

Comstock Sixth Street, LLC

**STATEMENT OF THE APPLICANT
TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION
FOR A
CONSOLIDATED PLANNED UNIT DEVELOPMENT
AND ZONING MAP AMENDMENT
SQUARE 3788, LOT 814**

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I. INTRODUCTION

This statement and the attached documents are submitted by Comstock Sixth Street, LLC (the “Applicant”) in support of its application to the Zoning Commission of the District of Columbia for the review and approval of a consolidated planned unit development (“PUD”) and related Zoning Map amendment to rezone Lot 814 in Square 3788 (the “PUD Site”) from the R-2 and FT/C-M-1 Districts to the R-4 District. The Applicant is the contract purchaser of the PUD Site from the Thos. Somerville Co., the longstanding owner of the site. Approval of this application will allow the Applicant to construct approximately 40 single family row dwellings on the PUD Site, which previously served as and is currently utilized for outdoor storage.

The PUD Site consists of approximately 182,600 square feet of land area and is irregularly shaped. The site is located in the northeast quadrant of the District and is bounded to the north by the Emerson Park townhouse development, to the west by the Capital Area Food Bank, and to the south and east by a number of semi-detached dwellings fronting on 6th Place, N.E. and 7th Street, N.E., respectively. The PUD Site is split-zoned: the western portion is zoned C-M-1 and subject to the Fort Totten (“FT”) overlay, and the eastern portion is zoned R-2. The PUD Site is within close walking distance of the Fort Totten Metrorail Station and is located within the boundaries of Advisory Neighborhood Commission (“ANC”) 5A.

The Applicant is seeking consolidated PUD approval and a related Zoning Map amendment to R-4 in order to establish a new residential use for the PUD Site, in the form of 40 single family row dwellings, each containing a garage for one vehicle and accessed by a private access road to be owned and maintained by a future Homeowners Association (“HOA”). Each dwelling will contain three bedrooms and contain approximately 2,205 to 2,282 square feet of gross floor area, including garage. Additional surface parking for approximately 17 vehicles will be provided throughout the PUD Site. The floor area ratio (“FAR”) for the overall site will be

approximately 0.49 FAR; the total lot occupancy will be approximately 18 percent; and the maximum building height will not exceed three stories or 40 feet. The PUD Site will be extensively landscaped and provide various outdoor amenities for residents, including a landscaped mews, seating areas, and a playground. The project also contemplates an improved and lighted walkway to the north of the site and public space/curb improvements in the neighborhood to the north of the site, with the goal of improving pedestrian connectivity from the PUD Site and properties to the south to the Fort Totten Metrorail Station.

The application is consistent with the District of Columbia Comprehensive Plan, 10A DCMR (the “Comprehensive Plan”). The project supports many of the guiding principles and major elements of the Comprehensive Plan, including the Upper Northeast Area Element, the area of the District in which the PUD Site is located. The application also is consistent with the Comprehensive Plan Future Land Use Map, which designates the PUD Site for Moderate Density Residential uses (*see Exhibit E*), and with the Comprehensive Plan Generalized Policy Map, which designates the eastern portion of the PUD Site as a Neighborhood Conservation Area and the western portion of the PUD Site as a Land Use Change Area (*see Exhibit E*).

The Zoning Commission approved a similar row dwelling project for the PUD Site pursuant to Z.C. Order No. 06-26, dated February 12, 2007, and effective on October 12, 2007. The approval granted in Z.C. Order No. 06-26 lapsed in 2009. The Applicant, the contract purchaser from the longstanding owner of the site, proposes herein to develop the PUD Site with a residential redevelopment similar to the project previously approved by the Zoning Commission in terms of residential use, density, and neo-traditional development principles, but with a more efficient layout and improved architectural treatments.

As set forth below, this statement and the attachments meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

A. The Applicant

The Applicant is a limited liability company managed by Comstock Holding Companies, Inc. (Comstock), formerly known as Comstock Homebuilding Companies, Inc., a publicly traded company listed on NASDAQ under the ticker symbol: CHCI. Comstock is a diversified real estate development and asset management services company primarily focused on the Washington, DC marketplace. Comstock Homes, a wholly owned subsidiary of Comstock, develops residential and mixed-use communities as for-sale communities and as rental properties.

The Comstock management team has significant experience in all aspects of real estate development and asset management. Having developed virtually every type of residential property, including single family homes, townhomes, mid-rise and high-rise condominium and apartment buildings, as well as mixed-use (commercial and residential) properties, and community-use buildings, the Comstock organization has the experience necessary to manage any type of real estate development or asset management assignment. In the District of Columbia, Comstock previously obtained land use approvals for an approximately 133-unit apartment building infill project in Square 1096 on East Capitol Street, SE (Z.C. Order No. 06-34) in Ward 6. Comstock is also currently developing and building The Hampshires, a 111-unit rowhouse and single family detached community in the Lamond neighborhood in Ward 4 (Z.C. Order No. 05-30).

