GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

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D.C. OFFICE OF ZONING
2003 MAY -7 PM 4:08
RECEIVED

Office of the Director

MEMORANDUM

TO: D.C. Zoning Commission

FROM: Andrew Altman, Director

DATE: May 6, 2003

SUBJECT: Waiver of Rules for Late Submission of Office of Planning Preliminary Report
Zoning Commission Cases Nos. 03-12 and 03-13
Planned Unit Developments and Map Amendment for
Capper/Carrollsburg Hope VI Revitalization Project

This preliminary report is being submitted later than the May 2, 2003 date the Zoning Regulations require for the Commission's May 2003 consideration of whether a public hearing should be scheduled for the application. The Office of Planning (OP) report was delayed because OP was engaged in negotiations with the applicant. OP requests that the Commission waive its rules so that this matter may be considered at the public meeting on May 12, 2003, rather than at the regular meeting of the Commission in June 2003.

Please note that since the report was written, the eastern boundary of the PUD application has been shifted slightly, at OP's request. A letter from the applicant confirming this adjustment is attached to the report.

Attachments

aa/sc

ZONING COMMISSION
District of Columbia
Case 03-13
Exhibit 16

ZONING COMMISSION
District of Columbia
CASE NO.03-13
EXHIBIT NO.16

Law Offices
HOLLAND & KNIGHT LLP

2099 Pennsylvania Avenue, N.W.
Suite 100
Washington, D.C. 20006-6801

202-955-3000
FAX 202-955-5564
www.hklaw.com

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*Representative Office

May 6, 2003

WHAYNE S. QUIN
202-663-7274
Internet Address:
wquin@hklaw.com

VIA HAND DELIVERY

Mr. Andrew Altman
Director
D.C. Office of Planning
Suite 400
801 North Capitol Street, N.E.
Washington D.C. 20002

Re: Capper/Carrollsburg Hope VI Planned Unit Development
Zoning Commission Cases No. 03-12/03-13

Dear Mr. Altman:

We represent the D.C. Housing Authority (DCHA) and the Capper/Carrollsburg Venture LLC, the owner and developer, respectively, of the mixed use project planned to redevelop the existing public housing projects into a mixed use, mixed-income development. Together with Square 769, LLC, DCHA and the Venture (collectively, the "Applicants") filed the above-referenced applications for preliminary and consolidated approval of a planned unit development and zoning map amendment applications to rezone some of the property in the site from R-5-B to CR.

The Applicants have had extensive discussions with staff of the Office of Planning. In a discussion held last week, staff requested that the PUD application be amended to include the site of the community recreation center, located on the east side of 5th Street between K and L Streets, S.E. (Square 881, part of lot 800). That site has been discussed with OP staff many times prior to the filing of the PUDs. The property was not included in the PUD applications because the planning and programming for the facility are still at an early stage and the Applicants believe that the building and use are likely to be permitted as a matter-of-right under the text amendments currently pending before the Zoning Commission for public recreation centers.

At OP's request, the Applicants are prepared to amend the applications to include the community recreation center in the preliminary PUD application. Given the time it will take to redraw the site plans and re-compute the area and density calculations and the Applicants' desire that the PUDs be considered by the Zoning Commission at the public meeting to be held on May 12, 2003, the Applicants hereby commit to make such a change as part of their pre-hearing submission if the Zoning Commission sets the cases for hearing.

We hope that this is responsive to the request of OP. Feel free to call us with any further questions or comments you may have.

Sincerely,

Whayne S. Quin

M. Carolyn Brown

cc: Ellen McCarthy, Office of Planning
Stephen Cochran, Office of Planning
Harry Sewell, Mid City Urban LLC, for Capper/Carrollsburg Venture LLC
Paul Rowe, D.C. Housing Authority
Brad Fennell, Square 769, LLC

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GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

Office of the Director

D.C. OFFICE OF ZONING
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2003 MAY -7 PM 4:09

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Andrew Altman, Director

SUBJECT: Preliminary Report – Zoning Commission Case No.03-12 and 03-13
Planned Unit Developments and Map Amendment for
Capper/Carrollsburg Hope VI Revitalization Project

DATE: May 5, 2003

I. APPLICATION SUMMARY

This application by the Capper/Carrollsburg Venture, LLC, the District of Columbia Housing Authority, and Square 769, LLC requests:

- Preliminary review and approval of a Planned Unit Development (PUD) encompassing all or parts of 13 Squares in Southeast Washington;
- Consolidated review and approval of a PUD for a 6-Square sub-set of the Preliminary PUD;
- An amendment to the zoning map for two full Squares and portions of a two other Squares.

The applicants propose to build a mixed-income, mixed-use development on 33 acres (including rights-of-way and other public space) between the Washington Navy Yard and the Southeast-Southwest freeway. *(See Attachment 1)*. The project includes the demolition of all but one of the existing Capper/Carrolsburg buildings, the retention of one elderly housing building, and the construction of 1645 new housing units, over 700,000 square feet of office space, and 51,000 square feet of retail space.

The project is financed, in part, with a $35 million federal grant under the U.S. Department of Housing and Urban Development's (HUD's) Hope VI program. It will be one of the largest Hope VI programs in the country.

By 2007, there will be:

Residential

- 1645 total units for the Hope VI project:
  - 1323 units within the PUD boundaries,
  - 322 units nearby, outside the PUD boundaries.
- Of these units, there will be:
  - 707 replacement public housing units,
    - of which 300 will be senior units;
  - 60 existing public housing units (existing senior housing);

- 50 Section 8/ Housing Choice voucher homeownership units;
- 838 mixed income units,
  - moderate and market rate units
  - rental and for sale units.

Commercial/Office

- 753,000 square feet of commercially-used space. Of this:
  - 702,000 square feet will be office space;
  - 30,000 will be retail space on the first floor of office buildings;
  - 21,000 square feet will be neighborhood-serving retail space on the first floor of larger apartment buildings.

Public Space and Amenities

- An approximately 18,000 square foot recreation center;
- Participation in the conversion of 3 blocks of federal reservation into public parkland.

II. OFFICE OF PLANNING PRELIMINARY RECOMMENDATION

The Office of Planning (OP) recommends the Zoning Commission schedule a public hearing on this project at its earliest convenience. The project is well designed and of considerable social merit. It is consistent with the District's Comprehensive Plan. Its realization is a prime objective for the community, the District government, and the U.S. Department of Housing and Urban Development.

