



Paul A. Tummonds  
ptummonds@goulstonstorrs.com  
202-721-1157

Lawrence Ferris  
lferris@goulstonstorrs.com  
202-721-1135

December 17, 2019

Anthony Hood, Chair  
D.C. Zoning Commission  
Office of Zoning  
441 4<sup>th</sup> Street, N.W., Suite 200-S  
Washington, DC 20001

Re: **Z.C. Case No. 19-19 – Application of Terrace Manor Redevelopment LP for Approval of a Consolidated Planned Unit Development for 3301 23rd Street SE (Square 5894, Lot 63) (the “Property”) – Supplemental Submission**

Dear Chair Hood and Members of the Commission:

Terrace Manor Redevelopment LP (the “**Applicant**”) hereby submits this supplemental submission for the proposed consolidated Planned Unit Development (“**PUD**”) for the property located at 3301 23<sup>rd</sup> Street SE (Square 5894, Lot 63) (the “**Property**”). As outlined in detail in the initial application materials, the Applicant proposes to demolish the existing dilapidated 12-building complex on the Property and replace it with a single apartment building with approximately 130 units, all of which will be affordable housing units with a maximum median family income (“**MFI**”) of 60% (the “**Project**”). The Project will have a Floor Area Ratio (“**FAR**”) of 1.29 and a building height of approximately 47 feet, seven (7) inches, within the 1.29 FAR and 60 feet of height permitted, respectively, for a PUD project in the RA-1 zone in which the Property is located. The Project will conform to matter-of-right zoning requirements in all other respects.

This supplemental submission provides additional information and updated architectural plans in response to feedback received from the Office of Planning (“**OP**”) regarding the Project. In addition, since the application was filed, the D.C. Council has adopted revisions to the Framework Element of the Comprehensive Plan which are relevant to the Project, and these changes are discussed below.

## **I. Updated Architectural Plans**

Attached as Exhibit A are updated plans (“**Plans**”) for the Project based on comments received from the Office of Planning. The Plans include the following changes from the plans submitted with the initial application:

- Updates to the building’s façades (including the addition of Juliet balconies), color palette, and materials;
- Detailed gross floor area (“**GFA**”) calculations, outlined on a new Sheet 1-2, for the portions of the Project that are partially below-grade;
- Plan updates reflecting a LEED Gold target and including a roof plan depicting, among other things, an extensive solar array combined with green roof features;
- Revisions to reflect a reduction in the number of vehicle parking spaces provided from 60 to 52, in response to feedback received from the District Department of Transportation (“**DDOT**”);
- Enhanced landscape plans; and
- New area amenity plan, included as Sheet 2-2, showing pedestrian access and proximity to other recreational activities in the immediate and adjacent neighborhoods.

## **II. Additional Background Regarding the Applicant, the Project and Resident Amenities**

As discussed in the initial statement, the Applicant is an affiliate of WC Smith. WC Smith is a Washington, D.C.-based multidisciplinary real estate firm, providing integrated real estate services to the Washington metropolitan area since 1968. WC Smith has long-standing ties to the community surrounding the Property, and the Project represents one component of a 20+ year endeavor by the company making a substantial, wide-reaching investment in the area. This extensive effort includes revitalization of the 54-acre Villages of Parklands apartment complex, building Park Vista, spearheading the creation of Town Hall Education Arts Recreation Campus (“**THEARC**”), bringing a full-service grocery store to the Shops at Park Village, intensive clean up and rehabilitation of Oxon Run Park, and improvements to a number of local schools. As part of the community improvements, WC Smith built D.C.’s first splashpark in Parklands and formed a nonprofit to build THEARC, a \$27 million state of the art cultural, arts, recreation, and education campus on Mississippi Ave SE. WC Smith also recently partnered with KaBOOM, a national non-profit dedicated to creating safe active play spaces for children in low-income

communities, to construct a playground immediately north of the Property on 23<sup>rd</sup> Street. In addition, WC Smith provides a Summer Youth Employment Program, now in its 27<sup>th</sup> year, that offers valuable work experience for youth ages 14-17 who live in WC Smith-managed properties or are dependents of WC Smith employees. The employment program runs for six weeks each year, with participants working 20 hours a week with paid educational workshops.

As shown on Sheet 2-2 of the Plans, residents of the redeveloped Terrace Manor apartments will benefit from the extensive amenities that WC Smith has been instrumental in bringing to this neighborhood, including:

- The recently constructed playground just north of the Property on 23<sup>rd</sup> Street;
- Villages of Parkland splashpark, which is open to the public and approximately six (6) minute walking distance from the Property;
- Cultural, arts, recreation, and education opportunities at THEARC, located approximately 11-minute walking distance from the Property; and
- Free shuttle services running during morning and evening commute times and offering service from WC Smith properties to the [Anacostia? (Howard Road)] Metrorail station.

In developing the program and design for the Project, and in response to feedback received from OP, the Applicant also explored including outdoor recreation space on the Property as part of the Project. However, the primary open space on the Property, to the rear (northwest) of the proposed building, does not lend itself to outdoor recreation use. Specifically, as shown on Sheet 4-1, this area is occupied by a large existing Heritage Tree with an expansive critical root zone that must be protected under the District's forestry regulations. The remainder of this area is either devoted to bioretention features necessary to meet the Project's stormwater management requirements or is affected by the steep change in grade on the northwest portion of the site. Accordingly, the Applicant's design team has determined that this area cannot accommodate outdoor recreation use or programming that is likely to be used by residents of the Project or their guests.

