



SQUARE 5914, LLC

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
CONSOLIDATED REVIEW AND APPROVAL OF A
PLANNED UNIT DEVELOPMENT AND
ZONING MAP AMENDMENT
May, 2013

DEVELOPMENT TEAM

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PREFACE

This statement and the attached documents support the application of Square 5914, LLC to the Zoning Commission for the consolidated review and approval of a Planned Unit Development and a related amendment to the Zoning Map of the District of Columbia.

This Planned Unit Development and Zoning Map Amendment application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10 DCMR (Planning and Development) § 100 *et seq.* (2006) (the “**Comprehensive Plan**”), as well as 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 Planned Unit Development and Zoning Map Amendment application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

Square 5914, LLC (the “**Applicant**”) hereby submits applications to the Zoning Commission of the District of Columbia (“**Commission**”) for the consolidated review and one-step approval of a Planned Unit Development (“**PUD**”) and a corresponding amendment to the Zoning Map of the District of Columbia. The project site consists of Parcels 229/160, 229/103, 229/151, 229/161, and 229/153 in Square 5914 and Lots 6 and 7 in Square 5914 (the “**Subject Property**”)¹.

The Subject Property is currently improved with an entrance to the Congress Heights Metro Station and four residential buildings. The Kiss and Ride Parking Lot for the Congress Heights Metro station and the Alabama Avenue entrance to the St. Elizabeth’s Hospital East Campus property are located across Alabama Avenue from the Subject Property. The Subject Property includes approximately 88,486 square feet of land area and is located within the boundaries of Advisory Neighborhood Commission (“**ANC**”) 8E.

The PUD and Zoning Map Amendment application proposes the development of a mixed-use, transit-oriented project consisting of two buildings with frontage along Alabama Avenue, SE and 13th Street, SE and a private alley for servicing both buildings. The PUD project will maintain the entrance to the Congress Heights Metro Station and will include an enhanced plaza area around the entrance to the Metro Station. The PUD project will include approximately 205-215 apartment units and ground floor retail (approximately 7,600 square feet) in the building located at the intersection of Alabama Avenue and 13th Street. The residential building will have a measured building height of approximately 93 feet. The residential portion of the project will include an amount of affordable housing that will satisfy the District’s

¹ The Applicant is authorized to process this application on behalf of all of the Subject Property owners.

Inclusionary Zoning requirements. The PUD project will also include an office building located along Alabama Avenue. The office building will include approximately 236,000 square feet and will also have approximately 8,650 square feet of retail in the ground floor adjacent to the entrance to the Congress Heights Metro Station. The office building will have a measured building height of approximately 94 feet. The plans, elevations, and drawings of the proposed PUD project are included in Exhibit A.

The Subject Property is currently located in the R-5-A Zone District. The Subject Property is also located in the Mixed-Use Medium Density Commercial and Medium Density Residential categories on the District of Columbia Generalized Land Use Map. The Applicant requests a Zoning Map amendment to the C-3-B Zone District for the Subject Property. As discussed in detail below, the proposed rezoning is not inconsistent with the goals and policies of the Comprehensive Plan.

II. THE PROPOSED PUD PROJECT

A. Description of the Subject Property and Surrounding Area

As noted above, the Subject Property is currently improved with an entrance to the Congress Heights Metro Station and four residential buildings. The Subject Property includes approximately 370 feet of linear frontage along Alabama Avenue and 145 feet of linear frontage along 13th Street. The Subject Property includes some contour changes with the low point of the site located at the intersection of 13th Street and Alabama Avenue and rises approximately 4.5 feet as one moves east along Alabama Avenue. The Alabama Avenue frontage is also approximately 5-6 feet higher than the rear of the Subject Property.

Directly across Alabama Avenue from the Subject Property is the Kiss and Ride Parking Lot for the Congress Heights Metro Station and the Alabama Avenue entrance to the St.

Elizabeth's Hospital East Campus Property, specifically subdistrict StE-18 of the recently adopted St. Elizabeths East (StE) District (See ZC Order No. 12-08, effective March 29, 2013). Across Alabama Avenue and further to the east is the historic Washington Hebrew Congregation Cemetery.

