

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

**SUPPLEMENTAL STATEMENT
IN SUPPORT OF AN APPLICATION FOR A
CONSOLIDATED PLANNED UNIT
DEVELOPMENT**

**PROVIDENCE PLACE
Z.C. Case No. 17-08**

September 29, 2017

**Holland & Knight LLP
800 17th Street, NW
Washington, DC 20006
(202) 955-3000**

I. INTRODUCTION

This supplemental prehearing statement is submitted by Providence Place I LP (the "Applicant") on behalf of the Progressive National Baptist Convention, Inc. ("PNBC"), the owner of the campus located 601 50th Street, NE (Square 5194, Lot 824). PNBC seeks approval of a consolidated planned unit development ("PUD") and related Zoning Map amendment from the RA-1 Zone to the RA-2 Zone for the western portion of the campus, consisting of approximately 70,712 square feet of land area (the "Property"). The Property is within the boundaries of ANC 7C. The public hearing on the Application is scheduled for October 19, 2017.

This prehearing statement supplements the original application statement filed with the Zoning Commission on April 7, 2017, and the prehearing statement filed with the Zoning Commission on July 17, 2017; and addresses the comments raised by the Zoning Commission at its setdown meeting on June 12, 2017, the comments raised by the Office of Planning ("OP") in its setdown report dated June 2, 2017, and additional information requested by other reviewing agencies.

The Applicant proposes to redevelop the Property with an apartment house with approximately 132,766 square feet of gross floor area, generating 100 residential units comprised of 1-bedroom, 2-bedroom, 3-bedroom, and 4-bedroom units, all of which will be reserved for households with incomes not exceeding 60% of the median family income ("MFI"). Of the 100 units, 35 will be replacement units for the Lincoln Heights and Richardson Dwellings communities controlled by the DC Housing Authority. Eight of the nine 3-bedroom units and all of the 4-bedroom units will be replacement units. The building will have a height of approximately 31 feet, 10 inches; a density of approximately 1.88 floor area ratio ("FAR"); and 48 below grade parking spaces (the "Project").

On September 7, 2017, the Applicant submitted a copy its Comprehensive Transportation Review (“CTR”) to the Zoning Commission in accordance with Subtitle Z § 401.8 of the Zoning Regulations. The Applicant also submitted a copy of the CTR to DDOT on August 21, 2017.

II. SUPPLEMENTAL INFORMATION ON THE APPLICATION

At set down, the Zoning Commission: (1) recommended that the Applicant continue to work with the Office of Planning (“OP”) on achieving LEED Gold certification for the Project and to consider the installation of solar panels; and (2) requested additional views of the building, specifically of the east elevation along Campus Drive. The Applicant provided additional renderings showing the east elevation of the building in its prehearing submission on filed on April 7, 2017. In its set down report, OP also requested additional information about the PUD. Those issues that were not fully addressed in the prehearing submission filed on April 7, 2017 are: (1) status of the proposed historic designation of the PNBC campus; (2) a comparison between the Enterprise Green Communities standard and LEED; and (3) refinements to the benefits and amenities package. The Applicant’s responses to these and other comments raised since setdown are provided below.

A. Updated Architectural Drawings

Attached as Exhibit A is a comprehensive set of updated architectural drawings (the “Plans”). This set includes the additional renderings submitted with the Applicant’s prehearing submission filed on April 7, 2017. As shown on the Plans, the same level of architectural detailing is used on all four sides of the building. Moreover, the massing and design of the Project is intended to enhance the residential character of the immediate area and the PNBC campus overall.

The Project includes the creation of a new public entrance to the PNBC campus on Fitch Place, and will significantly improve the fabric of the PNBC campus and 50th Street by redeveloping a large, underutilized site.

The east-facing courtyard of the proposed apartment house responds to the Trades Hall/PNBC Headquarters building, elevating its importance and highlights it as a special structure. The apartment house is situated on an uphill portion of the Property, helping to preserve the identity of the campus as a collection of buildings surrounded by the natural landscape, particularly from the most prominent view from Nannie Helen Burroughs Avenue. The significant topography is utilized to create a building mass that is integrated with the scale of the existing buildings on the PNBC campus. The building height steps down along the 50th Street frontage and from 50th Street to Campus Drive, creating a building mass integrated with the scale of the PNBC campus as well as a mass that steps down along 50th Street, responding to the road grade and scaling down the height. An additional west-facing courtyard is created along 50th Street that further breaks down the building mass and terminates the view corridor of Foote Street with a special feature. The character of the exterior facades pick up on the Arte Moderne style of the existing dormitory and chapel on the PNBC campus, using a more modest interpretation of the style that is sympathetic to the existing campus buildings, but does not compete with them. The exterior materials of the apartment house are complimentary to the existing buildings on the PNBC campus, enhancing the identity as a cohesive ensemble.

