

September 2, 2020

D.C. Zoning Commission
Office of Zoning
441 4th Street, N.W., Suite 200-S
Washington, DC 20001

Re: **Z.C. Case 66-68A - Application of Enterprise Community Development, Inc. ("Applicant") for a Modification of Significance for the Large Scale Planned Development ("LSPD") Approval for Edgewood Commons (Square 3630, Lots 2, 5, 803, 805, 807, & 810 – 813) (the "Property") – Prehearing Submission**

Dear Chairman Hood and Members of the Commission:

On June 29, 2020, the Zoning Commission ("**Commission**") voted to set down the above-referenced application for a public hearing. With this submission, the Applicant hereby requests that the Commission schedule a public hearing. This submission contains responses to the issues raised by the Office of Planning ("**OP**") in its setdown report and by the Commission at the public meeting.

1. Project Operations

OP and the Commission asked the Applicant to address several operational components of the Project, as discussed below, particularly with respect to outdoor space, laundry facilities, and sustainability. In considering the operation of the Project, the Applicant's priority is on the living environment created for the residents. Loneliness and isolation of seniors is a concern for those who advocate for this community.¹ Isolation among seniors can lead to negative mental health effects, while opportunities for connection and interaction with other residents and staff create the opportunity to forge meaningful relationships and avoid isolation. Because there is a greater risk of isolation among senior living communities generally, the communal space within the building is designed to facilitate smaller interpersonal networks amongst residents of each floor. Similarly, the exterior communal spaces are designed to facilitate social connections across the entire Edgewood community and promote physical activity.

¹ See, e.g., Anderson, Oscar G. and Colette Thayer, Report on Loneliness and Social Connections: A National Survey of Adults 45 and Older, AARP (September 2018) <https://www.aarp.org/research/topics/life/info-2018/loneliness-social-connections.html>; Taylor, Harry Owen et al. "Loneliness in senior housing communities." *Journal of gerontological social work* vol. 61,6 (2018): 623-639 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6938254/>.

Outdoor Space for Residents

OP and the Commission asked the Applicant to consider providing outdoor space for residents. Accordingly, the Applicant has redesigned the Project to include several new outdoor spaces for residents totaling over 2,500 square feet of outdoor space. On the First floor there are two patios – one accessed from the residential amenity space and another accessed from the Adult Day Care Suite. On the Third and Ninth floors there are outdoor spaces accessed from the laundry lounges that provide additional outdoor gathering space for residents. Finally, on each residential floor at the west end of the building, the Project is providing balconies that are accessed from the residential corridor and can be utilized by residents as a gathering space. These outdoor spaces encourage congregation for residents and create meaningful spaces to do so outdoors. These outdoor spaces on the building are in addition to the significant outdoor spaces available to residents as part of the Edgewood Commons Campus.

The Commission and OP suggested outdoor space could take the form of individual unit balconies. However, in the Applicant's experience, individual balconies are not the best approach for senior housing. Specifically, the traditional balcony sliding doors present operational difficulties for elderly residents who may have trouble opening and closing these heavy doors. Additionally, individual-unit balconies are difficult to make truly accessible given their limited size and could pose a tripping hazard to the residents, adding unnecessary risk to the seniors. In contrast, the communal balconies are able to be accessed directly from the corridor and will be designed to be accessible given their larger size. Finally, providing outdoor space as communal as opposed to individual also encourages interaction and allows residents to maintain social bonds and avoid isolation. Therefore, the Applicant believes the additional communal outdoor space outlined above appropriately provides this needed space without creating risks to residents.

Laundry Facilities

OP and the Commission also raised questions regarding the proposed laundry facilities for the Project. The Applicant is proposing floor-based laundry facilities rather than in-unit laundry facilities for several reasons. First and most importantly, in the Applicant's experience, as noted, a major concern in a senior living environment is isolation. Residents who primarily concentrate their time within their unit will experience greater isolation, so programmatically the Applicant strives to create meaningful opportunities for residents to connect. Providing communal laundry helps create this cross-resident interaction and, in the Applicant's experience, is a simple and effective way to minimize isolation. Even while encouraging community interaction, the laundry facilities are easily accessible to all residents due to their location on each floor.

Further, providing in-unit washers and dryers is an expensive undertaking. Given that the Project is an all-affordable housing project using public financing, the funds required to accommodate in-unit washers and dryers will take away funding for other critical components of the program, including the total number of units. There are a number of affordable senior properties receiving funding from the Department of Housing and Community Development that have recently or are about to be placed in service that include common area laundry facilities, which is typical for the market of all-affordable projects.

Sustainability

The Applicant has enhanced the sustainability measures of the Project in response to the Commission, OP, and the Department of Energy and Environment (“DOEE”). Specifically, the Applicant has increased the planned solar panels for the Project from 775 square feet to approximately 3,000 square feet, as shown on Sheets 20 and 51 of Exhibit B (updated sheets refining the Project design (the “Plans”). These solar panels will be integrated with the green roof on the Project. Additionally, the Project will be designed to meet or exceed Enterprise Green Communities 2020 requirements.

2. Updated Design

In addition to the operational details, the Commission and OP suggested design changes to the Project, including greater articulation of the building, which are attached as Exhibit B Attached as. The updated Plans include additional articulation, including an emphasized entry and refined western façade in response to comments from OP and the Commission. Specifically, the Applicant has revised the massing, fenestration, and color scheme for the west and north facades and included green screen plantings on the walls to further articulate this area, in addition to the communal balconies noted above, as shown on Sheets 30-32 of the Plans. Additionally, as shown on Sheets 26, 28A, and 28B of the Plans, the main building entrance has been revised to provide architectural distinction and highlight its importance by including a distinctive brick type not used elsewhere in the Project, adding sun shading devices, and reinforcing the two-story massing.