Directly to the east of the Subject Property is the campus of the Malcolm X Elementary School. The grounds of this public elementary school extend to the south of the Subject Property all the way to Savannah Street. A garden apartment complex is located directly to the south of the Subject Property along 13th Street. To the west of the Subject Property, along Alabama Avenue and 13th Street, residential row houses are the primary use. An Aerial Map depicting the Subject Property and the surrounding area is included in Exhibit A.

B. Project Description

The Applicant's vision for the development of the Subject Property was guided by the following goals:

- Create a vibrant transit-oriented development with neighborhood-serving retail, office, and residential uses;
- Increase Metro ridership originating/terminating at the Congress Heights station with uninterrupted operation of the station entrance;
- Enhance pedestrian safety along Alabama Avenue; and
- Enliven the plaza surrounding the Metro Station entrance.

In furtherance of those goals, the Applicant has created a truly transit-oriented project that helps achieve the District's vision of creating economic development opportunities in the Congress Heights neighborhood and Ward 8. The project will create new housing, office, and retail options for existing and new residents, and establish a high level of urban design and architectural quality that will guide future development in the area.

One of the focal points of the project's design process has been to create a truly special public space around the entrance to the Congress Heights Metro Station. The plaza area

(approximately 6,000 square feet) that is created by the location and architectural treatment of the proposed office and residential buildings will be a neighborhood center and focal point. A rotunda at the second level of the residential building provides a unique architectural marker for this building and helps pull pedestrians walking along Alabama Avenue into the plaza. Retail use is proposed along Alabama Avenue, at the corner of Alabama Avenue and 13th Street, as well as lining the proposed plaza that surrounds the Metro entrance. These retail uses will help animate the neighborhood and pedestrian realm as well as create a lively atmosphere for workers in the office building, tenants of the residential building and patrons of the new stores and restaurants.

The buildings along Alabama Avenue have been pulled back from the property line in order to create a more lively and engaging public realm. The sidewalks along Alabama Avenue and 13th Street will include tree boxes of approximately six feet wide and pedestrian travel ways of between ten and twenty feet wide. Planters with small trees and shrubs will help to define the plaza. All of the electrical vaults for both buildings will be placed on private property.

The proposed office building will be eight stories tall, with the eighth level further set-back from the building's edge along Alabama Avenue. The façade treatment for this building is intended to include mainly tan colored brick and sienna colored brick accents, precast trim, as well as painted aluminum windows and curtain wall elements. The entrance to the lobby at the plaza level, at the rear of the plaza, will be a double height atrium that is set back slightly from the main façade. The entrance will be framed with a stone surround and glass and metal accent elements. The roof level of the office building has been designed to highlight the truly special views that this project will have over the St. Elizabeths East and West Campuses and towards the Anacostia River. A large terrace area is proposed, as well as a significant vegetative green roof

which will reduce the urban heat island effect and be used to treat storm water for both quality and quantity.

The 205-215 residential units will be located in the building at the intersection of 13th Street and Alabama Avenue SE. As noted above, this building will include ground floor retail uses, a prominent lobby entrance on Alabama Avenue and small office users (perhaps a doctor or dentist office) along 13th Street. The façade of this frontage on 13th Street is treated as a series of townhouse like elements that step back at the fourth floor so as to better relate to the scale and rhythm of the neighboring buildings across 13th Street and further down 13th Street. Like the adjacent residential buildings the main façade material is a warm red brick. A vertical band of sienna colored brick marks the corner while balconies farther up the façade break up the mass of the building, act as a cornice and scale the new building to the existing context.

In order to help further animate the plaza, the residential building includes a gym (for use by the residents of the building) at the second level which includes a patio space that overlooks the plaza. A large courtyard, with significant plantings and vegetative treatment, is proposed at the rear of the building. Just as in the office building, the roof level for the residential building has been thoughtfully designed to take full advantage of the views to the North that the Subject Property provides. An open terrace area is proposed at the corner of 13th Street and Alabama Avenue and a large amount of the roof area will be covered with a vegetative green roof which will also reduce the urban heat island effect and treat storm water for both quality and quantity.