OP has engaged in an extensive series of discussions with the applicant and outreach with the public about this project over the last two years. From OP's standpoint, most of the major issues have been resolved.

There is, however, one matter that needs to be rectified before the sedown hearing, and there are a few matters that need to be addressed before a public hearing on the project. These are listed below. The applicant has agreed to supply some of this information before the set-down hearing, and the remainder of this information in its pre-hearing statement.

A. To Be Addressed Before the Setdown Hearing

- The Preliminary PUD Boundary: The applicant and OP have agreed that the boundary for the Preliminary PUD application will be adjusted to include the westernmost portion of Square 881W, adjacent to federal Reservation 19. The adjustment will allow the PUD boundaries to include the recreation center the applicant will be constructing as part of the PUD's proposed amenities package.

B. To Be Addressed in Pre-Hearing Statement

1. Alignment of new block of 6th Street: The pre-hearing statement will need to indicate either that the District Department of Transportation (DDOT) and the staff of the Historic Preservation Review Board have no problem with the location of this proposed street, or that the applicant will reclassify the access-way to either a private street or an alley.

2. Status of Square 739; Reservations 17-a, b, c and d; 2nd Place: The applicant, OP and DDOT will need to reach definitive conclusions about:
   A. The ownership and jurisdictional status of the reservations and the portion of 2nd Street that borders them on the east (a.k.a. 2nd Place);
   B. The future ownership of 2nd Place.

3. Public and Private Roadways: The pre-hearing statement will need to address:
   A. Whether the proposed street and alley closings are acceptable to DDOT and the Fire Department;
   B. Whether the configuration of the proposed private streets and alleyways within the Consolidated PUD application boundaries is acceptable to DDOT and the Fire Department;
   C. Whether the utility work required for the project will necessitate reconstruction of any existing streets and, if so, how this will be accomplished;
   D. DDOT's plans, if any, for the construction of the proposed new 100 block of Eye Street;
   E. The position of the affected local and federal parties with respect to the proposed changes to streets, alleys and the federal reservation.

4. Environmental Impact:
   A. The applicant's specific strategies to achieve low impact development should be included in the pre-hearing statement.

5. Public Benefits and Amenities:
   A. The applicant will need to give more explicit consideration not just to the total project as a public benefit, but also to the particular amenities being offered, in relationship to flexibility requested;
   B. The pre-hearing statement will need to be more specific about how the PUD will accommodate the active recreation and open space needs of future residents, given the proposed increase in residential density from the existing Capper-Carrollsburg dwellings.
   C. The statement should estimate the cost of the proposed Community Center and park in Square 881W and who will pay for it. This is needed for assessing the relationship of the public benefits and amenities in relation to the flexibility requested;
   D. The relationship between the square footage of commercial space being proposed and the ability to deliver the affordable housing should be explained;
   E. The pre-hearing statement should give greater, and more specific consideration to the environmental condition of the Canal Blocks, the mechanisms that will achieve the construction of the proposed park, and the contribution the applicant will make to that effort;
   F. The applicant should explain jurisdictional and access arrangements for the open areas shown for Squares 797 and 800;
   G. The pre-hearing statement should explain the relationship, if any, between the PUD's amenity' package and the agreements regarding public access to Reservation 19's playing fields;

H. Any reconstruction of existing roadways by the applicant should be listed among the public benefits of the project.

6. Ground Floor Retail Space:
   A. The design guidelines for the Preliminary PUD should require either vertical knockout panels, or a minimum 14' floor-to-finished-ceiling-height for first floors of buildings with frontage on 2nd Place, New Jersey Avenue, or M Street (other than senior housing);
   B. The manner of listing retail space square footages should be checked for consistency.

7. Public Housing Replacement / Income Mix: If the applicant wishes the Zoning Commission to consider the provision of affordable housing as a public benefit, the pre-hearing statement should include specific information about this, including a numerical, percentage and market comparison of the existing and proposed housing. The Consolidated PUD information should describe each Square's ratio of market-rate to subsidized housing.

8. Senior Housing, K Street Frontage: The pre-hearing statement for the Consolidated PUD application should address architectural and landscaping changes that could enliven the design of the first floor of the K Street façade. This street will become the neighborhood's principal access point to the recreation fields at the Marine Barracks annex.

9. Zoning Relief: The portion of the pre-hearing statement covering the Consolidated PUD should be explicit about any zoning relief needed for the proposed rowhouse construction. The particular circumstances that justify the Commission's approving lot coverage deviations will need to be addressed more explicitly.

10. First Source Agreements, Construction Period Training and Apprenticeships: The pre-hearing statement should address specific percentage objectives for the use of District minority and disadvantaged businesses during project construction and in subsequent property management. It should also demonstrate a specific numerical commitment to a job training and apprenticeship program during the construction period in addition to the Section 3 programs noted on page 24 of the application.

11. Parking: The applicant should resolve the inconsistency between the on-street parking shown on Sheets T-2.0 and T.3.0, as well as the minor inconsistencies between the off-street parking numbers shown on Sheet T-3.0 and page 24 of the O.R. George traffic and parking study. The pre-hearing statement should also address the operation of the off-street stacked parking shown on sheet T-3.0, given the multi-unit nature of the row housing served.

12. Traffic: Additional discussion and possible updating is needed regarding the background development assumptions for the Southeast Federal Center build-out, and the impacts on the two intersections projected for Level of Service D in 2007.

13. Rezoning to CR: The pre-hearing statement should explain the need for the greater height and/or bulk that CR zoning would allow over the existing zoning. The applicant has explained the justification in meetings with OP, but has not discussed it in the application.

14. Utilities: The pre-hearing statement should give a detailed description of the utilities that are likely to require replacement by the applicant, and what, if any, implications the cost may have for other aspects of the project. Recent indications are that the utility replacement could be extensive.

15. Design Guidelines: OP will have additional meetings with the applicant about the Consolidated PUD's proposed design guidelines if the Commission schedules a public hearing. The outcome of these discussions will need to be reflected in the pre-hearing statement.

