

1315 Clifton Street, NW

APPLICATION FOR REVIEW AND APPROVAL OF A CONSOLIDATED PLANNED UNIT
DEVELOPMENT AND RELATED MAP AMENDMENT

February 6, 2015



DEVELOPMENT TEAM

APPLICANT:	Aria Development Group 150 E. 58 th Street, 28 th Floor New York, NY 10155
PROJECT ARCHITECTS:	Cunningham Quill Architects 1054 31 st Street, NW Suite 315 Washington, DC 20007
TRAFFIC/PARKING CONSULTANT:	Gorove/Slade Associates, Inc. 1140 Connecticut Avenue, NW Suite 600 Washington, DC 20036
PROJECT CIVIL ENGINEER:	AMT, LLC 10 G Street, NE Suite 430 Washington, DC 20002
LANDSCAPE ARCHITECTS:	Landscape Architecture Bureau 714 7 th Street, SE Washington, DC 20003
LAND USE COUNSEL:	Goulston & Storrs, PC 1999 K Street, NW Suite 500 Washington, DC 20006

LIST OF EXHIBITS

Description	Exhibit
Architectural Drawings, Elevations, Renderings, Sections, Streetscape Designs, Landscaping, Civil, Photos of Property and Surrounding Area, Site Plans, Maps, and Other Plans	A
Application Forms and Agent Authorization Letters	B
Sanborn and Baist Plats and Zoning Map with Property Highlighted in Red	C
Excerpts of Comprehensive Plan Future Land Use Map and Generalized Policy Map	D
Certificate of Compliance with Chapter 24	E
Certificate of Notice and Notice of Intent to File	F
Property Owner List	G
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PREFACE

This statement is submitted by Aria Development Group in support of an application for the consolidated review and approval of a Planned Unit Development and Map Amendment for the property known as 1309-1315 Clifton Street NW (Lots 831 & 838 in Square 2866) before the District of Columbia Zoning Commission. The property that is the subject of this application is in the Northwest quadrant of the District of Columbia between Clifton Street, 13th Street, 14th Street, and an alley. The related Map Amendment proposes to rezone the site from the R-5-B to the R-5-C Zone District.

The Applicant is requesting approval of this PUD in order to create an architecturally distinguished and contextual “green” multifamily building on an underutilized site consistent with the goals of the DC Comprehensive Plan. In total, 155-170 residential units will be created as a result of this project. The project will contain a maximum FAR of 4.0 (approximately 118,800 gross square feet) and have a height of 60 feet. Based upon feedback from members of the community and the ANC that they desire an increase of affordable housing in the neighborhood, the Applicant proposes to exceed applicable Inclusionary Zoning standards by offering 10% of the residential floor area as affordable and doubling to 8% the percentage of low-income 50% AMI units.

Submitted in support of this application are a completed PUD application form, a notice of intent to file a PUD (with property owner list and certification of mailing), architectural drawings, and a map depicting the zoning districts for the property and the surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

INTRODUCTION

A. Summary and Purposes of the Application

Aria Development Group (the “**Applicant**”) hereby submits an application to the Zoning Commission of the District of Columbia (“**Commission**”) for consolidated review and approval of a Planned Unit Development (“**PUD**”) and related Zoning Map amendment to the R-5-C Zone District.

The project site consists of Lots 831 and 838 in Square 2866 (the “**Property**”). The Property contains approximately 29,700 square feet of land area and is currently improved with two apartment buildings. The Property is located within the boundaries of Advisory Neighborhood Commission (“**ANC**”) 1B. The Property is presently zoned R-5-B.

The Applicant is seeking approval of the PUD and Zoning Map amendment in order to create an architecturally distinguished apartment building on the Property befitting such an important neighborhood and inspired by its gracious streetscape (the “**Project**”), as shown on the plans attached hereto as Exhibit A (the “**Plans**”). The Project will replace two functionally outdated apartment buildings with new high-quality construction containing more residential units that will harmonize with the block and the neighborhood. The Project is designed to integrate into the neighborhood with contextual elements including masonry and lush landscaping that help make the neighborhood so special, and retaining the street presence and character of 1315 Clifton.

The Applicant was introduced to the project by the Latino Economic Development Center on behalf of two tenant associations working to preserve tenant quality of life and opportunity under the Tenant Opportunity to Purchase Act. The Applicant was selected after a rigorous competition of developers based on its vision for the property and for the tenants. The Project has offered all residents in the existing buildings the option to return to the new building

at their current rent. The tenants of each tenant association voted to give Applicant the opportunity to pursue this PUD and to create the value and density necessary to defray the costs of developing a new beautiful property while offering great options for existing and future tenants and meeting the needs and desires of the community.

In total, approximately 155-170 residential units, a portion of which will be affordable - exceeding the requirements in both number and level of affordability - will be created as a result of the Project. The Project will contain a maximum FAR of 4.0, or approximately 118,800 gross square feet, and it will have a height of 60 feet.

The Applicant proposes amenities such as exemplary architecture, an innovative site plan that embraces the streetscape, the retention of a portion of one of the existing apartment buildings characteristic of the neighborhood's history, and significantly more affordable housing – at deeper levels of affordability – than is otherwise required.

Over the past few months, the Applicant has held numerous meetings with many stakeholders in the Project. The Applicant met with the Office of Planning and the District Department of Transportation to discuss its proposed Project. Additionally, the Applicant met with the ANC single member district representative, and the Applicant presented the project to the Design Review Committee (“**DRC**”) of ANC 1B twice in the last two months. The Applicant revised project plans in response to comments from the DRC before even filing this application. The Applicant has met extensively with the existing tenant associations and their representatives communicating with tenants in numerous languages with the help of translators and members of the Latino Economic Development Center. The Applicant will continue its outreach to other neighbors, stakeholders, and community groups to ensure the Project achieves the goals of the District of Columbia and of the community.

