

## EDGEWOOD COMMONS



APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR  
REVIEW AND APPROVAL OF A MODIFICATION OF SIGNIFICANCE TO AN  
APPROVED LARGE SCALE PLANNED DEVELOPMENT

April 24, 2020

## **EXHIBITS**

<b><u>Description</u></b>	<b><u>Exhibit</u></b>
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Approved Orders (Z.C. Order No. 66-68; BZA Order Nos. 10335 and 11459)	B
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## I. Introduction

Enterprise Community Development, Inc. (“**ECD**” or “**Applicant**”) hereby submits this application (the “**Application**”) to the District of Columbia Zoning Commission (the “**Commission**”) for review and approval of a Modification of Significance of an approved large scale planned development (“**LSPD**”).<sup>1</sup> The property that is the subject of this Application is a triangular parcel known as 401-425, 601, 611, 615, & 635 Edgewood Street NE (Square 3630, Lots 2, 5, 803, 805, 807, & 810 – 813) (“**Property**”). The Property is located on the south side of Edgewood Street NE between 4<sup>th</sup> and 7<sup>th</sup> Streets NE and is otherwise bounded by 4<sup>th</sup> Street NE to the west, a large mixed-use development to the south, and industrial properties to the east. The Property has a land area of approximately 650,913 square feet (14.9 acres). The Property is located in Ward 5, within the Edgewood neighborhood.

The Applicant now seeks approval of a modification to the original LSPD to allow the construction of a new all-affordable, age-restricted residential building on an undeveloped portion of the Property (“**Project**”). The LSPD approved seven apartment buildings, some retail space, and other site improvements on the Property (“**Original LSPD**”). Other than the new building and some associated site improvements, the Applicant does not seek any other changes to the Original LSPD. The Project is proposed as shown in the plans and drawings included as Exhibit H (“**Plans**”).

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<sup>1</sup> An LSPD is analogous and a precursor to a planned unit development (“**PUD**”). LSPDs were regulated under Article 75, Section 7501 of the Zoning Regulations in effect at the time and were eventually replaced by PUDs. As this application will describe further, for purposes of application standards and procedure in this case, the LSPD will be reviewed and modified in accordance with the PUD regulations in Subtitle X, Chapter 3 and Subtitle Z of the Zoning Regulations.

## II. Background

Pursuant to Order No. 66-68, in 1966, the Zoning Commission approved the Original LSPD and a rezoning for the Property. An LSPD was the project type described in the Zoning Regulations in effect at the time that is analogous to a PUD. An LSPD was also similar to the present concept of a campus plan, with general site plans, heights, densities, and massings approved by the Zoning Commission. The design of a specific building or buildings in an LSPD was then approved by the Board of Zoning Adjustment (“**BZA**”) as a further processing.

The Original LSPD included a general site plan with multiple apartment buildings consisting of both low-rise and high-rise types containing a total 1179 residential units of which “no less than 500 units” shall be for low income tenants. The approved plan also included some retail space as well as recreation space. The Original LSPD had an approved overall floor area ratio (“**FAR**”) of 2.2 and building height maximums of 90 feet.<sup>2</sup> The project also was approved to be constructed in phases. The Original LSPD approval included rezoning the site to R-5-C. Subsequently, however, pursuant to Z.C. Order No. 721, dated October 19, 1992, the R-5-C zone became the R-5-D zone. Under the 2016 Zoning Regulations, R-5-D became RA-4, which is the current zone for the Property.

In 1970, pursuant to Order No. 10335, the BZA approved a further processing of the Original LSPD for a final site plan and to allow the construction of the buildings in phases. Then, in 1974, pursuant to Order No. 11459, the BZA approved another further processing to allow community service facilities, re-subdivision of the site, and increase the

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<sup>2</sup> Due to its age, the case record for the Original LSPD is incomplete, so some of the details of the Original LSPD that are referenced in Order No. 66-68, such as all of Exhibit 44-A, could not be located.

amount of commercial space in one of the buildings. The Applicant is unaware of any subsequent proceedings before the Zoning Commission or BZA affecting the Original LSPD.

