

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: JL fgennifer Steingasser, Deputy Director Development Review & Historic

Preservation

DATE: June 19, 2015

SUBJECT: Setdown Report for ZC #15-02, Consolidated PUD and related Zoning Map

Amendment from R-5-A to R-5-B, Brookland Townhomes (Square 3645, Lots

802 and 804, Square 3648, Lot 804 and Parcel 132/89)

I. RECOMMENDATION

OP recommends setdown of the consolidated PUD and PUD-related map amendment from the R-5-A District to the R-5-B District requested by MHI-Brookland, LLC and The Redemptorists (the "Applicant") to permit development of 40 townhomes, including 5 designated affordable units, at 3112 7th Street NE (Square 3645, Lots 802 and 804, Square 3648, Lot 804 and Parcel 132/89) (the "Property"). The existing Redemptorist (Holy Redeemer) building would remain on the Property and the Applicant would construct the new townhome units around the existing building. The development would include 114,882.2 square feet of development, or .96 Floor Area Ratio (FAR), which is below the matter-of-right FAR of 1.8 in the R-5-B District and the 3.0 FAR in an R-5-B PUD. The proposed PUD would include a total of 80 parking spaces, including 57 spaces for the townhome units (49 garage spaces and 8 surface spaces) and 23 spaces for the Holy Redeemer building. The existing Redemptorist building is considered eligible for historic designation, staff of the Historic Preservation division within OP have participated in discussions with the applicant regarding the proposed site plan.

The proposal conforms to the Comprehensive Plan's objectives for the Upper Northeast Area and would advance key Land Use and Housing goals by constructing transit-accessible infill housing on an underutilized lot, with an affordable housing component. The Property is intended for Institutional Use and the Generalized Policy Map locates the site within an area designated for Institutional Uses.

OP informed the Applicant that the following information should be provided prior to the public hearing:

- Revised site plan that eliminates the surface visitor parking spaces along the access driveways, and introduces appropriate lawn or landscaping, minimizes the width of drive aisles, and provides information on bike parking facilities;
- A more detailed stormwater management, site, and landscaping plan indicating how the proposal meets stormwater management requirements;
- Additional detail regarding the environmental benefits, including how the 0.4 GAR

requirement will be met;

- More detailed elevations that show design and materials for all units and that provide for the following: fully designed end units for all units and not just "high profile" units; revised treatment of the cornice at the intersection of the third and fourth floors; and high quality, fully designed rear elevations;
- Updated Affordable Dwelling Unit (ADU) Location Plan that better distributes the location of the units and provides larger units with a three-bedroom option;
- Additional information regarding the extent of employment and training opportunities; and
- A refined amenities package commensurate with the requested flexibility.

II. SITE AND SURROUNDING AREA

The proposed development would be located on a regularly shaped property within the Brookland neighborhood of Ward 5. The site consists of Lots 802 and 804 in Square 3645, Lot 804 in Square 3648, and Parcel 132/89 for a total of 2.73 acres. The Redemptorists obtained the Property in February 1932. The existing Holy Redeemer building, a four-story masonry structure, was constructed in 1934.

Directly surrounding the Property is a community consisting of a mixture of residential unit types and institutional uses. The Property is bounded by St. Paul's College and the Chancellor's Row development to the west (ZC Case # 07-27); a residential multi-family building to the south; 7th Street NE to the east; and Jackson Street NE to the north. To the east across 7th Street NE are two-story single-family dwellings in the R-4 district.

The Property features an elevated lawn panel, upon which the existing building sits. The Property slopes down from the lawn to 7th Street NE.

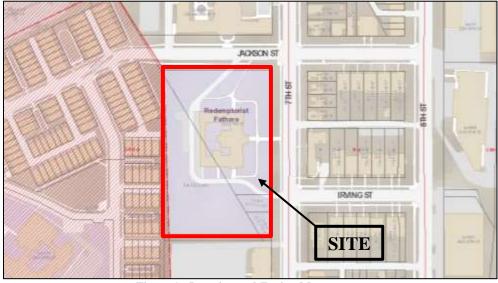


Figure 1: Location and Zoning Map

III. PROJECT DESCRIPTION

Ward/ANC: Ward 5, ANC 5E

Applicant/Owner: MHI-Brookland, LLC/The Redemptorists

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Current Zoning:

D/R-5-A Low Density Residential in the Mixed Use Diplomatic Overlay District

Existing Use of the

Property:

Four-story masonry building used for religious, residential (30 residential boarding rooms), and accessory office purposes. To remain; eligible for historic landmark designation.