III. SITE, ZONING, AREA AND HISTORIC PRESERVATION CONTEXT

A. Boundaries (Attachment 1)

The site is in near Southeast Washington. It is bounded generally by:

- South: M Street and the Washington Navy Yard, excluding a new office building between 3rd and 4th Streets, and the Van Ness Elementary School east of 5th Street;
- West: the centerline of the portion of 2nd Street that is west of the federal reservations lying between M Street and K Street, thence west to New Jersey Avenue and north to I Street;
- North: an irregular line formed generally by I Street, but "bumping" north to Virginia Avenue between 3rd and 4th Streets and again on the east side of 5th Street;
- East: an irregular line between 5th Street and 8th Streets, excluding the new Marine Barracks expansion site and the Van Ness Elementary School site. The site comprises 33 acres of total land area, and 21 acres that are not within public rights of way.
- Modification to Eastern PUD Boundary: The applicant has agreed to add the westernmost portion of Square 881to the Preliminary PUD boundary. This area is bounded by 5th Street, K Street, L Street and the western boundary of the property at the Marine Barracks annex garage.

All of parts of the following Squares are within the project area:

- 739, 767, 768, 769, 797, 798;
- 825, 882;
- Square 799, other than private rowhouse outparcels in the northwest portion of the Square;
- The northern half of Square 800;
- Square 824, other than private rowhouse outparcels at the northwestern and southeastern corners of the Square;
- Square 825S, but for the existing senior housing at the southeast corner of the Square, and;
- The western portion of Square 880.
- Addendum: the westernmost portion of Square 881W.

B. Zoning (Attachment 3)

With the following exceptions, the project area is in the R-5-B zone district:

- Squares 737 and 739 are zoned C-3-C;
- The Southern half of Square 769 is zoned CG/C-3-C.

C. Ownership

The District of Columbia Housing Authority's (DCHA's) Arthur Capper and Carrollsburg (Capper/Carrollsburg) public housing projects currently occupy most of the proposed PUD area site. The prominent exceptions to this pattern are:

- Square 739, which is presently occupied by a Department of Public Works (DPW) trash transfer station;
- Reservations 17-a through 17-d, which are in federal ownership, and under the jurisdiction of the District of Columbia;
- The southern third of Square 769, where a private office building has recently been completed.

There are, additionally, three private houses in Square 799 that the Housing Authority does not yet own, but plans to acquire through purchase or eminent domain. (*See Applicant Exhibit D*).

Between them, the Capper/Carrollsburg facilities have 707 housing units in a mix of two and three-story townhouses, high-rise apartments for the elderly and mid-rise buildings for families.
The mid-rise apartments for families do not meet current U.S. Department of Housing and Urban Development (HUD) guidelines for public housing family residences. HUD has made a concerted effort over the last decade to replace mid-rise and high-rise family housing with townhouses and walk-up apartments. Many of the other structures are in a deteriorated condition.

D. Surrounding Area and Development Context (Attachment 2)

The area around the Capper/Carrollsburg contains a number of uses that reflect the area's previous industrial zoning. The former Washington *Post* printing plant is to the north. A DPW trash transfer station is within the western end of the project boundaries. The District public school system stores school busses on the federal parkland reservations along 2nd Street, just west of the project boundaries. The Southeast Federal Center contains a number of large buildings that are either underutilized, or slated for demolition or rehabilitation. To the southwest is a large Metrobus storage and maintenance facility, as well as entertainment and industrial uses that were suited to the land's former industrial zoning.

However, the area is undergoing rapid change. The opening of the Navy Yard Metro station and the influx of 5500 new employees to the Washington Navy Yard have spurred the construction of numerous private office buildings along M Street, SE. A high-rise apartment-hotel has been approved by the Board of Zoning Adjustment (BZA) for the corner of 2nd and L Streets. The former Evening Star printing plant is slated for conversion to office and retail uses by a private developmer. The U.S. Department of Transportation will move its headquarters to a 1.5 million square foot building on the south side of M Street at New Jersey Avenue if the Zoning Commission approves the Planned Unit Development that OP has recently recommended for setdown to the Commission. The Commission has approved significant new zoning for Capital Gateway, a portion of which borders the proposed Hope VI project on the south. OP has also recommended the Commission establish zoning on the Southeast Federal Center, to facilitate the development of this property. The U.S. Navy has begun the expansion of the Southeast Marine Barracks along K and L Streets, between 5th and 7th Streets, just outside the northwest boundary of the proposed Hope VI. All of this is happening in the larger context of the District's Anacostia Waterfront Initiative (AWI). The AWI seeks to reconnect the City to the Anacostia riverfront. The revitalization of Capper/Carrollsburg is a major part of this initiative.

In addition to the Navy Yard Metro Station, the major transportation facilities are:

- M Street, a six-lane road running east-west at the southern boundary of the project;
- South Capitol Street, a major north-south arterial 2 blocks west of the project;
- I-395 (the Southeast-Southwest freeway), which runs over the right-of-way of Virginia Avenue at the northern project boundary;
- New Jersey Avenue, a currently underutilized L'Enfant Plan boulevard, and;
- 8th Street, which is the principal connection between the project area and Capitol Hill.

Bus lines run along M Street, South Capitol Street, and 8th Street.

E. Historic Properties

There are no designated historic structures within the project area boundaries. However, there are numerous nearby historic properties. The Capitol Hill Historic District was recently expanded to include several blocks south of Virginia Avenue, west of 7th Street. The Washington Navy Yard has many designated structures.

IV. PUD APPLICATION(S)

Hope VI is a federal program that is intended to reintegrate public housing sites and residents into surrounding communities by: 1) redesigning sites and buildings; 2) including a mix of publicly assisted families and a range of households able to afford market-rate housing, and; 3) developing and providing community services to assist Hope VI residents developing home-support and employment skills.

Washington, DC has received 5 Hope VI grants, including one that enabled the reconstruction of the Ellen Wilson Dwellings, immediately north of the Capper/Carrollsburg. The Capper/Carrollsburg HOPE VI grant is the largest in the District, and one of the largest in the country.

A. Types of Applications (Attachments 2 and 3))

The applicant proposes to proceed simultaneously with development under different types of review. Some of the proposed development will require rezoning in conjunction with the PUD.

1. **There is a <u>Preliminary, or First-Stage, PUD Application</u>, encompassing the entire area within the boundaries described above.** The concept design and development plan provides for:
    A. Three high-rise and mid-rise residential buildings west of 3rd Street
    B. One high-rise office building at 3rd and M Streets;
    C. Rowhouse-type construction (single-family and stacked units) between 3rd Street and 5th Streets;
    D. Two mid-rise Senior buildings;
    E. Two high-rise office buildings and rowhouse-type construction between the Van Ness Elementary School and 7th Street.