B. Applicant

The Applicant is Aria Development Group (“**Aria**”). Aria is a real estate development and investment firm targeting the Washington, DC, New York, and Miami markets. Aria was founded in 2009 by partners David Arditi, Joshua Benaim and Tim Gordon. The firm focuses on building and acquiring premier residential and mixed-use properties. The firm marries a classic investment strategy with the real estate principles of location, scarcity, and beauty. To date, Aria has developed and restored several projects in the District of Columbia including acclaimed historic restorations with modern features.

One of Aria’s significant accomplishments in Washington was the dedicated historic rehabilitation of The Alden (formerly known as The Alden, The Babcock, and The Calvert or later as the Warner apartments) around the corner from the Project at 2620 13th Street NW. It was through this project that Aria’s principals discovered the amazing fabric of Columbia Heights and the beauty of this stretch 13th Street as it climbs high above the city. Twenty percent (20%) of the units in that project are devoted to affordable housing. Aria worked closely with the Latino Economic Development Center to temporarily relocate tenants for construction as the property had been left to fall into disrepair and hazardous conditions. Aria engaged a historic preservation consultant and worked closely with the Historic Preservation Office and the Department of the Interior to bring this marvel, which is individually listed on the National Register of Historic Places, back to service in the community with a significant affordable component. The Applicant took great care to rehabilitate that building. For example, every brick was remortared with historic lime-based mortar. This labor of love inspired the proposed Project.

C. Architect

Cunningham | Quill Architects, located at Canal Square in historic Georgetown, Washington, DC, was founded in 1996 to provide complete professional services in the fields of architecture, community planning, and urban design. Founding principals Ralph Cunningham, FAIA and Lee Quill, FAIA, CNU bring over forty years of experience to the practice, shaping a unique design sensibility whose well-rounded approach has helped the firm grow substantially over the years. Cunningham | Quill has a staff of 20 architects and planners experienced in urban design, master planning, and architecture.

For its achievements, the firm has received over 55 awards from the American Institute of Architects, including the Award of Excellence for Architectural Design, the Award of Merit for Architectural Design and Planning, the Washingtonian Award of Residential Distinction, and the “Pro Bono Publico Award” honoring outstanding design in public interest. Internationally, Cunningham | Quill Architects has received two Charter Awards from the Congress for the New Urbanism.

Although nationally recognized for design excellence, Cunningham | Quill is a local firm, committed to working in the Metropolitan Washington region. Both of the Founding Principals of Cunningham | Quill, Ralph Cunningham and Lee Quill are lifelong residents of the DC Metro Area, and as such have a vested interest in living and working this area. Over the past 19 years, the firm has completed more than 200 construction projects within Washington, DC, including single-family homes, mixed-use commercial and multi-family buildings, and master plans.

II. SITE AND AREA DESCRIPTION AND ZONING

A. Location and Current Use

The rectangular-shaped Property is located in the Northwest quadrant of the District of Columbia and contains approximately 29,700 square feet of land area. It is bounded by a public alley that ranges from approximately 20 – 35 feet wide to the north, Clifton Street NW to the south, a multifamily condominium building to the east, and another condominium building to the west. The Property is less than ½ mile from both the U Street–Cardozo and the Columbia Heights Metrorail stations.

The PUD site is in Single Member District 1B08 of ANC 1B in Ward 1. The Columbia Heights neighborhood is generally to the north, and the U Street Corridor neighborhood is generally to the south. The site is currently improved with two older apartment buildings. The apartment building on the east side of the Property, 1309 Clifton Street, is a three-story building constructed circa 1954 that contains approximately 18 units and provides four parking spaces. This building is in poor condition and requires a gut renovation, including new building systems, windows, and roof. The defensive posture of the layout does not reflect current urban design since the entrance is sealed off from the street, and, partially as a result, there has been a security problem for the families residing in the building. The apartment building on the west side of the Property, 1315 Clifton Street, is an attractive four-story apartment building constructed circa 1909 in an Italianate Revival style; it contains approximately 30 units. This building has not been renovated in many years and lacks many modern conveniences and necessities. The existing landscaping in front of the buildings is largely unremarkable and unkempt. A berm elevates the majority of the Property above the sidewalk on Clifton Street.

B. Surrounding Area

The Property is on the southern edge of the Columbia Heights neighborhood, and is close to the U Street/14th Street Corridor. The surrounding area is predominantly residential with nearby commercial and institutional uses. The architectural style is eclectic, with some buildings that were developed in the 1920s, others developed in the 1960s as part of urban renewal, and still others developed in the last few years with a contemporary style. The surrounding area consists mostly of medium density apartment buildings, smaller apartment buildings (3-10 units), and flats. The immediately surrounding blocks are developed with a mixture of multifamily buildings of different heights and densities – ranging from two stories to more than six stories. In the same block, and along the same side of Clifton Street as the Property, are multiple three- or four-story apartment buildings. Directly across the street from the Property are three large six-story apartment buildings containing 100+ units that span almost the entire length of the block. These three buildings were developed contemporaneously, but one is a condominium, known as Wardman Court, and two are rental buildings. At the western end of the block is a paint store with a surface parking lot to service it. Access to the alley behind the Property is via an entrance off Clifton Street adjacent the paint store property. At the eastern end of the block, across 13th Street, is the Cardozo Educational Campus.

The area surrounding the Property has become an area of strong residential and retail growth. The areas to both the north (Columbia Heights) and the south (U Street/14th Street Corridor) have experienced a surge in development over the last 15 years. Among the major new and existing developments within ½ mile of the Property are: (i) DCUSA, a large retail development containing 890,000 square feet of space across the street from the Columbia

Heights Metro station; (ii) The Louis at 14th, a mixed-use residential and retail development containing approximately 268 apartments, a Trader Joe's grocery store, and multiple other retail tenants at the corner of 14th and U Streets; (iii) Capitol View on 14th, a new mixed-use residential and retail development at 14th and Chapin Streets; (iv) JBG's planned development of a 165-unit mixed-use retail and residential building at the corner of 13th & U Streets; (v) Highland Park, a nine-story mixed-use residential and retail building adjacent to the Columbia Heights Metro station; and (vi) the Howard University campus, including new buildings as part of its Campus Plan. A myriad of restaurants, bars, shops, and other retail establishments line 14th Street – both to the north in Columbia Heights and to the south along the 14th Street Corridor – within ½ mile of the Property.

