



October 20, 2016

Mr. Anthony Hood, Chairman  
DC Zoning Commission  
441 4<sup>th</sup> Street, NW, Suite 210  
Washington, DC 20001

RE: Support for PUD Case No. 16-09: Central Armature Works

Dear Chairman Hood and members of the Zoning Commission:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, DC metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We wish to express our enthusiastic support for this exciting project. We support the scale of this project, which offers 650 new homes in close proximity to the NoMa Metro station, and nearby services and jobs. This housing is needed and welcome. We commend the site's accommodation of a new Metro entrance and plaza connection to N Street. We know this is a top priority for the community and appreciate the developer's embracing of this major public benefit.

**Environmental performance** – While LEED Silver and above scores are a helpful standard for measuring a component of a project's sustainability, LEED does not measure other critically important aspects of sustainability, or appropriately value other Sustainable DC commitments, such as the goal to shift to a 75% non-driving mode share for individual trips. Unfortunately, LEED is not designed to give much credit to the environmental benefits of the vehicle trip reduction features of transit-oriented development. Thus we need to look to other measures to evaluate the overall sustainability achievement of this project. With limitations of scarce resources, we should allocate investments to achieve the most sustainable outcomes based on the specific situation.

We support a LEED Silver commitment for building efficiency, combined with the outstanding environmental and transportation benefit of accommodating a new Metro station entrance. We believe that the cost associated with accommodating this entrance on private property for the good of a larger area, and overall improved transit accessibility should be given greater credit. Shortening the walk to the NoMa Metro station is a significant measure to make riding transit more convenient for the rapidly growing east side of the railroad tracks. This walk connection will increase transit use and bicycling, and reduce the desire to use a private motor vehicle. This link is critically important to fulfill both the community's desire for this shortened access to the Metro station, and to achieve a higher level of

environmental performance for the area. We urge the Zoning Commission to recognize the significant environmental and transportation benefit proffered by the applicant's Metro plaza to support a new eastern entrance.

**Affordable housing** – We are pleased that this redevelopment will provide 53 below market-rate units in this desirable location. While we appreciate the revised offer made by the applicant to provide some 50% MFI IZ units, we request more be considered for this project given the value the site will receive by rezoning the property from a commercial to mixed residential use. Specifically, we ask that half of the total IZ units be affordable at the 50% MFI level. We ask that the Commission allow flexibility in the location of the 50% MFI units, allowing all of them to be located in the rental building. We support the current approach of providing all of the IZ units in the condo building to be at the 80% MFI level.

**Transportation benefits** -- We commend the transportation benefits beginning with the Metro tunnel plaza. We also recognize the landscaping and public spaces that complement ground floor retail to foster a walkable environment. We support the important benefit of the installation and operating support for a new Capital Bikeshare station, along with electric bike availability, and electric charging stations. We also commend the low vehicle parking ratio of 0.35. This low parking ratio will help ensure that excess traffic is not generated by the site, and that residents and visitors will be encouraged to rely on walking, bicycling, and riding transit to get around.

We recognize the low parking, walk and bike benefits, combined with the Metro station connection are an outstanding value to the community, city, and the environment. Additional benefits that might be considered to enhance the project would be offering residents bikeshare memberships, car share memberships, carshare parking spaces, increased bicycle storage (in-unit or in bike rooms), and a shared cargo bike. Offering memberships for multiple years is an even greater benefit. These would be helpful amenities to encourage more residents to opt to walk and ride more and drive less. They would also make living in the development more attractive to prospective residents.

Overall, we want to again express our strong support for this appropriately-scaled mixed use development that takes full advantage of its Metro station and broader neighborhood location. We ask that the extra effort that the applicant has provided to create a generous public connection for the much sought-after eastern entrance for the Metro station be credited with the environmental benefit it deserves.

Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director