Comprehensive Plan Future Land Use Map Designation:

Institutional

Property Size:

119,215 square feet (2.73 acres)

Proposal:

Together with a related map amendment to R-5-B, develop 40 residential townhomes of masonry, metal, and Hardie panel construction.²

The townhomes would vary in width from 14 to 18 feet with a typical depth of 37 feet. Each unit would be four stories in height with two to three bedrooms. The ground floor would include the garage parking and den. The partial fourth floor would include loft space, as well as access to a roof terrace with private outdoor space.

The total Gross Floor Area (GFA) is 114,882.2 square feet or an FAR of 0.96 for the entire site and 84,273.2 square feet or an FAR of 1.33 for the townhome portion of the project. The proposed FAR is greater than what would be permitted in the base R-5-A zone (0.9 max.) but is consistent with the 3.0 FAR permitted for an R-5-B/PUD.

No less than 12% of the GFA would be affordable with two townhomes for households at 80% of Area Median Income (AMI) and three townhomes for households at 50% of AMI.

The project would provide a total of 80 parking spaces. The townhomes would provide 57 spaces with 49 garage spaces and 8 surface spaces along the access drive aisles. The Redemptorists would maintain their parking area with approximately 23 spaces.

Relief and Zoning:

Pursuant to 11 DCMR Chapter 24, the Applicant/Owner seeks:

- 1. Consolidated PUD and related map amendment to the R-5-B District;
- 2. Flexibility from the rear (§ 404.1) and side (§ 405.6) yard requirements and to permit more than one structure on a single record lot (§ 2516) and from the front, rear, and side yard requirements of this section (§ 2516.5);

Additional discussion of the requested flexibility can be found in **Section V** of this report.

² See the Applicant's submitted plans dated May 12, 2015, Exhibits 12A1 – 12A4, Sheets A.101-A.400.

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The Applicant is working with ANC 5E to refine the amenity package prior to the public hearing.

IV. COMPREHENSIVE PLAN AND PUBLIC POLICIES

The proposed PUD must not be inconsistent with the Comprehensive Plan and with adopted public policies (§ 2403.4). The development proposal is not inconsistent with the Future Land Use and Generalized Policy Maps and would further objectives of the Land Use, Housing, and Upper Northeast Area elements and their related policies.

A. Generalized Policy Map

The Generalized Policy Map locates the Property within an "Institutional Area," which is characterized by colleges and universities, private schools, child care facilities, places of worship and other religious facilities, hospitals, private and non-profit organizations, and similar entities.

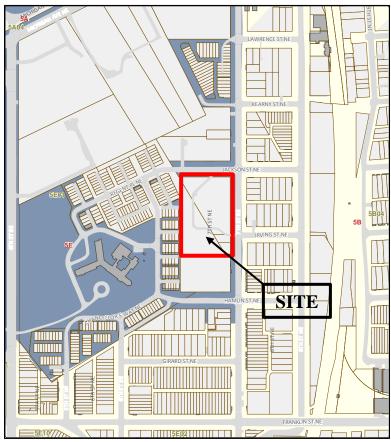


Figure 2: Comprehensive Generalized Plan Policy Map

B. Future Land Use Map

The Future Land Use Map also designates the subject property for Institutional Use. Properties to the east across 7th Street NE are designated for Moderate Density residential use and are in the R-4 district. These properties are characterized by one-family detached dwellings, row dwellings, and low-rise apartment complexes. Although this proposal represents a change in use from institutional, this development and the associated zone map change would not be inconsistent with the abutting land use designation.