The immediate neighborhood is primarily zoned R-5-B, with the properties along 14th Street to the west zoned C-2-B. To the north and east of the Property, properties are zoned R-4.

III. PROJECT DESCRIPTION

The proposed Project will be an attractive new residential building on a central and transit-oriented site that has been underutilized. The Project will be six stories fronting on Clifton Street NW and will include underground bicycle and automobile parking. The design will integrate contextual contemporary masonry with the existing Italianate Revival building façade to bring into relief the neighborhood's eclectic but harmonious streetscape. The building achieves the integration in the blending of two components: the majority of the building will be new structure on the east and north sides of the Project, but a large front segment of the existing west building (a footprint of approximately 2240 square feet) will be preserved and integrated into the design, resulting in one harmonious building that has two distinct but complimentary elements. The main entrance to the building will be on Clifton Street through the new

construction, but a secondary entrance will be retained through the portion of the existing west building that will be preserved. Although the existing west building is not a structure requiring preservation for historic purposes, the Applicant believes that retention of a portion is important to preserve the context of the neighborhood's history and will help maintain the sense of place along with the new construction. The portion of the existing building that will be retained will be rehabilitated and adapted to recreate, to the extent possible, the original appearance and features of that building.

The Project will have an "I" shape, with one north-south bar and two east-west bars. In a departure from some recent projects that seek safety by disconnecting from the neighborhood, the design here is intended to be open and embracing of the neighborhood, and the Applicant believes that openness will enhance the graciousness and the safety of the streetscape. The new construction will rise to six stories (60 feet), but the existing building portion that will be retained will not receive any additional height, thereby recessing the height and density behind and to the side of the retained structure. The new structure will be set back at least 10 feet from the front property line, while the retained portion of the existing building will maintain its setback of 27 feet from the front property line, thereby creating a significant amount of open green space at the front. To the east, the Project will abut the property line, but a large 42' x 45' closed court on the east side of the building will provide open and green space. To the west, the building will be set back a minimum of 10 feet from the property line, consistent with the existing building, but a large 41' x 38' open court will provide significant open green space. To the rear, the Project will be set back approximately one foot from rear property line. Because the rear alley is so wide, the Project orientation will not restrict light or air at its rear. The Applicant

designed the Project with little rear setback so that the building will provide the front setback that is common in the neighborhood and on the block.

The Project will have a maximum floor area of approximately 118,800 gross square feet (“GSF”), for an effective FAR of 4.0. All of the gross square feet will be dedicated to residential use. The lot occupancy will be 71%, and the maximum height of the building will be 60 feet.

The Project will not include any curb cuts, which will minimize the burden on the neighborhood by embracing multiple modes of non-automobile transportation, both public and private. Loading and parking access will be at the rear of the Property from the alley. The parking access will be via a ramp on the northern façade at the western side of the building, and will be oriented north-south for ease of entry from the alley. Access to the ramp will be controlled by a garage door. The underground parking garage will contain approximately 36 parking spaces on one level to serve the Project’s residents. The number of parking spaces provided will be approximately 1 per 4.2 units, which is a rate consistent with the guideline offered by the ANC Design Review Committee and in excess of the parking required in the proposed new Zoning Regulations. In addition, the Project will provide a significant amount of bike parking. Approximately 80 secure bike parking spaces will be available for residents in an underground area, as shown on Page A-12 of the Plans. Responding to community recommendations, the bike parking also will be accessed from the alley at the rear via a dedicated bike ramp parallel to the parking ramp, resulting in a safer bicycle experience. The number of bike parking spaces will far exceed the requirement in the Zoning Regulations and the number required by DDOT for residential buildings.

The Project will provide one 30-foot berth and one 200-square foot platform for loading. The loading berth will be accessed from the alley on the northern façade but at the eastern side of

the building to avoid conflict with the parking entrance. Its orientation will be north-south to ease entry from the alley. Also, the loading berth will be enclosed to minimize noise. Such loading facilities will allow space for the types of trucks, delivery vans, and service vehicles anticipated to service the Project.

The building will contain a mix of units ranging from studios to three-bedroom apartments. The building will contain approximately 22% studios, 66% one-bedrooms and one-bedrooms + dens, and 12% two- and three-bedrooms. The building also will provide a bike workshop, a community room, and a rooftop deck as amenities for residents. The residential component will dedicate 10% of the GFA (up to 11,880 gross square feet) to be set aside for affordable housing, which will be significantly more than required by Inclusionary Zoning.

The materials utilized for the Project's exterior will be brick, granite, metal panel, and cladding.

Overview

The Zoning Tabulations Sheet included as Page A-3 of the Plans provides a detailed overview of the proposed building and the requirements and restrictions of the R-5-C zone. The following table illustrates the zoning parameters of the proposed Project:

	<u>Proposed</u>	<u>Allowed/Required by R-5-C Matter-of-Right</u>	<u>Allowed/Required by R-5-C PUD</u>
<u>Height</u>	60'	60'	75'
<u>Number of units</u>	155-170	No maximum	
<u>FAR</u>	4.0	3.0	4.0
<u>Square footage</u>	118,800	89,100	118,800
<u>Lot occupancy</u>	71%	75%	

<u>GAR</u>	0.39	0.3 required	
<u>Parking</u>	36 spaces	1 for each 3 dwelling units (52-57 spaces) required	
<u>Affordable housing</u>	10% of residential GFA (up to 11,880 gross square feet)	8% of residential GFA (up to 7128 gross square feet)	8% of residential GFA (up to 9504 gross square feet)

A. Development Parameters Under Existing Zoning

The R-5-B Zone District, as a matter-of-right, permits a maximum height of 50 feet, a maximum lot occupancy of 60%, and a FAR of 2.16.¹

B. Project Goals and Objectives and Benefits of Using PUD Process

The PUD process is the appropriate means for realizing this development because it will provide the community and the District the tools to ensure that the Project is well-designed and best meets the needs of the community. It further will allow the public to provide input on whether the proposed uses, density, height and design are complementary to the existing community. The Property is an important site for providing significantly more housing in a centrally-located and transit-oriented location that has a high demand for housing. The PUD process will provide the framework for realizing the potential of this site capturing the benefits and amenities that will enhance the surrounding community.