The Applicant also revised the loading plan for the Project in response to OP’s concern about its operation. Loading operations were previously planned to take place outside, in a surface parking lot adjacent to the building, which would require travel from loading trucks to the building. However, as reflected in the Plans, loading has been moved internal to the building in the basement level on the west end of the Project. This loading revision allows easier operation for the Project, including direct access to the trash room adjacent to the loading facility.

3. Benefits and Amenities

The Commission and OP also requested additional information regarding the benefits and amenities proposed by the Project. As detailed in the initial application materials, the Project provides all-affordable housing for seniors and supporting daycare use, which OP and the Commission acknowledged as a significant benefit.

OP requested confirmation that the Project was not intended to reduce the overall number of affordable units at the overall Edgewood Commons campus. The Project is increasing the total number of affordable units at the Property, and it will not reduce the total number of affordable units on the Campus. The Project will provide all of the senior affordable units in this building in addition to the 500 units required as part of the original LSPD approval. Therefore, the Applicant must continue to meet the overall LSPD affordability requirements (and any other affordability requirements based on financing and other factors for other campus buildings) in addition to the commitment that the Project consist entirely of affordable units.

OP also requested that the Applicant provide details on future Inclusionary Zoning (“IZ”) units at the Project. The Project will be exempt from IZ pursuant to Subtitle C, Section 1001.6(a) as the Project is receiving financing from the District of Columbia Housing Finance Agency and the Department of Housing and Community Development. Once the affordability term expires from the financing, the Project will meet the IZ requirements by providing 8% of the total residential area of a project (i.e. 11,492 square feet, representing 8% of the total 143,643 residential square feet) at 60% MFI. Included as Sheet 20B in the Plans are the IZ unit designations that will apply after the all-affordable component has expired.

OP requested clarification regarding the connections noted on the previously submitted plans connecting the Property to the Metrorail station to the south. The Applicant included these connections on its plans for reference; they are neither being constructed, nor proffered, as a part of this Project. These connections will be constructed by the property owner to the south in connection with their redevelopment of their property.

Finally, because the Applicant will be financing construction of the Project through the District of Columbia Housing Finance Agency and the Department of Housing and Community Development, the Project will enter into and comply with the First Source hiring requirements and subcontract at least 35% of its adjusted budget to Certified Business Entities.

4. Filing Requirements

The Applicant hereby certifies that this submission complies with the provisions of Subtitle Z, Section 401 of the Zoning Regulations as set forth below, that the application is complete, and that no further substantive changes are expected to be submitted prior to the public hearing on this application, other than the changes discussed in this submission.

<u>Subsection (Subtitle Z)</u>	<u>Page</u>
401.1(a) Information Requested by the Commission; Updated Materials Reflecting Changes Requested by the Commission	Pre-Hearing Submission
401.1(b) Witnesses	To be submitted prior to the hearing
401.1(c) Summary of Testimony of Applicant’s Witnesses	To be submitted prior to the hearing
401.1(d) Resumes of Expert Witnesses Additional Information, Reports or Other Materials Which the Applicant Wishes to Introduce	Pre-Hearing Submission
401.1(e) Reduced Plans	Application (Exhibit I); Exhibit B

401.1(f)	List of Publicly Available Maps, Plans, and Other Documents	Application (Exhibit F)
401.1(g)	Estimated Time Required for Presentation of Applicant's Case	1 Hour
401.2	Memoranda of Understanding with Agencies and Entities regarding Public Benefits	N/A
401.3	List of Names and Addresses of All Property Owners within 200 Feet of the Property	Updated List Exhibit A
	List of Names and Addresses of All Tenants at the Property	N/A
401.7	Comprehensive Transportation Review (also provided to DDOT)	To be submitted prior to hearing
1601.1	Hearing Fee	\$1,300; Included with submission

5. Flexibility Requested

As detailed in the initial application, the Applicant has requested relief from the full long-term bicycle parking requirements and relief to provide an in-building adult day care facility serving up to 60 people, rather than the 25-maximum permitted as a matter-of-right. The Project conforms to the Zoning Regulations in all other ways. Additionally, the Applicant requests the following areas of flexibility:

- a. To vary the location and design of all interior components, including but not limited to partitions, structural slabs, doors, hallways, columns, signage, stairways, mechanical rooms, elevators, and toilet rooms, provided that the variations do not change the exterior configuration or appearance of the building;
- b. To vary the final selection of the exterior materials within the color ranges of the material types as proposed, based on availability at the time of construction without reducing the quality of the materials;
- c. To make minor refinements to exterior details, dimensions, and locations, including belt courses, sills, bases, cornices, railings, balconies, trim, frames, mullions, spandrels, or any other changes to comply with Construction Codes or that are otherwise necessary to obtain a final building permit, or are needed to address the structural, mechanical, or operational needs of the building uses or systems;
- d. To vary the number of residential units by plus or minus 10%;
- e. To vary the number of parking spaces by plus or minus 10% provided that no additional relief is required;
- f. To reconfigure the garage layout provided that no additional relief is required; and
- g. To vary the roof plan as it relates to the configuration of solar panels and green roof areas, provided that the square footage of the solar panels and green roof are not reduced.

6. Conclusion

Based on the information above and attached hereto, the Applicant respectfully requests that the Commission schedule a public hearing in this case at its earliest convenience.

Sincerely,

_____/s/_____

Cary Kadlecek
Meghan Hottel-Cox