    Some of the proposed development would require rezoning in conjunction with the PUD (*Attachment 3).*

    The construction of the full Preliminary PUD is to be completed in 2007.

2. **There is a more fully developed Consolidated PUD Application for a "T"-shaped subset of the Preliminary PUD's area.** This is in the central portion of the project area. Squares 825S and 825 (bounded by M, K, 4th and 5th Streets) comprise the tail of the T. Squares 797, 798, 824 and the western section of Square 880 (bounded by 3rd Street, the Marine Barracks Annex, Virginia Avenue and K Street) comprise the top of the T. The Consolidated PUD will contain both of the new mid-rise Senior buildings, as well as 233 units of stacked row-housing or townhouses.

   Included initially within the Consolidated PUD boundaries would be **Matter of Right Development Under Existing R-5-B Zoning.** This would be limited to the Senior building in Square 880, adjacent to the Marine Barracks annex. The applicant hopes to start construction on this building by Fall 2003. The building would then be incorporated into the PUD, should the Commission approve the Consolidated PUD application. The senior building will contain 162 units, generous common areas, space for medical facilities catering to Capper/Carrollsburg Seniors and a large central courtyard. The applicant wishes to expedite this construction so that most seniors living in structures to be demolished will have to relocate only one time. The timing of the new senior building's construction entails some procedural complications from a zoning standpoint. These would be rectified by the approval of the Consolidated PUD.[1] (OP has reservations about this approach, but does not feel the concerns warrant not setting down the case).

   The remainder of the construction within the Consolidated PUD will follow this Senior Building. The Consolidated PUD will include 233 units of rowhouse-type housing in Squares 797, 798, 824, 825, and the northern half of Square 825S. This phase would also see the construction of an additional 198 units of senior housing in a mid-rise building on Square 825S, adjacent to the existing Senior Building fronting on M Street.

   Drawings L-1.1, 2.0 and 2.1 in the application indicate that the applicant will reconstruct sidewalks, install new light fixtures, plant new trees, and install ornamental railings and/or street furniture in the landscaped common areas. The Consolidated PUD includes four semi-private open spaces associated with the rowhouse-type construction, and one private open space for each of the two senior buildings.

B. Project Description (Attachment 4 and Table 1)

1. Overview

The project is divided into three general areas:

- The Western portion, between 3rd Street and the portion of 2nd Street west of the federal Reservations known as the Canal Blocks, plus the current DPW trash transfer facility;

[1] All the land on which matter of right FAR for this building is calculated is currently owned by DCHA. However, DCHA is obligated to transfer some of this land to the Department of the Navy for the playing fields at the new Marine Barracks annex, which would render it non-conforming as to FAR, without zoning relief. The inclusion of the Senior Building in the Consolidated PUD to obtain that relief would avoid its becoming a non-conforming structure after the land transfer.

- The Central portion, between 3rd Street and 5th Street, plus the senior housing site in Square 880, noted above, and excluding the new private office building along M Street between 3rd and 4th Streets;
- The Southeastern portion, bounded by the Van Ness Elementary School, L, 7th and M Streets.

The applicant intends to demolish all of the remaining buildings within the PUD boundaries that are owned by the District of Columbia Housing Authority (DCHA), as well as some that are currently in private ownership.

The current number of public housing units in the Capper/Carrollsburg dwellings would be replaced on a one-to-one basis. The ratio of publicly-assisted to market-rate housing would generally be one-to-one.

The residential component will be composed of 1645 units. There will be:

- 871 rental or condominium apartments not reserved for Seniors;
- 360 apartments reserved for Seniors;
- 414 individual townhouses or rowhouse stacked units.

Of these, 707 units will be public housing replacement units, 50 will be Housing Choice Voucher Program (Section 8) for-sale units, and the remaining 838 will be moderate and market rate rental and for-sale units.

Within the high-rise residential buildings facing the Canal Blocks and facing New Jersey Avenue, there will be 21,000 square feet of neighborhood-serving retail space.

There will be three office buildings along M Street, totaling 753,000 square feet. Of this space, 30,000 square feet will be devoted to retail uses.

The location of the proposed new buildings will reinforce the traditional street grid.

M Street will be the principal commercial artery.

Three alleys and one street will be closed, and 3 blocks of new streets will be built. The street closing and dedication process will extend beyond the building permit stage for the first few phases of construction. Until the streets are completed and accepted into the District's system, it may be necessary to treat some of the parcels as theoretical lots.

The specific numbers and/or square footages of residential, office and retail uses, by Square, are listed in *Table 1*, on the next page. A description of the general nature of the plan for these areas follows the table.

Square	Proposed Use	Number of Stories	Bldg. Height (Feet)	Number of units	Sf of Office, retail	Building Area (footprint)	Percentage of Lot Occupancy	Building SF	Square SF	FAR
739	Residential Apartments	6 to 13	65 to 130	322	6000	51,735	0.73	430,013	70,732.79	6.08
767	Residential: Apartments	6	65	147	6000	30,368	0.39	182,210	77,412.97	2.35
768	Residential: Apartments	11	110	295	6000	30,368	0.38	334,052	79,001.8	4.23
769 – A	Residential: Apartments	11	110	107	*3000*	*15,446*		*169,906*	---	---
769 – B	Office	11	110		*236,000*	*23,600*		*236,000*	---	---
769 total					239,000	39,046		405,906	61,848	6.56
797	Residential: Townhomes/ Stacked Units	3 to 4	30-45	47		25,788	0.61	94,972	42,508.38	2.23
798	Residential: Townhouses/ Stacked Units	3 to 4	30-45	75		41,384	0.53	141,422	77,413.69	1.83
799	Residential: Townhouses/ Stacked Units	3 to 4	30-45	60		34,492	0.52	122,055	66,738.71	1.83
800	Residential: Townhouses/ Stacked Units	3 to 4	30-45	46		23,752	0.54	77,966	44,247.66	1.76
824	Residential: Townhouses/ Stacked Units	3 to 4	30-45	41		22,512	0.57	29,732	39,363.53	0.76
825	Residential: Townhouses/ Stacked Units	3 to 4	30-45	57		31,188	0.63	61,284	49,345.29	1.24
S-825-A	Residential: Townhouses/ Stacked Units	3 to 4	30-45	13		*7,035*		*25,411*	---	---
S-825-B	Residential: Senior Apartments	4	50	198		*32,592*		*166,717*	---	---
S-825 total						39,627	0.65	192,128	60,983.6	3.15
880	Residential: Senior Apartments	4	50	162		32,582	0.73	128053	44,917.35	2.85
881 W	Community Center	1 or 2	--	--	--	--	--	Approx 18,000	--	--
882-A	Residential: Townhouses/ Stacked Units	3 to 4	30-45	75		*39,924*		131,288	---	
882-B	Office	9 to 10	110		496,000	*45,090*		496000	---	
882 total					496,000	85,014	0.54	627,288	15,8215.6	3.96
Total				**1645**	**753000**	**487,856**		**2,827,081**	**908,184.9**	**3.11**