C. Zoning Flexibility Requested.

In addition to the rezoning of the Property from R-5-B to R-5-C and the application of the PUD standards in Chapter 24 of the Zoning Regulations, the Applicant requests the following relief from strict application of the relevant provisions of the Zoning Regulations through the flexibility allowed by the PUD process:

¹ Includes bonus density for Inclusionary Zoning.

1. The rear yard requirement in § 404.1. The required rear yard for the Project is 17 feet-10 inches, and the Project will provide a minimum rear yard of 1 foot.

Because the front of the building will have a setback from the front property line to be consistent with the other buildings on the street, and because it will have two large courts, the building must be “pushed” back to the rear property line to accommodate the entire program. Since the rear alley is so wide (20-35 feet), the requested rear yard will not have an adverse impact. The Commission has the authority to grant this relief pursuant to § 2405.5.
2. The side yard requirement in § 405.6. A side yard is not required, but since it will be provided, it must measure at least 15 feet wide. The provided western side yard will be a minimum of 10 feet wide. The side yard will be substandard because of the large open courts that will be provided, which “pushes” some of the density further west. Because of the large amount of open space on the west side of the building, this side yard will not have an adverse impact. The Commission has the authority to grant this relief pursuant to § 2405.5.
3. The parking requirement in § 2101.1. The required parking is 54-57 spaces, and the Project will provide 36 spaces. The Applicant will be unable to provide additional parking on the single underground level without losing mechanical, utility, and building amenity space that is essential to the Project’s functioning. To add an additional level of underground parking would be cost prohibitive. As the traffic study will illustrate, the amount of provided parking will be sufficient without adversely impacting conditions in the neighborhood. The Commission has the authority to grant this relief pursuant to § 2405.6.

4. The loading requirements in § 2200.1. The required loading is one 55-foot berth, one 200-square foot platform, and one 20-foot delivery space. The provided loading will be one 30-foot berth one 200-square foot platform. The Applicant cannot provide the full 55-foot berth without sacrificing necessary circulation space on the ground floor, which is essential to the building program. Because most of the residential units will be studios or 1-bedrooms, the Applicant anticipates that residents will not use 55-foot trucks for moving, so there will be no adverse impact because the provided loading berth will be able to accommodate trucks that residents will use. The Commission has the authority to grant this relief pursuant to § 2405.6.
5. The roof structure setback requirements in § 400.7(b) and equal wall height requirements in § 411.5. The roof structure will be three-tiered. The lower tier rising 11 feet, 4 inches (11'-4") above the roof, and the upper tier rising 4 feet (4') above the lower tier, for a total roof structure height of 17'-4" above the roof. The elevator overrun (third tier) will rise another 1'-2" above the second tier, for a maximum height of 18'-6" above the roof, but it will be in the center of the building far removed from any walls. The roof structure must be set back from all exterior walls at least 17'-4" (11'-4" for the lower tier and 17'-4" for the second tier). The second tier of the roof structure will be set back 14'-10" from the western open court, and it will be set back from the western side yard by 13'-6". Otherwise the roof structure will be adequately set back from all other exterior walls by at least 17'-4". The roof structure's placement on the roof is dictated by the location of the core and by its necessary size so that it can remain one

structure. However, because this relief pertains only to a court that opens onto an open court and a side yard, there will be no adverse impact. Further, because of the tiered shape, the roof structure will have enclosing walls of varying heights. The roof structure will have this tiered shape to minimize its appearance. While Applicant could enclose the roof structure with walls of uniform height, it would significantly increase its size and appearance. The Commission has the authority to grant this relief pursuant to § 2405.7.

IV. THE APPLICATION MERITS APPROVAL PURSUANT TO THE PUD EVALUATION STANDARDS

The Zoning Regulations, at 11 DCMR § 2403.1 *et seq.*, set forth the evaluation standards for Commission approval of PUD applications. The PUD must not have an unacceptable impact on the surrounding area and the operation of city services and facilities, it must not be inconsistent with the Comprehensive Plan and other adopted public policies and programs, and it must offer project amenities and other public benefits that are superior to what would likely be provided under matter-of-right development. The Project's impact on the surrounding area and city services and facilities is discussed below. Consistency with the Comprehensive Plan is addressed in Section V, and public benefits and project amenities are described in Section VI.

A. Project Impact On the Surrounding Area

The PUD Evaluation Standards, at 11 DCMR § 2403.3, state: "The impact of the project on the surrounding area and the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project."

The Applicant submits that the impact of the Project on the surrounding area will be favorable because it will: 1) bring new market rate and much needed affordable housing to the neighborhood, 2) revitalize an underutilized parcel in the middle of an established residential neighborhood, 3) promote the goal of transit-oriented development, and 4) preserve a significant portion of a building characteristic of the history of the neighborhood.

Moreover, the Project's proposed height and massing are consistent with current development projects in the area and with the Comprehensive Plan's goals and policies for this area. The Project will replace an underutilized and dated pair of buildings in a prime residential location with an attractive building that preserves neighborhood character.

The Project will create 155-170 new housing units on a property located less than ½ mile from the entrances to two Metrorail stations. The Property is also within a ½ mile radius of numerous retail establishments, restaurants, and other residential developments. This location is highly desirable for residents because of its proximity to a wide array of amenities, so this Project will provide new housing opportunities for residents in the area and for the District as a whole.

