## **BEFORE THE**

## ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA

## PREHEARING SUBMISSION

**Z.C.** Case No. 18-21

# **HANOVER 8th STREET**

SQUARE 3832 LOT 15 SQUARE 3835 LOT 804 3135 AND 3201 8<sup>th</sup> Street, N.E. WASHINGTON, D.C.

APPLICATION FOR A CONSOLIDATED PUD AND ZONING MAP AMENDMENT

February 25, 2019

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#### <u>CERTIFICATION OF COMPLIANCE</u> WITH SUBTITLE Z § 401 OF THE ZONING REGULATIONS

The undersigned hereby certifies that, in accordance with Subtitle Z  $\S$  401 of the Zoning Regulations, ten (10) copies of the architectural drawings and two (2) copies of all of the other below information were filed with the Zoning Commission on February \_\_\_, 2019; and, in accordance with Subtitle Z  $\S$ 401.5, the application shall not be modified less than twenty (20) days prior to the public hearing.

Subtitle Z Subsection	<u>Description</u>	Page/Exhibit
401.1(a)	Information requested by the Zoning Commission and the Office of Planning and	Submitted herewith
401.1(b)	List of witnesses prepared to testify on the Applicant's behalf	Exhibit G
401.1(c)	Summary of testimony of witnesses or reports and area of expertise	Exhibit G
401.1(d)	Additional information introduced by the Applicant	Submitted herewith
401.1(e)	Reduced Architectural Drawings	Exhibit A
401.1(f)	List of maps, plans, or other documents readily available that may be offered into evidence	Exhibit I
401.1(g)	Estimated time required for presentation of Applicant's case	Exhibit G
401.3(a)	Names and addresses of owners of all Property within 200 feet of the subject property	Exhibit J
401.8	Report by Traffic Consultant	To be submitted no later than 30 days prior to the hearing

Respectfully submitted,

**HOLLAND & KNIGHT LLP** 

Joseph O. Gaon

### **LIST OF EXHIBITS**

<u>Description</u>	<b>Exhibit</b>
Updated Architectural Drawings ("Revised Drawings") <sup>1</sup>	A
IZ Unit Location Plan	В
Dance Place Contribution Letter	C
Beacon House Contribution Letter	D
Edgewood Civic Association Contribution and Support Letter	Е
Hope Community Public Charter School Contribution Letter	F
List of Witnesses and Estimated Time Required For Presentation of Applicant's Case	G
Outlines of Testimony for Witnesses and Resumes of Expert Witnesses	Н
List of Maps, Plan or Other Documents Readily Available Which Will Be Offered Into Evidence	I
Updated List of Names and Addresses of All Owners of Property Within 200 feet of the Site (plus two sets of labels submitted separately)	J

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<sup>&</sup>lt;sup>1</sup> The Revised Drawings include an updated Zoning Map, which correctly identifies the boundaries of the Site.

# I. INTRODUCTION

This Prehearing Statement and accompanying documents (the "Prehearing Submission") are submitted by Hanover R.S. Limited Partnership (the "Applicant") in support of its application to the Zoning Commission for the District of Columbia for approval of a consolidated planned unit development ("PUD") and a related Zoning Map amendment. This application is submitted in accordance with Subtitle X, Chapter 4 and Subtitle Z of the 2016 District of Columbia Zoning Regulations.

The property that is the subject of this application includes 3201 8<sup>th</sup> Street, N.E. (Lot 15 in Square 3832) and 3135 8<sup>th</sup> Street, N.E. (Lot 804 in Square 3835) (collectively the "Site"). The Site has a total land area of 90,293 square feet, is presently zoned PDR-1, and is bounded by the Washington Metropolitan Area Transit Authority ("WMATA") tracks to the east and 8<sup>th</sup> Street, N.E. to the west. Kearny Street, N.E. is located to the northwest of the Site, and Irving Street, N.E. is located to the southwest of the Site. As part of the PUD, the Applicant is seeking a related Zoning Map amendment to the MU-4 District in order to bring the Site into compliance with its designation on the Future Land Use Map, as well as the residential neighborhood surrounding the Site.

The Zoning Commission considered this case for set down at its December 17, 2018, public meeting and voted to set the case for hearing. At that meeting, the Zoning Commission requested additional information regarding the building's materials, the Applicant's environmental and LEED commitment, and additional information regarding affordable housing. This Prehearing Submission provides updated information in response to those requests as well as information requested by the Office of Planning ("OP") in its report dated December 7, 2018. As is set forth below, this Prehearing Submission also meets the filing requirements under Subtitle Z § 401, and

accordingly, the Applicant requests that the Commission schedule a public hearing for consideration of this application.

