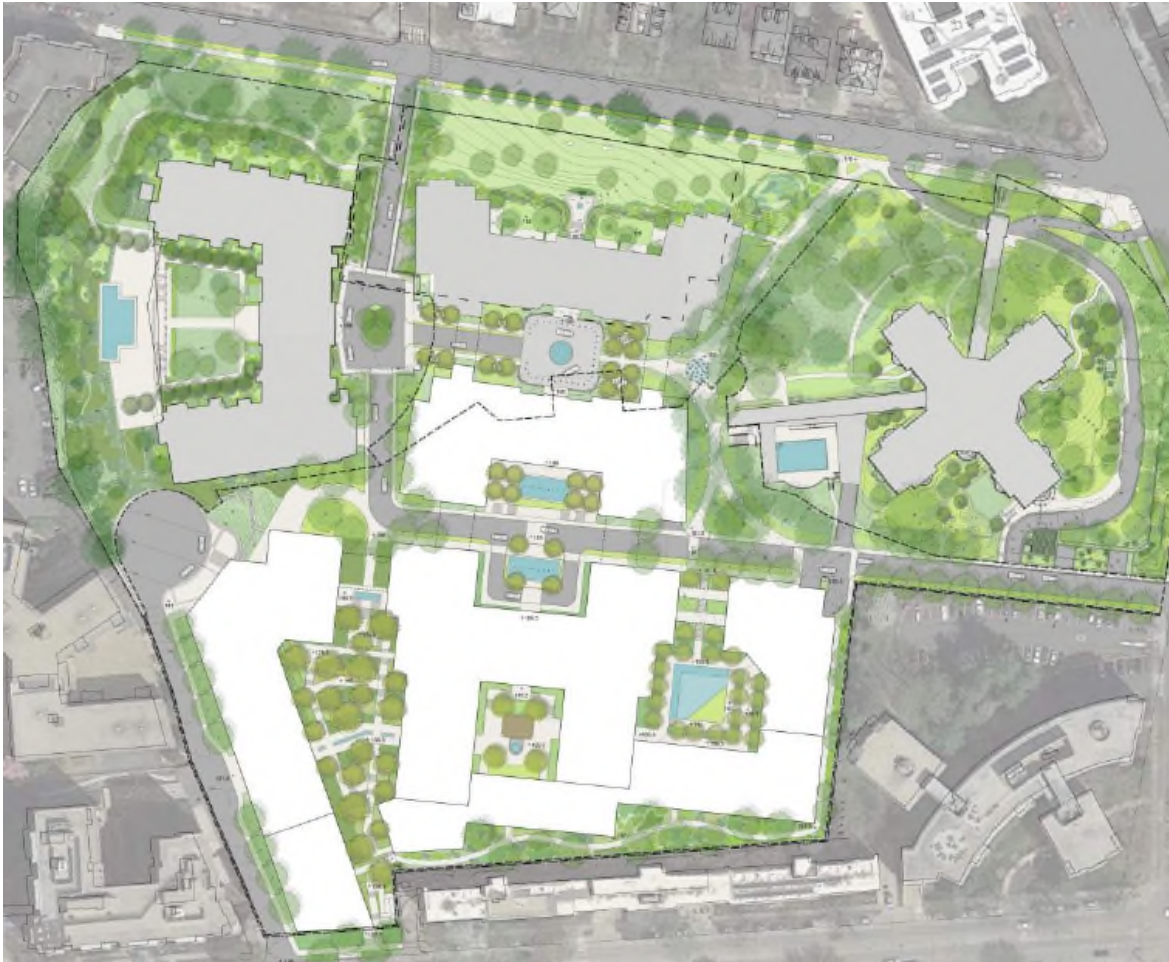


Wardman Park II



APPLICATION FOR REVIEW AND APPROVAL OF A
FIRST-STAGE PLANNED UNIT DEVELOPMENT
AND RELATED MAP AMENDMENT

June 24, 2016

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LIST OF EXHIBITS

Description	Exhibit
Agent Authorizations	A
Certificate of Notice and Notice of Intent to File	B
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I. INTRODUCTION

A. Purpose of the Application

In 1980, the District of Columbia adopted a policy to exclude hotels from residential zones, as embodied in a change to the Zoning Regulations that prohibited new hotels in residential zones. This change demonstrated that hotels were no longer seen as compatible with residential uses. This policy continues today and is, in many ways, the premise of this application.

The purpose of the proposed project is to advance that objective of removing incompatible uses and preserving residential zones with only residential uses but in a manner that is appropriate for its location near public transit and compatible with the site's historic significance. The proposed project will return a large site in a residential zone to a conforming, all-residential use and will create a harmonious residential "campus" consisting of a series of apartment buildings designed with a superior level of architecture punctuated by green open spaces. The high-quality buildings will eventually replace the nonconforming hotel if and when the hotel ceases to operate. Historically, this site was designed with large buildings punctuated by large open spaces, but only one of the original buildings remains: the Wardman Tower. In consideration of this history, the Project will concentrate an appropriate amount of residential density within a few hundred feet of a Metrorail station suitable for the modern era of transit-oriented development. Once completed, the proposed project will embody smart growth principles, timeless architectural design, and deference to existing nearby residential uses.

B. Application Summary

This is the application of Wardman Park Residential, LLC and Wardman Hotel, LLC (together, the "**Applicant**") to the District of Columbia Zoning Commission ("**Commission**") for

the First-Stage review and approval of a Planned Unit Development (“**PUD**”) and a related Zoning Map amendment to the RA-4 Zone District (the “**Application**”). This Application is for approval of four new residential buildings, site improvements, new underground parking, and landscaping (the “**Project**”). The Project will provide new housing options suitable for many types of residents on a site that is most appropriate for residential use.

The site of the Project is in the Woodley Park neighborhood of northwest Washington, D.C. and is currently the location of the Washington Marriott Wardman Park hotel. The property that is the subject of this Application contains approximately 286,252 square feet of land area. It has an address of 2660 Woodley Road NW and is formally designated as Square 2132, Lots 831, 844, 846, 850, & 851 (the “**Subject Property**” or “**Property**”). The Property is irregularly shaped, and a narrow “pipestem” extends east to connect to 24th Street and a wider “leg” extends south toward Calvert Street. The Property is primarily bounded by an apartment building to the north, Calvert Street NW and a condominium building to the south, apartment buildings and 24th Street NW to the east, and apartment buildings and a public school to the west.