II. PROJECT DESCRIPTION

A. Neighboring Land Uses

The PUD Site is located in Fort Totten, an established neighborhood in the northeast quadrant of the District with a solid housing stock and direct access to the Metrorail's green, red, and yellow lines at the Fort Totten Metrorail Station. Fort Totten is bordered by North Capitol Street, N.E. to the west, Riggs Road, N.E. to the north, the Red line Metrorail tracks to the east, and Hawaii Avenue, N.E. to the south. Fort Totten and the surrounding areas contain a housing mix of single-family homes, duplexes, and multi-family dwellings. *See* Washington DC Economic Partnership, DC Neighborhood Profiles 2013.

The PUD Site stretches from a warehouse at its west to single family residential uses to the north, east, and south. To the immediate south of the PUD Site are a number of semi-detached residences on 6th Place, N.E. To the north of the PUD Site is Emerson Park, a townhouse development approved by the Zoning Commission in Z.C. Case No. 04-11, dated April 11, 2005, and effective on May 20, 2005. To the northeast, east, and southeast of the PUD Site, the immediately surrounding area is zoned R-2 and improved with a mixture of detached and semi-detached single family residences.

B. Project Design

As shown on the project drawings, attached hereto as Exhibit A, the Applicant proposes to remove the debris and residue that presently cover the PUD Site and construct a vibrant residential rowhouse development that includes ample parking and significant new landscaped areas. The row dwellings will be situated in three rows fronting upon landscaped areas with a private access road providing vehicular access to the rear of the dwellings where the individual garage entrances are located. New sidewalks with pedestrian amenities will be provided at the

front of the row dwellings and significant new green spaces and outdoor amenities will be provided throughout the development. Consistent with Chapter 26 of the Zoning Regulations, the project will dedicate four dwellings (10 percent) as inclusionary units, two of which shall set be aside for eligible low income households (earning up to 50 percent of the Metropolitan Washington, DC, area medium income (“AMI”)), and two of which shall be set aside for eligible moderate income households (earning up to 80 percent of the AMI). In addition, the Applicant proffers to dedicate one additional dwelling to be set aside as affordable for eligible moderate income households.

The three-bedroom row dwellings will be grouped in three lines organized in an east-west configuration in the center of the PUD Site in order to minimize visual impacts to surrounding properties and disturbance of the existing grades of the site. Each dwelling will front on a landscaped common area and have a rear-loaded, integrated one-car garage, plus a driveway in front of the garage capable of accommodating a second car. Each dwelling will contain between approximately 2,205 square feet and 2,282 square feet of gross floor area and will rise to a height of three stories and not more than 40 feet. Seventeen additional surface parking spaces will be provided throughout the PUD Site on the perimeter of the development.

C. Design and Materials

Pedestrian-focused urban design and sensitive architectural treatment are essential components of the project’s design. Accordingly, the project will be fully integrated into the experience and appearance of the existing community and its overall sense of place. The architectural treatment will be neo-traditional in style, similar to the Emerson Park development bordering the site to the north and the recently-constructed duplexes bordering the site to the east. As with those developments, the materials palette for the project will consist generally of

masonry and siding, however the project will contain cementitious siding as opposed to vinyl and significantly more masonry throughout, including the entire ground level belt coursing on all elevations, the entirety of several front elevations, and the entirety of the side-facing units fronting the Capital Area Food Bank. As shown on the project drawings, a variety of elevation types is proposed, with a mixture of masonry and siding, gables and dormers, varied types and patterns of fenestration, and oriel windows. On the rear elevations, the Applicant is also providing enhanced design treatment, including garage entries with doors designed to appear as traditional carriage house doors, terraces above the garages (rather than stilt-supported decking) and masonry surrounds.

Central to the project is the extensive landscape redevelopment proposed for the PUD Site, which is currently largely occupied by concrete slab given its past use for heavy storage. The southern two “lines” of row dwellings will front upon a heavily landscaped mews, which will also be a primary location for the project’s storm water management filtering and retention. The northernmost of the three lines of row dwellings will front to the north and upon an additional open and landscaped area, including a small playground and additional storm water filtration. Lighting will be provided throughout the site through wall-mounted fixtures on each dwelling unit along with a series of pole-mounted lights, all provided in a traditional design consistent with the architectural direction of the project. Lighting will be provided along the pedestrian path proposed to connect the end point of 6th Street, NE (private) to the continuation of 6th Street, NE, via the Emerson Park development.