Currently, as shown on the Plans, the Edgewood Commons campus consists of seven apartment buildings – three of which are large and approximately 90 feet tall and four of which are smaller with 3-4 stories – an above-grade parking structure, surface parking, and landscaping and outdoor recreation space on the Property (the “**Campus**”). The large buildings are clustered on the east and south sides of the Property, and the smaller buildings are clustered along the north and west sides of the Property. The parking garage is located on the far east side. The as-built condition of the Campus has existed since approximately 1974, and it differs slightly from the Original LSPD and further processing approvals, with some of the approved buildings not having been constructed. A total of 792 residential units and 423 parking spaces currently exist on the Campus.

All of the housing at Edgewood Commons is affordable in some form. Different buildings offer different affordability schemes. Two hundred (200) of the residential units are age-restricted to seniors and affordable to households whose incomes are below 50% MFI. These residents also receive rental assistance provided through the Department of Housing and Urban Development (“**HUD**”) or the District of Columbia Housing Authority. The remaining units are affordable under land use restrictions restricting rents and incomes according to Low Income Housing Tax Credit set-asides. More than 200 of those units are also subsidized through long-term Project Based Rental Assistance contracts provided through HUD.

### **III. Summary of PUD Modification**

Many of the residents of Edgewood Commons have lived on the Campus for many years, and a large senior population – those aged 60 or older – of at least 400 people now reside there.

In response to this aging demographic and a desire to allow this senior population to age in place, ECD now plans to construct an all-affordable, age-restricted building on the Campus. The Project will allow many of Edgewood Commons' senior residents to move into specialized housing with supportive services concentrated in the new building, thereby allowing them to age in place without leaving their neighborhood.

In addition to approximately 151 apartments designed specifically for seniors, the Project will have many services and amenities purposely for the senior population who will reside there. The ground floor of the building will host an approximately 7,000 square foot adult daycare center that will accommodate up to 60 seniors, for which the Applicant requests flexibility to allow more than 25 individuals. This daycare will provide meals and daily programming, including art and fitness, for seniors to have a variety of social and intellectual activities. The daycare will be operated by Iona Senior Services. While it is intended primarily for residents of the Project and Edgewood Commons, neighborhood seniors also will be able to attend, subject to space availability. The ground floor also will include approximately 9,600 square feet of program space for the senior community in the building. This will include regular medical services (a few times per week), personal care services, a café, a library, and a fitness center. The upper floors of the building will be for residents. Floors two through nine will include the individual apartment units for seniors with common community space on each floor.

A. Modification to the Site Plan and Project Specifications

As shown on the Plans, the Project will be constructed at the southwest corner of the Property, which is currently improved with only some surface parking and landscaping. This area for development of the Project is designated as Assessment and Taxation (“**A&T**”) Lot 812 (“**Project Site**”). Thus, with the completion of the Project, the Campus will contain a total of

eight buildings. Because the Project Site is largely unimproved, the development of the Project will complement and “complete” the Campus’ site plan. In addition to the new building, the Project will include new landscaping, improved Campus circulation, and additional connectivity to outside the Campus, as shown on the Plans. Vehicular access to the Project will be via the existing curb cut on 4<sup>th</sup> Street and the private drive along the south side of the Campus.

The Project will conform to the development standards for the RA-4 zone, as shown on the zoning tabulation on page 12 of the Plans. In accordance with a confirmation from the Zoning Administrator, the development standards will be based on and calculated from the entire Campus area rather than the Project Site, except for GAR, which will be calculated based on the Project Site area. However, as shown in the Plans, even when the development standards are based on the Project Site, the Project will conform to the RA-4 standards. The building will have a maximum height of 90 feet and a gross floor area of approximately 150,156 square feet. This density equates to a FAR of 0.23 when based on the Campus area and a FAR of 3.44 when based on the Project Site area. With the addition of the Project, the Campus will have an overall FAR of approximately 1.48.<sup>3</sup> Rear and side yards in accordance with the RA-4 standards will be provided for the Project. Further, loading will be provided within the Project. Five of the Project’s required 13 automobile parking spaces will be provided on the Project Site, and the remaining eight required spaces will be accommodated by the existing spaces on the Campus, which has an excess number of parking spaces.<sup>4</sup> Bicycle parking will be provided, but the

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<sup>3</sup> The total square footages are aggregated over the entire Property, as the Zoning Regulations calculate FAR in a PUD on a site-wide basis. 11-X DCMR § 303.2.