The Project’s four new residential buildings will contain a total of approximately 1,572,223 square feet of residential space and will be located, generally speaking, on the site where the existing hotel is today. The Project will include a mix of unit types from studios to four-bedrooms.

The Project will be a complex of four new residential buildings. The entire Project will be connected so that it will be one building for zoning purposes. A new underground parking garage will serve the entire Project, and the Project will include open space, private streets, and pedestrian walkways open to the public.

The total FAR of the Project, when calculated on its own parcel, will be approximately 5.51, but the size of each building will vary. Each of the buildings will have a maximum height of 90 feet.

The northern portion and majority (approximately 71%) of the Property is located in the R-5-B (soon to be RA-2) Zone District. A smaller southern portion of the Property is located in the R-5-D (soon to be RA-4) Zone District. The Property is located in the High Density Residential land use category on the District of Columbia's Comprehensive Plan Future Land Use Map. The Property is located within the boundaries of Advisory Neighborhood Commission ("ANC") 3C.

This Application is not inconsistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10 DCMR (Planning and Development) § 100 *et seq.* (2006) (the "**Comprehensive Plan**"), and it advances numerous goals and policies of the District of Columbia. Submitted in support of this application are completed application forms, a notice of intent to file a PUD (with property owner list and certification of mailing), architectural drawings, plans, and elevations, and a map depicting the Zoning District for the properties impacted by these applications and the surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a First-Stage Planned Unit Development application under Subtitle X, Chapter 3 of the District of Columbia Zoning Regulations.

C. Applicant

The Applicant is a subsidiary of The JBG Companies. It is the mission of The JBG Companies to be a world-class investor, owner, developer and manager of real estate properties in the Washington metropolitan area. JBG takes great pride in and embraces the responsibility that accompanies all of its development activities. In order to create the most desirable

environments, JBG has cultivated product-focused teams led by a skilled senior development officer in each of the following product types: office, residential, retail and hotel. This wide range of expertise gives the firm a distinct advantage when it comes to mixed-use developments. The complex challenges inherent in mixed-use development can only be successfully managed by a company with such broad capabilities. NAIOP, the commercial real estate development association, selected JBG as its 2012 National Developer of the Year for its high-quality projects as well as its ability to develop and manage many product types, from residential to retail to hotels and large government buildings

D. Architects

David M. Schwarz Architects, Inc. (“**DMSAS**”) is a Washington, DC-based architecture firm established in 1978 with a broad, nationally-based practice that encompasses urban planning, multi-family residential, commercial, mixed-use, civic, and institutional work. DMSAS has numerous completed and on-going projects in Washington, DC, many located in historic districts. A central tenant of the firm’s work is the creation of timeless, sustainable, human-scaled places that positively contribute to their communities.

II. **SITE AND AREA DESCRIPTION**

The Property is part of a larger single record lot that contains two other existing buildings that are not included in this Application. The record lot has a land area of approximately 702,415 square feet. On the west side of the record lot is The Woodley apartment building, and on the east side of the record lot is the historic Wardman Tower, which contains residential units and some hotel rooms. A new residential apartment building, proposed in a separate Consolidated PUD application, will be located on the north side of the record lot (the “**North Building**”). Currently, the hotel, The Woodley, and the Wardman Tower are all connected so

that they are one building for zoning purposes. A single underground parking garage serves all of the buildings on the record lot. When the North Building is constructed, it also will be connected and will share the underground parking garage.

The Property currently contains the Washington Marriott Wardman Park hotel, which contains approximately 1152 rooms and approximately 200,000 square feet of meeting and conference space. The hotel was constructed in two phases with the Park Tower delivering circa 1965 and the Center Tower delivering circa 1979. Until the most recent Convention Center was constructed, the hotel contained the largest function room in Washington. The hotel was built to be automobile-oriented and to accommodate multiple large groups at a time when hotels wanted to locate outside the city's central core and when hotels were permitted in certain residential zones. As a result, the hotel continues to receive a significant amount of automobile and bus traffic despite its location in residential zones.

The hotel occupies nearly the entire Property, with a portion of the hotel building extending south to Calvert Street. On the north side of the Property is a driveway for the hotel. The parking garage that serves all of the buildings on the record lot is underneath the north part of the Property and the proposed North Building. Most automobile and bus traffic enters the Property via the driveway off Woodley Road since the hotel's main entrance faces to the north. The Property also contains an access road to the hotel from 24th Street to the east, and another smaller entry point to the Property (and the hotel's parking) is from Calvert Street.

The Property is defined by a dramatic grade change, sloping downward to both the north and the south. The highest point is near the center of the Property, and the grade change is the most drastic to the south. The elevation change from the highest point near the center of the Property to the lowest point at the south is approximately 71 feet. The lowest point of the

Property is where it intersects Calvert Street. Because of the grade change, the hotel rises prominently above all other surrounding buildings, and it is most particularly visible from both the Duke Ellington Bridge (Calvert Street) and the Taft Bridge (Connecticut Avenue) nearby.

The surrounding area is primarily residential in character, but it includes a mix of commercial uses. Directly across Woodley Road to the north, the neighborhood consists mostly of moderate density row houses. Slightly to the northeast, the buildings along Connecticut Avenue are large apartment buildings. Directly to the east of the Property, the Wardman Tower shares the record lot. Across 24th Street further to the east is a commercial strip along Connecticut Avenue that contains primarily retail establishments. The Woodley Park Metrorail station also is located approximately 650 feet directly east of the center of the Property (and the Property's "pipestem" to the east is directly across the street), at 24th Street and Connecticut Avenue. To the south of the Property, a condominium building with a single loaded corridor is adjacent, so it has no windows facing north to the Property. Further south across Calvert Street is the Omni Shoreham hotel. To the west of the Property are The Woodley apartment building, which is approximately 90 feet tall, and another large apartment building that is five stories tall and further to the west on a separate property. The Oyster-Adams School is also located to the west. Southeast of the Property is a large 10-story apartment building fronting on Calvert Street. Rock Creek Park also is close to the Property and can be accessed directly across Calvert Street to the south.