The project will include approximately 215 parking spaces, 140 bicycle parking spaces inside the building (60 for the office building and 80 for the residential), 30 public bicycle parking spaces at grade as well as the DC Bikeshare station which includes 15 bicycle spaces. Vehicular access to the project will be provided through the creation of a private alley system

that wraps the project. Access to this alley system will occur from an existing curb cut on Alabama Avenue at the eastern end of the site (expanded from its current 13 foot width to a minimum width of 20 feet throughout) and a relocated curb cut on 13th Street to the southern end of the Subject Property. One existing curb cut on Alabama Avenue will be closed as a result of this application. The private alley will operate as one-way for trucks, with a clockwise directional flow of trucks entering the Subject Property from Alabama Avenue and then exiting out of the project onto 13th Street. Passenger cars will be able to access the entrances to the parking spaces at grade as well as the two below grade parking levels through the alley from either 13th Street or Alabama Avenue.

The loading and parking facilities for each building will be separate. Access to the two below-grade levels of parking spaces for the office building (with approximately 130 spaces) will be from an entrance at the southeast corner of the Subject Property. Four 12 Foot X 30 Foot loading berths and associated platforms will be fully enclosed in the building and two 10 Foot x 20 Foot Service Delivery Spaces are located in a wide portion of the alley. Access to the one below-grade level of parking for the residential building will be in the general center of the Subject Property. Two separate entrances allow access from the at-grade parking onto the private alley. A total of 69 parking spaces are provided for the residential use. The residential building will have one 10 Foot X 20 Foot delivery space and one 12 Foot X 30 Foot loading berth. The Applicant is requesting flexibility from the requirement to provide a 55 foot loading berth.

As noted above, the Subject Property includes a slope of approximately five to six feet from the northern edge along Alabama Avenue to the southern edge. The design of the private alley effectively utilizes this grade change to help buffer the visual and noise impacts of personal vehicles and trucks that will access the parking and loading facilities. A retaining wall along the

eastern and southern edges of the Subject Property is proposed to separate the private alley from the adjoining properties.

C. Development Data

The total gross floor area included in the proposed PUD is approximately 446,000 square feet for a total Floor Area Ratio (“**FAR**”) of approximately 5.03. The proposed office building will include approximately 236,000 square feet and will have a measured building height of approximately 94 feet. The proposed residential building will include approximately 205-215 residential units and will have a measured building height of approximately 93 feet. The C-3-B District permits a maximum FAR of 5.0 (4.0 commercial) as a matter-of-right and a maximum FAR of 5.5 (4.5 commercial) in a PUD project. The maximum height allowed as a matter-of-right in the C-3-B Zone District is 70 feet. A PUD project in the C-3-B Zone District is permitted a maximum building height of 90 feet².

D. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require the approval of the Board of Zoning Adjustment (“**BZA**”).

The project proposes multiple roof structures, some of which are not setback from the roof at a 1:1 ratio. In addition, the two buildings will have multiple roof structures, of varying heights, to house the elevator overrun and the roof access stair towers. The proposed roof structures require relief from Sections 411.2, 411.3 and 411.5 of the Zoning Regulations. The

² The Zoning Commission may authorize an increase of not more than 5% in the maximum height (94.5 feet for the C-3-B Zone District) provided the increased height is essential to the successful functioning of the project and consistent with the purpose and evaluation standards of Chapter 24 of the Zoning Regulations.

Zoning Commission has the authority to grant this flexibility pursuant to Section 2405.7 of the Zoning Regulations.

The PUD project also seeks relief from the requirement to provide a 55 foot loading berth. A large articulated truck that would utilize a 55 foot loading berth would have difficulty accessing the Subject Property from Alabama Avenue or 13th Street. The Applicant believes that the proposed loading facilities (which include five 30 foot loading berths, a 200 square foot loading platform, four 100 foot loading platforms, and four 20 foot service/delivery spaces) will be able to satisfy the loading needs of this project. The Zoning Commission has the authority to grant this flexibility pursuant to Section 2405.6 of the Zoning Regulations.

The Applicant is also requesting that the Zoning Commission approve two separate buildings on a single record lot. While the office and residential buildings will abut each other, there will be no above-grade connection between the structures. Therefore, they must be considered separate buildings. Pursuant to Section 2516.2 of the Zoning Regulations, multiple buildings are permitted on a single record lot with BZA special exception approval, provided that each building satisfies applicable zoning requirements (such as use, height, bulk and open spaces around each building). In order to locate the two structures on the Subject Property, it is necessary to obtain relief from some elements of Section 2516.2 of the Zoning Regulations. The Zoning Commission has the authority to grant this flexibility pursuant to Section 2405.7 of the Zoning Regulations.