The project will be subjected to a HOA, which, among other things, will ensure a consistency of design and upkeep of the unit properties and will actively maintain the open space and private road system.

D. Matter of Right Development Under Existing Zoning

As indicated on the Zoning Map, attached hereto as Exhibit B, the PUD Site is split-zoned, with the eastern portion of the PUD Site located in the R-2 District and the western portion of the PUD Site located in the FT/C-M-1 District. Residential uses are not permitted in the C-M Districts; therefore, a rezoning of the PUD Site is necessary to permit the residential use proposed.

The R-2 District consists of those areas that have been developed with one-family semi-detached dwellings, and is designed to protect them from invasion by denser types of residential development. 11 DCMR § 300.1. The maximum permitted matter of right height in the R-2 District is 40 feet and three stories. 11 DCMR § 400.1. There is no maximum FAR imposed in R-2 Districts (*see* 11 DCMR § 402.4); however, lot occupancy is limited to 40 percent for residential uses (*see* 11 DCMR § 403.2), which can result in a building density of up to 1.2 FAR. Calculated at a permitted density of 1.2 FAR, the R-2 portion of the PUD Site alone would permit a density of approximately 131,602 square feet (109,668 square feet x 1.2 FAR).

The C-M Districts are intended to provide sites for heavy commercial and light manufacturing activities employing large numbers of people and requiring some heavy machinery under controls that minimize any adverse effect on other nearby more restrictive districts. 11 DCMR § 800.1. The maximum permitted matter of right height in the C-M-1 District is 40 feet and three stories. 11 DCMR § 840.1. The maximum permitted matter of right density is 3.0 FAR. 11 DCMR § 841.1. Overall, the C-M-1 portion of the PUD Site alone allows for approximately 218,796 square feet of matter of right non-residential uses, at 40 feet in height (72,932 square feet x 3.0 FAR). The project as a whole contemplates providing only

approximately 89,124 square feet of development, all of which is residential and will measure no more than 40 feet in height.

Pursuant to 11 DCMR § 2101.1, parking for one-family dwellings in all districts is one parking space for each residential dwelling unit. As noted above, the project includes 40 parking spaces (one for each residential dwelling), plus 17 additional parking spaces located throughout the PUD Site, and therefore complies with the parking requirements of the Zoning Regulations. The individual driveways for the rowhouses also are dimensioned to allow for parking of an additional vehicle without projecting into the private access road. Loading facilities are not required for the proposed residential use.

E. Development Under Proposed Zoning

The Applicant proposes to rezone the PUD Site to the R-4 District. The R-4 District is designed to include those areas now developed primarily with row dwellings, but within which there have been a substantial number of conversions of the dwellings into dwellings for two or more families. Very little vacant land is included within the R-4 District, since its primary purpose is the stabilization of remaining one-family dwellings. 11 DCMR § 330.1-2.

The maximum permitted matter of right height in the R-4 District is 40 feet and three stories (11 DCMR § 400.1), and 60 feet as a PUD (11 DCMR § 2405.1). There is no maximum FAR imposed for matter of right projects in the R-4 District (11 DCMR § 402.4), but density is limited to 1.0 FAR as a PUD (11 DCMR § 2405.2). Lot occupancy is limited to 60 percent for residential uses (11 DCMR § 403.2). Row dwellings are permitted as a matter of right in the R-4 District, with one parking space required for each residential dwelling.

F. Tabulation of Development Data

The tabulation of the project's development data is included in the project drawings attached hereto as Exhibit A.

III. THE PROJECT MEETS THE STANDARDS OF THE ZONING REGULATIONS AND PUD REQUIREMENTS

A. The PUD Process is the Appropriate Mechanism for the Project

The PUD Process is the appropriate mechanism for guiding the development of the PUD Site. It allows the project to be developed within the purview of the Zoning Commission while at the same time providing opportunities for input from various agencies and parties. Through the PUD process, the Office of Planning and other District agencies will have the opportunity for greater participation in the fulfillment of the District's planning objectives for this area. .

Accordingly, use of the PUD process gives the community and District agencies an opportunity to work with the Applicant to ensure a well-planned development.

B. PUD Requirements Under Chapter 24 of the Zoning Regulations

1. Area Requirements under Section 2401.1

The PUD Site has a land area of approximately 182,600 square feet (4.20 acres). The Zoning Regulations require a minimum land area of two acres (87,120 square feet) for a PUD to be located in residential districts. 11 DCMR § 2401.1. Thus, the PUD Site meets the area requirement of 11 DCMR § 2401.1.