The immediate neighborhood includes a mixture of zones. Most properties immediately surrounding the Property are zoned R-5-D (soon to be RA-4), R-5-B (soon to be RA-2), and R-3. Properties to the east along Connecticut Avenue are zoned WP/C-2-A (soon to be NC-4) and WP/C-2-B (soon to be NC-5).

III. PROJECT DESCRIPTION

The Project will consist of a redevelopment of the Property into a new, varied, and distinguished master-planned residential apartment community with landscaping and site improvements most appropriate for the location and context. As shown on the Plans in Exhibit G (“**Plans**”), the Project will include four interconnected residential buildings extending south to Calvert Street.

The Project is intended to be constructed after completion of the proposed North Building to allow a sequence of operational changes to the record lot as development progresses. The Project will include four interconnected buildings with significant improvements to the landscaping and site circulation.

The northernmost building in the Project will be a “C”-shaped building that opens to the south (“**Building 2**”). This Building 2 will generally mirror the footprint of the North Building that already will be constructed. Building 2 and the North Building will be connected by two, two-level “link elements” containing residential program area that will extend over the drive and entry courtyard between the buildings that will serve the entrances to both buildings. Building 2 will contain approximately 322,485 square feet of gross floor area and will have a maximum height of 90 feet throughout.

South of Building 2 will be a series of three connected buildings arranged east to west along the private road. The building directly south of Building 2 will be a square-shaped building with a central courtyard and an arrival court on its north side formed by two wings extending north (“**Building 3**”). Building 3 will be connected to Building 2 via a second pair of elevated four-level “link elements” containing residential program areas that span over the private access road and connect to the two wings on Building 2. Building 3’s main lobby will

adjoin an arrival court, which will be connected to the private access drive, allowing for vehicular access for drop-off and pick-up. The Building 3 arrival court, combined with the open court on the south side of Building 2, and connected by the two link elements, will combine to create a large, two-level courtyard. Building 3 will contain approximately 616,233 square feet of gross floor area and will have a maximum height of 90 feet. However, the building's two north-south bars will transition down three stories in height toward the south. Because of the Property's significant grade change, the transitions will minimize the building's height and appearance from Calvert Street and other locations to the south and southeast. In fact, because of the step-downs, the visibility of Building 3 from outside the Property will be very limited, as shown on the illustration in the Plans.

Adjacent to Building 3 to the east will be an inverted "L"-shaped building with another courtyard ("**Building 4**"). Building 4 will contain approximately 251,805 square feet of gross floor area and will have a maximum height of 90 feet. Similarly, Building 4 will transition three stories in height to the south to minimize its appearance as viewed from Calvert Street and other southern locations, as shown in the Plans. A four-level "link element" running parallel to the private access drive and occurring at levels 2 through 5 will contain residential program area and will connect Building 4 to Building 3.

Flanking Building 3 to the west will be another building composed primarily of a single bar with a slight cant at its north end ("**Building 5**"). Building 5 will extend to the Calvert Street Property line. A large, terraced courtyard will occupy the space between Building 5 and Building 3. Building 5 will contain approximately 381,701 square feet of gross floor area and will have a maximum height of 90 feet. Building 5 will transition four stories down in height to the south. Two, four-level "link elements" containing residential area will connect Building 5 to

Building 3. The southerly link will occur at sub-level 1, elevations 166'-6" through 196'-6". The northerly link will occur at levels 3 through 6.

Each of the four buildings in the Project will have its own identity and residential program (rental, condominiums, unit types, etc.), but they will all be connected as an integrated whole and will be one building for zoning purposes. Furthermore, they will be connected to the other three buildings on the record lot, so that all seven buildings on the record lot are one building for zoning purposes. Some of the buildings in the Project will share amenities or other common spaces. Each of the four buildings will be designed in a distinguishing style yet applied in a manner that will create visual relationships between each building with respect to massing, scale, materials, and levels of detail. The color of the building materials will be a common element across the Project, with the four buildings utilizing brick masonry in the red range, consistent with how brick colors on the Wardman Tower, The Woodley, and North Building are each different but generally falling into the category of a red range. The parking and loading for the entire Project will be in a multistory garage below Buildings 2, 3, 4, and 5. Automobile access to the parking garage will be via Calvert Street and the private access drive. The underground garage will contain loading facilities and 910-950 parking spaces that will serve all four of the buildings in the Project and will connect to the parking located under the North Building.

The overall site plan of the Project is intended to reflect and integrate into the surrounding predominantly residential neighborhood with significant open space. The site plan draws heavily from the time that the Wardman Tower was constructed. It, too, was a constructed as a multistory apartment building surrounded by a park-like environment. Furthermore, the proximity of the Property to Rock Creek Park just to the south and southeast

influences the feeling of open space that is contextually-appropriate for the Project. The Project, itself, will create a park-like setting with significant greenery and open space punctuated by multistory apartment buildings, thereby creating significant new housing that will provide a substantial amount of green space available to both Project residents and the larger surrounding community. Unlike the current condition with the existing hotel, the Project will provide a more porous and accessible environment for the community. A large shared entry/vehicular courtyard will be located between the North Building and Building 2, and the south side of Building 2 will contain another landscaped courtyard. The large courtyards within Buildings 3, 4, and 5 will be terraced and landscaped and will invite residents and nearby community members for active or passive recreation.

The landscape design will be a unifying element for the Project, tying together all the open spaces to provide a consistent look, feel, and quality upon entering the Project site. The Project could be characterized as one large garden with a collection of buildings located within it. The open space will be diverse, ranging from open lawns and dog parks to a series of much more intimate courtyards, gardens, and green roofs. In all cases, the landscape treatment will be inviting, colorful, of superior quality, and program specific. It will draw from the context of the historic landscape of Wardman Tower while being sensitive to current and future water resources by including significant bio-retention measures and native planting.