# II. RESPONSE TO THE ZONING COMMISSION'S AND OFFICE OF PLANNING'S COMMENTS

The proposed PUD includes the construction of two multifamily residential buildings separated by a landscaped entry plaza, with a total of approximately 377 units (the "Project"). While the buildings will function as a single residential development, the Project includes two separate buildings in order to break down the scale of the PUD and appropriately site the Project within the surrounding residential neighborhood. The two buildings will include approximately 325,050 square feet of gross floor area, or 3.6 floor area ratio ("FAR"), calculated based on the overall Site. The maximum height of the both buildings is 65 feet as measured to the top of the parapet, with penthouse habitable space and mechanical equipment above. The buildings include setbacks at the 6<sup>th</sup> story, as recommended by the Brookland-CUA Small Area Plan ("Small Area Plan") and courtyards above the second level fronting on 8<sup>th</sup> Street, which break up the façade along 8<sup>th</sup> Street.

The Project includes approximately 186 parking spaces in a below-grade parking garage that will be shared between the two buildings. The parking garage will also include indoor bicycle storage facilities with parking for approximately 125 bikes. While the Project will function as a single residential development, each building will include one 30-foot loading berth and a related platform. A single 20-foot service-delivery space will be shared by the buildings.

#### A. <u>Building Materials</u>

The Commission requested additional information regarding the use of vinyl windows and cementitious panels. In response to Commission's comments, and as shown on Sheets A24 through

A27 and A30 through A32 of the Revised Drawings, the cementitious panels have been replaced with metal panel and stucco. ACM metal panel is included on the base and middle of the buildings, and corrugated metal is included on the top of the buildings. Precedent images of the proposed metal panels are included on Sheets A30 through A32 of the Revised Drawings.

The proposed stucco is a full three-coat stucco system with a 7/8" thickness. The Applicant is not proposing EIFS foam, which is meant to resemble stucco. The proposed stucco is comprised of a lath, brown and scratch coat, and a finish coat. In addition to the traditional stucco installation, the Applicant is proposing to use a continuous drainage mat that works by creating an air gap that promotes rapid drainage of potential moisture. Thus, the proposed stucco is a high quality and long-lasting material that will age appropriately over time since it includes an integral color to prevent it from fading. Precedent images of the proposed stucco are included on Sheet A34 of the Revised Drawings.

As shown on the precedent images include on Sheet A35 of the Revised Drawings, the proposed vinyl windows are low-profile and a dark color. These modern vinyl windows are steel-reinforced, which allows for a slimmer profile than traditional vinyl windows and provides for increased durability. While the proposed windows are a dark color, technological advancements in vinyl window construction allow them to be fade- and scratch-resistant such that they are more durable than traditional white or beige vinyl windows. As a result, the proposed vinyl windows are also a high quality and long lasting material.

The Applicant has also revised the design such that Juliette- and full-sized balconies are included on a majority of the units (approximately 55% of the units). The addition of balconies provides additional outdoor space for the building's residents and also enhances the residential character of the building.

#### **B.** Revised Landscape Drawings

OP requested additional information regarding the proposed landscaping for the Project, including additional information on the landscaped entry plaza. Included as part of the Revised Drawings is an updated landscape plan. Specifically, Sheets L08 through L10 of the Revised Drawings include additional details regarding the proposed landscaped entry plaza. The plaza serves as a focal point of the Project and aligns with Jackson Street. It masks the views of the WMATA tracks to the east of the Site as a result of its wedged geometry, which is 55 feet wide near 8<sup>th</sup> Street and 30 feet wide near the WMATA tracks. The landscaped entry plaza is similarly sized as the Arts Walk at Monroe to the north of the Site and will function in a similar fashion.

The leasing office and amenity spaces within both buildings in the Project will be oriented towards the plaza, to create greater activity and make the plaza feel as if it is public space. Overhead festoon lighting provides ambient lighting that also creates a perceived ceiling within the space. The improvements to the plaza include specialty paving, custom seating, feature walls, and sculpted planting islands.