2. Height and FAR Requirements under Sections 2405.1 and 2405.2

The PUD regulations permit a maximum building height of 60 feet and a maximum density of 1.0 FAR in the R-4 District. 11 DCMR §§ 2405.1-2 The project has a maximum building height not exceeding 40 feet and a density of approximately 0.49 FAR, and therefore meets the PUD height and FAR requirements of 11 DCMR §§ 2405.1-2.

3. Impacts of the Project under Section 2403.3

The proposed PUD will have a positive impact on the surrounding area. The project will significantly improve the existing area by virtue of its exceptional architectural design and site plan, which carefully consider nearby uses and will have minimal impact on the area. The PUD will provide new housing and affordable housing opportunities to District residents and will help reinforce the residential character of the immediately surrounding neighborhood, increase safety, and improve the pedestrian experience.

4. Not Inconsistent with the Comprehensive Plan under Section 2403.4

As discussed at length in Section IV below, the PUD is not inconsistent with the Comprehensive Plan.

B. Public Benefits and Project Amenities

1. Overview

The PUD guidelines require the evaluation of specific public benefits and project amenities for a proposed project. Public benefits are defined as “superior features of a proposed planned unit development that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from the development of the site under the matter of right provisions....” 11 DCMR § 2403.6. A project amenity is further defined as “one type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds attractiveness, convenience or comfort of the project for occupants and immediate neighbors.” 11 DCMR § 2403.7. Additionally, when deliberating the merits of a PUD application, the Zoning Commission is required to “judge, balance and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.”

11 DCMR § 2403.8. Public benefits and project amenities may be exhibited in a variety of ways and may overlap with furthering the policies and goals of the Comprehensive Plan.

This project will help to achieve a number of the goals of the PUD process by creating a high-quality residential development with ample parking, thoughtful sustainable design, high quality single family housing, including dedicated inclusionary units, and dynamic new landscaping and open space. These and the other significant public benefits and amenities, as described in more detail below, reflect and implement the goals of the PUD process as it relates to the surrounding community and the District as a whole.

2. Urban Design, Architecture, Landscaping and Open Space (Section 2403.9(a))

Under 11 DCMR § 2403.9(a), the PUD guidelines list urban design, architecture, and landscaping as categories of public benefits and project amenities for a PUD. This application presents a residential design that accomplishes all of these criteria, and which will assist in the further development of the Fort Totten area. The project has been carefully designed to include rear-loaded garages, public green spaces, a coordinated internal sidewalk system that allows for a high level of neighborhood walkability, and convenient connections to nearby transit and other uses in the surrounding area.

Due to a steep grade shift along the northern and western edges of the PUD Site, virtually all of the existing vegetation in those locations will be preserved for slope stabilization purposes. Additional plantings will be comprised primarily of native/indigenous species, and the planting of exotic ornamental species will be minimal.

3. Site Planning and Efficient and Economical Land Utilization (Section 2403.9(b))

Pursuant to 11 DCMR § 2403.9(b), site planning and efficient and economical land utilization are public benefits and project amenities to be evaluated by the Zoning Commission.

The proposed development epitomizes efficient site utilization and planning. Physically, the project makes efficient use of its shape and topography by fitting 40 individual row dwellings and approximately 57 parking spaces onto the infill site. Economically, the project will benefit the city by generating significant revenue in the form of vastly increased property taxes payable by new residents. Furthermore, the new occupants of the 40 units will add significantly to the market demand for existing neighborhood retail uses and amenities, further invigorating the Fort Totten neighborhood.

The project also epitomizes transit oriented development (“TOD”). In the case of an established urban jurisdiction such as the District, TOD is accomplished in the form of infill projects rather than wholesale neighborhood design. The TOD model stresses six design principles, namely: (i) orientation and connectivity, (ii) quality public realm and amenities, (iii) pedestrian-friendly, safe environments, (iv) attractive architecture and design, (v) mix of uses, and (vi) creative parking management. In the context of the surrounding area, the project satisfies each of the TOD criteria. Successful TOD results in increased property values, a higher tax base, and economic strength throughout a neighborhood, as well as the protection of the existing neighborhood character by focusing development around transit.

4. Housing and Affordable Housing (Section 2403.9(f))

Under 11 DCMR § 2403.9(f), the PUD guidelines state that the production of housing and affordable housing is a public benefit that the PUD process is designed to encourage. Here, the single greatest benefit to the area, and to the city as a whole, is the creation of new housing on a long vacant site surrounded on three sides by residential uses, consistent with the goals of the Zoning Regulations, the Comprehensive Plan, and the District's housing initiatives. The proposed PUD will provide 40 new residential units, four of which will be designated as

inclusionary zoning units devoted to households earning 50 and 80 percent of the AMI, respectively. The Applicant is proffering a fifth dwelling unit to be dedicated for affordable housing purposes to moderate income households under the Zoning Regulations. This amount of affordable housing that is proposed for the PUD Site exceeds that of matter-of-right development, especially because housing is not permitted in the C-M-1 District, which comprises a significant portion of the PUD Site.