Improved and superior site circulation will be an important component of the Project. The existing hotel forms a monolithic block that creates a significant circulation barrier along the southern half of the site. The Project will transform circulation patterns across the property, opening up the site with a series of new connections linking Woodley Road, 24th Street, and Calvert Street. The Project will include a series of private roads, pedestrian pathways,

landscaped open spaces, and courtyards. Once the Project is complete, the Property will have three automobile access points: one each from Woodley Road, Calvert Street, and 24th Street. From Woodley Road, cars will be able to access the entry court between the North Building and Building 2 or continue south then east to access the entrances/drop off points to Building 3. This private access road will continue to 24th Street. Similarly, automobiles entering from 24th Street will be able to access the same points in the Project. A private drive off of Calvert Street, located along the west side of the property, will provide access to the Building 5 lobby drop-off. This drive currently provides access to one of two parking entry points for The Woodley, as well as its loading dock. Access to the Project's below-grade parking and loading areas will occur at two points: at the southeast corner of Building 2 from the private road running between 24th Street and Woodley Road, and from the south, off Calvert Street, using the access drive that will service the Building 5 lobby drop-off and currently serves the parking and loading for The Woodley.

Pedestrians and cyclists will be able to traverse the Property in the same way as automobiles, but they will have additional pedestrian- and cyclist-only options. The complete Project will include a series of welcoming pedestrian/bike paths that will cross the green spaces to avoid conflicts with automobiles. In particular, pedestrian/bike paths will allow pedestrians/cyclists to cross the park area north of the building to the north and around to its east side and Building 2's east side and then leading out to 24th Street. The Applicant envisions that this will become a primary pedestrian/cyclist pathway between properties to the west and northwest of the Property and the Metrorail station entrance. Similarly, pedestrians/cyclists will be able to access the site from Calvert Street by moving through the large and welcoming landscaped courtyard between Buildings 3 and 5. This courtyard will include designated paths

that will provide a direct route from Rock Creek Park and points to the south across the site and to Woodley Road and points to the north. For residents of the Project, additional circulation options will be provided between the different buildings that will be internally connected, as well as through the many courtyards that will connect to each building's public areas and to the surrounding open space, walkways and access drives.

As mentioned, the Project is part of a single record lot that includes The Woodley, the Wardman Tower, and the North Building. Thus, the Project's site planning is sensitive to those buildings and the context that they create. In a way, The Woodley and the North Building are earlier phases of this Project: the architect is the same, and the open space and design is commensurate with that proposed for the Project. The design of the Project is similarly intended to be compatible with and responsive to the Wardman Tower. The site plan will benefit and will seamlessly integrate with The Woodley, the Wardman Tower, and the North Building. Though the two existing buildings and the proposed North Building on the record lot are not part of this PUD application, all buildings on the record lot will be connected as one building for zoning purposes.

A. Zoning Overview

The Zoning Tabulations Sheet included as page A.29 of the Plans provides a detailed overview of the proposed building and the requirements and restrictions of the RA-4 zone. The following table illustrates the zoning parameters of the proposed Project:

	<u>Proposed</u>	<u>Allowed/Required by RA-2 MOR</u>	<u>Allowed/Required by RA-4 MOR</u>	<u>Allowed/Required by RA-4 PUD</u>
<u>Height</u>	90'	90'		
<u>Number of residential units</u>	1500-1550	No maximum		
<u>FAR</u>	5.49 (PUD) 3.37 (record lot)	2.16	4.2	5.04
<u>Square footage</u>	1,572,223 (PUD) 2,268,392 (record lot)	N/A	1,202,258 (PUD) 2,950,143 (record lot)	1,442,710 (PUD) 3,540,171 (record lot)
<u>Lot occupancy</u>	23% (PUD) 37% (record lot)	60%	75%	
<u>Parking</u>	910-950 spaces	1 per 3 dwelling units but shall be reduced by 50% since within ½ mile of Metrorail station		
<u>Loading</u>	3 30-foot berths and 3 20-foot spaces	1 30-foot berth and 1 20-foot space		
<u>Affordable housing</u>	At least 8% of residential GFA	8% of residential GFA or 50% of achievable bonus density		8% of residential GFA

B. Zoning Flexibility Requested

The Applicant requests the following relief from strict application of the relevant provisions of the Zoning Regulations through the flexibility allowed by the PUD process:

1. The First-Stage time limit in Section Z-702.1. A First-Stage PUD approval is normally valid for a period of one year. The Applicant is requesting flexibility

from this requirement. The Project is intended to be constructed after the completion of the North Building so that the site can slowly absorb all of the proposed development. The Applicant requests that this First-Stage PUD be valid until after the North Building receives a certificate of occupancy. Thereafter, the Applicant must file a Second-Stage application for at least one building within three years after the North Building receives a certificate of occupancy. Subsequently, the Applicant shall file a Second-Stage application for each successive building within two years after each preceding building receives its certificate of occupancy.

IV. THE APPLICATION MERITS APPROVAL PURSUANT TO THE PUD EVALUATION STANDARDS

The Zoning Regulations, 11 DCMR § X-304.1 *et seq.*, set forth the evaluation standards for Commission approval of PUD applications. The PUD must not have an unacceptable impact on the surrounding area and the operation of city services and facilities, it must not be inconsistent with the Comprehensive Plan and other adopted public policies and programs, and it must offer project amenities and other public benefits that are superior to what would likely be provided under matter-of-right development. The Project's impact on the surrounding area and city services and facilities is discussed below. Consistency with the Comprehensive Plan is addressed in Section IV.C, and public benefits and project amenities are described in Section IV.D.

A. Project Impact on the Surrounding Area

The PUD Evaluation Standards, at 11 DCMR § X-304.4(b), state: "The impact of the project on the surrounding area and the operation of city services and facilities shall not be found

to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project.”

The Applicant submits that the impact of the Project on the surrounding area will be favorable because it will: 1) bring new market rate and affordable housing to the neighborhood, 2) redevelop a site more appropriately used for residential purposes, 3) promote the goal of infill development and concentration of housing close to a Metrorail station, and 4) create high quality open space.

Moreover, the Project’s proposed height and massing are appropriate for the location and are consistent with the Comprehensive Plan’s goals and policies for this area. The Project will create a series of distinguished residential buildings and associated open space.

The Project will create new housing units of multiple sizes and types in a transit-oriented location that is predominantly residential in character. The site of the Project is well-suited for new residential development with grand open spaces. In particular, this large site is ideal for high density residential uses. This location is highly desirable for residents because of its close proximity to transit, retail, and downtown. The Project will be part of the larger vision to transform this site into a residential neighborhood characterized by beautiful apartment buildings surrounded by large open green spaces.