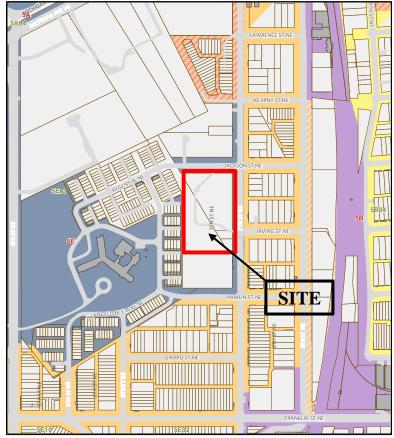


Figure 3: Comprehensive Plan Future Land Use Map

C. Comprehensive Plan Policies

The Property is located in the Upper Northeast Area of the Comprehensive Plan. There are several policies within the Upper Northeast Area Element, as well as policies in the Citywide Framework (primarily the Land Use and Housing Elements), which encourage the protection of the residential character of the Brookland neighborhood while allowing for sensitive infill development on underutilized lots.

Upper Northeast Area Element

The project would be consistent with the following policies contained in the Upper Northeast Area and Land Use Elements of the Comprehensive Plan.

- Policy UNE-1.1.1: Neighborhood Conservation Protect and enhance the stable neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond Riggs, and Arboretum. The residential character of these areas shall be conserved, and places of historic significance, gateways, parks, and special places shall be enhanced. 2408.2
- **Policy UNE-1.1.3: Metro Station Development** Capitalize on the presence of the Metro stations at Rhode Island Avenue, Brookland/CUA, and Fort Totten, to provide new transit-oriented housing, community services, and jobs. ...Development shall comply with other provisions of the Comprehensive Plan regarding the compatibility of new land uses

- with established development, the provision of appropriate open space, and mitigation of impacts on traffic, parking, and public services. 2408.4
- Policy UNE-1.2.7: Institutional Open Space Recognize the particular importance of institutional open space to the character of Upper Northeast, particularly in and around Brookland and Woodridge. In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces. Connections between Upper Northeast open spaces and the network of open space between McMillan Reservoir and Fort Totten also should be pursued. 2409.7

Land Use Element

• Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods — Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to "create successful neighborhoods" in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. 309.8

The project is consistent with the policies of the Upper Northeast Area and Land Use Elements, as it is an infill residential project that would provide appropriately scaled, transit-accessible housing with an affordable component and would result in the redevelopment of an existing institutional site, along with the preservation of the Holy Redeemer College building and functions.

Transportation Element

- **Policy T-1.1.4:** Transit-Oriented Development Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. 403.10
- Policy T-2.4.1: Pedestrian Network Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city. 410.5

The Property is located within one-half mile of the Brookland/CUA Metrotrail Station, which is served by the Red Line. The Property also is proximate to the G8 and D8 Metrobus routes. The Applicant is proposing to provide sidewalk at the perimeter of the property, which will close an existing gap in the neighborhood sidewalk network on 7th Street NE. The proposed improvements should connect the project and surrounding neighborhood with the Metro, new development at Monroe Street Market, and other neighborhood amenities.

Urban Design Element

- **Policy UD-2.2.1:** Neighborhood Character and Identity Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. 910.6
- **Policy UD-2.2.7: Infill Development** Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. 910.15

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The Applicant is proposing to maintain the Holy Redeemer building at the center of the site and the development parcels to the north and south will be improved with a total of 40 townhomes. The proposed townhome design relates to other neighborhood development in the area, including Chancellor's Row and the varied architecture found in the residential and religious buildings in the neighborhood.

Housing Element

- **Policy H-1.1.1:** Private Sector Support Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 503.2
- **Policy H-1.1.3: Balanced Growth** Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. 503.4
- Policy H-1.2.1: Affordable Housing Production as a Civic Priority Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. 504.6

The Applicant is proposing to construct 40 townhomes on an underutilized property. The proposed development also would result in the provision of five new units of affordable housing with no less than 12% of the GFA of the site dedicated to affordable units with two townhomes for households at 80% of Area Median Income (AMI) and three townhomes for households at 50% of AMI.

Parks, Recreation, and Open Space Element

• **Policy PROS-4.2.1: Institutional Open Space** – Encourage local institutions, such as private and parochial schools, colleges and universities, seminaries, hospitals, and churches and cemeteries, to allow the cooperative use of their open space lands for the benefit of District residents. 818.3

The Applicant is proposing to maintain a portion of the lawn that frames the Holy Redeemer building and the proposed development on the site has been organized in such a way as to provide deference to the structure. The northern townhomes are oriented to Jackson Street NE and the southern townhomes are arranged to form a separate grouping. One stick of units fronts on 7th Street NE, the two interior sticks front on a mews that it 28 feet in depth, and the rear stick faces a landscaped yard at the rear of the Property.

