

October 5, 2015

VIA IZIS

Chairman Anthony Hood
District of Columbia Zoning Commission
441 4th Street NW, Suite 210S
Washington, DC 20001

Re: Z.C. Case No. 15-03 – Pre-Hearing Submission

Dear Chairman Hood and Members of the Commission:

The above-referenced case was set down for a public hearing at the Commission's March 30, 2015 public meeting. This letter serves as the Applicant's statement in support of its pre-hearing submission, and the Applicant requests that you schedule a public hearing for as soon as possible. Plan changes, additional explanations, and revisions to the overall Project are discussed in turn below.

1. Plan Changes

Following comments from the Commission and the Office of Planning and after extensive discussions with neighbors and the ANC single member district representative, the Applicant revised the plans. The revised plans are included in Exhibit A. The plans include the following changes:

- Reduction in front retaining wall height and changes to front landscaping.
- Removal of retaining walls at the front west side of the property.
- Increase from 36 to 45 parking spaces.
- Reallocation of interior space to allow for larger units and decrease in number of units. Total unit count range has been reduced to 155-159, and the unit distribution includes studio, 1-bedroom, 2-bedroom, and 3-bedroom units.

- Setback of 5th floor at northwest corner of building an additional 10 feet away from western property line, resulting in a 10-foot setback from the floor below and 20 feet from the western property line.
- Removal of west-facing balconies at northwest corner of building.
- Increase in depth of the rear yard. It now has a depth ranging from one (1) to six (6) feet.
- Simplification and reduction of height of penthouse. The penthouse now includes habitable space and has been designed to comply with the proposed new penthouse regulations. Flexibility for the penthouse setback is no longer requested.

2. Responses to comments from the Commission and OP

A. Revise plans for front public space and landscaping, and reduce height of retaining wall

As shown on pages L-1, L-4, L-5, and A-18 of the plans in Exhibit A, the Applicant reduced the height of the retaining wall to range from 14-34 inches and altered the landscaping to reduce the need for retaining walls and completely remove the retaining walls in front of the existing building.

B. More information about request for parking flexibility, impacts of parking flexibility, and TDM measures

The amount of parking flexibility has decreased, and the number of provided spaces has been maximized. The number of required spaces is 50-53, and the Applicant increased the number of provided spaces to 45. The provided number of spaces is the maximum that can be accommodated in a single level of underground parking. The Applicant redesigned the parking level to remove all elements that are not otherwise necessary in that location and configured the layout to accommodate as many spaces as possible. Providing the additional five to eight required spaces would necessitate constructing an additional level of underground parking. This would be extremely expensive and inefficient for only a few spaces. Based on its experience with other buildings it owns – one of which is approximately one block away – the Applicant expects that the demand for parking spaces will be lower than the requirement and that the provided number will meet the demand. In addition, it is worth noting that under the Zoning Regulations Review, the proposed number of spaces will far exceed the requirement.

As will be described in the Applicant's transportation study, which will be filed at least 40 days before the public hearing, the requested flexibility for only five to eight parking spaces will not have an adverse impact on traffic and parking conditions in the neighborhood. Also, the Applicant will commit to a robust transportation demand management ("TDM") plan that will moderate the residents' automobile use and parking demand. The TDM plan includes measures such as the following:

- Transportation Management Coordinator;
- TransitScreen in the lobby;
- Marketing program to distribute information to residents about transit options;
- Transportation incentives that include annual carshare and bikeshare memberships to each new resident for the first three years that the building is open; and
- Bicycle amenities that include significant indoor parking (more than 80 spaces) and a bicycle repair station in the parking area.

C. Additional information regarding neighborhood context of proposed building height

The building height study on pages A-11 and A-12 of the plans in Exhibit A provides the context for the Project's height. As illustrated, the proposed height of the Project is consistent with building heights in the neighborhood, particularly with respect to the large condominium buildings across the street and the buildings on 13th Street and Euclid Street (the street on the north side of the same square). Therefore, the proposed building height is appropriate for the location and context.