B. Project Impact on City Services and Facilities

The proposed Project will not have an adverse impact on the public facilities that it will rely on for service, as described below.

i. *Transportation and Parking*

The Applicant engaged a transportation consultant, Gorove/Slade Associates, to further study the area’s traffic conditions and the Project’s traffic generation. The Applicant will submit

its traffic impact study once this case is set down for a public hearing, and it will continue to work with DDOT to refine the Project's transportation-related elements and impacts. The center of the Property is approximately 650 feet from the Woodley Park Metrorail station, and it is served by multiple Metrobus lines on Connecticut Avenue and Calvert Street. A Capital Bikeshare station is also approximately one block away at Calvert Street and Woodley Place. Furthermore, Rock Creek Park, which provides easy bicycle access both north and south, is accessible across Calvert Street to the south.

The Project will provide 910-950 underground automobile parking spaces. This number of spaces will exceed the zoning requirement.¹ The Applicant believes that the number of provided spaces will be consistent with the expected demand.

Further, the Project will provide ample secure bicycle spaces; the exact number to be determined when the Project is more fully designed in the Second-Stage PUD. The number of provided spaces will exceed the requirement to encourage the use of bicycles by residents, employees, and patrons of the Project. The proximity of the Project to the Rock Creek Park and to multiple existing bike lanes will allow for easy bicycle use. The provision of abundant bicycle parking will facilitate such bicycle use.

ii. *Water/Sewer Demand*

The water and sanitary service usage resulting from the Project will have an inconsequential effect on the District's delivery systems. The site is currently served by all major utilities. The Project's proposed storm water management and erosion control plans will minimize impact on the adjacent properties and existing storm water systems. The requisite erosion control procedures stipulated by the District will be implemented during construction of

¹ The Project will provide more than twice the number of required spaces, so it will comply with the required transportation demand management features in § C-707.3.

the Project. The estimated potable water demand is 215,560 gallons per day. The estimated sanitary sewer generation is 0.33 cubic feet per second, and the estimated stormwater generation is 212,000 gallons per day.

iii. *Public Schools*

Regarding the impact on the District of Columbia Public Schools (“**DCPS**”) system, the Project is within the boundaries of the Oyster-Adams Bilingual School at 2801 Calvert Street NW and 2020 19th Street NW and Wilson High School at 3950 Chesapeake Street NW. In addition, several other schools are in the general vicinity of the Project, offering schooling options to residents who may seek alternatives to the neighborhood public schools, including the Maret School and the Washington International School.

The Applicant will work with D.C. Public Schools, charter schools, and the ANC to ensure that any expected increase in enrollment due to the Project can be accommodated in local schools.

C. The Application is “Not Inconsistent with the Comprehensive Plan and with other Public Adopted Policies [...] Related to the Subject Site.” 11 DCMR § X-304.4(a).

i. *Comprehensive Plan*

The proposed PUD is not inconsistent with the Comprehensive Plan and will advance numerous goals and policies enumerated in the Comprehensive Plan for the National Capital adopted in 2006 (the “**Comprehensive Plan**” or “**Plan**”).

The purposes of the Plan are to: (a) define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (b) guide executive and legislative decisions and matters affecting the District and its citizens; (c) promote economic growth in jobs for District residents; (d) guide private and public development in order

to achieve District and community goals; (e) maintain and enhance the natural and architectural assets of the District; and (f) assist in conservation, stabilization and improvement of each neighborhood and community in the District (D.C. Code § 1-245(b)).

Generally, the Project will advance these purposes by furthering the social and economic development of the District through the construction of a new residential development on underutilized land in a desirable location, providing new market-rate and affordable residential units, improving site circulation, creating welcoming public open and green spaces, and concentrating density near a Metrorail station.

ii. *Compliance with Citywide Elements*

The Project will serve the goals of several of the citywide elements of the Comprehensive Plan, as follows:

a. Future Land Use Map

The Future Land Use Map (“**FLUM**”) includes the Property in the High Density Residential land use category. The proposed RA-4 zone is not inconsistent with such a designation in this location, and this zone is important to allow the construction of a high-quality residential project. The proposed Project – with an FAR of approximately 5.49², a maximum height of 90 feet, and the requested Zoning Map amendment to the RA-4 Zone District – is consistent with the FLUM designation for the Property given the additional goals and policies of the Comprehensive Plan due to its location near a Metrorail station, and amidst other medium and high density residential projects.

² This is for the PUD site only; the FAR for the record lot will be approximately 3.37.

b. Generalized Policy Map

The Generalized Policy Map (“GPM”) includes the majority of the Property in the Neighborhood Conservation Area category, and a small portion is included in the Main Street Mixed Use Corridor category. Because the Project will convert the Property to entirely residential use, it will be consistent with the Neighborhood Conservation Area designation on the GPM.

c. Land Use Element

The Project will advance the following policies of the Land Use Element:

- **Policy LU-1.3.2: Development Around Metrorail Stations** – Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas.
- **Policy LU-1.3.3: Housing Around Metrorail Stations** – Recognize the opportunity to build senior housing and more affordable “starter” housing for first-time homebuyers adjacent to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations.
- **Policy LU-1.3.4: Design To Encourage Transit Use** – Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots.
- **Policy LU-1.3.5: Edge Conditions Around Transit Stations** – Ensure that development adjacent to Metrorail stations is planned and designed to respect the character, scale, and integrity of adjacent neighborhoods. For stations that are located within or close to low density areas, building heights should “step down” as needed to avoid dramatic contrasts in height and scale between the station area and nearby residential streets and yards.
- **Policy LU-1.4.1: Infill Development** – Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern.

- **Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods** – Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others.
- **Policy LU-2.1.10: Multi-Family Neighborhoods** – Maintain the multi-family residential character of the District’s Medium- and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible.
- **Policy LU-2.2.4: Neighborhood Beautification** – Encourage projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements.
- **Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas** – Maintain zoning regulations and development review procedures that: (a) prevent the encroachment of inappropriate commercial uses in residential areas; and (b) limit the scale and extent of non-residential uses that are generally compatible with residential uses, but present the potential for conflicts when they are excessively concentrated or out of scale with the neighborhood.
- **Policy LU-2.4.11: Hotel Impacts** – Manage the impacts of hotels on surrounding areas, particularly in the Near Northwest neighborhoods where large hotels adjoin residential neighborhoods. Provisions to manage truck movement and deliveries, overflow parking, tour bus parking, and other impacts associated with hotel activities should be developed and enforced.

