotes the goals of the Environmental Protection and the Parks, Recreation, and Open Space Elements. The Project includes the retention of significant portions of the existing tree canopy, including heritage trees, and includes landscaping to improve the Property, furthering goals of the Environmental Protection Element. §§603.5-6 (E-1.1.2 Tree Requirements in New Development; E-1.1.3 Landscaping). The Project's proximity to Rock Creek Park also showcases its importance of providing low-density housing and adaptive reuse of a historic resource that is "compatible with [the] parkland." §812.14 (PROS-3.1.6)

Compatibility with Parklands). The Project also includes significant amounts of "landscaped open areas and other common open space areas that provide visual relief and aesthetic balance" in preserving the trees and natural topography of the Property. §819.5 (PROS-4.3.3 Common Open Space in New Development).

Finally, the Project also supports the Urban Design Element of the Comprehensive Plan. The Project furthers the Element's goal of "preserv[ing] natural features rather than altering them to accommodate development" and the Project relates "the scale of infill development . . . to existing neighborhood context." §904.3 (UD-1.2.1 Respecting Natural Features in Development); §910.6 (UD-2.2.1 Neighborhood Character and Identity). The Project utilizes the natural topography of the site and retains the existing trees to provide open space and wooded areas around the new houses and the Landmark Building. Further, the Project has specifically been designed to respect and complement the scale of the existing neighborhood.

B. Compliance with Area Elements

The Property is within the Rock Creek West Area Element. This Element encourages the exact kind of single-family house residential development contemplated by the Project – "Protect the low density, stable residential neighborhoods west of Rock Creek Park." §2308.2 (RCW-1.1.1 Neighborhood Conservation). Specifically, the Project will develop underutilized land with residential houses of a similar character to those in the surrounding neighborhood, respecting the scale and density of the area. Second, the Project promotes the Element's focus on preserving historic estates. §2308.11 (RCW-1.1.10 Conservation of Historic Estates); §2309.6 (RCW-1.2.5 Historic Resources). In such development, the Element highlights the need to "be sensitive to the surrounding natural areas and the adjacent low density residential uses, and not harm historic resources on the site." §2308.11 (RCW-1.1.10: Conservation of Historic Estates). The Project fulfills these goals by providing significant open space and preserving the natural topography

and trees of the site. The Project includes low-density, single-family houses in similar character to the surrounding neighborhood. Finally, the Project adaptively reuses an existing historic resource to provide for additional residential use.

VI. CONCLUSION

For the foregoing reasons, the Applicant submits that the enclosed applications meet the standards of Chapter 3 of Subtitle X and Chapter 3 of Subtitle Z of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of the included applications; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the PUD application and the related Zoning Map Amendment should be approved and adopted by the Zoning Commission.

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

Respectfully submitted,

GOULSTON & STORRS, PC

___/s/_____

Allison C. Prince

Date: November 20, 2017