B. Project Impact on City Services and Facilities

The proposed Project will not have an adverse impact on the public facilities that it will rely on for service.

i. Transportation and Parking

The Applicant engaged a traffic consultant, Gorove/Slade Associates, to further study the area's traffic conditions and the Project's traffic generation. The Applicant will submit its Traffic Impact Study in the Applicant's Pre-Hearing Submission (or earlier) and will continue to work with DDOT to refine the Project's vehicular and pedestrian circulation plans. The Property

is located in the vicinity of the Columbia Heights and the U Street-Cardozo Metrorail stations, multiple Capital Bikeshare stations, multiple Metrobus routes, and the Circulator bus.

Along 14th Street, both to the south and to the north, the neighborhood is served by numerous amenities (grocery stores, drug stores, restaurants, gyms). These amenities are all within walking distance of the Property, so residents will have no incentive to drive for daily needs and services.

The Property is also close to established bicycle routes, notably along 14th Street. Anticipated bicycle usage by residents of the Project has been integrated into the design. A significant amount of secure storage – to allow for approximately 80 bicycles – will be located on the below-grade “half level” of the garage, and the Applicant will support and encourage bicycle use through its traffic demand management plan.

The Project will provide approximately 36 underground automobile parking spaces. This number of spaces equates to a ratio of approximately 0.22 spaces per residential unit. Because of the highly transit-oriented nature of the location and the Project, the provided number of parking spaces will satisfy the demand of residents. In addition, the provided number of parking spaces will be an increase from the rate of parking provided for the existing buildings (current ratio is approximately 0.08 spaces per residential unit), so the Applicant does not anticipate an adverse impact on the supply of proximate on-street parking.

ii. Water/Sewer Demand

The water and sanitary service usage resulting from the Project will have an inconsequential effect on the District's delivery systems. The site is currently served by all major utilities. The Project's proposed storm water management and erosion control plans will minimize impact on the adjacent properties and existing storm water systems. The requisite

erosion control procedures stipulated by the District will be implemented during construction of the Project.

Further, as more specifically detailed in Section VII, no adverse environmental impact will result from the construction of this Project.

iii. Public Schools

Regarding the impact on the District of Columbia Public Schools (“**DCPS**”) system, the Project is within the boundaries of Garrison Elementary School at 1200 S Street NW and the Cardozo Education Campus at 1200 Clifton Street NW. In addition, several other schools are in the general vicinity of the Project, offering schooling options to residents who may seek alternatives to the neighborhood public schools, including Booker T. Washington Public Charter School, Meridian Public Charter School, and St. Augustine Catholic School.

In this neighborhood, as in the city as a whole, the population of school-age children is declining while the population of childless households is increasing. Due to these trends, the current under-enrollment of the neighborhood public schools, and the relatively convenient access to charter and private schools in the vicinity, the Applicant expects that the school network will be able to accommodate the school-age children that may reside at the Project.

V. THE APPLICATION IS “NOT INCONSISTENT WITH THE COMPREHENSIVE PLAN AND WITH OTHER PUBLIC ADOPTED POLICIES [...] RELATED TO THE SUBJECT SITE.” 11 DCMR § 2403.4.

A. Comprehensive Plan

The proposed PUD is not inconsistent with the Comprehensive Plan and will advance numerous goals and policies enumerated in the Comprehensive Plan for the National Capital adopted in 2006 (the “**Comprehensive Plan**”).

The purposes of the Plan are to: (a) define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (b) guide executive and legislative decisions and matters affecting the District and its citizens; (c) promote economic growth in jobs for District residents; (d) guide private and public development in order to achieve District and community goals; (e) maintain and enhance the natural and architectural assets of the District; and (f) assist in conservation, stabilization and improvement of each neighborhood and community in the District (DC Code Section 1-245(b)).

Generally, the Project will advance these purposes by furthering the social and economic development of the District through the construction of new residential units on underutilized land, providing additional affordable residential units, constructing a more environmentally sustainable structure than the current buildings, and preserving part of an existing building to help retain the character of the neighborhood.

1. Compliance with Citywide Elements

The Project will serve the goals of several of the citywide elements of the Comprehensive Plan, as follows:

a. Future Land Use Map

The Future Land Use Map includes the Property in the Medium Density Residential land use category. Such designation supports the construction of a high-quality residential project on a site that is currently underutilized. The proposed Project, with an FAR of 4.0 and a height of 60 feet, and the requested Zoning Map amendment to the R-5-C Zone District, are consistent with the Medium Density Residential land use category for the Property.

b. Generalized Policy Map

The Generalized Policy Map (“GPM”) includes the Property in the “Neighborhood Conservation Area” category. Under the terms of the GPM, for this category, new development is appropriate since it will be multifamily residential consistent with the existing use on the Property and with the surrounding uses. Thus, the Project will conserve the apartment building character of the neighborhood. As an infill development with new housing, the Project will be consistent with the Property’s designation on the GPM.

c. Land Use Element

The Plan devotes a great deal of attention to the preeminence of transit-oriented development. The Project will advance the following policies of the Land Use Element:

- **Policy LU-1.3.2: Development Around Metrorail Stations** – Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 306.11
- **Policy LU-1.3.4: Design To Encourage Transit Use** – Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots. 306.13
- **Policy LU-1.4.1: Infill Development** – Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. 307.4
- **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
- **Policy LU-2.2.4: Neighborhood Beautification** – Encourage projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. 310.5

The Project will rehabilitate an overlooked and underutilized parcel of residential land in the center of a thriving multi-family residential and retail neighborhood. At the same time, the Project will conserve parts of an existing building to help retain the neighborhood character. The new building design will beautify the existing parcel and will add an attractive new building to the fabric of the neighborhood. The Project will leverage its proximity to myriad public transit options (two Metrorail stations, Metrobus routes, Capital Bikeshare stations) and a plethora of amenities and services by promoting density on the site oriented to pedestrians. The Project will be the quintessential infill development that will allow an underutilized site to be brought to its highest and best use with new housing close to public transportation and amenities. Given its location near both Columbia Heights and the U Street/14th Street Corridor, the Project will deftly promote transit oriented development without compromising the existing nearby multifamily residential areas.