As noted above, the office building has a measured building height of approximately 94 feet and the residential building has a measured building height of approximately 93 feet. The PUD guidelines for the C-3-B Zone District generally permit a maximum building height of 90 feet. The Applicant is requesting that the Zoning Commission use its authority to approve a

height increase of up to 5% over the PUD guidelines for the C-3-B Zone District pursuant to Section 2403.5 of the Zoning Regulations. In order for the Zoning Commission to approve this request, the Applicant must show that the increase in height “is essential to the successful functioning of the project and consistent with the purpose and evaluation standards of this chapter.” The creation of superior retail spaces, with clear floor-to-ceiling heights of 15 feet, is truly driving the need for the additional building height in both buildings. Moreover, the increased four feet of height for the office building allows the Applicant to provide typical floor-to-ceiling heights of nine feet which is essential in order to compete with downtown office buildings for potential tenants. Similarly, the additional three feet of height for the residential building is necessary to provide floor-to-ceiling heights of nine feet, four inches which helps raise these new residential units to a higher level of quality and experience. In both instances, the requested flexibility is consistent with the purpose and evaluation standards of this chapter because the appearance of these buildings, with the requested additional height, is not out of character with the goals and plans for the future development of this area of the City.

III. PLANNING ANALYSIS

A. Introduction

Through the PUD process, the Applicant will create a transit-oriented mixed-use project that provides significant amounts of office, housing and retail uses in furtherance of numerous policies of the Comprehensive Plan.

B. Land Use Impact

The proposed PUD project incorporates all of the design principles that the Office of Planning (“OP”) has enumerated are necessary for a project to be deemed a transit oriented development. These design principles include: (i) connectivity; (ii) quality public realm; (iii)

pedestrian-friendly environment; (iv) attractive architecture and design; (v) mix of uses; and (vi) creative parking management. This project will serve as an important connection between the development on the St. Elizabeths East Campus and the broader Congress Heights neighborhood. Having significant development of office, housing and retail uses on both sides of Alabama Avenue near the Metro Station will help knit together the future St. Elizabeths' community and the Congress Heights community. With regard to creating a quality public realm, the proposed streetscape along Alabama Avenue and 13th Street and the plaza area around the Metro Station canopy and entrance on the Subject Property creates an active and vibrant setting with broad sidewalks, planting beds which serve as rain gardens with their own planters and plantings, and street trees, as well as possible cafe zones. The mixed-use nature of the project will provide new residents for the area, new office tenants, as well as new retail options for all residents of the area. The proposed architecture is of the highest quality and properly invokes the spirit of the surrounding community. The project's proposed number of parking spaces and the provision of a significant number of bicycle parking spaces in the project are creative responses to parking management. For all of these reasons, the project is a truly transit-oriented development.

C. Zoning Impact

The proposed Zoning Map Amendment application can be granted without adversely affecting nearby and adjacent Zone Districts. The existing R-5-A Zone District is not consistent with the Comprehensive Plan's goals and vision for the Subject Property. The Zoning Map Amendment that is associated with this PUD project seeks to rezone the Subject Property to the C-3-B Zone District. The proposed C-3-B Zone District is certainly more consistent with the Future Land Use Maps designation of the Subject Property as mixed use, medium density commercial/medium density residential. In addition, as discussed in detail in Section V of this

statement, the proposed C-3-B Zone District is consistent with various elements, policies and goals of the Comprehensive Plan.

IV. EVALUATION STANDARDS

Section 2403 of the Zoning Regulations provides the standards for evaluating a PUD application. In deciding a PUD application, the Commission is required to “judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case” (See Section 2403.8). In order to approve a PUD application, the Commission must find that the impact of the project on the surrounding area is either favorable, capable of being mitigated, or acceptable given the quality of the public benefits in the project. (See Section 2403.3.)

A. Public Benefits and Project Amenities

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high quality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning.

1. Housing and Affordable Housing

Pursuant to Section 2403.9(f) of the Zoning Regulations, the PUD guidelines state that the production of housing and affordable housing is a public benefit that the PUD process is designed to encourage. This project will create approximately 205-215 residential units and approximately 15,515 square feet of workforce affordable housing (8% of the total amount of residential square footage in the project – 8% X 193,938 sf) for households earning up to 80% of

the Area Median Income (“AMI”). The affordable housing units will be distributed throughout the residential building (except for the upper two stories of the building).