Table 1

2. Western Portion

When fully developed, the Canal Blocks will have become a public park flanked by a 110'-high office building entered from M Street, with retail on the ground-floor (southern half of Square 769). High-rise residential buildings with neighborhood-serving retail will be constructed along the eastern side of the Canal Blocks. They will step-down, south to north, from 110' to 65' (northern part of Square 769 and Squares 768 and 767. The housing will be primarily market rate rental and condominium units, because HUD guidelines do not permit new publicly assisted housing for families in high-rise buildings.

The Canal Blocks will have been cleared and seeded as part of this PUD and landscaped as part of joint public-private venture.

The DPW site at the north and west end of the Canal Blocks (Square 739) will have the existing roadways and public reservations configured. A market rate apartment building will be constructed south of a new I Street. This will be 130' high along New Jersey Avenue and 65' high along the Canal Blocks.

3. Central Portion

The core of the project area (Squares 798, 799 and the northern half of Square 800, as well as Squares 824, 825 and the northern edge of Square 825S), will appear as-if the buildings were three and four story rowhouses. Some will be actual single-family rowhouses; others will actually be multi-family apartments and duplexes. All will be ground level or walk-up units. Two of the Squares will have additional streets inserted within them to enable the construction of more front street-facing townhouses, and ground-level and walk-up units. The new streets will run north-south from I Street to L Street between 2nd and 3rd Streets. The southern end will terminate in a small park on the south side of L Street.

At the southeastern corner of the central portion, behind the existing Senior high-rise building along M Street (Square 825S) a new 50' Senior building will be constructed.

The northeastern-most part of the central portion will be the previously mentioned Senior mid-rise building. This would be constructed (initially) under matter-of-right R-5-B zoning, adjacent to the new Marine Barracks annex's parade grounds and recreation fields (Square 880).

South of the matter-of-right Senior building, and north of the Van Ness Elementary School, the applicant will construct a new community center in Square 881W, on the east side of 5th Street. This community center's program will be integrated with the recreation facilities being constructed at the Marine Barracks annex.

4. Southeastern Portion

In the southern half of Square 882, along M Street between the Van Ness Elementary School and 7th Street, there will be two 110' high office buildings that will include retail uses on the ground floors. The northern half of the Square will be developed with walk-up, row-house type residences.

C. Architecture and Urban Design

There will be several residential building types. The lower, walk-up structures will be based on a traditional Washington building vernacular. Most structures will be brick and will be required to reinforce the building line at the street right-of-way. There are a wide variety of interior designs to accommodate a range of family sizes. Fully accessible units will be on the first floors. The variety of designs will be accommodated within facades that generally appear to be rowhouses. The Preliminary PUD urban design guidelines are included in Section U1 – U4 of the applicant's submission drawings.

The office buildings and high-rise residential structures will be required to follow a traditional tri-partite form. Special treatment will be required for important intersections, especially those that demarcate public spaces.

The application includes standards for landscaping, paving, light fixtures and other street furniture. The standards are consistent with those for other larger-scale projects approved by the Commission in the last few years.

The drawings do not seem to indicate that the applicant will engage in reconstruction or rehabilitation of existing curbs or streets.

Design guidelines for the Preliminary PUD and for the Consolidated PUD are included in two separate booklets submitted with the PUD application.

V. PUD EVALUATION

The proposal is generally consistent with the objectives and evaluation standards of a Planned Unit Development, as defined in DCMR Section 2400.

The objectives of a PUD are:

- to permit flexibility of development in return for
- the provision of superior public benefits,
    - o provided the PUD process is not used to circumvent the intent and purposes of the Zoning Regulations,
    - o or results in an action inconsistent with the Comprehensive Plan.

A. Consistency with the Comprehensive Plan

1.The Economic Development Element

The policy at 11DCMR §209.6(b) (5) encourages the use of the Navy Yard expansion to generate redevelopment, business activity and employment in the surrounding area.

Discussion

The PUD will include 753,000 square feet of office space, inclusive of 30,000 square feet of retail space. There will be another 21,000 square feet of retail space on the first floors of

apartment buildings. The office space will help anchor M Street's position as the primary office corridor in Southeast Washington.

The ancillary programs of the Hope VI development will provide job and skill training for eligible residents so that the office space can provide employment opportunities for the residents..

2. The Housing Element

The policies in §303 encourage provision of housing for low and moderate income residents, provision of opportunities for homeownership, self-sufficiency and upward mobility; the removal of units where excessive densities or other design factors make rehabilitation undesirable; the provision of replacement units, and a mixing of income levels and household sizes in rehabilitated projects.

The policies in §304 stress the need to continue to rehabilitate and provide publicly owned housing for the elderly.

Discussion

707 deteriorated units of public housing, many of them in high-rise buildings deemed inappropriate for families, will be replaced by 707 units of new public housing. 300 of these units will be reserved for the elderly. The family units will be in accessible and walk-up units with a range of bedroom configurations. An additional 50 units will be targeted to Section 8 Housing Voucher homeownership. These publicly assisted units will be mixed in with another 650 units of market rate housing. While many units of market rate housing will be concentrated around the 2nd Street Canal Blocks, there will be a substantial number of market rate townhouses and market rate condominium units between 3rd and 7th streets. The design of the publicly assisted and market rate units will be indistinguishable from the exterior.

3. The Environmental Element

The policy at §403.2 (c) urges the promotion of land use patterns that decrease reliance on automobiles through clustering of multi-use neighborhoods in proximity to transit services.

Discussion

Capper/Carrollsburg is between two and six blocks from the Navy Yard Metro. With its proximity to Metro and its mix of housing, retail and office development, it will become an example of transit-oriented development. It will also double the number of housing units in proximity to the Navy Yard Metro while still being less dense than the aggregate density permitted by the existing zoning.