d. Transportation Element

The Project will promote the following Transportation Element policy:

- **Policy T-1.1.4: Transit-Oriented Development** – Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. 403.10

As mentioned above, the Project will be an ideal example of transit oriented development since it will make such a significant contribution of new housing at a site served by mass transit and surrounded by services and amenities. The Project will be strategically located near the Yellow and Green Line's Columbia Heights and U Street-Cardozo Metrorail stations, as well as along a major transportation and Metrobus corridor (14th Street). The Property's proximity to public transportation makes it a prime location for additional density and residences. The Project design also will encourage bicycling with its substantial bike storage facilities. Altogether, the Project will encourage alternate modes of transportation by providing the infrastructure for walking, biking, and various modes of public transportation.

e. Urban Design Element

The Project will further many of the policies of the Urban Design Element:

- **Policy UD-2.2.1: Neighborhood Character and Identity** – Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. 910.6
- **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. 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. 910.14
- **Policy UD-2.2.9: Protection of Neighborhood Open Space** – Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. 910.18

The Project design acknowledges and embraces the importance of the site location in a vibrant retail and residential neighborhood. By incorporating new construction and contemporary design with preservation of part of an existing building, the the building design will relate to its location in an established neighborhood while facilitating the vibrancy and

growth of the neighborhood. The PUD design will successfully create a sense of place, while relating to the existing residential buildings nearby. As such, the design effectively incorporates elements of materials and articulation that are reminiscent of the nearby buildings while offering a contemporary design that does not try to emulate other buildings. Further, the design maintains the front setbacks and open spaces that are characteristic of the neighborhood. At the same time, the Project will have a scale, height, and density appropriate for a site in the center of a growing and thriving residential and retail neighborhood.

f. Housing Element

The PUD will advance the following goal and policies of the Housing Element:

- **H-1.1 Expanding Housing Supply** – Expanding the housing supply is a key part of the District’s vision to create successful neighborhoods. Along with improved transportation and shopping, better neighborhood schools and parks, preservation of historic resources, and improved design and identity, the production of housing is essential to the future of our neighborhoods. It is also a key to improving the city’s fiscal health. The District will work to facilitate housing construction and rehabilitation through its planning, building, and housing programs, recognizing and responding to the needs of all segments of the community. The first step toward meeting this goal is to ensure that an adequate supply of appropriately zoned land is available to meet expected housing needs. 503.1
- **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-1.2.1: 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. 504.8
- **Policy H-1.3.1: Housing for Families** – Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. 505.6
- **Policy H-2.1.1: Protecting Affordable Rental Housing** – Recognize the importance of preserving rental housing affordability to the well-being of the District of

Columbia and the diversity of its neighborhoods. Undertake programs to protect the supply of subsidized rental units and low-cost market rate units. 509.5

The Project will expand the District's housing supply in an established and growing residential neighborhood. By providing 155-170 new residential units in a neighborhood with a significant housing demand, the Project will promote multi-unit residential development objectives. The Project will produce replacement and new housing on an underutilized site in thriving residential community for all income levels. The residential building will be a high quality design and will incorporate high quality materials. Most importantly, the Project will provide 10% of its GFA for affordable housing. The existing buildings provide no guarantee of affordability, but the Project will provide, in perpetuity, more affordable housing – at deeper levels of affordability – than the Inclusionary Zoning regulations require.

B. Mid-City Area Element

The PUD site is located in the Mid-City Area Element of the Comprehensive Plan. The Project will be consistent with the following policies and action of the Area Element:

- **Policy MC-1.1.1: Neighborhood Conservation** – Retain and reinforce the historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and walkable neighborhood shopping districts. The area's rich architectural heritage and cultural history should be protected and enhanced. 2008.2
- **Policy MC-1.1.3: Infill and Rehabilitation** – Encourage redevelopment of vacant lots and the rehabilitation of abandoned structures within the community, particularly along Georgia Avenue, Florida Avenue, 11th Street, and North Capitol Street, and in the Shaw, Bloomingdale, and Eckington communities. Infill development should be compatible in scale and character with adjacent uses. 2008.4
- **Policy UNE-1.1.7: Protection of Affordable Housing** – Strive to retain the character of Mid-City as a mixed income community by protecting the area's existing stock of affordable housing units and promoting the construction of new affordable units. 2008.8

The Project will advance three key goals of the Mid-City Area Element by constructing an infill residential project with a preservation component and significant affordable housing. As

described, the condition of the existing buildings on the Property is outdated, and the existing units have no guarantee of affordability. The Project will replace these substandard buildings on an underutilized parcel in a central location with a new high-quality building. The Project will conserve the character of the neighborhood by retaining a significant portion of the existing western building, which has a character that is prevalent in the neighborhood. Further, the Project will devote 10% of the gross floor area to affordable units, most of which will be at deep levels of affordability. All of this will contribute to the well-being of the Mid-City community.

VI. THE APPLICATION PROVIDES SUPERIOR PUBLIC BENEFITS AND PROJECT AMENITIES

The PUD Evaluation Standards, at 11 DCMR §§ 2403.5-2403.7, require the Commission to “evaluate the specific public benefits and project amenities of the proposed Development.”

That Section continues:

Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title. A project amenity is one type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors.

Based on its meetings with the ANC, the Applicant has developed a public benefits and amenities package best suited to the desires of the community.

A. Review of Project under Section 2403.9

The PUD Evaluation Standards, at Section 2403.10, provide that “a project may qualify for approval by being particularly strong in only one or a few” of the public benefits and project amenities listed in Section 2403.9, “but must be acceptable in all proffered categories and superior in many.” The Applicant submits that the Project provides superior public benefits and

project amenities in these categories. The Applicant's benefits and amenities are in the following categories:

1. Housing and affordable housing (§ 2403.9(f))

Pursuant to Section 2403.9(f) of the Zoning Regulations, the PUD guidelines state that the production of housing is a public benefit that the PUD process is designed to encourage. The Project will create 155-170 new residential units in the Columbia Heights neighborhood, where housing is in high demand. This will be a net increase in housing units on the site, where 48 currently exist.