The Project also includes improvements to the public space along 8<sup>th</sup> Street adjacent to the fronts of each building, which will enliven the streetscape and provide a safe walking environment both for residents in the area as well as the children that travel between Dance Place to the north of the Site and the Hope Community Public Charter School-Tolson Campus to the south of the Site. As shown on Sheet L03 through L07 of the Revised Drawings, the 8<sup>th</sup> Street streetscape includes include an eight-foot wide planting strip that includes ornamental trees. Moreover, the 8<sup>th</sup> Street sidewalk will be 10 feet wide and will be improved with benches and bicycle racks. The Project includes private stoops and entrances along 8<sup>th</sup> Street with tiered foundation plantings at

the base of both buildings, which complement the scale and character of the surrounding residential neighborhood.

Layers of evergreen trees and shrubs will be mixed in with leafy deciduous planting to provide year-round tree cover. Drip irrigation is proposed for all plantings, which is a best management practice to promote plant health while preserving water. Several bio-retention planters will utilize roof runoff for irrigation as they filter the water and slow the conveyance and impact on the public storm sewer. The extensive use of permeable pavers for the driveway on the northern portion of the Site will greatly reduce storm runoff and reinforce the Applicant's commitment to green practices.

#### C. Sustainable Design Elements

The Commission requested additional information regarding the Applicant's environmental and LEED commitments. As noted in its application statement, the Project is designed to integrate a host of sustainable features including approximately 2,750 square feet solar panels that are anticipated to generate approximately 1% of the energy for the Project. In addition, the Applicant has recently completed 18 projects throughout the country that have been designed and certified under varying levels of LEED. The Applicant similarly intends to seek LEED Gold certification of the Project under the LEED v4 Multifamily Midrise standard. Consistent with Subtitle X § 305.5(k)(5), certification of the Project will come after issuance of the certificate of occupancy, and accordingly, the Applicant will provide evidence to the Zoning Administrator that it has been designed in order to meet that standard.

#### D. <u>Signage</u>

Included on Sheet A36 of the Revised Drawings, is a signage plan.

#### E. Housing and Affordable Housing

The Commission and OP requested additional information regarding the location and size of the Inclusionary Zoning ("IZ") units. The Applicant has committed to set aside 12% of the gross floor area<sup>2</sup> of the Project to affordable housing units at varying levels of the median family income ("MFI"), which will create a mixed-income community. Based on this gross floor area, it is anticipated that approximately 46 units will be set aside as IZ units. The affordable housing will be set aside as follows: 6% of the affordable gross floor area at 30% MFI, 14% of the affordable gross floor area at 50% MFI, 67% of the affordable gross floor area at 60% MFI, and 13% of the affordable gross floor area at 80% MFI. Attached as Exhibit B is the Applicant's IZ unit location plan.

The Commission and OP both encouraged the Applicant to consider committing to three-bedroom units in further of the District's goals of providing more family-sized affordable units. The Applicant commits to providing two three-bedroom IZ units within the overall IZ provided, which represents approximately 14% of the three-bedroom units in the Project.

# III. <u>UPDATED INFORMATION REGARDING PUBLIC BENEFITS</u> AND PROJECT AMENITIES

The Project incorporates numerous public benefits and project amenities, including both on-site and off-site, which provide significant benefit to the neighborhood and the District as a whole. The Applicant's proffered public benefits and project amenities include the following:

factor of the finally-designed building.

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<sup>&</sup>lt;sup>2</sup> In its initial submission, the Applicant computed the net residential area based on the commitment for 12% of the gross floor area. The net residential area was based on an efficiency factor of 86%, which is a typical efficiency factor for concrete buildings. Because the Project will be stick construction, it is anticipated to have an efficiency factor of between 82% and 84%. Accordingly, the amount of <u>net</u> residential area has decreased in the Revised Drawing. The Applicant commits to provide 12% of the gross floor area, with a net residential area based on the ultimate efficiency

- The Applicant will set aside approximately 12% of the gross floor area of the overall Project as affordable units at varying levels of the median family income ("MFI"). This set aside includes two three-bedroom IZ units.
- The Project has been designed to LEED Gold standards under the LEED v4 Multifamily Midrise standard.
- The Project includes approximately 2,750 square feet solar panels that are anticipated to generate approximately 1% of the energy for the Project.
- The Applicant will construct an approximately 5,150 square foot landscaped entry plaza in between the two residential buildings that will include seating for the public as well as the buildings' residents.
- The Applicant will work with DDOT to ensure that the Project coordinates with potential future improvements to the Metropolitan Branch Trail that are planned for 8<sup>th</sup> Street adjacent to the Site.
- The Applicant will remove the PUD from the District's Residential Parking Permit
   ("RPP") program in order to alleviate on-street parking concerns of the surrounding
   neighborhood.
- The Applicant will contribute \$10,000 to Beacon House to support Beacon House's summer camp.
- The Applicant will contribute \$24,000 to the Edgewood Civic Association for the creation of an Edgewood Street Festival.
- The Applicant will contribute \$20,000 to a non-profit organization that supports the McKinley Tech Track Club (Fast Lane), to fund additional uniforms, meet fees, and specified travel expenses that are not currently covered by the Track Club's budget.