B. Historic Preservation

The Applicant has agreed to file a historic designation application for portions of the PNBC campus as a way to commemorate the historical significance of the campus and its association

with Nannie Helen Burroughs. The designation application will not include the PUD site, but will include the Lincoln Memorial Arch, as well as the chapel and dormitory constructed in the 1950s. Below is a summary of the historical significance of these three resources.

The PNBC campus is historically associated with the National Training School for Women and Girls, which was later renamed the National Trade and Professional School for Women and Girls (the “School”). The School was established in 1906 by the Women’s Convention Auxiliary (“WCA”) of the National Baptist Convention (“NBC”). Although originally sponsored by the WCA, the School was the vision of one person, WCA President Nanny Helen Burroughs. Burroughs, a noted Civil Rights leader during the twentieth century, desired to create a national school for African-American women to help guide women for a productive life in twentieth century society. Burroughs served as President of the institution from 1906 until her death in 1961. She was primarily responsible for developing the curriculum and obtaining funding necessary to keep the School open. The School was largely funded through the donations of African-American working-class families who understood its benefits and appreciated the value of this education.

All but one of the buildings associated with the School from 1906 to 1950 remains extant. The Trades Hall, which is currently the PNBC Headquarters building, was completed in 1928 and served as one of the school’s primary classroom buildings. The building was designated a National Historic Landmark in 1991 as a result of its association with the School’s role in the Civil Rights movement and the life of activist Nannie Helen Burroughs.

Although other pre-1950 buildings associated with the School were demolished, a dormitory and chapel building remain on the PNBC campus. Both the dormitory and chapel were constructed in the 1950s and represent the development of the School during its last decades in operation. Similar to earlier development at the School, Burroughs reached out to her donors to

provide the funding for these projects. Both buildings were completed during her lifetime, but the chapel was dedicated after Burroughs' death in 1961. In 1964, the School was renamed in her honor. In addition to these buildings, the original entrance gate at the corner of Nannie Helen Burroughs Avenue, NE and 50th Street, NE also remains. Known as the Lincoln Memorial Arch, this entrance gate was dedicated in 1914 to commemorate the 50th anniversary of Abraham Lincoln's death.

C. Sustainable Design

The Applicant is implementing strategies to enhance the inherently sustainable nature of the Property. The Project is a compact development built in an existing neighborhood and the building will utilize the existing infrastructure, which is an important smart growth feature. Extensive bio-retention areas are provided to reduce the amount of stormwater sent to the sewer system, which also enhances the landscape of the existing PNBC campus. Additional sustainable features include efficient lighting, Energy Star rated appliances, non-combustible equipment, utilization of safe non-toxic materials all of which will benefit the Project's residents and help reduce utility costs. The Applicant will also ensure that proper ventilation of interior spaces is provided to prevent exposure to mold and other contaminants.

As suggested by the Zoning Commission and the Department of Energy and Environment, the Applicant will incorporate solar panels on the building's upper roof. As shown on the updated roof plan on Sheet A21 of the Plans, the solar panels will cover approximately 6,000 square feet of the roof area and will reduce the building's energy use.

The PUD will be certified under the Enterprise Green Communities standards and will use Enterprise Green Communities certification to meet the applicable Green Building Act

Requirements. The Green Building Act states that the Enterprise Green Communities standard was developed for affordable housing, and shall be used for projects with at least 15% District financing. An updated Enterprise Green Communities Checklist for the Project is included on Sheet A14 of the Plans. The updated Enterprise Green Communities checklist illustrates an increased commitment to sustainable design with a target score of 54 Yes and 26 Maybe optional points, which significantly exceed the 35 optional points required for Enterprise Green Communities certification.

D. Inclusionary Zoning

All of the units in the development will be for households with incomes not exceeding 60% of MFI. In accordance with the tax credit financing structure that will be utilized for the Project, the affordability period for the building will be 40 years. The Applicant agrees that, at the expiration of the 40-year affordability period, the building will comply with the Inclusionary Zoning requirements in effect at the time the Project is originally approved by the Zoning Commission, for the life of the Project. Specifically, 10% of the gross floor area of the building (approximately 13,278 square feet) will be set aside for households with incomes not exceeding 60% MFI, in accordance with Subtitle C, Section 1003.1 of the Zoning Regulations.