As part of the approximately 118,800 gross square feet of residential use provided in the Project, 10% of the gross floor area (up to 11,880 gross square feet) will be provided as affordable housing, which will exceed the requirement for the R-5-C zone by up to 2,376 square feet. Eight percent (8%) of the gross floor area will be reserved for households making 50% or less of the AMI, and 2% of the gross floor area will be reserved for households making 80% of the AMI.² This will result in up to 2376 square feet more of affordable housing than required in a R-5-C matter-of-right development or PUD. In addition, this will result in up to 4752 square feet more of affordable housing reserved for households making 50% or less of the AMI than required in a R-5-C matter-of-right development or PUD.

Section 2403.9(f) notes that affordable housing may be considered a public benefit to the extent it exceeds what would have been required through matter-of-right development under existing zoning. The affordable housing is a considerable benefit above a matter-of-right R-5-B

² The minimum required is 4% of the residential GFA reserved for households making 50% or less of the AMI and 4% of the residential GFA reserved for households making 80% or less of the AMI.

(existing zoning) development, a matter-of-right R-5-C (proposed zoning) development, or a R-5-C PUD that provides the minimum amount.

2. Urban design, architecture and landscaping (§ 2403.9(a))

Section 2403.9(a) lists urban design, architecture, and landscaping as categories of public benefits and project amenities for a PUD. As shown in the detailed plans, elevations, and renderings included in the Plans, the Project exhibits the characteristics of exemplary urban design, architecture, and landscaping. The Project provides a superior design that fully responds to the site location and history while efficiently integrating a new building that will provide new housing for the community.

The Project's design will create a sense of place, incorporating elements from the neighborhood's past (preserving a portion of the existing western building), while tying it to a contemporary and inventive design for a new residential building. The building as a whole will employ traditional, time-tested materials in new and modern ways in a design that is aesthetically enduring and that will add to the urban texture of the District. The building articulation, with multiple setbacks and landscaped courts, will create an open and visually appealing new structure that responds to its context without trying to emulate it or detract from it. The exemplary design of the building incorporates architectural innovation appropriate for a new residential building in a well-established neighborhood without overpowering the existing buildings. The Project design will retain a portion of one existing structure on the Property in order to demonstrate an appreciation for the neighborhood's history and to tie the new structure to the neighborhood fabric. The Project will preserve a portion of the western building on the Property to give the Project authenticity and character at great cost to the Applicant. Although the Applicant is not pursuing incentives typically related to renovation of historic structures, such

as historic tax credits or certain zoning allowances for non-conforming historic structures, the Applicant believes that the retention of a portion of the existing western building significantly will contribute to the retention of the neighborhood character.

The landscape design of the Project will draw upon and enhance the streetscape for the benefit of both residents and the community. The Project will be framed by two complementary but unique landscape spaces. The western area will draw on the neighborhood's history with traditional shrub and perennial plantings along the street and flowering trees framing the existing facade. To the east, a grove of columnar trees will transition to a more modern, layered landscape that will provide the threshold to the building's main entry.

Residents of and visitors to the Project will be able to enjoy a series of landscape experiences, from lush, tranquil garden spaces to active, social rooftop terraces. Views of the east courtyard at its entrance will provide a preview of the garden throughout the year. The east courtyard will be characterized by shady, lush plantings and a quiet, intimate patio for individuals or small groups. The west courtyard will be similar in its focus on the garden, providing private terrace views of flowering trees and shade-loving plants.

The primary social space will occur on the building's two rooftops: the lower roof terrace over the existing building and the upper roof terrace over the new construction. The lower roof terrace will allow for sunny, passive recreation, while the upper roof will offer spectacular views of the city. The upper roof terrace will include outdoor grilling and dining space, as well as space for lounging around a fireplace.

In addition to the landscape spaces provided for individual and social enjoyment, 1315 Clifton Street will provide a significant amount of green roof area, stormwater catchment, and landscape improvements that will benefit the neighborhood and the District's environment.

3. Site planning, and efficient and economical land utilization (§ 2403.9(b))

Pursuant to Section 2403.9(b) of the Zoning Regulations, "Site planning, and efficient and economical land utilization" are public benefits and project amenities to be evaluated by the Zoning Commission.

The Project will capitalize on the Property's transit-rich and retail-dense location to create much-needed market-rate and affordable housing on an underutilized site. The Project will strike the delicate balance between ushering change to the block while enhancing and retaining the character of the neighborhood. The Project will accomplish this by efficiently using the land to accommodate more apartments than currently exist, but the innovative design will retain a sense of history and open space. The front yard setbacks and large landscaped courts will provide the open space necessary for site planning that integrates well into the neighborhood. At the same time, the construction of more housing in a walkable and transit-oriented location will be a highly efficient and economical use of the Property.

4. Environmental benefits (§ 2403.9(h))

According to Section 2403.9(h), "environmental benefits such as [...] stormwater runoff controls in excess of those required by the Stormwater Management Regulations; use of natural design techniques that store, infiltrate, evaporate, treat and detain runoff in close proximity to where the runoff is generated, and preservation of open space or trees" are deemed to be public benefits and project amenities. The Project will be designed to meet LEED Certified requirements, and it will incorporate large amounts of landscaping and open space.

In addition, the Project will incorporate extensive sustainable features. They include energy efficient lighting and appliances; low-flow plumbing fixtures; a green roof; significant landscaping; access to daylight and views; bike storage beyond what is required; TDM measures;

recycled or local/regional materials; permeable pavers; and a high-reflectance roofing system, where applicable.