2. Urban Design, Architecture, Landscaping, or Creation of Open Spaces

Section 2403.9(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. As shown in the detailed plans, elevations, and sections included in Exhibit A, the proposed project exhibits all of the characteristics of exemplary urban design and architecture. The massing, height, and articulation of the buildings have been carefully studied in order to create a project that provides new housing, office, and retail opportunities for the District, yet also respects the nearby lower density residential and educational uses. The public spaces along Alabama Avenue and 13th Street and the public plaza have been designed to provide for an engaging and active street level experience.

3. Site Planning, and Efficient and Economical Land Uses

Pursuant to Section 2403.9(b) 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 creation of a truly transit-oriented project on the Subject Property, with housing, office and retail uses, is an example of appropriate site planning and efficient and economical land use as a project amenity. Given the Subject Property’s adjacency to the Congress Heights Metro station, it is appropriate to have this level of density and building height on this site as proposed in this PUD project.

4. Effective and Safe Vehicular and Pedestrian Access

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities. Vehicular access to the site has been carefully studied and designed to minimize the potential for pedestrian and vehicular conflicts. The private alley system will allow for vehicles and trucks to

safely and efficiently access the parking and loading facilities without impeding pedestrian traffic flow along both Alabama Avenue and 13th Street.

A total of approximately 140 dedicated bicycle parking spaces will also be provided in the three parking levels of the office and residential buildings. An additional 30 bicycle parking spaces will be provided in the adjacent public space and a DC BikeShare station provides an additional 15 bike parking spaces. Wells + Associates, Inc., the traffic and parking engineering consultant for this project, has submitted a Comprehensive Transportation Review Scoping Document (attached as Exhibit G) to DDOT. The Applicant and its traffic and parking consultant will continue to work with representatives of the DDOT and OP, as well as members of the surrounding community to address any traffic or parking related impacts associated with this PUD project.

5. Environmental Benefits

The Applicant is committed to creating an environmentally sensitive and sustainable development. The PUD project is designed to be able to achieve LEED Silver Certification. A preliminary LEED checklist is included in Exhibit A. Moreover, the Applicant's design team has applied the proposed Green Area Ratio (GAR) requirements to this project and has determined that the project would receive a GAR score of 0.25.

No adverse environmental impact will result from the construction of this project. The project's proposed stormwater management and erosion control plans will minimize impact on the adjacent properties and existing stormwater systems. The requisite erosion control procedures stipulated by the District will be implemented during construction of the project.

6. Uses of Special Value

According to Section 2403.9(i), “uses of special value to the neighborhood or the District of Columbia as a whole” are deemed to be public benefits and project amenities. Even prior to the filing of this PUD and Zoning Map Amendment application, representatives of the Applicant have met with leaders of the neighboring Congress Heights and Ward 8 residential and business communities. As this case moves towards a public hearing, the Applicant will continue to engage with these stakeholders in creating an appropriate community amenities package. During this early dialogue process, the Applicant has requested input from community residents as to what the community amenities and project benefits package should include for this PUD project. One potential component of the community amenities package that the Applicant is interested in pursuing is the possibility of providing below-market rate retail space in the project for locally owned businesses.

7. Revenue for the District

Section 2403.9(i) states that “uses of special value to the neighborhood or the District of Columbia as a whole” are deemed to be public benefits and project amenities. The creation of approximately 205-215 new households, approximately 16,250 square feet of retail space, and approximately 236,000 square feet of new commercial office space will result in the generation of significant additional tax revenues in the form of real estate, income, sales, use and employment taxes for the District.

8. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include “other ways in which the proposed planned unit development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan.” As described

in greater detail in Section V, the PUD is consistent with and furthers many additional elements and goals of the Comprehensive Plan.

9. Public Benefits of the Project

The annotated table(s) required by Section 2403.11 of the Zoning Regulations are found in Exhibit A. Sections 2403.12 and 2403.13 require the Applicant to show how the public benefits offered are superior in quality and quantity to typical development of the type proposed. This PUD project will include many, if not all, of the attributes of PUD projects that have been recently approved by the Zoning Commission, including:

- exemplary/superior architecture;
- affordable housing;
- transit-oriented development; and
- ground floor retail establishments.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD and Zoning Map Amendment application is consistent with and fosters numerous policies and action items enumerated in the Comprehensive Plan. On April 8, 2011, The Comprehensive Plan Amendment Act of 2010 (DC Law 18-0361) became effective. In this Law, the City Council made specific amendments to policies in the Far Southeast/Southwest Area Element that specifically address the Subject Property.