The Project will advance the above-referenced land use policies by creating a new residential development, in lieu of a hotel, in a primarily residential location with close proximity to public transit. The Project will support transit-oriented development and provide more housing near a Metrorail station. The Project will promote the policy of infill development by concentrating more density on a site that is largely underutilized for residential purposes. This Property’s location, in particular, will allow the Project to balance the goals of conserving and enhancing the neighborhood through beautification and land use change.

d. Transportation Element

The Project will promote the following Transportation Element policies:

- **Policy T-1.1.4: Transit-Oriented Development** – Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points.
- **Policy T-1.2.3: Discouraging Auto-Oriented Uses** – Discourage certain uses, like “drive-through” businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas.

The Project will exemplify transit-oriented development since it will contribute multiple new housing units in a central part of the city close to a Metrorail station and other public transit. The Property’s central location and proximity to transit and bicycle facilities makes it a prime location for additional density. Also, in support of the applicable policies, the Project will reduce the existing auto-oriented use and multiple curb cuts currently serving the Property.

e. **Housing Element**

The proposed PUD will advance the following goal and policies of the Housing Element:

- **H-1.1 Expanding Housing Supply** – Expanding the housing supply is a key part of the District’s vision to create successful neighborhoods. Along with improved transportation and shopping, better neighborhood schools and parks, preservation of historic resources, and improved design and identity, the production of housing is essential to the future of our neighborhoods. It is also a key to improving the city’s fiscal health. The District will work to facilitate housing construction and rehabilitation through its planning, building, and housing programs, recognizing and responding to the needs of all segments of the community. The first step toward meeting this goal is to ensure that an adequate supply of appropriately zoned land is available to meet expected housing needs.
- **Policy H-1.1.1: Private Sector Support** – Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives.
- **Policy H-1.1.3: Balanced Growth** – Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing.
- **Policy H-1.1.5: Housing Quality** – Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood.

- **Policy H-1.3.1: Housing for Families** – Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments.

The Project will expand the District’s housing supply in a neighborhood and on a site well-suited to accommodate significantly more housing. The Project will feature high-quality architecture and site design, such that all affordable units throughout will be indistinguishable. In addition, the Project likely will feature many family-sized units (2+ bedrooms).

f. Environmental Protection Element

The Project will advance the following policies of the Environmental Protection Element:

- **Policy E-1.1.3: Landscaping** – Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity.
- **Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff** – Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces.
- **Policy E-4.3.2: Reduction of Vehicle Noise** – Provide regulatory, mitigation, and monitoring measures to minimize exposure to noise from vehicular traffic, including buses, trucks, autos, and trains. Encourage the use of landscaping and sound barriers to reduce exposure to noise along freeways, rail lines, and other transportation corridors.

The Project will feature extensive landscaping that will greatly enhance the aesthetic appearance of the Project and will mark its identity in the District. Also, the new landscaping will reduce stormwater runoff significantly more than the existing impervious improvements. Finally, the conversion of the Property to all-residential use will eliminate buses and associated noise as well as reduce the volume of automobile traffic and associated noise.

g. Parks, Recreation, and Open Space Element

The Project will promote the following policies of the Parks, Recreation, and Open Space Element:

- **Policy PROS-1.2.2: Improving Access** – Improve access to the major park and open space areas within the city through pedestrian safety and street crossing improvements, bike lanes and storage areas, and adjustments to bus routes.
- **Policy PROS-1.4.3: Parks on Large Sites** – Include new neighborhood and/or community parks on large sites that are redeveloped for housing and other uses that generate a demand for recreational services. The potential for such parks to enhance the connectivity of parks and open spaces throughout the city should be an important planning and design consideration, particularly where multiple large adjacent sites are being redeveloped.
- **Policy PROS-3.1.6: Compatibility with Parkland** - Maintain and design public and private development adjacent to the edges of open spaces and parks to be compatible with these parklands and improve park access and safety.
- **Policy PROS-4.3.3: Common Open Space in New Development** – Provide incentives for new and rehabilitated buildings to include “green roofs”, rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance.
- **Policy PROS-4.3.4: Protection of Open Space in Multi-Family Development** – Recognize the implicit value of the lawns, courtyards, gardens, and other open areas that surround many of the District’s older high- and medium density residential buildings. Discourage the practice of building on these areas if the historic proportions and character of the original buildings would be compromised.

The Project will incorporate large, publicly-accessible landscaped green spaces as a key feature. The park-like open spaces will improve access and circulation in the neighborhood by providing residents new, shorter routes to the Metrorail station and Connecticut Avenue. Furthermore, the open spaces will be available to the whole community for active and passive recreation, and much of the existing open space on the record lot will be preserved and enhanced. The Project’s extensive green space will allow it to be compatible with the residential neighborhood context and with Rock Creek Park, particularly.

h. Urban Design Element

The Project will promote the following policies of the Urban Design Element:

- **Policy UD-1.2.1: Respecting Natural Features in Development** – Respect and perpetuate the natural features of Washington’s landscape. In low-density, wooded or hilly areas, new construction should preserve natural features rather than altering them to accommodate development. Density in such areas should be limited and setbacks should be provided as needed to protect natural features such as streams and wetlands. Where

appropriate, clustering of development should be considered as a way to protect natural resources.

- **Policy UD-1.2.3: Ridgeline Protection** – Protect prominent ridgelines so as to maintain and enhance the District’s physical image and horizontal skyline.
- **Policy UD-2.2.1: Neighborhood Character and Identity** – Strengthen the defining visual qualities of Washington’s neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context.
- **Policy UD-2.2.2: Areas of Strong Architectural Character** – Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development within such areas does not need to replicate prevailing architectural styles exactly but should be complementary in form, height, and bulk.
- **Policy UD-2.2.5: Creating Attractive Facades** – Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street.
- **Policy UD-2.2.7: Infill Development** – Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs.
- **Policy UD-2.2.8: Large Site Development** – Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades.
- **Policy UD-2.2.9: Protection of Neighborhood Open Space** – Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas.
- **Policy UD-2.3.3: Design Context for Planning Large Sites** – Ensure that urban design plans for large sites consider not only the site itself, but the broader context presented by surrounding neighborhoods. Recognize that the development of large sites has ripple effects that extend beyond their borders, including effects on the design of transportation systems and public facilities nearby.
- **Policy UD-2.3.5: Incorporating Existing Assets in Large Site Design** – Incorporate existing assets such as historic buildings, significant natural landscapes, and panoramic vistas in the design of redeveloped large sites. For sites that were originally planned as integrated complexes of multiple buildings, historic groupings of structures should be conserved where possible.
- **Policy UD-3.1.8: Neighborhood Public Space** – Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the “activation” of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas.