5. Uses of special value to the neighborhood or the District of Columbia as a whole (§ 2403.9(i))

According to Section 2403.9(i), "uses of special value to the neighborhood or the District of Columbia as a whole" are deemed to be public benefits and project amenities. The addition of 155 to 170 new households (a net increase of approximately 117 households on the Property) will result in the generation of significant additional tax revenues in the form of property, income, sales, use, and employment taxes for the District. In addition, these new residents will add to the vibrancy of the neighborhood and the block.

6. Effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts (§ 2403.9(c))

The Zoning Regulations, pursuant to Section 2403.9(c), state that "effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impact" can be considered public benefits and project amenities of a project.

As previously described above, the Project site is located within ½ mile of two Metrorail stations. Also, its proximity to a major Metrobus corridor, one Circulator route, multiple Capital Bikeshare stations, and Downtown will help to reduce dependence on the private personal vehicles and will allow residents to experience an urban environment free from personal automobiles. Residents in the Project will be able to use public transit to and from work, and then they will be able to shop and dine near home.

Furthermore, as will be articulated in the full traffic report to be submitted with the pre-hearing statement, the Project will incorporate a traffic demand management plan in and around

the PUD site to properly manage the traffic flow in the area. The traffic management plan will include such features as easily accessible bicycle storage.

The proposed Project will provide a below-grade parking garage with approximately 36 parking spaces. This vehicular entrance and exit as well as the loading for the building will be accessed from the alley at the north side of the Property. This important location for vehicle access will allow for an uninterrupted Clifton Street pedestrian right-of-way in front of the Property. Accordingly, the single alley access point and absence of a curb cut for the Property will minimize vehicle-pedestrian conflicts. Further, locating the loading dock off the alley will remove potential truck sidewalk crossings and curbside loading that would obstruct Clifton Street.

7. Employment and training opportunities (§ 2403.9(e))

According to Section 2403.9(e), "employment and training opportunities" are representative public benefits and project amenities. The Project will create several types of job opportunities. During its construction phase, the Project will provide jobs primarily in the construction and related fields. Once operational, the Project will provide jobs for the management of the residential building.

8. Comprehensive Plan (§ 2403.9(j))

According to Section 2403.9(j), public benefits and project amenities include "other ways in which the proposed planned unit development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan." As described in greater detail above in Section V, the Project is consistent with and furthers many elements and goals of the Comprehensive Plan.

B. Public Benefits of the Project

Section 2403.12 and 2403.13 require the Applicant to show how the public benefits offered are superior in quality and quantity to typical development of the type proposed. The Applicant has addressed this issue in the text of the statement, particularly Section VI above. It is only as a result of the additional density provided through the PUD process that the Applicant is able to construct such a well-designed project.

VII. ENVIRONMENTAL ANALYSIS FOR SECOND STAGE APPLICATION

A. Water Demand

The Project will contain approximately 118,800 square feet of development, and the average daily demand for water is estimated to be approximately 20,500 gallons per day. This demand can be met by the existing District water system. The proposed connection for fire water supply will be made within the existing distribution system and will be coordinated with DC Water.

B. Sanitary Sewer Demand

The average daily demand on the sanitary sewer system for the Project is estimated to be approximately 31,800 gallons per day. The proposed connection for the sanitary sewer line will be made with the existing distribution system and will be coordinated with DC Water.

C. Stormwater Management

The Project will accommodate its storm water run-off with a stormwater management system in compliance with standards set by the District Department of the Environment. The proposed systems will be designed, constructed, and maintained in accordance with standards set by the District Department of the Environment.

D. Solid Waste Services

Solid waste will be collected by a private company from covered receptacles kept inside the building for appropriate disposal.

E. Electrical Service

Electricity for the Project will be provided by the Potomac Electric Power Company in accordance with its general terms and conditions of service. All electrical systems will be designed to comply with the District of Columbia Energy Code.

F. Energy Consumption

The Project will be constructed in full compliance with Article 24 (Energy Conservation) of the District of Columbia Building Code. Conformance to code standards will minimize the amounts of energy needed for the heat, ventilation, hot water, electrical distribution and lighting systems contained in the buildings.

G. Erosion Control

During excavation and construction, erosion on the project site will be controlled in accordance with District of Columbia law.

VIII. COMMUNITY OUTREACH

The development team has engaged in discussions about the Project with many community stakeholders. The Applicant has met on multiple occasions with the ANC 1B08 Single Member District representative as well as with other community leaders. In addition, the Applicant presented the project twice to the ANC 1B Design Review Committee for feedback and refinement. At the last presentation, the DRC representatives commended the Applicant for the improvements to the Project based on community input. Furthermore, the entire project was conceived in cooperation with the tenant community and tenant associations, and many residents are looking forward to vastly upgraded living conditions in the new building. The Applicant and

development team will continue to meet with the ANC throughout the course of the Project entitlement process. In addition, the Applicant will meet with other neighbors, such as nearby condominium associations and other community groups, to ensure inclusion in this process.

As discussed above, the Project's mixed-use development is consistent with objectives and policies that the Comprehensive Plan identifies for this part of the District of Columbia.

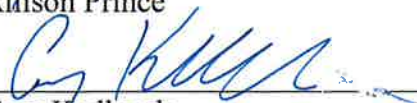
IX. CONCLUSION

The Applicant submits that the Project complies with the requirements of Chapter 24 and related provisions of the Zoning Regulations applicable to Zoning Commission review and approval of Consolidated PUD and Related Map Amendment applications; complies with the 1910 Height of Buildings; is consistent with the Comprehensive Plan; will provide significant public benefits that would not be provided by matter-of-right development; and will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia. The Applicant aspires to make this a distinguished project that will be a credit to its developers and to the community.

For the foregoing reasons, the Applicant submits that the Consolidated PUD and related Map Amendment application should be set down for a hearing by the Zoning Commission at its earliest convenience.

Respectfully submitted,
GOULSTON & STORRS, PC

By: 
Allison Prince

By: 
Cary Kadlec