- The Applicant will contribute \$20,000 to 1way2rise, which will fund tutoring and afterschool services that will occur during the construction of the Project.
- The Applicant will contribute \$50,000 to the Hope Community Public Charter School, Tolson Campus to fund improvements to the Campus.
- The Project is designed to be compatible with the adjacent residential community, with a combination of setbacks and courtyards breaking up the façade and creating a pedestrian scale consistent with the recommendations of the Small Area Plan.

#### A. Arts Uses in Furtherance of the Small Area Plan

To foster artistic uses in the neighborhood as called for in the Small Area Plan, the Applicant will contribute \$75,000 to Dance Place. *See* Small Area Plan at pg. 52. Dance Place is an important arts-focused nonprofit in the neighborhood that offers performances, dance classes for adults and kids, and arts in education programs for youth.

The Applicant's contribution will help fund the Energizers Program at Dance Place's campus located adjacent to the Project immediately to the north. This program targets African-American youth from the surrounding neighborhood and includes an after-school program, a teenage leadership program, as well as a creative arts camp during the summer months. The Applicant's contribution will be \$25,000 per year for three years (\$75,000 total). Specifically, the \$25,000 per year will fund eight scholarships for camp, 20 weeks of job training for 14 teenagers, and five scholarships for the Energizers Afterschool Program. The multi-year support ensures the continued delivery of these services and on-going value to the neighborhood, and the multi-year nature of the contribution is critical to Dance Place to ensure the funding provides the greatest amount of support to these programs. The Applicant intends to commence the initial contribution prior to the issuance of a building permit for the Project and will continue annual contributions for

the following two years. The Applicant anticipates that, at a minimum, the first two years of contributions will be made prior to the issuance of a final certificate of occupancy for the PUD. In the likely event that the construction timeframe and the fiscal years for Dance Place do not align in such a way as to allow the third annual contribution to be accepted and used by Dance Place prior to the issuance of the final certificate of occupancy, the Applicant will fully fund an escrow account setting forth delivery of the funds for the final year and will provide evidence of that escrow account prior to the issuance of a final certificate of occupancy for the PUD in accordance with Subtitle X § 305.3(d). Included as Exhibit C is a letter from Dance Place outlining how the Applicant's contribution will be spent.

#### B. Uses of special value to the neighborhood or the District of Columbia as a whole

The Applicant has continued to work with the community and related organizations in order to refine and provide further information relating to the benefits and amenities that are consistent with the Community Benefits Agreement approved by Advisory Neighborhood Commission 5E ("ANC 5E") and in the record at Exhibit 10. All monetary contributions proffered by the Applicant are fully in accordance with Subtitle X § 305.3(d) since the Applicant agrees that no final certificate of occupancy for the PUD will be issued unless the Applicant provides proof to the Zoning Administrator that the items or services funded have been or are being provided. As requested by OP, updated information and specificity is as follows:

#### 1. Beacon House

The Applicant will contribute \$10,000 to Beacon House, which engages over 300 boys and girls in the Edgewood neighborhood annually in an award-winning programs. The Applicant's contribution will support Beacon House's summer camp, which serves approximately 90 children over five weeks. The camp seeks to address demand from the Edgewood community for a low-

cost, high-quality summer camp and includes academic, athletic, arts, cultural and other lessons. The Applicant's contribution will cover the full cost of attendance for at least eight campers. The Applicant will make the contribution such that it can provide proof to the Zoning Administrator that the tuition has been funded prior to issuance of a certificate of occupancy for the Project. Included as Exhibit D is a letter from Beacon House outlining how the Applicant's contribution will be spent.

#### 2. Edgewood Street Festival

The Applicant will contribute \$24,000 to the Edgewood Civic Association for the creation of an Edgewood Street Festival. There is currently no street festival in the Edgewood neighborhood and the Applicant's contribution will fund a festival that will bring together the residents of the surrounding neighborhood and highlight all that Edgewood has to offer.