5. Transportation (Section 2409.3(c))

Pursuant to 11 DCMR § 2409.3(c), effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other strategies to mitigate adverse traffic impacts are representative public benefits and project amenities. As described above, the PUD provides an ample supply of on-site parking to ensure that the project does not increase the pressure on the surrounding neighborhood for limited street parking. Moreover, the PUD Site is ideally located for residential development because it is located within easy walking distance of the Fort Totten Metrorail station and several Metrobus routes. The Applicant anticipates that the project's proximity to transit will serve as a major amenity to potential purchasers and is proposing a pedestrian connection to Emerson and 6th Streets, NE, to allow for more convenient pedestrian access to the Metrorail station. The Applicant is studying the installation of two crosswalks and replacement or installation of four wheelchair-bicycle ramps to improve accessibility from 6th Street, NE to the Fort Totten Metrorail station. The improvements will be installed at locations to be approved by DDOT across Emerson Street, NE and Gallatin St, NE.

6. Environmental Benefits (Section 2403.9(h))

The Applicant is fully committed to providing high-quality housing in the District of Columbia that is sensitive to the natural environment. Through the development of this project, the Applicant will ensure the implementation of a number of strategies to enhance the inherently sustainable nature of the PUD Site's location and to promote a healthy, desirable, and comfortable lifestyle that will fully benefit the project's residents and minimize development impact on the environment. The project provides a number of environmental benefits, including tree planting and maintenance, landscaping, methods to reduce storm water runoff, and green engineering practices. All of the units will include water-conserving fixtures, Energy Star appliances, Manual J sizing of HVAC systems, Energy Star lighting, low VOC paints, primers, adhesives and sealants, "Green Label" rated carpets, Energy Star exhaust fans, and mold prevention measures. The project incorporates an infiltration trench, allowing storm water from the site to be discharged directly back into the water table, one of the primary goals of LID design. The project promotes sustainability goals further by utilizing efficient site design to minimize the impervious area for development and providing 91,300 square feet of pervious area, which exceeds the required pervious area of 18,260 square feet, by 73,040 square feet, or 1.68 acres.

7. Other Benefits and Amenities of Special Value

The Applicant also notes that, at its core, the PUD involves removing the PUD Site from its longstanding industrial/storage use and replacing it with a vibrant residential use, including five units dedicated to affordable housing, consistent with the Comprehensive Plan, the stated TOD and housing goals for the District, and the preferences of the neighboring community. In addition, the Applicant is engaging ANC 5A and neighboring property owners to arrive at a

package of in-kind and financial contributions to benefit the immediate neighborhood and surrounding residents of Ward 5.

IV. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use Map and Generalized Policy Map, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

A. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District; and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. D.C. Code §1-245(b); 10A DCMR § 102.6.

The PUD significantly advances these purposes by promoting the social, physical, and economic development of the District through the provision of a high-quality, state-of-the-art, sustainable residential development that will add 40 new units to the District, achieve the community goal of adequate parking, and enhance the natural and architectural assets of the District without generating any adverse impacts.

B. Future Land Use Map

The District of Columbia Comprehensive Plan Future Land Use Map designates the PUD Site for Moderate Density Residential uses (*see Exhibit D*). The Moderate Density Residential category is used to define the District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone Districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 10A DCMR § 225.4.

The Applicant's proposal to rezone the PUD Site from the R-2 and FT/C-M-1 Districts to the R-4 District to construct a new infill residential development on the PUD Site is consistent with the Comprehensive Plan designation. The proposed R-4 zoning classification is specifically identified as a Moderate Density Residential zone district. In addition, the R-4 District contemplates that very little vacant land shall be included within the R-4 District, since its primary purpose shall be the stabilization of remaining one-family dwellings. 11 DCMR § 330.2. The PUD Site also is located in close proximity to a Metrorail station and numerous Metrobus lines. Given the District's stated policy of channeling new residential growth into areas near transit stations and along bus routes, the PUD and map amendment are consistent with the Comprehensive Plan's designation for the PUD Site.