4. The Urban Design Element

§712.1 encourages new development or renovation that promotes a strong, positive physical identity.

Discussion

The "neo-traditional" design of this project encourages very strong physical identity and integration with surrounding neighborhoods. It continues the street pattern and vernacular of Capitol Hill, provides for new parks that give clear focal points for community gathering and recreation, and begins the reconnection of the neighborhood to the Anacostia River Waterfront.

5. The Generalized Land Use Map *(Attachment 5)*

The area west of the 2nd Street Canal Blocks is designated as suitable for medium-high density commercial uses. The southern half of the Squares along the north side of M Street, between New Jersey Avenue and 4th Streets are also designated for these uses.

The remaining area encompassed by the proposed PUD is deemed suitable for medium density residential uses.

The area bounded by K, L and 5th Streets, and a boundary line between 6th and 7th Streets – known as federal Reservation 19 – is designated for parks, recreation and open space.

Discussion

In aggregate, the proposal addresses all of the uses contemplated by the Generalized Land Use Map. At the Square level, there are difference between the proposal and the Map.

6. The Generalized Land Use Policies Map

The Arthur Capper Dwellings are labeled a Housing Opportunity Area.

Discussion

The Comprehensive Plan's Generalized Land Use Map designates the site as appropriate for medium-density housing, and medium-high density commercial. However, the Comprehensive Plan's Generalized Land Use Policies Map clearly identifies the site as a Housing Opportunity Area, because of its adjacency to a Metro stop. Increased residential density is consistent with several of the written policies, objectives and proposed actions of the Comprehensive Plan, as well as with the policies of the Mayor's Task Force on Transit Oriented Development.

B. Consistency with the PUD Evaluation Standards of Section 2400

In the following tables, areas where different zone districts are proposed, or where the proposed development exceeds the matter of right standard for the existing zoning are indicated with shading.

1. Quantitative Standards: Lot Coverage

Lot Coverage Calculations										
	EXISTING CONDITIONS			PROPOSED ZONING			PROPOSED DEVELOPMENT			
Square		Zoning	Maximum Lot Coverage matter-of-right and PUD	Proposed zoning	Maximum Lot Coverage matter-of-right and PUD	Qualifiers	Square's Proposed Res. Lot Coverage	Square's Proposed Comm. Lot Coverage	Total Lot Coverage	Square's Percentage of Lot Coverage
739	70,733	C-3-C	100%	C-3-C						
767	77,413	R-5-B	60%	CR	100%	Non-res. coverage limited to 75%	51,735			73.14%
768	79,002	R-5-B	60%	CR	100%	"	30,368			39.23%
769 (northern)	49,418	R-5-B	60%	CR	100%	"	30,368			38.44%
769 (southern)	47,885	CG/C-3-C	100%	C-3-C	100%	--		23,600		31.26%
769 (total)	97,303									
797	42,508	R-5-B	60%	R-5-B	60%	--	25,788			49.28%
798	77,414	R-5-B	60%	R-5-B	60%	--	41,384			60.67%
799	66,739	R-5-B	60%	R-5-B	60%	--	34,492			53.46%
800	44,248	R-5-B	60%	R-5-B	60%	--	23,752			57.19%
824	39,364	R-5-B	60%	R-5-B	60%	--	22,512			63.20%
825	49,345	R-5-B	60%	R-5-B	60%	--	31,188			64.98%
825S	60,984	R-5-B	60%	R-5-B	60%	--	39,627			72.54%
880	44,917	R-5-B	60%	R-5-B	60%	--	35,582			57.73%
882 (northern)	78,102	R-5-B	60%	CR	100%	Non-res. coverage limited to 75%		45,090		49.83%
882 (southern)	80,114	R-5-B	60%	R-5-B	60%	--	39,924			
TOTAL	**908,185**						**419,166**	**68,690**	**487,856**	**53.72%**

Table 2

In an R-5-B zone, the most restrictive zone district within the application's boundaries, a PUD has a 1-acre minimum lot area. This project meets that standard.

Although individual lots exceed Zoning Regulation standards for lot coverage, the aggregate lot coverage is well below that permitted. 11DCMR§2405.4 permits the Commission to approve deviations, depending upon the exact circumstances of a particular project. The pre-hearing statement will need to address these circumstances more explicitly.

Quantitative Standards: Height

Height Calculations									
	EXISTING ZONING			PROPOSED ZONING			PROPOSED DEVELOPMENT		
Square	Zoning	Maximum Height, Matter-of-Right	Maximum Height, PUD	Proposed Zoning	Maximum Height Matter-Of-Right	Maximum Height PUD	Proposed Height	Height Change (ft.) from Existing Matter- Of Right	Height Change (ft.) from Existing PUD
739	C-3-C	90	130	C-3-C	90	130	130 on NJ 65 on 2nd	+40 on NJ Ave -25 on 2nd St	None on NJ -65 on 2nd
767	R-5-B	50	60	CR*	90	110	65	+15	+5
768	R-5-B	50	60	CR*	90	110	110	+60	+50
769	R-5-B (northern)	50	60	CR*	90	110	110	+60	+50
769	CG/C-3-C (southern))	90	130	C-3-C	90	130	110	+ 20	-20
797	R-5-B	50	60	R-5-B	50	60	30-45	-(15-20)	-(15-20)
798	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	-(15-20
799	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	- (15-20)
800	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	- (15-20)
824	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	- (15-20)
825	R-5-B	50	60	R-5-B	50	60	30-45	- (15- 20)	- (15-20)
825 S (northern)	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	- (15-20)
825 S (southern)	R-5-B	50	60	R-5-B	50	60	50	0	-10
880	R-5-B	50	60	R-5-B	50	60	50	0	- (10)
882 (northern)	R-5-B	50	60	R-5-B	50	60	30-45	- (15-20)	- (15-20)
882 (southern)	R-5-B	50	60	CR*	90	11	110	+60	+50

Table 3

Section2405.2 sets maximum heights. The proposed building heights would be within matter of right zoning limits for all but the following areas, which are also highlighted with shading in the above table:

- The Squares fronting on the Canal Blocks at 2nd Street. The height would be greater here near the Metro, where the streets are wider, where there is a significant public space, and where the market is already building 110 and 130-foot high office buildings and residential structures.