<sup>4</sup> Per a determination from the Zoning Administrator, the parking requirement for the Project may be satisfied by the existing parking spaces on the Campus, and no additional parking is required. The parking requirement for the Campus, as stated in Order No. 66-68, is as indicated in Exhibit 44-A in that case record, the full extent of which could not be located. The parking requirement for 792 units in 1966, pursuant to § 7202.1 of the Zoning Regulations in effect at the time, was 264 parking spaces (1 space per 3 units). Under Subtitle C §§ 701 & 702 of the current Zoning Regulations, the parking requirement for the existing units is 132 spaces. Thus, under either

Applicant proposes to provide 28 long-term spaces when 51 are required since the senior residents largely will not ride bikes; thus, the Applicant is requesting flexibility from the number of long-term bicycle spaces.

B. Architectural Design

As detailed in the Plans, the Project is designed to fit within the context of the existing Campus and neighboring development. The building will be a nine-story, slightly curved structure with setbacks, terraces, bay windows, and modulating materials to provide context and scale. The building's location on the south side of the Campus with the other tall buildings and the larger buildings to the separate project to the south will be appropriate for that context, as shown on the Plans. Also, the Project's siting will provide the appropriate transition to the lower-density buildings on the north side of the Campus. The third and ninth floors each will contain setbacks that include building articulation and additional green roof space for an improved visual experience.

The Project's materials and colors will allow the building to blend into its surroundings. A light, multi-tone color palette will allow the building to sit pleasantly within the natural landscape of the Property. The building's materials will pull in the brick color from some Campus buildings and the lighter colored fiber cement panel system from another building on Campus, thereby tying the new building to the Campus through the materials palette. Further, the building's slight curve will reflect the curve on the south side of the Campus. Finally, the building will integrate with the site's grade, which slopes down from north to south, and landscape to provide a visually appealing structure that responds to and integrates with the varied topography, rather than opposing it.

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requirement, the Campus currently provides at least 159 more parking spaces than required, and the requirement for the Project may be satisfied with this excess.



As shown on pages 14 and 52-55 in the Plans, the building will be surrounded by environmentally-sensitive and context-appropriate landscaping that will provide green space for building residents and a soft exterior for the Project. The building also will include a front porch which will allow residents to enjoy the landscaping and view of the neighborhood as part of the Project. The Project also will include an outdoor patio and accessible pathways to connect to and access the rest of the Campus.

### Environmental Sustainability Measures

The Project will satisfy the Enterprise Green Communities standards, which is the metric used for affordable housing projects. The Enterprise Green Communities standards requires certain environmental features, including high efficiency mechanical systems, lighting, and windows; low-flow plumbing systems; Energy Star appliances; and low emitting and recycled construction materials. A healthy environment for the buildings' residents will be created using safe non-toxic materials and properly ventilating spaces to prevent exposure to mold and other contaminants. The Project will include additional environmentally sustainable features, such as solar panels on the roof and an extensive vegetated roof. Satisfaction of the Enterprise Green Communities standards will make the Project roughly equivalent to a LEED v.4 Silver project. The Project's specifications for the Enterprise Green Communities standard are shown on page 38 in the Plans.

### C. Site Circulation

The new building will be well-served by the existing Campus' circulation as well as new Campus improvements constructed as part of the Project. Vehicular access to the Project Site will be via the rear drive of the Campus, which passes along the south side of the Project Site. The Project will include a pick-up/drop-off area from this drive for ease of access for building

residents and visitors. As mentioned above, there are ample parking spaces on the Campus that will serve the Project, and most residents of the Project will not have cars in any event since they are largely non-driving seniors. The Campus also provides trails and pathways, many ADA accessible, that will facilitate access within and to the outside of the Campus from the Project.

In addition to the various means of site circulation, the Campus includes open space that will allow Project residents to enjoy green space and community, which will be especially important for the senior residents. The Project will include a fitness center located on the second floor directly adjacent to, and with easy access to an existing active recreation playground. In addition, the siting and configuration of the Project will create a new ADA accessible pedestrian connection to the active playground from the north side of the Campus.