Environmental Protection Element

- Policy E-1.3.2: Grading and Vegetation Removal Encourage the retention of natural vegetation and topography on new development sites. Grading of hillside sites should be minimized and graded slopes should be quickly revegetated for stabilization. 605.3
- Policy E-3.1.1: Maximizing Permeable Surfaces Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. 613.2

• **Policy E-3.1.3:** Green Engineering – Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. 613.4

The Applicant is proposing to preserve as many mature trees on-site, as possible, and minimize the number of specimen trees to be removed. The Applicant is proposing to install bio-retention areas and pervious paving.

V. ZONING

Standard	R-5-A	R-5-B	R-5-B/PUD	Proposed	Flexibility
Min. Area	2 acres	1 acre	1 acre minimum	2.73 ac.	Complies
for PUD			(43,560 sq. ft.)	(119,215 sq. ft.)	
Height	40 ft./3 stories	50 ft.	60 ft. maximum	41 ft., 6 in./	Complies
				4 stories for	
				townhomes	
FAR	0.9	1.8	3.0 maximum	.96 for site	Complies
Lot	40%	60%	60% maximum	28 % for site	Complies
Occupancy				(townhomes &	
				Holy Redeemer)	
				63.31 % - 90.32	
				% for townhomes	
Lot Width	40 ft.			14 – 18 ft. for	Complies
				townhomes	
Rear Yard	20 ft.	4 ft./ft. of height of	4 ft./ft. of height of	4 ft. for	Relief
		building but not less	building but not less	townhomes	Requested
		than 15 ft.	than 15 ft.		
				.97 ft. for Holy	
				Redeemer	
Side Yard	3 ft./ft. of	None required but if	None required but if	0 ft. north side	Relief
	height of	provided 3 ft./ft. of	provided 3 ft./ft. of	9.5 ft. south side	Requested
	building but not less than 8 ft.	height of building but not less than 8 ft.	height of building but not less than 8 ft.	for site	
				1.7 - 5 ft. for	
				townhomes	
Parking	1 space for	1 space for each	1 space for each	80 sp. for site	Complies
	each dwelling	dwelling unit	dwelling unit OR	1	1
	unit			57 sp. for	
			40 spaces	townhomes	
			•		
				23 sp. for Holy	
				Redeemer	

Flexibility

The Applicant has requested flexibility from the strict application of the rear and side yard requirements, as well as the provisions at § 2516 to allow more than one structure on a single record lot and because certain of the theoretical building lots would not meet the yard requirements.³

• Rear Yard (§ 404.1) – All 40 units would feature a four foot rear yard where a 15 foot rear yard would be required. The Holy Redeemer Building has an existing brick shed

³ See Applicant's submitted plans dated May 12, 2015, Exhibit 12A3, Sheet C.02.

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that sits .97 feet from the rear property line, which does not meet the required 15 foot rear yard requirement.

- Side Yard (§ 405.6) Ten of the 40 units would not meet the side yard requirements with nine units providing a five foot side yard and one unit providing a one-point-seven foot side yard where an eight foot side yard would be required.
- Front Yard (§ 2516.5(b)) A front yard equal to the rear yard would be required and none of the units would provide a rear yard of sufficient depth (15 feet). Nine of the units provide a five foot rear yard, while 31 units provide no rear yard.

In general, the requested flexibility is intended to allow the Applicant the opportunity to provide separation between the townhome and the Holy Redeemer building.

VI. PUD EVALUATION STANDARDS

The purpose and standards for PUDs are outlined in 11 DCMR, Chapter 24. Section 2400.1 and 2400.2 state that, "[t]he PUD process is designed to encourage high quality developments that provide public benefits....The overall goal is to permit flexibility of development and other incentives, such as increased building height and density; provided, that the project offers a commendable number or quality of public benefits and that it protects and advances the public health, safety, welfare, and convenience." The Applicant has requested various flexibilities detailed above and also offers several public benefits and amenities.