- The Squares at either end of M Street, where office buildings are desired to generate revenue that will help to support the project.

The proposed heights would be within limits permitted by the requested CR zoning.

Quantitative Standards: FAR

Density Calculations										
	EXISTING ZONING			PROPOSED ZONING			PROPOSED DEVELOPMENT			
Square	Zoning	Maximum FAR & GFA matter-of-right	Maximum FAR & GFA PUD	Proposed zoning	Maximum FAR & GFA matter-of-right	Maximum FAR & GFA, PUD	Proposed Comm. GFA	Proposed Res. GFA	Proposed Total GFA	Proposed FAR
739	C-3-C	6.5 459,762	8.0 565,861	C-3-C	459,762	565,861	6,000	424,013	430,013	6.08
767	R-5-B	1.8 139,343	3.0 232,239	CR	6.0 464,478	8.0 619,304	3.0 FAR limit 6,000	176,210	182,210	2.35
768	R-5-B	1.8 142,203	3.0 237,005	CR	6.0 474,011	8.0 632,014	3.0 FAR limit 6,000	328,052	334,052	4.23
769 (northern)	R-5-B	1.8 193,450	3.0 322,416	CR	6.0 296,509	8.0 395,345	3.0 FAR limit 3,000	166,906	169,906	3.44
769 (southern)	C-3-C	6.5 104,494	8.0 128,608	C-3-C	311,255	383,083	236,000		236,000	4.93
797	R-5-B	1.8 76,515	3.0 127,525	R-5-B	76,515	127,525		94,972	94,972	2.23
798	R-5-B	1.8 139,345	3.0 232,241	R-5-B	139,345	232,241		141,422	141,422	1.83
799	R-5-B	1.8 120,130	3.0 200,216	R-5-B	120,130	200,216		122,055	122,055	1.83
800	R-5-B	1.8 79,646	3.0 132,743	R-5-B	79,646	132,743		77,966	77,966	1.76
824	R-5-B	1.8 70,854	3.0 118,091	R-5-B	70,854	118,091		29,732	29,732	0.76
825	R-5-B	1.8 88,822	3.0 148,036	R-5-B	88,822	148,036		61,284	61,284	1.24
S825	R-5-B	1.8 109,770	3.0 182,952	R-5-B	109,770	182,951		192,128	192,128	3.15
880	R-5-B	1.8 80,851	3.0 134,752	R-5-B	80,851	134,752		128,053	128,053	2.85
882	R-5-B	1.8 144,204	240,341	CR	6.0 480,681	8.0 640,908	496,000		496,000	6.19
882	R-5-B	1.8 140,584	3.0 234,306	R-5-B	140,584	234,306		131,288	131,288	1.68
TOTAL		2,089,973	3,237,330		3,393,212	4,747,376	753,000	2,074,081	2,827,081	
Aggregate		2.30	3.56		3.74	5.23	0.83	2.28	3.11	

Table 4

- §2405.2 states that the FAR shall not exceed the aggregate FARs as permitted in the project area's zone districts, as modified by the PUD regulations. The maximum FAR for a PUD may not exceed 3.0 in the R-5-B zone, 8.0 in the C-3-C district, or 8.0 in the CG/C-3-C district. §2405.3 permits the Commission to authorize a 5% increase in height or FAR if deemed essential for project function and consistent with PUD evaluation standards. The aggregate FAR that would be permitted for a PUD in the project area is 3.56 and the aggregate FAR for the proposed development would be 3.11. Overall, the project seems to meet the standards of §2405.2.

The project would exceed the currently permitted matter of right FAR for the following individual Squares: 768, 769, 797, 797, 798, 799, 825S, and 882. It would exceed the FAR permitted for a PUD under existing zoning for the following individual Squares: Squares 768, 769, 825S and 882. Because of this the applicant is seeking rezoning in the following Squares:

- A portion of Square 769 from R-5-B to CR
- All of Square 768 from R-5-B to CR
- All of Square 882 from R-5-B to CR.

It appears that, with the requested rezoning, the proposed development in all but Square 825S would meet the FAR standards for a PUD. However, OP will continue its FAR analysis should the Commission set down the project for a public hearing.

2. Quantitative Standards: Traffic

OP has reviewed the traffic study performed by O.R. George Associates, dated March 21, 2003. The study was developed in consultation with the District Department of Transportation (DDOT). Future background development projections were based on information supplied by OP, the office of the Deputy Mayor for Economic Development, and on information contained in the USDOT Headquarters Traffic Impact Analysis performed by Gorove Slade & Associates, 2003. Future traffic projections considered scenarios both with and without the projected new 100 block of Eye Street, SE.

OP notes that the background development assumptions for the Southeast Federal Center, as listed in Table 2 (page 8) of the O.R. George report, may be low, perhaps by as much as 50%, for projected office development. This could have an impact on the future Level of Service projections listed in Table 4 (page 16) for the intersection of New Jersey Avenue and M Street, S.E. n the report's Table 4. While this intersection is just outside of the Capper-Carrollsburg PUD boundaries, it is an important intersection to give additional consideration. It is projected at a Level of Service (LOS) D for the p.m. peak hour. This is lowest LOS considered generally acceptable in an urban setting. This intersection will also be the principal entrance to the new Southeast Federal Center development and to the planned Department of Transportation Headquarters.

One other intersection, 7th and M Streets is also projected for LOS D. Again, this is outside the PUD boundaries. But here, again, should certain development assumptions –such as those for Maritime Plaza, or for property at the eastern terminus of Virginia Avenue – be low, traffic at this intersection could be of future concern.

Overall, however, the proposed PUD is anticipated to generate an average of 807 peak-hour vehicular trips. Given the broad distribution of the project-area road network, and the temporal spacing of traffic generation given the range of planned uses, OP feels that the applicant has demonstrated that the project's traffic impact would not be unacceptable. Any traffic concerns are not serious enough to impede recommending the scheduling of a public hearing.

3. Quantitative Standards: Parking

Section 4.5 (page 24) of the O.R. George study tabulates the parking requirements and how they will be met by the proposed project. Sheet T-3.0 of the applicant's architectural and design drawings (Torti

Gallas) also address parking tabulations. There seem to be some minor discrepancies and questions raised by a comparison of the two presentations. These will need to be addressed in the pre-hearing statement. These include:

- The Torti-Gallas drawings list 1447 off-street residential parking spaces; the O.R. George report lists 1396 off-street residential spaces, plus another 54 spaces associated with retail, some of which uses will be in residential buildings.
- The Torti-Gallas drawings seem to indicate that some parking may be stacked. The pre-hearing statement should address whether this is stacked parking and, if so, how such parking would function in structures that may include more than one residential unit.