E. DDOT Urban Forestry

The Applicant has reviewed the DDOT Urban Forestry memo dated September 12, 2017, and will work with the agency to address its comments regarding trees on the Property.

F. Project Benefits and Amenities

(1) Urban Design and Architecture; Landscaping and Open Space; Property Planning & Efficient & Economical Land Utilization (§ 305.5(a) – (c)). The massing and design of the Project is intended to enhance the residential character of the immediate area and the PNBC campus. The Project includes the creation of a new public entrance to the campus on Fitch Place, which will enhance the prominence and visibility of the Trades Hall, and improve automobile and pedestrian access to the campus. Moreover, the Project will significantly improve the fabric of the PNBC campus and 50th Street by redeveloping a large, underutilized site.

The new building is situated on an uphill portion of the Property, helping to preserve the identity of the PNBC campus as a collection of buildings surrounded by the natural landscape, particularly from the most prominent view along Nannie Helen Burroughs Avenue. The east-facing courtyard of the apartment house responds to the Trades Hall/PNBC Headquarters building, elevating its importance and highlights it as a special structure. The significant site topography is utilized to create a building mass that is integrated with the scale of the surrounding buildings on the PNBC campus and on 50th Street. The building height steps down both along the 50th Street frontage, and from 50th Street to Campus Drive, creating a building mass integrated with the scale of the PNBC campus and the existing apartment buildings and new townhouses along 50th Street. The frontage facing the campus is predominately three stories, creating a building mass compatible with the Trades Hall/PNBC Headquarters building and existing school building. Stepping down along 50th Street, the apartment house responds to the road grade while a second west-facing courtyard further articulates the street frontage and provides a unique spatial feature that terminates the view corridor of Foote Street. A secondary residential entrance, new sidewalks, grass strip with street trees and low retaining walls with extensive plantings, together with the attractive building

frontage, improve the character and quality of 50th Street. The new PNBC campus entry, as well as the primary pedestrian building entry, are articulated with a unique bay feature, which creates new features along Fitch Place and will enliven the street with new pedestrian activity.

Car parking, bicycle parking, and all of the loading and service spaces are located in a partially below-grade garage, removing them from public view. Access to the garage is provided at the northernmost end of the building on 50th Street.

The character of the exterior facades pick up on the Arte Moderne style of the existing dormitory and chapel on the PNBC campus, using a more modest interpretation of the style that is sympathetic to the existing buildings on the campus, but does not compete with them. Streamlined horizontal readings in masonry detailing and window patterns, corner windows, and articulated vertical bays and features at the two building entries are components of the style utilized to create a nuanced, human-scaled facade. The exterior materials, including the brick and siding in the upper story, are complimentary to the existing buildings on the PNBC campus, enhancing the identity as a cohesive ensemble.

The PUD includes a range of unit types, including 1-bedroom, 2-bedroom, 3-bedroom and 4-bedroom. The 3-bedroom and 4-bedroom units will accommodate larger families and are carefully located to provide access to appropriate amenities, such as the private outdoor space either on ground level patios or the upper level balconies. Additional amenity spaces include primary and secondary residential lobbies, a business and fitness center, and a community room that will be made available to building residents and the broader community, including PNBC. The roof terrace on the lower northernmost roof level will made available to all of the building residents, and will provide spectacular views of the District's skyline.

(2) Historic Preservation (§ 305.5(e)). The Property is situated at the western edge of the PNBC campus, across from the campus' Trades Hall/PNBC Headquarters building. This building was one of the early classroom/administration buildings for the Nannie Helen Burroughs School, originally known as the National Training School for Woman and Girls, and which is designated a National Historic Landmark. Civil rights and suffrage advocate, Nannie Helen Burroughs founded the school in 1906, and remained active in its leadership until her death in 1961.

In light of the historic significance of the PNBC campus, the Applicant has agreed to file a historic designation application on the portion of the PNBC campus that includes the extant resources associated with the National Training School for Women and Girls. The resources included within the landmark designation would include the Trades Hall, chapel, dormitory, and the Lincoln Memorial Arch, but will not include that portion of the site included in the PUD application. The historic designation application will be filed with the Historic Preservation Office prior to the issuance of a certificate of occupancy for the apartment house that is the subject of this application.