C. Generalized Policy Map

The Comprehensive Plan Generalized Policy Map designates the eastern portion of the PUD Site as a Neighborhood Conservation Area and the western portion of the PUD Site as a Land Use Change Area (*see Exhibit E*). The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities exist in these areas, and new development and alterations should be compatible with the existing scale and architectural character of the area. 10A DCMR § 223.5. The guiding philosophy in Land Use Change Areas is to encourage and facilitate new development and to promote the adaptive reuse of existing structures. 10A DCMR §223.11. As Land Use Change Areas are redeveloped, the District aspires to create high quality environments that include exemplary site and architectural design and that are compatible with and do not negatively impact neighborhoods. 10A DCMR § 223.12.

Consistent with the goals of the Neighborhood Conservation Area and the Land Use Change Area, the project will enhance the established semi-detached and rowhouse neighborhood by developing a vacant site with new three-story single family row dwellings that are compatible with the existing scale and character of the area. The project will implement dynamic site and architectural design by creating a high-quality new development that supports existing land uses and respects the surrounding community.

D. Compliance with the Guiding Principles of the Comprehensive Plan

The Project is consistent with many guiding principles in the Comprehensive Plan for managing growth and change, creating successful neighborhoods, and building green and healthy communities, as set-forth in the Comprehensive Plan.

1. Managing Growth and Change

In order to manage growth and change in the District, the Comprehensive Plan encourages, among other factors, redevelopment and infill opportunities along corridors and near transit stations to reinvigorate and enhance neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. 10A DCMR § 217.6. The proposed PUD is fully consistent with each of these goals, since the project will redevelop a vacant site in close proximity to a Metrorail station and numerous Metrobus routes. Developing the infill site with three-story single family row dwellings will respect the broader community context, which is also primarily improved with row dwellings and semi-detached dwellings of a similar density.

2. Creating Successful Neighborhoods

One of the guiding principles for creating successful neighborhoods is protecting, maintaining, and improving the residential character of neighborhoods. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places to live. These qualities can lead to development pressures that threaten the very qualities that make the neighborhoods attractive. 10A DCMR § 218.1. The PUD supports this principle by maintaining and improving the existing residential character of Fort Totten and by linking the PUD Site to nearby single family and mixed-use neighborhoods and existing infrastructure. The infill project will revive the underutilized site with much-needed new housing and affordable housing that complement and respond to the surrounding vernacular without threatening the character of the existing community.

Another guiding principle for creating successful neighborhoods is getting public input in decisions about land use and development, from development of the Comprehensive Plan to

implementation of the Plan's elements. 10A DCMR § 218.8. The PUD furthers this goal since, as part of the PUD process, the Applicant is working closely with Advisory Neighborhood Commission 5A to ensure that the development provides a positive impact to the immediate neighborhood.

3. Building Green and Healthy Communities

One of the guiding principles for building green and healthy communities is that building construction and renovation should minimize the use of non-renewable resources, promote energy efficiency and water conservation, and reduce harmful effects on the natural environment. 10A DCMR § 221.3. The PUD furthers this goal since, as discussed above, the project will include a significant number of sustainable design features.

E. Compliance with the Citywide Elements of the Comprehensive Plan

1. Land Use Element

For the reasons described above, the project supports the following policies of the Land Use Element of the Comprehensive Plan:

a. Policy LU-1.3.2: Development Around Metrorail Stations

The Fort Totton Metrorail station offers a great opportunity for infill development and growth. Consistent with Policy LU-1.3.2, the project will be located in close proximity to the Metrorail station and will redevelop a poorly utilized infill site. By virtue of its transit-oriented location, the project will minimize the necessity for automobile use and will maximize transit ridership while respecting the needs of the surrounding area.

b. Policy LU-1.3.3: Design to Encourage Transit Use

Consistent with this policy, the project's architecture and site planning will support pedestrian and bicycle access to the Metrorail station and will enhance the safety, comfort, and convenience of passengers walking to the station or transferring to and from local busses.

c. Policy LU-1.4.1: Infill Development

The project is consistent with the goal of encouraging infill development on vacant land within the city, particularly in areas where there are vacant or underutilized lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. The proposed project complements the established character of the area by filling in a large underutilized lot without creating sharp changes in existing development patterns.

d. Policy LU-2.1.5: Conservation of Single Family Neighborhoods

Consistent with Policy LU-2.1.5, the PUD will protect and conserve the District's stable residential neighborhood and ensure that the project reflects the established character. The Applicant will carefully manage the development of the PUD Site in a manner that preserves open space and maintains the neighborhood scale.

e. Policy LU-2.1.11: Residential Parking Requirements

Consistent with Policy LU-2.1.11, the parking provided on the PUD Site is responsive to the varying levels of demand associated with the row dwellings and the location of the site near transit. Parking will be accommodated on the PUD Site in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow.

f. Policy LU-2.2.4: Neighborhood Beautification

Policy LU-2.2.4 encourages projects to improve the visual quality of the District's neighborhoods. As shown on the project drawings, the project architect designed the dwellings to improve the visual aesthetic of the neighborhood. The design and materials proposed are of a high quality, and the project is focused in the interior of the site to buffer from surrounding properties. Moreover, the development of the PUD Site will be an improvement to the current site condition and will help to revitalize the area. The project also includes a significant amount of landscaped and open space that will greatly enhance the streetscape.

