



May 13, 2016

Community Preservation and Development Corporation

8403 Colesville Road
Suite 1150
Silver Spring, MD 20910
P: 202.895.8900 | F: 202.895.8805
www.cpsc.org

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

RE: 4th and Rhode Island PUD Case No. 15-16

Dear Chairman Hood,

The Community Preservation and Development Corporation (CPDC) respectfully submits this letter related to PUD application for 4th and Rhode Island Avenue, NE, Zoning Case No. 15-16 (First Stage & Consolidated PUD).

Established in 1989, Community Preservation and Development Corporation (CPDC) is a premier non-profit real estate developer in the region and has owned and/or redeveloped more than 28 affordable housing communities throughout Washington, D.C., Maryland, and Virginia. Today, the organization owns and operates over 4,800 residential apartments serving more than 910,000 residents. More than 2,600 of those apartments are located in the District of Columbia.

CPDC owns Edgewood Commons, a planned community consisting of the 792 units located immediately north of the Applicant's PUD site. Of these 792 units, 200 are in a 9 story midrise dedicated for seniors and the other units are multi-family in character and are located in a 220 unit midrise, a 258 unit high-rise, with the remaining 114 units located in garden style apartment buildings. There are 260 surface parking spaces accessed off of 4th Street and a 200 space parking deck accessed off of Edgewood Street.

CPDC has seen great transformative change in the neighborhoods where we operate. None have been more dramatic than in the Edgewood community. Over 20 years ago the Edgewood property was a failed development owned by government entities and others once known for its open air drug markets and crime. Edgewood Commons is now a thriving mixed income campus meeting the needs of residents at various income levels serving 30% AMI, 60% AMI, and 80% AMI households. The Edgewood community is currently characterized by rapid development and gentrification. According to the Washington DC Economic Partnership 2016 Neighborhood Profile Report, there are nearly 4,000 residential units and 426,000 square feet of retail being planned or developed along the Northeast Rhode Island Avenue corridor.

The PUD Applicant is proposing significant changes to the shopping center adding 1,500 new residential units and 250,000 square feet of retail with an increased height. There have been five community meetings in ANC 5E02 alone with the PUD developer with CPDC staff, residents of Edgewood Commons and with residents of the single member district. We commend Commissioner Williams for her leadership in creating the space for meaningful dialog at these meetings.

*Investing in the future of communities
to grow and thrive*

ZONING COMMISSION
District of Columbia
CASE NO. 15-16
EXHIBIT NO. 66

CPDC **conditionally supports** part of the Applicant’s PUD and **opposes** other parts of the plan:

1. Controlled intersection at the 4th Street entrance to Edgewood Commons at Channing Street. Our 4th Street access is the only vehicular access to our property for over 2/3 of our residents including our senior building residents and for the emergency vehicles serving them. The proposed residential and commercial uses on the PUD site will double the traffic on 4th Street at our intersection making it virtually impossible to get in and out of our property unless there are acceptable mitigation measures. Working with MRP, **CPDC supports the revised PUD now had a viable solution with a new traffic signalized intersection to be built by the developer.**

2. Landscaped buffer between the properties. Our residents will have obstructed views given the new height of the development. Many of these trees may need to come down when the retaining wall work is performed. There needs to be an improved landscaped buffer on the hill between our parking lot and their buildings, which should be planted and maintained by the adjacent property owner. **This is a requested change CPDC would like to see in the PUD.**

3. Residential affordability with 8% of units at 60% AMI. CPDC **opposes** the Applicant’s proposal to only meet the Inclusionary Zoning requirements with a slight reduction for 2% of the residential units to 50% of Area Median Income (AMI). Inclusionary Zoning is a tool designed to provide affordable housing in neighborhoods of opportunity, allowing the District to affirmatively further fair housing without the need for financial subsidies. However, targeting households at 80% of AMI does not reach the households who are least likely to be served in the existing market. The current market rate rents in the one mile radius surrounding the Rhode Island Avenue metro station are lower than 80% AMI restricted rents in all cases (see Table 1).

Table 1: Market rents in the 1 mile radius from the Rhode Island Avenue Metro Station as compared to 80% AMI and 60% AMI maximum rents.

	market survey rents	5-year average	80% AMI rent limit	market rent as % of rent limit	60% AMI rent limit	market rent as % of rent limit
Studio	1,097.00	1,106.00	1,530.00	72%	1,147.00	96%
1 bedroom	1,469.00	1,426.00	1,748.00	84%	1,311.00	112%
2 bedroom	1,826.00	1,787.00	1,966.00	93%	1,474.00	124%
3+ bedroom	1,857.00	1,924.00	2,184.00	85%	1,638.00	113%

(Market rents cited from costar.com. Restricted rent levels from novogradac.com and do not take into account utility allowances)

New construction in the neighborhood will drive these market rents higher and there will be fewer housing options for low and moderate income households. CPDC submitted a letter to the Zoning Board on April 13, 2016 strongly recommending that the Inclusionary Zoning affordable housing limits be dropped from 80% AMI to 60% AMI. We are asking the Zoning Board to require that the applicant proffer a set aside of 8% of the units at 60% of AMI to better serve this community as part of their Community Benefits Agreement. **JBG recently agreed to the 60% AMI affordability in their ANC 5E project. The Applicant should agree to the same.**

4. Staircase Connection. We appreciate that the Applicant is proposing points of pedestrian connection to Edgewood Commons, but this connection is too close to our seniors building and parking deck and should be moved further west on the site. We are concerned about that traffic increasing on our property dramatically and with negative impact. This access must be controlled and be able to be closed off during late night hours. DDOT is proposing hours when the Metro is closed. **CPDC conditionally supports the connection with the request that it move to a more westerly location on our property and be closed off during late night hours (all at the adjacent developer's expense).**

5. Resident concerns. CPDC is proud of its strong resident community and for over 20 years we have partnered with our residents to address many concerns. In the various meetings our residents raised a number of concerns most of which are noted below:
 - a. Security:
 - i. The residents support our concerns about a secure stair access. The PUD uses will attract many District-wide and late night activity will increase dramatically.
 - ii. Residents have expressed concerns about bars and clubs at the PUD whose primary sales are alcohol and not food.
 - iii. Residents have expressed other concerns about the need for a security presence along the Metro Branch Trail and in the open space park. The arrangement for a MPD substation would help alleviate these concerns.
 - b. Affordable Retail, Job Referrals and other Community Benefits for the Neighborhood:
 - i. Residents have expressed concerns about the need for an affordable grocery store option and eating establishments.
 - ii. The Applicant proposes a job referral program and support for neighborhood organizations. **The details of that program should be worked out as a condition of any final approval.**
 - c. Accessibility for Seniors:
 - i. Due to the topography, an ADA ramp is not practical to provide access for our mobility impaired residents and seniors to the PUD property. MRP has proposed a weekly access from our senior building at 635 to their property on a weekly basis. **CPDC supports and request that the service be more than once a week if the demand is there for increased service.**

This proposed PUD development will make a huge impact on our Edgewood Commons property and the community. The applicant has agreed to address a number of our concerns, but more should be done to provide a landscape buffer due to the taller buildings, to move the stair connection westward to address safety concerns, to provide more access for our mobility impaired seniors, to provide more affordable units and to work through the remaining community concerns in a community benefits agreement, all as a condition of getting their PUD approvals.

Respectfully,



Suzanne Welch
Vice President of Real Estate
202-885-9559
swelch@cpdc.org