Specifically, the Applicant's contribution will fund various elements, including but not limited to, the cost of an event coordinator, equipment rental, food and beverage services, activities, and required permits. The contribution will be spread out over three years (\$8,000 per year), which is estimated to fund the event in large part. The Applicant will establish and fully fund an escrow account prior to the issuance of the certificate of occupancy for the Project. The escrow account will be structured such that the funds will be released to the Edgewood Civic Association, a 501(c)(3) organization. Included as Exhibit E is a letter from the Edgewood Civic Association outlining how the Applicant's contribution will be spent..

#### 3. McKinley Technology Track Club

The Applicant will contribute \$20,000 to the McKinley Technology High School Parent-Teach Organization ("PTO"), which supports the McKinley Tech Track Club (Fast Lane). Specifically, the Applicant's contribution is initially identified to fund following: (i) the Track Club's participation in the Penn Relays Meet including bus transportation and lodging costs; (ii) the Tack Club's participation in the National Capitol Invitational Meet including a timer, security, officials, venue fees, clerks, and a starter; (iii) uniforms and equipment; and (iv) other meet and administrative fees. The donation will fund these expenses during the school year in which the donation is made or in the school year immediately following the school year in which the donation is made. The Applicant will provide additional information, and submit a letter from the non-profit organization confirming how the funds will be spent.

#### 4. 1way2rise

The Applicant will contribute \$20,000 to 1way2rise, which will fund tutoring and afterschool services that will occur during the construction of the Project. 1way2rise is a non-profit organization licensed to do business in the District of Columbia.

Specifically, the Applicant's contribution will fund the following: (a) educational supplies for the afterschool youth and teen tutoring services; (b) sporting equipment; and (c) STEM/robotics supplies and equipment. In the event 1way2rise is unable to administer these services, the Applicant will contribute \$20,000 to Beacon House for similar services. The Applicant will provide additional information, and submit a letter from 1way2rise confirming how the funds will be spent.

#### 5. Hope Community Public Charter School, Tolson Campus

The Applicant will contribute \$50,000 to the Hope Community Public Charter School, Tolson Campus (the "Tolson Campus") to help revitalize the school's campus. The Tolson Campus is located in the Edgewood neighborhood, just south of the Site, and is the learning community for 470 scholars in grades PK3 through 8. The majority of the students at Tolson Campus are from Ward 5. The Applicant's contribution will help revitalize the school's outdoor

space to the north side of its building. This new multipurpose outdoor space will promote and support outdoor activities, as well as support the Tolson Campus' programing, afterschool athletics, and activities programs.

Specifically, the Applicant Contribution will fund the following: (i) \$30,000 to resurface, seal, and paint blacktop on the north side of the Tolson Campus building; (ii) \$5,000 to remove the concrete platform in front of the Tolson Campus building entrance that has been an ongoing safety concern; (iii) \$4,000 to purchase and install two in ground basketball hoops; (iv) \$600 to purchase and install a bicycle rack; (v) \$3,000 to purchase large planters, supplies, and tools to create a garden space for the STEAM program; (vi) \$6,600 to repair and improve fencing on north side of the school building; and (vii) \$1,400 for minor landscaping on west side of the Tolson Campus building. In the event that there are excess funds, those funds will be used to paint an artistic mural on the front entrance side of the Tolson Campus building. The estimated cost of this project is between \$5,000 and \$7,000. The Applicant will make the contribution such that it can provide proof to the Zoning Administrator that the services have been funded prior to issuance of a certificate of occupancy for the Project. Included as Exhibit F is a letter from the Tolson Campus outlining how the Applicant's contribution will be spent

# IV. TRANSPORTATION ISSUES

The Applicant is working with the District Department of Transportation ("DDOT") on a variety of transportation issues for the Project, including potential future improvements to the Metropolitan Branch Trail that are planned for 8<sup>th</sup> Street adjacent to the Site.

#### A. <u>Transportation Study</u>

The Applicant has submitted its Comprehensive Transportation Review ("CTR") scoping form to DDOT and will submit its complete CTR to DDOT no later than 45 days prior to the date

of the public hearing. In accordance with Subtitle Z § 401.8 of the Zoning Regulations, the Applicant will also submit its CTR to the Zoning Commission no later than 30 days prior to the date of the public hearing and will serve a copy of the report on ANC 5E, OP, and DDOT.