### **III. Compliance with Requirements of the Zoning Regulations**

As described above, the Original LSPD was approved under the Zoning Regulations in effect in 1966. As set forth in 11-A DCMR § 102.4, modification of the Original LSPD is processed under the procedural requirements of the 2016 Zoning Regulations, and the substantive requirements of the 2016 Zoning Regulations apply to the requested changes.

The Project, as a Modification of Significance, should meet the requirements for and be processed akin to a second-stage PUD. 11-Z DCMR § 704.3; *see also* 11-X DCMR § 302.1 (outlining scope of first- and second-stage PUD applications). The review of the modification is “limited to impact of the modification on the subject of the original application.” 11-Z DCMR § 704.4. Section 704.4 also notes an intent by the Commission to not “revisit its original decision” in a PUD modification. As set forth below, the Project satisfies the requirements of the Zoning Regulations for review and approval of a Modification of Significance to a PUD.

A. Filing Requirements

Attached as Exhibit E is a certificate of compliance with the filing requirements for a PUD, which are the procedural requirements for this Modification of Significance.

B. Evaluation Standards

As discussed above, the evaluation of a Modification of Significance is generally limited to the impact of the modification on the original PUD (LSPD). Here, the Project refines the overall site plan and uses, but it does not materially impact the planning, amenities, and benefits that formed the basis of the Commission's prior determination that the Original LSPD complied with the overall LSPD evaluation standards. The Project does not significantly change the uses the Commission previously approved, and, indeed, improves the Campus as follows:

- Residential Use: The Project will provide an additional 151 units, still within the overall FAR that the Original LSPD approved. All of these units will be affordable and age-restricted for seniors, providing the opportunity for existing Edgewood Commons residents to age in place and increasing the supply of desperately needed housing in the District. The addition of the Project to the Campus will maintain the overall residential character of the Original LSPD in a location appropriate for high-density residential development.
- Senior Care Use: The Project also will provide 7,000 square feet of adult daycare use on the ground floor for seniors, providing meals, community, and activities for residents and other area seniors. This use will complement the senior housing and serve the overall Edgewood Campus population as well.

1. *Flexibility from the Zoning Regulations*

Pursuant to Subtitle X § 303.13, the Applicant requests that the Commission grant flexibility (1) from the bicycle parking requirements in Subtitle C § 802.1, and (2) to allow the adult daycare use for more than 25 individuals pursuant to Subtitle U § 203.1(h).

Bicycle Parking

In particular, the Applicant requests flexibility to provide 10 short-term and 28 long-term spaces, where 9 short-term and 51 long-term spaces are required. Pursuant to Subtitle C § 807.1, flexibility from these requirements may be granted as a special exception pursuant to the standards under Subtitle C § 807.2.

- a. The use or structure will generate demand for less bicycle parking than the minimum bicycle parking standards require as a result of the nature of the use or structure (C-807.2(b)(1))

All of the Project's residents will be seniors who are aged 60 or older. This is inherently a population that is not inclined to bike as a method of transportation. As the Applicant's forthcoming transportation study will show, the percentage of seniors who use bicycles as opposed to the general population is much less. In addition, as described above, most of the Project's residents already live on the Campus, and the Applicant's own analysis of the population already reveals that they are largely not using bicycles for transportation. Therefore, there will be much less demand in the Project for bicycle parking than the Zoning Regulations require.

- b. A reduction in parking granted under Subtitle C § 807.2 shall only be for the amount that the applicant demonstrates cannot be physically provided, and proportionate to the reduction in bicycle parking demand demonstrated by the applicant (C-807.3)

The Applicant is requesting relief from only the number of long-term spaces that will not be in demand from residents and employees in the Project. Based on 12 regular employees in the Project and small percentage of residents who are likely to use a bicycle, the Applicant estimates that the demand for long-term bicycle parking will be satisfied by the 28 spaces that will be provided.

Because the Project will be all-affordable, the costs of constructing unneeded long-term spaces (e.g., a larger storage room) would result in a trade-off of how available space is used and ultimately would be physically constraining. The space devoted to unneeded long-term bicycle parking could otherwise be used for needed building programming, such as common spaces and activity areas to serve the senior residents.