Per § 2403.3 PUD Evaluation Standards, the PUD regulations state that "[t]he impact of the project on the surrounding area and upon the operations of city services and facilities shall not be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project."

Sections 2403.5 through 2403.13 of the Zoning Regulations state the definition and evaluation standards of public benefits and project amenities. Public benefits are tangible, quantifiable superior features of a proposed PUD that benefit the surrounding neighborhood or public in general to a significantly greater extent than would likely result from a by right project. A project amenity is a type of public benefit that is a functional or aesthetic feature of a development that adds to the attractiveness, convenience or comfort of the occupants and immediate neighbors.

In its review of a PUD application, § 2403.8 states that "...the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case." To assist in the evaluation, the Applicant is required to describe amenities and benefits, and to "show how the public benefits offered are superior in quality and quantity to the typical development of the type proposed..." (§2403.12).

To date, the Applicant has offered the following amenities and benefits as an offset to the additional development gained through the application process:

(a) Urban design, architecture, landscaping, or creation or preservation of open spaces

The Applicant is proposing a transit-oriented, infill residential townhome project and maintenance of the Holy Redeemer building. The Project would result in 40 for-sale homes, five

of which would be affordable units. The Holy Redeemer building sits on a grand elevated lawn panel at the intersection of 7^{th} and Jackson Streets NE and fronts on 7^{th} Street NE. The Applicant is proposing to maintain the four-story masonry structure and would organize the new townhomes in two groups to the north and south of the Holy Redeemer building.

To the north, the Applicant is proposing a stick of 14 townhomes fronting on Jackson Street NE. To the south, the Applicant is proposing a stick of six units fronting on 7th Street NE, parallel sticks of six and seven units fronting on a central mews, and a stick of seven units fronting on a landscaped lawn at the rear of the property.

The Applicant is proposing a traditional design for the townhomes with brick facades and architectural features such as front porches and bays. The townhomes would feature flat roofs, which can be found in the surrounding neighborhood. The rear elevation of the townhomes would feature an open terrace at the fourth floor that would serve as private outdoor space for the residents. The Applicant is proposing to clad the rear of the units with Hardie panel and would provide a brick façade at the rear of end units. Visible side facades also would be clad in brick.

Prior to a hearing, the Applicant should address the treatment of the heavy cornice line at the intersection of the third and fourth floors, and the design and materials proposed for the side and rear elevations.

(b) Site planning, and efficient and economical land utilization

The proposed organization of the new townhomes on the site provides separation from the Holy Redeemer building and allows the structure and lawn to be viewed without competition from the new residential units. OP has suggested to the Applicant that they consider removing unit 1,⁴ to ensure an uninterrupted view of the Holy Redeemer building from the 7th and Jackson Street NE intersection.

The Applicant also should ensure that sufficient space is provided at the mews in the southern portion of the site. The 28-foot separation may not be adequate to provide a usable open space for the residents. Families with children who may reside in the development would have limited outdoor space for children to play. The closest playground is located at the Edgewood Recreation Center, which is just over a half mile from the Property. Furthermore, the introduction of the bio-retention facilities and retaining walls (discussed in h, below) along with the drive aisles, separate the townhomes from the lawn of the Holy Redeemer building and do not encourage community use of the open space.

The Applicant should evaluate opportunities to minimize changes in grade to the site, which could reduce the extent of retaining walls required. This would help to preserve the setting for the Holy Redeemer building and unite the townhomes with the Holy Redeemer building and its lawn. Should retaining walls be required, the Applicant should provide a detailed section and information regarding the proposed materials and design. The Applicant should work with OP, Historic Preservation, and DDOE staff to further refine the site plan prior to public hearing.

The Property is adjacent to the Chancellor's Row Development and the Applicant should be mindful of the interaction between the proposed units at the western edge of the site and the adjoining development.

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⁴ See Applicant's submitted plans dated May 12, 2015, Exhibit 12A1, Sheet A.001.

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(c) Effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts

A single 24-foot wide curb cut at Jackson Street NE would serve as the sole point of ingress and egress for the 14 units at the north end of the Property. Residents would access the private parking garages via a 20-foot drive aisle. The Applicant is proposing five surface parking spaces that would be accessed from the drive aisle.