#### B. <u>Transportation Demand Management</u>

The Applicant proposes following transportation demand management ("TDM") measures:

- The Applicant will identify a TDM Leader (for planning, construction, and operations) at the building, who will act as a point of contact with DDOT/Zoning Enforcement with annual updates. The TDM Leader will work with residents to distribute and market various transportation alternatives and options.
- The Applicant will provide TDM materials to new residents in the Residential Welcome Package materials.
- The Applicant will exceed zoning requirements by providing 125 long-term bicycle parking spaces in the development garage.
- 20 short-term bicycle parking spaces will be provided along 8th Street, meeting zoning requirements.
- All parking on site will be priced at market rates, at minimum, defined as the average cost for parking in a 0.25-mile radius from the Site.
- The Applicant will unbundle the cost of residential parking from the cost of lease or purchase of each unit.
- The Applicant will provide one incoming resident of each unit with an \$100 SmartTrip Card for the first two years of occupancy. A proactive marketing strategy will be provided to ensure residents are aware of this benefit.

- The Applicant will provide a bicycle repair station to be located in the secure long-term bicycle storage room.
- The Applicant will provide an on-site business center to residents with access to internet services.
- The Applicant will install a Transportation Information Center Display (electronic screen)
  within the residential lobbies containing information related to local transportation
  alternatives.
- The Applicant will provide 4 shopping carts to residents of the building to use for running errands and grocery shopping.

The Applicant will continue to work with DDOT to refine the Applicant's TDMs and the Applicant's CTR will include the finalized list of TDMs.

## V. <u>UPDATES ON COMMUNITY OUTREACH</u>

The Applicant has worked with a variety of community stakeholders to further refine the Project, including the proffered public benefits and project amenities. At its November 20, 2018, public meeting, with a quorum of commissioner present, ANC 5E voted 7-2-0 in support of the Project, including the public benefits and project amenities proffered by the Applicant. *See* Exhibit 10 of the record. In addition, at its October 22, 2018, public meeting, the Edgewood Civic Association also voted unanimously to support the Project, including the public benefits and project amenities proffered by the Applicant. A copy of Edgewood Civic Association's letter in support is included as Exhibit E.

# VI. UPDATES ON WORK WITH DISTRICT AGENCIES

The Applicant attend an Interagency PUD meeting (the "Interagency Meeting") on February 6, 2019. Representatives from the Department of Energy and Environment ("DOEE"), the Department of Housing and Community Development ("DHCD), OP's Design Development Team, the Office of the State Superintendent of Education ("OSSE"), and the Fire and Emergency Medical Services Department ("FEMS") were all in attendance.

At the Interagency Meeting, representatives of FEMS raised certain questions regarding fire hydrants, fire truck access to the Site, and emergency responder radio coverage. In subsequent discussions, the Applicant's team has confirmed that the Site complies with the fire hydrant requirements of the DC Fire Code (IFC § 507). Additionally, the applicant confirmed that the Site has been designed to provide the required access for fire trucks (IFC § D103) and apparatuses. Moreover, the Applicant confirmed that it will comply with DC Fire Code § 510.1, which requires emergency responder radio cover in new buildings. The Applicant will continue to work with FEMS to ensure that it has addressed any additional questions.

At the Interagency Meeting, DOEE discussed the Applicant's LEED proffer, including the Applicant's previous success with achieving LEED certification, compliance with the green area ratio ("GAR) requirements, and the Applicant's sustainable design features, including the provision of solar panels. Moreover, DHCD discussed the Applicant's IZ proffer and commented on the Applicant's commitment to providing three-bedroom IZ units.

While DDOT was not in attendance at the Interagency Meeting, the Applicant is working with DDOT on a variety of transportation issues for the Project, including potential future improvements to the Metropolitan Branch Trail. In addition, the Applicant will submit its CTR to

DDOT no later than 45 days prior to the date of the public hearing. After DDOT's review, the Applicant will respond to any of DDOT's comments regarding the CTR.

While not in attendance, the DC Office of Aging ("DCOA") also provided comments on the application that were shared with the Applicant at the Interagency Meeting. Specifically, DCOA requested that an IZ unit be reserved for residents that are aged 65 years or older. As stated above, the Applicant is providing affordable housing at varying income levels. While no IZ unit in the Project will be specifically reserved for individuals who are aged 65 years or older, the Applicant will make all IZ units available to District residents of all ages.

#### VII. CONCLUSION

This Prehearing Submission along with the original application meets the filing requirements for a consolidated PUD and related Zoning Map amendment, as required by Subtitle X, Chapter 4 and Subtitle Z of the Zoning Regulations. For the foregoing reasons, the Applicant respectfully requests that the Zoning Commission schedule a hearing on the application.

Respectfully submitted,

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By:

Christine M. Shiker

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