



Community Preservation and Development Corporation

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May 20, 2016

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,

On behalf of Community Preservation and Development Corporation (CPDC), I submitted a letter to the Zoning Commission dated May 13, 2016, but as a result of the events at the ANC meeting on May 17th and comments at the first part of the zoning case hearing May 19th, this supplemental letter is needed.

CPDC has a 25 year history as a leading non-profit real estate developer in the District and the region and has owned and/or redeveloped more than 28 affordable housing communities throughout Washington, D.C., Maryland, and Virginia. Half of CPDC's 5000 unit portfolio is located in the District.

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. Edgewood Commons offers a mixture of affordability levels from 30% AMI, 60% AMI, 80% AMI and some market rate units.

We have a nearly three city block common property line with the subject property. Because of that, our position is unique from that of some of the other interested parties. It is important to us to have a developer neighbor with whom we can work because there are various issues along this common boundary such as access, run off, maintenance of the retaining wall that holds up the hill, and line of sight. We have been working MRP over the last two months with this good neighbor approach.

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to grow and thrive*

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EXHIBIT NO.78

Our first and foremost major concern was access to our property off of 4th Street, our only vehicular access to 2/3s of our residents. It was critically important that at signalized intersection be added. This issue appears resolved now with a combined signalized intersection at 4th and Channing Street. Our concerns, however, do not stop there.

The PUD Applicant is proposing significant changes to the community. 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. We also fully support ANC 5E and Edgewood Civic Association in their concerns for greater **affordability**.

CPDC’s concerns over affordability are not just academic but a real, genuine concern for our residents and our neighbors. CPDC **opposes** the Applicant’s proffer as providing enough affordable units and that they cannot provide more. The current neighborhood rental rates are below 80% AMI so that warrants a greater level of affordability (see Table 1). The applicant is only proffering 4% of the units below the current rent levels (at 50%) and 4% at slightly above the current rent levels (at 80%). The rest of the project, 92%, will have significantly higher rents. This project will dramatically change the landscape of this community. Rents will be pushed higher and out of the reach of low and moderate income working families. As a point of reference, we understand that JBG recently proffered 8% of their units at 60% AMI. We believe the PUD should at least meet the minimum standard of 8% at 60%.

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. (See attached map)

| | 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)

With respect to the **stair case connection**, as it is currently drawn, it comes up next to our senior building and our parking deck that primarily serves our seniors. This is a bad location on our property for the connection, creating an easy route for anyone trying to run from the subject property, run from the police and duck behind our building. We already experience vandalism from outsiders cutting across on our property. This connection needs to be designed and located more carefully and moved west to a more visible area. The other issue is 24 hour access. Our residents do not want 24 hour access. What outsiders should be using that staircase after the Metro closes? We do not want the liability of people cutting across our property during these late night hours. We do not have the funds to provide security to protect either those individuals or to police this area because there is a new public point of connection. 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 if it is moved**

to a more westerly location on our property, designed with safety in mind and be closed off during late night hours (all at the adjacent developer's expense).

At the May 19th hearing, the Commission requested perspectives of the project from the Edgewood Commons side, including the staircase connection. We would also like to see those perspectives in advance of any decision by this Commission so that we can review and comment.

The Applicant should be required to work out a Community Benefits Agreement with the ANC. As testimony on May 19th indicated, not enough time was allotted for this to occur before the hearing to give the ANC time to respond.

CPDC wants a good neighbor like MRP next door and to be a good neighbor, however the affordability commitment is not adequate given the dramatic changes this project will make to the neighborhood. We support our ANC Commissioner and the process that she undertook for community approval and we also support the concerns raised by the Edgewood Civic Association, ANC 5E and the neighbors. While MRP has been responsive to quite a number of concerns and many of our concerns as the adjacent property owner, further refinement to address the issues raised will only result in a better, stronger development product.

Respectfully,



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CC: ANC 5E
Michael Clark, Edgewood Civic Association