- c. Granting the special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Maps and will not tend to affect adversely the use of neighboring property (X-901.2)

Granting the requested relief will be in harmony with the general purpose and intent of the Zoning Regulations and Maps. The intent of the bicycle parking requirements is to encourage and accommodate the use of bicycles as a mode of transportation. The requested relief is consistent with that intent because the provided number of spaces will still accommodate the expected demand, thereby still encouraging and accommodating bicycle use. In addition, granting the relief will not adversely impact the use of neighboring property. Since most of the residents are not likely to use bicycles in any event, the absence of all of the required parking will not result in residents choosing automobiles for transportation. They will not choose bicycles as a transportation mode in any event, so the requested reduction in bicycle parking will not result in crowding or congestion on nearby streets.

## Daytime Care Use

Pursuant to Subtitle U § 401.1(f), elderly development centers are allowed as a matter-of-right, but the use is limited to 25 individuals. Here, the Project proposes an adult daytime care facility that will accommodate up to 60 seniors. Daytime care without a cap is allowed as a special exception pursuant to the standards under Subtitle U § 203.1(h).

- a. The facility shall be located and designed to create no objectionable traffic condition and no unsafe condition for picking up and dropping off persons in attendance (U-203.1(h)(1))

The facility is designed and located in a way that it will not create an objectionable traffic condition. First and most importantly, the Applicant anticipates the majority of attendees of the senior daycare facility will be residents of the Project. Beyond Project residents, most other users will come from the Edgewood Commons campus. Therefore, the total number of staff and users coming to the Project from off-site for the adult daytime care use is expected to be very minimal given the proximity of the majority of attendees. Additionally, the Applicant will be submitting a transportation statement for the overall Project which will include a full analysis and transportation demand management plan that will address any traffic impact from the Project, including the senior daycare.

- b. Any off-site play area shall be located so as not to endanger individuals traveling between the play area and the center or facility (U-203.1(h)(2))

There is no play facility proposed for the adult daytime care because the facility will be for seniors.

- c. The Board of Zoning Adjustment may require special treatment in the way of design, screening of buildings, planting and parking areas, signs, or other requirements as it deems necessary to protect adjacent and nearby properties (U-203.1(h)(3))

The Applicant does not believe any additional design changes are needed to address the daycare use given the overall high quality design of the Project.

- d. More than one (1) child/elderly development center or adult day treatment facility in a square or within one thousand feet (1,000 ft.) of another child/elderly development center or adult day treatment facility may be approved only when the Board of Zoning Adjustment finds that the cumulative effect of these facilities will not have an adverse impact on the neighborhood due to traffic, noise, operations, or other similar factors (U-203.1(h)(4))

The Applicant is still gathering data on whether there is another daytime care facility within this square or within 1,000 feet of the Property. However, even if there were another facility, the Project would not create a cumulative adverse impact because the majority of individuals utilizing the daytime care facility will be residents of the Project. Further, in addition to the residents of the Project, additional users are expected to otherwise be residents of the Edgewood Commons Campus. Therefore, only a minimal number of individuals accessing the adult daycare use at the Project will come from outside the Campus, which would minimize any kind of traffic impact or similar considerations. Finally, the use is largely concentrated to the indoor space at the Project, which will minimize any kind of noise or operational impact on the neighborhood.

- e. Granting the special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Maps and will not tend to affect adversely the use of neighboring property (X-901.2)

Granting the requested relief will be in harmony with the general purpose and intent of the Zoning Regulations and Maps. First, the proposed use is complementary to the age-restricted residential use in the Project and is a needed use in the Edgewood Commons community. The primary users of the daytime care use will be residents of the Project and will therefore not have

an external impact that a program of the same size with attendees coming from elsewhere would have. Additionally, because the Project is part of the overall Campus, a large residential campus, there is less of an anticipated impact on the neighboring properties from this use.