The Project will have a unique urban design suitable for a large site in a central location such as this. The strong architectural quality and site plan of the Project will respect and accommodate the large grade change on the Property while creating attractive buildings with distinct and compatible styles. By providing ample open green space available to the public, the site design will respect and protect the park-like setting and development pattern of large apartment buildings surrounded by extensive green space that was historically on this site.

i. Rock Creek West Area Element

The PUD site is located in the Rock Creek West Area Element of the Comprehensive Plan. The Project will be consistent with the following policies and actions of the Area Element:

- **Policy RCW-1.1.4: Infill Development** – Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage projects that combine housing and commercial uses rather than projects that contain single uses. Heights and densities for such development should be appropriate to the scale and character of adjoining communities. Buffers should be adequate to protect existing residential areas from noise, odors, shadows, and other impacts.
- **Policy RCW-1.1.6: Metro Station Areas** – Recognize the importance of the area’s five Metrorail stations to the land use pattern and transportation network of Northwest Washington and the entire District of Columbia. Each station should be treated as a unique place and an integral part of the neighborhood around it. The development of large office buildings at the area’s metro stations should be discouraged. The preference is to use available and underutilized sites for housing and retail uses in a manner consistent with the Future Land Use Map, the Generalized Policies Map, and the policies of the Comprehensive Plan. Careful transitions from development along the avenues to nearby low-scale neighborhoods must be provided.
- **Policy RCW-1.1.9: Protecting Common Open Space** – Protect the large areas of green space and interior open spaces that are common in and around the community’s institutional uses and its older apartment buildings, such as Cathedral Mansions and the Broadmoor. Where these open spaces are recognized to contribute to the integrity of the site or structure, stringent protection from inappropriate infill shall be maintained.
- **Policy RCW-1.1.11: Managing Transportation Demand** – Improve traffic service levels on the area’s thoroughfares by developing transportation systems management programs, transportation demand management programs, and other measures to more efficiently use the area’s road network and reduce the volume of vehicle trips generated by new development. Ensure that new development does not unreasonably degrade traffic conditions, and that traffic calming measures are required to reduce development

impacts. This policy is essential to protect and improve the quality of life and the residential character of the area.

- **Policy RCW-1.1.15: Metro Access** – Ensure pedestrian, bicycle, and bus access to the five Metro Station areas, and improve their visual and urban design qualities. Space for car-share vehicles should be provided near the stations where feasible to reduce parking congestion in neighborhoods and encourage car-sharing as an alternative to vehicle ownership.
- **Policy RCW-1.2.1: Urban Design Focus** – Focus urban design efforts in the Rock Creek West Planning Area on its commercial centers and major avenues, historic landmarks, historic districts, and areas with significant environmental and topographical features.
- **Action RCW-2.1.B: Large Hotel Sites** – Carefully monitor future proposals for the Omni-Shoreham and Marriott Wardman Park hotels to ensure compliance with the Zone regulations and prevent adverse effects on the adjacent residential community. Proactively address ongoing issues at the hotels, such as tour bus and visitor parking.

The Project will advance six important policies and one action of the Rock Creek West Area Element by converting the entire site into a residential development with significant open space. The Project will create new housing opportunities in a location suitable for higher density because of its proximity to Metrorail and other transit. As described, the Project's site plan will create new and faster pedestrian access to the Metro station. Furthermore, the Project's exemplary design will respond to the Property's topographical characteristics with a sensitivity that will minimize its visual impacts and enhance the aesthetic appeal of buildings on the site. Indeed, this Application allows for thorough public review and comment on the redevelopment of the Marriott Wardman Park hotel site to ensure that it will minimize the potential for any adverse effects on neighboring properties.

D. The Project will Provide Superior Public Benefits and Project Amenities

The PUD Evaluation Standards, at 11 DCMR §§ X-305.1 – X-305.12, require the Commission to “evaluate the specific public benefits and project amenities of the proposed Development.” That Section continues:

Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent

than would likely result from development of the site under the matter-of-right provisions of this title. A project amenity is one type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors.

Based on its meetings with the Office of Planning and the community, the Applicant will develop a public benefits and amenities package best suited to the desires of the community.

i. *Review of Project under Section X-305.12*

The PUD Evaluation Standards, at Section X-305.12, provide that “a project may qualify for approval by being particularly strong in only one or a few” of the public benefits and project amenities listed in Section X-305.5 “but must be acceptable in all proffered categories and superior in many.” The Applicant submits that the Project provides superior public benefits and project amenities in these categories. The Applicant’s benefits and amenities are in the following categories:

a. Housing (§ X-305.5(f))

Pursuant to Section X-305.5(f), the PUD guidelines state that housing that provides units with three (3) or more bedrooms is a public benefit. While the exact unit mix will be determined in the Second-Stage application, the Project will include some three (3) and four (4) bedroom units.

b. Affordable housing (§ X-305.5(g))

Section X-305.5(g) lists affordable housing, beyond what is required, as a public benefit and project amenity for a PUD. The Applicant will specify the amount of affordable housing for the Project upon filing of the Second-Stage application(s), but it will exceed the minimum requirement.

c. Urban design and architecture (§ X-305.5(a))

Section X-305.5(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. As shown in the detailed plans, sections, elevations, and massing views included in the Plans, the Project exhibits the characteristics of exemplary urban design. The Project will have a superior urban design that reflects the historic development pattern of the site and the extensive landscaping that accompanies it. In addition, as will be shown in the Second-Stage application(s), the Project will have exemplary architecture.

d. Superior landscaping, or preservation or creation of open spaces (§ X-305.5(b))

Pursuant to Section X-305.5(b), superior landscaping and preservation of open spaces are public benefits and amenities. The Project will include permanent publicly-accessible open space throughout the site. In particular, the landscaped courtyard between Buildings 5 and 3 will be publicly accessible, and will create open space where there currently is not any. Similarly, the landscaped courtyard between Buildings 3 and 4 will create open space where none currently exists. This is in addition to the new private streets, pedestrian pathways, and autocourts throughout the site to make it more open and generally accessible to the public than the current conditions.