Moreover, based on the Applicant's extensive experience with residential developments in the area and throughout the District, the Applicant expects that residents of the Project would have a strong preference for outdoor space that is visually connected to the street, rather than in the back yard, and are much more likely to bypass any such on-site space in favor of utilizing the other amenities in the area, including the Capitol View YMCA that is a four (4) minute walk immediately to the west of the Property, the playground to the north, THEARC, and the Villages of Parkland Splashpark, as shown on

the area plan on Sheet 2-2. For these reasons, the Applicant is not proposing any on-site outdoor recreation space as part of the Project.

### **III. Consistency with the Framework Element**

As noted above, the D.C. Council recently made notable revisions to the Framework Element of the Comprehensive Plan, with a particular focus on the need for housing and affordable housing. Set forth below are relevant excerpts from the newly-updated Framework Element, followed by a brief discussion of how the Project addresses these issues and furthers the District’s goals with respect to housing, affordable housing, and equity.

***Section 205.6:*** *[T]here are sites potentially suitable for additional development through an entitlements process (a Planned Unit Development) that instead are developed “matter-of-right” (to existing zoning standards), forgoing additional capacity. These factors, particularly to the extent they limit housing and affordable housing production or other desired uses, represent missed opportunities for the District to grow inclusively.*

- The Applicant has chosen the PUD process in order to allow a slightly larger development envelope — specifically, gaining an additional 0.21 FAR and 7 feet, 7 inches of height — in order to provide a better project for residents and the community, including an increase the number of two-bedroom units from 39 to 54 units, in response to community input requesting more family-size units.

***Section 206.1:*** *The rising cost of housing is one of the most pressing and critical issues facing the District and the region. To achieve our goal of an inclusive city, we must meet the challenge of providing housing for a variety of household types, including families, the elderly, and the homeless; for owners and renters; for existing and new residents; workforce housing; and housing affordable at all income levels. Tied in with housing cost issues are deeper concerns about displacement, the impacts of gentrification, and long-term competitiveness.*

- The Project is all-affordable with a maximum household income level of 60% MFI. In addition, all prior Terrace Manor tenants will be provided the opportunity to return to the property following redevelopment at their previous rent levels (plus CPI), as confirmed in a Memorandum of Understanding executed between WC Smith and the tenant association.

***Section 206.8:*** *Increasing costs and a decreasing supply of naturally occurring affordable housing are affecting the types of households that are staying in the District. . . . This data highlights the importance of preserving and developing housing affordable to low and extremely low-income households.*

- The Project will not only replace the existing 61 severely dilapidated units on the Property, but will more than double the number of units on-site to 130 units.

***Section 213.5 (under Resilience and Equity):*** *[T]he stress of poverty, combined with substantial population growth, has created a housing affordability crisis that must be addressed. The need for more housing, and more affordable housing, has become an important policy goal that, if addressed and achieved, will help the city be more resilient.*

- The Project will further the District’s goals to achieve resilience and promote equity by replacing existing dilapidated housing on the Property and make a substantial contribution towards increasing the stock of affordable housing in the area and the District as a whole.

***Section 220.5:*** *The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing, especially for low income and workforce households are essential to avoid a deepening of racial and economic divides in the city, and must occur city-wide to achieve fair housing objectives. Affordable renter-and owner- occupied housing production and preservation is central to the idea of growing more inclusively . . . .*

- As noted above, the Project will preserve, by replacing, the existing 61 dilapidated units in the existing apartment complex and will more than double the number of units currently on-site, all of which will be affordable units.

***Section 224.9:*** *Specific public benefits are determined through each PUD application and should respond to critical issues facing the District as identified in the Comprehensive Plan and through the PUD process itself. In light of the acute need to preserve and build affordable housing, described in Section 206, and to prevent displacement of on-site residents, the following should be considered as high-priority public benefits in the evaluation of residential PUDs:*

- *The production of new affordable housing units above and beyond existing legal requirements or a net increase in the number of affordable units that exist on-site . . . .*
  - The Project will increase the number of existing units from 61 to 130 units, all of which will be affordable at 60% MFI, well in excess of the minimum required under Inclusionary Zoning. This proposal is a high-priority public benefit, as stated in the Framework Element, and is commensurate with the amount of PUD flexibility being requested — an additional 0.21 FAR of density and 7 feet, 7 inches of additional height.


For all of these reasons, the Project is consistent with the Framework Element, in addition to being consistent with the other elements of the Comprehensive Plan and the Mayor's May 10, 2019 Housing Order, as discussed in detail in the initial submission.

**IV. Conclusion**

For the reasons discussed above and in the initial application statement, the proposed PUD meets the standards for approval under the Zoning Regulations, and the Applicant respectfully requests that the Zoning Commission set the PUD application down for a public hearing at the earliest possible date.

Please feel free to contact Paul at (202) 721-1157 or Lawrence at (202) 721-1135 if you have any questions regarding the above. We look forward to the Commission's consideration of this matter at an upcoming public meeting.

Sincerely,

  
Paul A. Tummonds

  
Lawrence Ferris

Enclosures

**Certificate of Service**

The undersigned hereby certifies that copies of the foregoing document will be delivered by first-class mail or hand delivery to the following addresses on December 17, 2019.

Jennifer Steingasser  
Office of Planning  
1100 4<sup>th</sup> Street, SW, Suite 650E  
Washington, DC 20024

Jonathan Rogers  
District Department of Transportation  
55 M Street, SE, Fourth Floor  
Washington, DC 20003

ANC 8E (7 copies)  
1310 Southern Avenue  
Room G047  
Washington DC 20032

Monica Watts – ANC 8E03  
3225 23<sup>rd</sup> Street SE  
Washington, DC 20020

Humam Abdulmalik – ANC 8B06  
3416 25<sup>th</sup> Street SE #13  
Washington, DC 20020



---

Lawrence Ferris