D. Additional description and refinement of amenities package

The Applicant committed to provide significantly more affordable housing and at deeper levels of affordability than required as the overriding feature of its public amenities package. This is a significant commitment by the Applicant which amounts to a value of approximately \$1.5 million and is commensurate with the height (only 10 additional feet) and density provided by the PUD. The substantial affordable housing commitment is as follows:

- (i) 10% of gross floor area (GFA) reserved for affordable units [only 8% is required]. This amounts to approximately 2376 square feet more than required.
- (ii) 2% of GFA will be reserved for households making 80% or below of the AMI [this is the minimum level of affordability required in this zone]. This amounts to approximately 2736 square feet for units at or below the 80% AMI level.
- (iii) 8% of GFA will be reserved for households making 50% or below of the AMI [this greater level of affordability is more than required in this zone]. This amounts to approximately 9504 square feet for units at or below the 50% AMI level.

The affordable housing notwithstanding, the Applicant continues to work with the ANC and the community to identify additional project amenities that would benefit the neighborhood. These additional amenities will further enhance the project's positive impact on the neighborhood and will be included with the Applicant's 20-day filing.

E. Requests for flexibility from the Zoning Regulations

- (i) Parking (§ 2101.1) – This is described above. The amount of flexibility requested has decreased.
- (ii) Rear yard (§ 404.1) – The amount of flexibility requested has decreased because the depth of the rear yard has increased to a range of 1-6 feet.
- (iii) Side yard (§ 405.6) – The flexibility requested remains as described in the initial application. Also, with the additional setback on the western side of the building at the 5th floor, more open space will be provided than initially proposed.
- (iv) Loading (§ 2201.1) – The flexibility requested is as described in the initial application: the project will provide a 30-foot berth instead of a required 55-foot berth. Plus, the Applicant now requests flexibility from the 20-foot loading/delivery space requirement. As with the 55-foot berth, the loading/delivery space cannot be accommodated without sacrificing necessary interior circulation space on the ground floor. This relief can be granted without adverse impact because the provided loading facilities will be able to accommodate the small units in the project.
- (v) Roof structure setback – Flexibility no longer requested. The proposed penthouse has been designed in accordance with the new penthouse regulations on which the Commission is scheduled to take final action (October 19) before a hearing will occur in this case.

F. Additional information regarding unit mix

The estimated unit mix is as follows, which includes an increase in the number of larger (2- and 3-bedroom) units:

Type	#	SF Range	%
Studio	15	340-420	9.87%
Junior 1	69	460-695	45.39%
Junior 1 + Den	5	895-1005	3.29%
1	21	530-735	13.82%
1 + Den	14	550-750	9.21%
2	23	700-1180	15.13%
3	5	1080- 1350	3.29%
Total	152		100.00%

The unit mix shown above is for illustrative purposes and may change upon final design.

G. *Proposed locations of affordable units*

The proposed locations of the affordable units are shown on pages A-15, A-16, and A-17 of the plans in Exhibit A.

H. *Additional information regarding environmental benefits*

The project will include the following environmental benefits:

- Green roof & permeable pavers
- Electric vehicle charging
- VRF system
- High efficiency windows & insulation
- Bike parking & work area
- Use of regional and/or recycled materials wherever possible
- High-reflectance roofing
- Energy efficient lighting & appliances
- Water-efficient landscaping
- Significant open space and landscaping
- Access to daylight & views

In addition, the project will be designed to meet the LEED Silver requirements, as shown on the preliminary LEED scorecard attached as Exhibit B.

I. *Estimated number of construction and building management jobs that will be created*

The project will generate approximately 400-500 construction jobs and two building management jobs.

3. **Enclosed Exhibits**

- A. Revised Plans
- B. Preliminary LEED Scorecard
- C. Hearing Fee Calculator

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Should you or your staff have any questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "Allison Prince / CK".

Allison Prince

A handwritten signature in blue ink that appears to read "Cary Kadlecek".

Cary Kadlecek

Enclosures
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