(3) Affordable Housing (§ 305.5(g)). The PUD's most significant benefit is the creation of new housing, including additional affordable housing units, consistent with the goals of the Zoning Regulations, the Comprehensive Plan, and the Mayor's housing initiative. If the Property was developed as a matter of right, the Applicant would be required to set aside the greater of 10% of the gross floor area dedicated to residential use including penthouse habitable space, or 75% of its achievable bonus density to inclusionary units, which would result in approximately 13,278 square feet of gross floor area set aside for households with incomes not exceeding 60% of MFI. However, the PUD will result in approximately 132,776 square feet of gross floor area

devoted to households with incomes not exceeding 60% of MFI for an affordability period of 40 years. This is a significantly greater amount of affordable housing, and at deeper levels of affordability, than would have been required if the Property was developed as a matter-of-right. The Applicant agrees that at the expiration of the 40-year affordability period, the building will comply with the Inclusionary Zoning requirements in effect at the time the Project is originally approved by the Zoning Commission, for the life of the Project. Specifically, 10% of the gross floor area of the building (approximately 13,278 square feet) will be set aside for households with incomes not exceeding 60% MFI, in accordance with Subtitle C, Section 1003.1 of the Zoning Regulations.

The PUD also includes a variety of housing types and includes, 1-bedroom, 2-bedroom, 3-bedroom, and 4-bedroom units. Of the 100 units, 35 will be replacement units for the Lincoln Heights and Richardson Dwellings properties. Eight of the nine 3-bedroom units and all of the 4-bedroom units will be replacement units.

(4) Employment and Training Opportunities (§ 305.5(h)). Expanding employment opportunities for residents and local businesses is a priority of the Applicant. Therefore, the Applicant will enter into a First Source Employment Agreement with the Department of Employment Services. In addition, the Applicant will enter into a Certified Business Enterprise Agreement with the District Department of Small and Local Business Development to ensure that a preference is made to District-based firms pursuing District government issued procurement opportunities.

(5) Building Space for Special Uses (§ 305.5(j)). The Applicant is providing a community room in the building that will be made available to the broader community, including PNBC.

(6) Environmental Benefits (§ 305.5(k)). The Applicant will incorporate solar panels on the building's upper roof. As shown on the updated roof plan on Sheet A21 of the Plans, the solar panels will cover approximately 6,000 square feet of the roof area and reduce the building's energy use.

Also, the PUD will meet the requirements of the *Enterprise Green Communities* standard for residential buildings. It will employ environmentally sustainable strategies as called for in the Green Communities standard such as surface water management with extensive bioretention features, native and soil appropriate plantings, natural ventilation features, Energy Star rated appliances, low VOC finishes, water conserving plumbing fixtures, and Energy star rated residential unit light fixtures.

(7) Streetscape Plans (§ 305.5(l)). As shown on sheet L100 of the Plans, the PUD includes landscaped and improved streetscapes surrounding the Property. The improved sidewalks along 50th Street and Fitch Place will provide for a better pedestrian experience through the use of street trees, enhanced lighting, and paving, all of which will reactivate the areas adjacent to the Property.

(8) Uses of Special Value to the Neighborhood or the District as a Whole ((§ 305.5(q)). The proposed development is important to the implementation of the "Physical Plan" element of the *Lincoln Heights and Richardson Dwellings New Communities Initiative Revitalization Plan*, which was approved by the City Council on December 19, 2006, pursuant to Resolution No. 16-923. Among other things, this plan calls for 140 replacement units for the Lincoln Heights and

Richardson Dwellings properties, in order for those properties to be redeveloped with new mixed-income residential communities.

G. Community Outreach

The Property is within the boundaries of Advisory Neighborhood Commission (“ANC”) 7C. At its meeting on June 8, 2017, ANC 7C voted unanimously (7-0-0) to recommend approval of the application including the benefits and amenities package. The ANC letter in support of the application is marked as Exhibit 13 of the record.

III. ADDITIONAL WITNESSES

Rex Cole or Lindsay Lecour of Atlantic|Pacific Communities will testify on behalf of the Applicant, instead of Ray Nix who was previously listed. A copy of their bios are attached as Exhibit B. Dr. Carson Eugene Wise, Sr. of the Progressive National Baptist Convention, CDC will also testify on behalf of the Applicant. A copy of Dr. Wise’s bio is attached as Exhibit C.

IV. CONCLUSION

In accordance with Subtitle Z, Section 401.5 of the Zoning Regulations, this statement is submitted on behalf of Providence Place I LP in order to provide additional information in support of its application for a PUD and related Zoning Map amendment at the Property. Based on the information and items contained herein, and the case presented in the original submittal, we respectfully request the Zoning Commission's favorable consideration of the application.

Respectfully submitted,

HOLLAND & KNIGHT LLP



By: _____
Leila M. Jackson Batties