Policy FSS-2.4.1: Congress Heights Metro Station Mixed Use “Encourage reuse of the Congress Heights Metro station site and its vicinity with mixed use medium density residential and commercial development through the use of planned unit developments that promote new economic development. Development on the site should be cognizant of the adjacent lower density neighborhood to the west and south, provide a connection to the future development on the St. Elizabeths Campus, and create a stronger sense of identity and gateway for the Congress Heights neighborhood. Medium density development on the portions of the northwest quadrant of Square 5814 [sic.] would be compatible with the adjacent lower density neighborhood to the west and south with appropriate design review through a Planned Unit Development process. Strongly encourage WMATA to make its land available for joint development around the Congress Heights Metro Station.”

Policy FSS-1.1.1.: Directing Growth (in pertinent part)

Additional opportunities for future housing development and employment growth in the Far Southeast/Southwest should be directed to the area around the Congress Heights Metro Stations [sic.] and along the Great Streets corridors of South Capitol Street. Provide improved transit and automobile access to these areas and improve their visual and urban design qualities.

The proposed PUD project and Zoning Map Amendment application are the embodiment of these policies. The Applicant is proposing medium density commercial (office and retail) and residential development directly above and adjacent to the Congress Heights Metro Station. The proposed project helps create a gateway between the development that will occur on the St. Elizabeths East Campus and the Congress Heights community. The massing and height of the buildings is respectful to the nearby lower scale residential uses and also creates an attractive and engaging street level experience along Alabama Avenue, 13th Street and the new public plaza.

The Comprehensive Plan's Urban Design Element includes the following policies which are furthered by the PUD project:

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-3.1.7; Improving the Street Environment: Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall.

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 high levels of architectural design and quality of materials used in this project will serve as the standard for future development in the area. The creation of ground floor retail uses and the

treatment of the public space along Alabama Avenue and 13th Street and the public space will encourage and foster pedestrian activity.

The Comprehensive Plan's Housing Element includes the following policies that are supported by this project:

Policy 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-1.1.3 - 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-1.1.4 - Mixed Use Development: Promote mixed-use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations.

The project's provision of 205-215 residential units, including approximately 15,515 square feet of workforce affordable housing, is consistent with this policy of encouraging mixed-use development in close proximity to Metro Stations.

The Land Use Element of the Comprehensive Plan includes the following policy:

Policy LU-1.3.1; Station Areas as Neighborhood Centers: Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide. ...

Policy LU-2.4.5; Encouraging Nodal Development: Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them.

The proposed PUD project will certainly serve as an anchor for further economic and civic development of the Congress Heights neighborhood. The creation of a significant amount of office space, on top of the Congress Heights Metro Station, is an important economic generator that also has the opportunity to minimize adverse impacts on the surrounding community. The creation of 16,250 square feet of new retail uses, provided in high-ceilinged light-filled spaces, surrounded by active and accessible pedestrian travel routes provides both economic and civic benefits. The creation of approximately 205-215 new residential units provides the opportunity for new residents to come to the neighborhood or for existing residents to remain in their neighborhood. Finally, the creation of a lively and animated plaza around the Congress Heights Metro Station canopy and entrance creates a public place and new cultural focal point for the Congress Heights community.

For all of these reasons, the creation of this transit-oriented project furthers numerous policies and goals of the Comprehensive Plan.

VI. CONCLUSION

For the foregoing reasons, the Applicant submits that the consolidated PUD and Zoning Map Amendment applications meet the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment; provide significant public benefits; and advance important goals and policies of the District of Columbia.

Therefore, the consolidated PUD and Zoning Map amendment application should be approved and adopted by the Zoning Commission. Accordingly, the Applicant respectfully requests that the Zoning Commission set down this project for a public hearing.

Respectfully submitted,

GOULSTON & STORRS

A handwritten signature in blue ink, appearing to read "Paul T. D.", is written over a horizontal line.

Paul Tummonds