2. Transportation Element

The Applicant's proposal to develop a new residential development on the PUD Site will support several policies of the Transportation Element of the Comprehensive Plan, including:

a. Policy T-1.4.1: Transit-Oriented Development

The proposed project is a textbook example of transit-oriented infill development. It also includes various transportation improvements, including the construction of new sidewalks, and public space improvements. The Applicant also proposes to invest in pedestrian-oriented improvements leading from the PUD Site to the Fort Totten Metrorail station and along major bus corridors to encourage transit use by neighborhood residents.

b. Policy T-2.3.1: Better Integration of Pedestrian and Bicycle Planning

As shown on the project drawings, the Applicant has carefully considered integrated pedestrian and bicycle safety considerations into the design of the project and the development of new roads and sidewalks.

c. Policy T-2.4.1: Pedestrian Network and Policy T-2.4.2: Pedestrian Safety

Consistent with these policies, the Applicant will develop, maintain, and improve pedestrian facilities within the PUD Site and will connect these facilities into the District's sidewalk network. The project will improve safety and security of pedestrian travel by providing a variety of techniques including new lighting, crosswalks, and wide sidewalks.

3. Housing Element

The overarching goal of the Housing Element is to "[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia." 10A DCMR § 501.1. The proposed project will help achieve this goal by advancing the policies discussed below:

a. Policy H-1.1.1: Private Sector Support

The project helps meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the project will contain 40 new single-family dwellings, more than 12 percent of which will be designated as affordable units. This represents a substantial contribution to the District's housing supply, and the provision of new affordable units at this location is fully consistent with the District's land use policies.

b. Policy H-1.1.3: Balanced Growth

Consistent with this policy, the Applicant will develop new housing on underutilized land, helping to ensure that the city will meet its long-term housing needs, including the need for low- and moderate-density single-family homes.

c. Policy H-1.1.5: Housing Quality and Policy H-1.2.1: Affordable Housing as a Civic Priority

As shown on the project drawings, the project is designed to include high-quality materials and design elements. Moreover, five of the residential uses will be dedicated as affordable housing units. Consistent Policies H-1.1.5 and H-1.2.1, the affordable units will meet the same high-quality architectural standards provided for the market-rate units and will be indistinguishable from market rate housing in their exterior appearance. The project also addresses the need for open space and recreational amenities, and respects the design integrity of adjacent properties and the surrounding neighborhood.

d. Policy H-1.2.3: Mixed Income Housing

The proposed development is mixed-income in that it includes a number of affordable housing units dedicated to families earning not more than 50 and 80 percent of the AMI, respectively. Thus, the project will support the District's policy of dispersing affordable housing throughout the city to mixed-income communities, rather than concentrating such units in economically depressed neighborhoods.

e. Policy H-1.3.1: Housing for Families

The project will support this policy by constructing a large number of new single-family row dwellings that can accommodate families with children.

4. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. This Element

provides policies and actions on important issues such as energy conservation and air quality, and specific policies including the following:

- a. Policy E-1.1.1: Street Tree Planting and Maintenance – Encourages the planting and maintenance of street trees in all parts of the city;
- b. Policy E-1.1.3: Landscaping – Encourages the use of landscaping to beautify the city, enhance streets and public spaces, reduce storm water runoff, and create a stronger sense of character and identity;
- c. Policy E-2.2.1: Energy Efficiency – Promotes the efficient use of energy and a reduction of unnecessary energy expenses;
- d. Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff – Calls for the promotion of tree planting and landscaping to reduce storm water runoff, including the expanded use of green roofs in new construction; and
- e. Policy E-3.1.3: Green Engineering – Has a stated goal of promoting green engineering practices for water and wastewater systems

As described previously in this statement, the project includes street tree planting, landscaping, energy efficient techniques, methods to reduce storm water runoff, and green engineering practices, and is therefore fully consistent with the Environmental Protection Element.

5. Economic Development Element

The Economic Development Element of the Comprehensive Plan addresses the future of the District's economy and the creation of economic opportunity for current and future District

residents. This element places a high priority on stimulating and facilitating a variety of commercial, retail, and residential development investments appropriate to selected Metrorail station areas outside of the Central Employment Area. The proposed development will attract and retain residents who desire a moderate density residential neighborhood with direct access to public transportation and safe pedestrian and bicycle facilities. Attracting and retaining residents will further increase the District's tax base and will create additional revenue for the city.

