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VIA ELECTRONIC FILING AND HAND DELIVERY

Zoning Commission for the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

Re: Zoning Commission Case No. 15-04
Comstock Sixth Street, LLC – Totten Mews
Square 3788, Lot 814

Dear Members of the Commission:

On behalf of Comstock Sixth Street, LLC (the "Applicant") we submit the attached materials, pursuant to section 3013.8 of the Zoning Regulations, in advance of the public hearing scheduled for Zoning Commission Case No. 15-04 on July 30, 2015. These materials supplement materials previously filed with the Zoning Commission (the "Commission") by the Applicant, including its application, dated March 4, 2015, and prehearing statement, dated May 22, 2015, in support of the Applicant's request for a planned unit development ("PUD") and related Zoning Map amendment from mixed R-2 and FT/C-M-1 zoning to R-4 to facilitate construction of 40 townhouse residences (the "Project") on a 4.2 acre former industrial storage site that is surrounded on three sides by single family residential development.

The following materials are attached for the Commission's reference in advance of the hearing:

- A. Transportation Impact Study prepared by Gorove/Slade confirming the Project will have no detrimental transportation impacts;
- B. Site plan and rendered view from north of proposed pedestrian/bicycle connection through property;
- C. Diagram showing nature and location of proposed public space improvements to be provided by the Applicant along 6th Place, NE, between Emerson and Gallatin Streets;
- D. Letter from DC FEMS confirming emergency access provided by Project complies with Fire Code and presents no operational concerns;

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- E. Site plan identifying location of IZ/affordable unit within Project; and
- F. Summary of Proposed Project Amenities and Community Benefits

Transportation and Circulation

Per the Commission's request when approving the application for set-down, the Applicant has engaged Gorove/Slade to undertake a comprehensive transportation impact study ("TIS") for the Project, with particular focus on site access and circulation within the immediate neighborhood. As confirmed in the TIS, the Project will generate very few peak hour trips, provides sufficient vehicle parking, includes construction of a pedestrian/bicycle connection as well as recommended pedestrian access improvements along 6th Place, NE, to facilitate trips to the Fort Totten Metrorail station and points north of the site. As a result, Gorove/Slade has concluded that the Project will have no detrimental impacts to the surrounding neighborhood.

The Commission also requested that the Applicant meet with representatives of the DC Fire and EMS Department (FEMS) and Metropolitan Police Department (MPD) to ensure the safety/security of Project residents and obtain confirmation that emergency vehicles can access the site. As part of its prehearing submission filed on May 22, 2015, the Applicant confirmed its discussions with FEMS and MPD and included a Fire Access Plan showing adequate clearance for emergency vehicles through the Project. Attached is a letter from FEMS determining that the Applicant's Fire Access Plan is consistent with the requirements of the DC Fire Code and does not present any operational concerns to FEMS.

The Applicant anticipates that the lighted and landscaped pedestrian and bicycle connection proposed for the Project will serve as both a significant amenity for residents of Totten Mews as well as an important benefit to the surrounding community, providing direct north-south access for those seeking to utilize the Metrorail and Metrobus facilities nearby. To that end, the Applicant has attached a plan view showing the general location and contour of the connection as well as a rendered view showing the northern entry point to the connection as seen looking south from the Emerson Park development. The connection will be paved, landscaped and lighted. Bollards and striping will be provided to ensure access is clear and restricted to pedestrians and bicycles. As noted in the Gorove/Slade TIS, there are some deficiencies in the pedestrian facilities located going north along 6th Place, NE, toward the Metrorail station and South Dakota Avenue, NE. The Applicant is proposing to undertake improvements, in coordination with DDOT, to crosswalks and curb ramps, to improve this condition.

Flexibility and Benefits

Section 2403.8 of the Zoning Regulations provides that, when deciding a PUD application, 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. In the present application, the Applicant is requesting rezoning from the current mixed-

zoning category for the site of R-2 and FT/C-M-1 to R-4 in order to allow for the construction of 40 three-bedroom single family townhouse residences on a site that has long been largely unutilized and vacant as an industrial storage operation and is surrounded by single-family residential properties on three sides. The Project has been designed to setback from these neighboring residences to the extent possible and preserve existing slopes and large trees. The proposed rezoning is consistent with the Comprehensive Plan's Future Land Use Map, which designates the site for moderate density residential use, and is needed to allow for the proposed residential use given the prohibition of residential use in C-M-1 zones.

Aside from minor flexibility under the Zoning Regulations requested to establish theoretical lots without public street frontage and to allow the access road to cross over small portions of the required rear yards, and for general flexibility regarding standard minor architectural, landscaping, and materials details, the Project requires no development incentives such as increased building height, density or lot occupancy. In fact, as set forth in the Statement of Applicant, dated March 4, 2015 (Exhibit 6 of the hearing record), the Project proposes a significantly less dense development than permitted under the existing mixed zoning for the site. Height and lot occupancy are also in keeping with the underlying zoning and without need for the increases available for R-4 zoned properties pursuant to section 2405 of the Regulations.

To balance the requested flexibility to provide residential use, the Applicant is proposing a Project with extensive amenities for resident homeowners and significant benefits to the surrounding community. A summary is attached for the Commission's reference. Primary among these amenities and benefits is the proposed use itself, 40 new architecturally-designed three-bedroom townhouses with extensive landscaping proposed as an infill development near the Fort Totten Metrorail Station (serving three Metrorail lines) to replace a largely vacant industrial storage pad site. Of the 40 units, four units will be restricted as Inclusionary Zoning units. The Applicant is proposing a fifth unit to be deed-restricted in perpetuity as affordable for households not exceeding 80 percent Metropolitan AML. As discussed above, the Applicant is also undertaking extensive efforts to facilitate non-vehicular transportation and circulation, as described above. Finally, the Applicant is working with immediately abutting property owners, including the Capital Area Food Bank, and residents of the Emerson Park development to provide specific benefits tailored to their mission and perceived impacts, respectively. The Applicant has engaged with Advisory Neighborhood Commission 5A and interested community members extensively over the past several months, including prior to initiating the present application, and continues to work with ANC 5A to finalize terms of additional benefits of specific value to the ANC and immediate neighborhood, including contemplated benefits listed in the attached summary. The Applicant will provide more details on these benefits at the hearing on July 30. The Applicant is unaware of any adverse effects the Project would have on the surrounding community.

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Thank you for your consideration of these additional materials submitted in advance of the July 30, 2015, public hearing.

Respectfully submitted,

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cc: Advisory Neighborhood Commission 5A Chair Ronnie Edwards
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ANC 5A08 Representative Angel Alston (via electronic and UPS delivery)
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Ryan Westrom, D.C. Department of Transportation (via electronic and hand delivery)