This open space throughout the site will include extensive and superior landscaping that will continue the character and quality of open space that exists along Woodley Road and seamlessly integrate into the historic landscape of the Wardman Tower and the landscape of The Woodley. The specific elements of the landscape design will be included in the Second-Stage application(s).

e. Site planning, and efficient and economical land utilization (§ X-305.5(c))

Pursuant to Section X-305.5(c) of the Zoning Regulations, "Site planning, and efficient and economical land utilization" are public benefits and project amenities to be evaluated by the Zoning Commission.

The Project will take advantage of the uncommon opportunity to significantly expand residential development with multiple buildings in a desirable location best suited to residential use. The Project will capitalize on its location near a Metrorail station to provide new housing with the appropriate higher levels of height and density that the District has identified as goals for this location. The Project will efficiently use the land to provide an appropriate level of residential density that will incorporate significant open space.

Indeed, the site plan for the Project is unique among large residential projects near the center of the city. While the site will be transformed to all residential use, its plan will involve large park-like spaces punctuated by the multiple residential buildings. The "campus-like" feel of the Project will allow for the provision of a significant amount of housing without a dramatic loss in open space and greenery. Indeed, approximately 46% of the Property will be devoted to open space. The large open spaces, particularly along Woodley Road, will provide the District with a rare opportunity to have such a large amount publicly-available green space integrated with myriad new housing opportunities. This significant public benefit and project amenity will greatly improve the quality of the Project and its contribution to the development of the neighborhood.

f. Environmental and sustainable benefits (§ X-305.5(k))

According to Section X-305.5(k), "environmental and sustainable benefits to the extent they exceed the standards required by zoning or other regulations..." are deemed to be public benefits and project amenities. The buildings will be designed to be environmentally sustainable beyond the minimum required by applicable regulations. Specific sustainability features will be specified in the Second-Stage application(s).

g. Transportation infrastructure (§ X-305.5(o))

The Zoning Regulations, pursuant to Section X-305.5(o), state that "transportation infrastructure beyond that needed to mitigate any potential adverse impacts of the application" may be considered public benefits and project amenities of a PUD.

Importantly, the Project will provide multiple new pathways for pedestrians/cyclists – both the general public and residents – to traverse the site in a safe and effective manner. Pedestrians and cyclists will be able to cross the Property on pathways to go to and from the Metrorail station and to other nearby destinations. Similarly, the Project will provide welcoming paths for pedestrians and cyclists going to and from Rock Creek Park via Calvert Street.

Furthermore, the Project will include a private street with only two curb cuts: one on 24th Street and one on Woodley Road. This infrastructure will benefit the neighborhood and the site well beyond any mitigation because it will streamline traffic and allow for multiple entry points to the underground garage. Also, the Project will include a driveway from Calvert Street that will allow for another entry into the underground garage to disperse traffic in an orderly manner far beyond what is necessary to mitigate traffic impacts from the development of the Project.

h. Uses of Special Value (§ X-305.5(q))

Section X-305.5(q) states that "uses of special value to the neighborhood or the District of Columbia as a whole" can be considered public benefits and project amenities of a PUD. The conversion of the Property to all residential use and the construction of new residences will result in the generation of additional tax revenues in the form of property and income taxes for the District. In addition, these conversion of the site to residential use will result in the type of development sought by the neighborhood.

Furthermore, in addition to those already described above, the Project will provide additional public benefits and project amenities that will be developed as part of the Second-Stage application(s).

ii. Public Benefits of the Project

Section X-305.2 requires the Applicant to show how the public benefits offered are "superior features... that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from the development of the site under the matter-of-right provisions..." The Applicant has addressed this issue in the text of the statement, particularly Section IV.D above. It is only as a result of the zoning change and additional density provided through the PUD process that the Applicant is able to construct such a high quality project. Throughout the PUD process, the Applicant will work with ANC 3C, the Woodley Park Citizens Association, and the larger community to define a benefits and amenities package commensurate with the Application.

V. COMMUNITY OUTREACH

The development team has engaged in discussions about the Project with many stakeholders. Over the past few months, the Applicant has met with both the Office of Planning

and the District Department of Transportation to discuss its proposal. The Applicant also met with the Woodley Park Citizens Association and other property owners in the area. Additionally, the Applicant presented the Project to the ANC 3C Planning and Zoning Committee at its regularly-scheduled meeting on June 6, 2016 and, at the request of the ANC, plans to present the Project at the ANC's regularly scheduled meeting on July 18, 2016. Accordingly, the Applicant has complied with the ANC meeting requirement in Section Z-300.9. The Applicant will continue its communication with all stakeholders to ensure the Project achieves the goals of the District of Columbia and of the community.

VI. LIST OF PUBLICLY AVAILABLE DOCUMENTS

- A. The Zoning Regulations and Zoning Map of the District of Columbia, available at dcoz.dc.gov.
- B. The Comprehensive Plan of the District of Columbia, available at planning.dc.gov/page/comprehensive-plan.

VII. CONCLUSION

The Applicant submits that the Project complies with the requirements of Subtitle X, Chapter 3 and related provisions of the Zoning Regulations applicable to Zoning Commission review and approval of a First-Stage PUD and Related Map Amendment application; complies with the 1910 Height of Buildings; is consistent with the Comprehensive Plan; will provide significant public benefits that would not be provided by matter-of-right development; and will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia. The Applicant aspires to make this a distinguished project that will be a credit to its developers and to the community.

For the foregoing reasons, the Applicant submits that the First-Stage PUD and related Map Amendment application should be set down for a hearing by the Zoning Commission at its earliest convenience.

Respectfully submitted,
GOULSTON & STORRS, PC

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Phil T. Feola

/s/ Cary Kadlecek
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