6. Urban Design Element

The goal of the Comprehensive Plan's Urban Design Element is to “[e]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces.” 10A DCMR § 901.1. In keeping with this objective, the Applicant has gone to great lengths to align the proposed project with the character of the surrounding neighborhood.

a. Policy UD-2.2.1: Neighborhood Character and Identity and Policy UD-2.2.5: Creating Attractive Facades

Consistent with Policies UD-2.2.1 and UD-2.2.5, the project will strengthen the defining visual qualities of the Fort Totten neighborhood by relating the scale of the infill development to the existing neighborhood context. In addition, as shown on the project drawings, the project includes elegant, visually-interesting, and well-designed building facades that eschew monolithic or box-like forms and long blank walls that detract from the quality of the streetscape.

b. Policy UD-2.2.7: Infill Development and Policy UD-2.2.8: Large Site Development

In furtherance of these policies, the project will avoid overpowering contrasts of scale, height, and density as the infill development occurs. The Applicant will also ensure that the project is carefully integrated with adjacent sites.

c. Policy UD-3.1.1: Improving Streetscape Design and Policy UD-3.1.2:

Management of Sidewalk Space

The project will improve the appearance and identity of the District's streets through providing new street lights, paved surfaces, landscaped areas, street furniture, and adjacent building facades. Sidewalks within the PUD Site will promote pedestrian safety, efficiency, and comfort. The sidewalks will enhance the visual character of the streets within the PUD Site with landscaping and buffer planting to reduce the impacts of vehicular traffic.

d. Policy UD-3.2.4: Security Through Streetscape Design and Policy UD-3.2.5:

Reducing Crime Through Design

Consistent with these policies, the Applicant will ensure attractive, context-sensitive security measures in the design of the streets, plazas, and public spaces within the PUD Site. These measures will include an appropriate mix of bollards, planters, landscaping, vegetation, and street furniture, rather than incorporating barriers and other approaches that detract from the aesthetic quality of the street. Furthermore, the design of the PUD Site will minimize the potential for criminal activity through the provision of preventative measures such as adequate lighting, clear lines of sight and visual access, and the absence of dead-end streets.

7. Upper Northeast Area Element

The PUD Site is located within the boundaries of the Upper Northeast Area Element. Section 2407 of the Comprehensive Plan explains the Upper Northeast Area Element's planning and development priorities. One stated priority is to encourage future development around the Fort Totten Metrorail station, which has not taken full advantage of its proximity to the Metro, and provides opportunities for diverse housing types of moderate and medium density housing. *See* 10A DCMR § 2407.2(i). The Upper Northeast Area Element also encourages compatible infill development (Policy UNE-1.1.2), Metro station development (Policy UNE-1.1.3), streetscape improvements (Policy UNE-1.2.1), and environmental quality (Policy UNE-1.2.8), all of which are policies and goals that the proposed PUD will support.

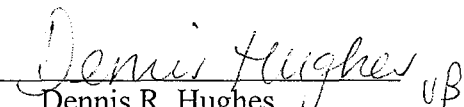
In addition, the Upper Northeast Area Element specifically states that the Fort Totten Metrorail station area has strategic importance in plans for the District's growth. *See* 10A DCMR § 2417.1. Furthermore Policy UNE-2.7.1 envisions underutilized property in the immediate vicinity of the Fort Totten Metrorail station as a "transit village" combining medium-density housing, ground floor retail, local-serving office space, new parkland and civic uses, and structured parking. Policy UNE-2.7.1 states that redevelopment should protect the lower density residences nearby and address traffic congestion and other development impacts. Furthermore, Policy UNE-2.7.2 calls for improvements to pedestrian access to the Fort Totten Metrorail station. As stated previously in this statement, the project at the PUD Site is consistent with the infill, and transit-oriented development objectives that are part of the Upper Northeast Element, and will provide much-needed new housing opportunities that protect the nearby lower density residences and increase pedestrian accessibility and safety in the area.

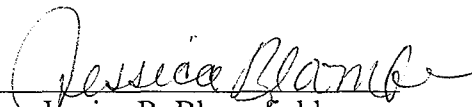
V. CONCLUSION

For the reasons stated above, the Applicant submits that the PUD and related Zoning Map amendment meets the standards of Chapter 24 of the Zoning Regulations and is consistent with the purposes and intent of the Zoning Regulations and Zoning Map. Accordingly, the Applicant requests that the Zoning Commission determine that the application has merit and that a public hearing on the application should be scheduled.

Respectfully submitted:

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