## 2. *Project Impacts on the Surrounding Area*

The Commission previously concluded that the Original LSPD was appropriate and met the evaluation criteria for approval. With the addition of the Project, the location, mix, and size of buildings, uses, and the amount and location of parking and loading facilities will remain generally consistent with the Original LSPD. Given the size of and development already on the Campus, the Project will not add density, massing, or traffic that materially exceeds what the Original LSPD approved. The Original LSPD, as constructed, is already an affordable large residential campus with multiple buildings of varying scales and accessory non-residential uses to serve residents. Accordingly, the Commission's conclusion that the impact of the Original LSPD is acceptable remains intact with the addition of the Project that will be consistent with that overall concept.

The Project will not create significant additional adverse impacts because of the ample open space that will be maintained, the continuation of residential use, the ample parking and loading, proximity to Metrorail, and the height and massing within the matter-of-right standards for the zone. As the Project's uses remain within the approved uses in the Original LSPD and the mostly non-driving residents, the anticipated traffic impact is minimal and expected to be absorbed by the transportation improvements already in place. Furthermore, the provision of adequate parking and the Project's proximity to the Rhode Island Ave. Metrorail station, is expected to further encourage and promote non-vehicular modes of transportation, thereby minimizing impact on the surrounding transportation network. Additional analysis to quantify the Project's traffic impact and determine if additional mitigation is required will be provided in the Project's



Comprehensive Transportation Review (“**CTR**”) to be submitted to and reviewed by the District Department of Transportation (“**DDOT**”) in advance of the public hearing.

3. *Public Benefits and Project Amenities*

Generally, the Project continues the same public benefits and amenities proffered in the Original LSPD, which was largely centered around affordable housing and efficient site planning. The Original LPSD approval included a condition that at least 500 dwelling units be available for low income tenants, which, as mentioned above, is more than satisfied with the existing buildings. In addition to affordable housing and uses of special value discussed below, the Project design and planning, as detailed above, illustrates its superior benefits related to urban design, landscaping and open space, site planning, transportation measures, and environmental benefits.

Housing and Affordable Housing: The Project, as detailed above, will provide 151 affordable units for seniors. Importantly, all of these units will be provided as affordable to seniors aged 60+ earning up to 60% of the Median Family Income (“**MFI**”), but the exact affordability levels of the units will be determined by the final funding schemes.<sup>5</sup> Providing this additional housing for seniors, all at an affordable level, is a hugely significant benefit of the Project to the community and the District. The Project, as a matter-of-right, would only be required to provide 8% of the total gross floor area as affordable, and, for rental units, only at 60% MFI. Therefore, the significantly higher number of affordable units, all at a deeper level of affordability, represent the largest benefit of the Project.

Uses of Special Value: In addition to the Project’s affordable housing, the senior daytime care use provides a benefit to the neighborhood and the District. Providing resources for seniors

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<sup>5</sup> 60% MFI will be the maximum rent level for all units, but some of the units may have deeper affordable levels.

to age within their communities and have daily activities is a use desperately needed in DC, particularly in Ward 5. This use, coupled with the Project’s senior housing, is of special value to the District.

4. *Consistency with the Comprehensive Plan, the General Purpose and Intent of the Zoning Regulations, and the Approved PUD*

The Project continues to be consistent with the Comprehensive Plan and with other adopted public policies. The Property is designated for High Density Residential Use on the Future Land Use Map of the Comprehensive Plan, with which the Project is directly consistent. Additionally, the Project advances numerous elements of the Comprehensive Plan, as described in greater detail below.

First, the Project furthers the following goals of the Land Use Element through its expansion of housing opportunities in a high-density residential area with housing that weaves into the fabric of the existing neighborhood:

**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. § 309.8

**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. § 309.15

The Project is also consistent with the following aspects of the Transportation Element of the Comprehensive Plan through its use of existing parking and providing ADA access to the Project, designed for seniors:

**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. § 404.8

**Policy T-2.6.1: Special Needs:** Address the transportation needs of all District residents, including those with special physical requirements and trip needs, such as access to medical centers or senior centers. § 412.2

The Project is a quintessential development furthering the goals of the Housing Element of the Comprehensive Plan. By providing senior-housing and senior care uses in a community of residents who wish to age in their neighborhood, all at affordable levels, the Project advances the following policies:

**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. § 503.2

**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. § 503.4

**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. § 503.6

**Policy H-1.2.1: Affordable Housing Production as a Civic Priority:** Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. § 504.6

**Policy H-1.4.6: Whole Neighborhood Approach:** Ensure that the construction of housing is accompanied by concurrent programs to improve neighborhood services, schools, job training, child care, parks, health care facilities, police and fire facilities, transportation, and emergency response capacity. § 506.12

**Policy H-4.2.2: Housing Choice for Seniors:** Provide a wide variety of affordable housing choices for the District's seniors, taking into account the income range and health-care needs of this population. Recognize the coming growth in the senior population so that the production and rehabilitation of publicly-assisted senior housing that meets universal design standards becomes a major governmental priority.

Acknowledge and support the establishment of Senior Villages throughout the city that allow seniors to remain in their homes and age in-place. § 516.8

**Policy H-4.2.3: Neighborhood-Based Senior Housing:** Encourage the production of multi-family senior housing in those neighborhoods characterized by large numbers of seniors living alone in single family homes. This will enable senior residents to remain in their neighborhoods and reduce their home maintenance costs and obligations. § 516.9

The Project also furthers the following principles of the Environmental Protection Element through its Enterprise Green Communities certification and its inclusion of green roof, solar panels, and other environmentally sustainable features:

**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. § 603.6

**Policy E-2.2.4: Alternative Energy Sources:** Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. § 610.6

**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. § 613.3

The Project's siting within the natural slope of the Property, development on an already-residential Campus, and its high-quality design furthers the following goals 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. § 904.3

**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. (see Figure 9.12) § 910.12

**Policy UD-2.2.7: Infill Development:** Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. § 910.15

Finally, of the Citywide Elements of the Plan, the Project furthers the goals of the Community Services and Facilities Element by providing senior housing and senior care uses:

**Policy CSF-2.3.1: Senior Care Facilities:** Establish new senior centers in areas that have large elderly populations, particularly neighborhoods in Upper Northwest and Far Northeast. These centers could be co-located in community health facilities or near other public facilities such as libraries or elementary schools to increase the interaction and learning between senior citizens, youth, and others. § 1108.3

In addition to the Citywide Elements of the Comprehensive Plan, the Project promotes numerous objectives of the Upper Northeast Area Element. First, the Element notes that Upper Northeast “has a large population of seniors, many with special transportation, housing, and health care needs” (§2400.8), and “relative to the city as a whole, the area has a much higher percentage of seniors (§2403.4).” Additionally, when the Element was being drafted, community members noted “the need for senior services” and “affordable housing needs” like those the Project provides. (§2407.2(b, k).) The Project’s focus on infill development of affordable housing is also consistent with the following principle:

**Policy UNE-1.1.2: Compatible Infill:** Encourage compatible residential infill development throughout Upper Northeast neighborhoods, especially in Brentwood, Ivy City, and Trinidad, where numerous scattered vacant residentially-zoned properties exist. Such development should be consistent with the designations on the Future Land Use Map. New and rehabilitated housing in these areas should meet the needs of a diverse community that includes renters and owners; seniors, young adults, and families; and persons of low and very low income as well as those of moderate and higher incomes. § 2408.3

Therefore, the Project as a whole is not inconsistent with the Comprehensive Plan.

The Project also continues to be consistent with the intent and purpose of the Zoning Regulations, and the goals of the PUD process, including the overall massing, development envelope, policy objectives, character and appropriateness of the Project.

**IV. Community Dialogue**

ECD has been a present and active member of the Edgewood community for many years. They met with the ANC 5E02 SMD representative on February 3, 2020 to review Project. ECD will continue to meet with residents of Edgewood Commons, members of the Edgewood community, and ANC 5E as this Application progresses.

**V. Conclusion**

For the foregoing reasons, the Applicant submits that this Application meets the standards of Chapter 3 of Subtitle X and Chapter 7 of Subtitle Z of the Zoning Regulations. Accordingly, the Applicant respectfully requests that the Zoning Commission set this Modification of Significance application down for a public hearing at the earliest possible date.

Respectfully submitted,

GOULSTON & STORRS, PC

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Cary Kadlecek

Meghan Hottel-Cox

Date: April 24, 2020