Access to the southern units would be via a single 24-foot wide curb cut at 7th Street NE. Two 20-foot private alleys would provide garage access for the tenants of these units. The Applicant is proposing three surface parking spaces adjacent to the 7th Street NE entrance.

The Holy Redeemer building would maintain its surface parking area, via gated access, and would enter from Jackson Street NE and exit at 7^{th} Street NE.⁵

The Applicant is proposing to provide a new sidewalk on 7th Street NE where it does not exist today. This improvement would help facilitate pedestrian connections in the neighborhood.

OP has suggested that the Applicant remove the surface parking spaces and narrow the drive aisles to the minimum necessary for circulation and reduce the paved surface area, particularly in front of or to the east of the front façade of the Holy Redeemer building. The Applicant should provide information about any bike parking that would be provided on-site or in the public space adjacent to the site.

(d) Historic preservation of private or public structures, places, or parks

The Applicant has proposed to submit a Landmark Nomination for the Holy Redeemer buildings, and will continue to coordinate with D.C. Historic Preservation Office staff in this effort.

(e) Employment and training opportunities

The Applicant states that they will enter into an agreement to participate in the Department of Employment Services (DOES) First Source Employment Program to promote and encourage the hiring of District residents during the development and construction phased of the Project. The Applicant should provide additional details regarding the number of potential jobs provided.

(f) Housing and affordable housing

The Project would provide 40 new residential units where none exist today. The proposed development also would result in the provision of five new units of affordable housing with no less than 12% of the GFA (13,785.86 square feet) of the site dedicated to affordable units. Two townhomes would be targeted for households at 80% of Area Median Income (AMI) and three townhomes would be targeted for households at 50% of AMI.

As shown, the affordable units are clustered in the southern portion of the site (four of the five proposed units) and in the two western-most sticks of townhomes. Additionally, the five affordable units (units 10, 18, 19, 24, and 25) are the smallest units (14 feet wide by 32 feet deep). The Applicant should better distribute the affordable units and provide greater variety in unit size and bedroom count.

⁵ See Applicant's submitted plans dated May 12, 2015, Exhibit 12A3, Sheet C.06.

⁶ See Applicant's submitted plans dated May 12, 2015, Exhibit 12A1, Sheet A.003.

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(g) Social services/facilities

No social services/facilities are to be provided by this proposal.

(h) Environmental benefits

The Applicant is proposing two bio-retention facilities on the site, to the north and south of the Holy Redeemer building. The Applicant has provided a Green Area Ratio (GAR) Scoresheet that shows a score of 0.323. A minimum score of 0.4 is required in the R-5-B district, and the Applicant should design for a GAR compliant site.

While OP recognizes that the Applicant must meet the District's strict stormwater management standards, the introduction of the bio-retention facilities and the resultant change in grade and use of retaining walls, proposed to separate the bio-retention facilities from the new townhomes, is concerning. The lawn panel is emblematic of the historic Holy Redeemer building and the proposed retaining walls, which reach to the property line in the southern portion of the site, disrupt the natural grade of the site and alter a character defining feature of the site.

(i) Uses of special value to the neighborhood or the District of Columbia as a whole

The amenity package is not fully developed at this time and the Applicant continues to work with ANC 5E to ensure the Project meets the goals of the District and the community.

(j) Other public benefits and project amenities

The Applicant has not proposed other public benefits and project amenities at this time.

VII. AGENCY REFERRALS

If this application is set down for a public hearing, OP will refer it to the following District agencies for review and comment:

- District Department of Housing and Community Development (DHCD);
- District Department of the Environment (DDOE);
- District Department of Transportation (DDOT);
- DC Water; and
- District Department of Public Works.

VIII. COMMUNITY OUTREACH

The site is located in Advisory Neighborhood Commission (ANC) 5E. The Applicant has met with ANC 5E and the Edgewood Civic Association. OP encourages the Applicant to continue its community outreach efforts throughout the public review process.

IX. CONCLUSION

The proposed PUD is not inconsistent with the Comprehensive Plan and OP recommends the application be set down for a public hearing. OP will continue to work with the Applicant to respond to any Zoning Commission requests for additional information prior to the public hearing.