4. Additional Zoning Flexibility Requested

a. Possible Variances

The applicant has not provided information on variances that may be needed. Based on OP's experience with other Hope VI projects, it may be necessary to seek some of the following variances.

DCMR Section	Requirement	Matter of Right	# of Lots	Variation
Theoretical Lots				*Range of relief requested, by measurement and percentage*
2516.5 (b)	Front open space equivalent to greater of rear yard or distance from building restriction line to front public space	--	--	--
2516.5 (d)	Rear yard of theoretical. lot shall be along subdivided lot's rear lot line	--	--	--
Final Lots				
403.2	Lot Occupany	60%; .9 FAR	--	--
405.1 & 405.4	Side Yard	None, or, if provided, 8 feet	--	--
404.1	Rear Yard	4"/ft of structure's vertical distance, not less than 15'	--	--
410.3	Front Entrance	Entrance on street, front yard or front court	--	--
406.1	Closed Courts	Width: 4"/ft. of structure's height; not less than 6' for single family or 10' for other	--	--
406.1	Open Court	See regulations	--	--

Table 5.

Should such variances be necessary the pre-hearing statement will need to include such information.

b. Requested Rezoning *(Attachment 3)*

The applicant is requesting the rezoning of Squares 767, 768, the northern half of Square 780 and the southern half of Square 882. In each instance the requested rezoning is from R-5-B to CR. OP has had several discussions with the applicant about this request and is supporting it. However, Section F of the Applicant's statement (page 17) does not describe the constraints that would be imposed on the Hope VI program by retaining the existing zoning on these parcels, nor does it explain the reasons why the applicant feels the rezoning is needed for the project to work. This will need to be addressed in the pre-hearing statement.

7. Amenities and Benefits in Relation to the Degree of Flexibility

From its two years of involvement reviewing the Hope VI project, OP knows the project to have a high degree of public benefit in relation to the degree of flexibility requested. In OP's opinion, the applicant's statement has not demonstrated this adequately, and the applicant will need to provide additional information in the pre-hearing statement.

The applicant describes several exceptional merits that justify consideration of the project as a PUD:

- Urban Design, Architecture and Site Planning. Deteriorated mid-rise apartment buildings and row-apartments will be replaced with a more traditional design that promotes more interaction, "eyes-on-the-street" safety and connection with the surrounding urban grid. Historic open spaces will be recaptured. Architecture that stigmatizes residents as public-housing occupants will be replaced with designs that make no distinction between residents on public assistance and those who are not.

- A Mix of Housing Types and Family Incomes. The isolation of families dependent on public assistance will be replaced by a physically integrated mix of housing serving a range of users from public housing-eligible seniors and families to those who can afford market rate units.

- Social Services and Facilities. Hope VI requires social programs that help families become more mature renters and homeowners, and teach new job skills. The new community center and recreation fields at 5th Street and the Marine Barracks annex will provide expanded opportunities for training and play.

- Employment and Family-building Opportunities. The extensive public involvement effort of the last two years has already begun to build future community leadership capacity. The PUD application makes a commitment to a job-training program for 50 adults with a commitment of 15 job placement slots. The applicant states that family-self-sufficiency placements have also contributed to more economically viable households.

- Environmental Benefits: Clean up of Canal Blocks new parks, and two smaller landscaped areas, as well as new storm sewers and retention facilities will be constructed. The pre-hearing statement will need to be more specific about the new utilities that will be constructed.

- Increased Tax Revenues. It is anticipated that the new opportunities for home ownership will keep some existing middle-income families in the District, who would otherwise have left. The project will also provide opportunities for new middle-income families to move into the District.

Increased property and income taxes will result. The infusion of 838 units of moderate and market-rate housing, plus the construction of 702,000 square feet of office space, and 51,000 square feet of retail space will bring new income tax and property tax revenue to the District.

- The applicant estimates that the $35 million Hope VI grant will leverage approximately $400 million of private construction.

In addition to the benefits listed by the applicant, OP notes the following:

- While many individual lots will exceed matter of right lot occupancy limits, the traditional design of the PUD will result in an overall FAR of 3.11. The density of the overall project will be less than that permitted under a PUD with the current zoning.

- Parking appears to more than meet matter-of-right standards.

- Usable open space will be increased through the proposed improvements to the Canal Blocks, through small open spaces scattered throughout the housing component, and through the construction of the open space associated with the new community center.

- The applicant will construct a new community center that will become the focal point for social, recreational, and support-services activities in the neighborhood.

- The combination of neighborhood-serving retail in the first floors of apartment buildings, and the commercial-space oriented retail on M Street, will help ensure the needed variety of services currently absent from this mixed-use neighborhood.

VI. AGENCY REFERRALS AND COMMENTS

This application will be referred to the following District government agencies for review and comment:

1. Department of Public Works;
2. Metropolitan Police Department;
3. Fire and Emergency Medical Services Department;
4. Department of Housing and Community Development;
5. Department of Transportation, and;
6. Department of Community and Regulatory Affairs (DCRA).

Most of these agencies have already been part of the pre-application review process initiated by the Business Ambassador program at DCRA. Many comments have already been incorporated in the designs the applicant is now submitting.

VII. COMMUNITY COMMENTS

The Community has been involved in all steps of the planning process, as is noted in the applicant's preliminary statement exhibits. The most recent public meeting was held April 29, 2003, and an

322 Total Off-Site Units
115 Public Housing Units

Houses to Remain

3-Story Townhomes
32 Section 8 H. O. Units
122 Public Housing Units
260 Market Units



4-Story Senior Apartments
162 Units

Canal Park

Community Center

6- & 11- Story Apartments & Condominiums
160 Public Housing
18 Section 8 Home-Ownership
371 Market-Rate

Office

4-Story Senior Apartments
138 Units

Office

Capper/Carrollsburg Venture, llc/DCHA
Torti Gallas and Partners

Cappper/Carrollsburg Dwellings

ATTACHMENT 4

Attachment 5
Orange = Medium Density Residential
Purple = Medium-High Density Commercial
Green = Park/Open Space

