



STANTON SQUARE, LLC

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
CONSOLIDATED AND FIRST STAGE REVIEW AND APPROVAL OF A
PLANNED UNIT DEVELOPMENT AND
ZONING MAP AMENDMENT
May, 2013

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EXHIBITS

DESCRIPTION

EXHIBITS

Architectural Drawings, Elevations, Civil Drawings, and Photographs of the Subject Property and Surrounding Area; Tabulation of Development Data

A

Application Forms

B

Certificate of Notice

C

Notice of Intent to File

D

List of Owners of Property within 200 feet of the Subject Site

E

Preliminary LEED Checklist and Required Calculations

F

Compliance with Consolidated PUD Requirements

G

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H

Surveyor's Plat of the Subject Property

I

PREFACE

This statement and the attached documents support the application of Stanton Square, LLC to the Zoning Commission for the consolidated review and approval of a Planned Unit Development, first stage approval of a Planned Unit Development, and a related amendment to the Zoning Map of the District of Columbia.

This Planned Unit Development and Zoning Map Amendment application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10 DCMR (Planning and Development) § 100 et seq. (2006) (the “**Comprehensive Plan**”), as well as numerous goals and policies of the District of Columbia. Submitted in support of this application are completed application forms, a notice of intent to file a PUD (with property owner list and certification of mailing), architectural drawings, plans, and elevations, and a map depicting the Zoning District for the properties impacted by these applications and the surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a Planned Unit Development (Consolidated and First Stage) and Zoning Map Amendment application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

Stanton Square, LLC (the “**Applicant**”) hereby submits applications to the Zoning Commission of the District of Columbia (“**Commission**”) for the consolidated review and approval of a Planned Unit Development (“**PUD**”), first stage approval of a PUD, and a corresponding amendment to the Zoning Map of the District of Columbia. The project site consists of Lot 122 in Square 5877 (the “**Subject Property**”). The Subject Property includes approximately 8.1 acres (353,271 square feet), is currently zoned R-3, and is located in the moderate density residential land use category on the District of Columbia’s Comprehensive Plan Future Land Use Map. The Subject Property is located within the boundaries of Advisory Neighborhood Commission (“**ANC**”) 8B.

The Applicant proposes the development of a project that includes a mixed-income residential community on the lower five acres of the Subject Property, and a community service center campus (similar to the Town Hall Education Arts Recreation Campus (THE ARC)) on the upper three acres of the Subject Property. The Applicant is proposing a Consolidated PUD application and Zoning Map Amendment for the residential community (rezoning this portion of the Subject Property to the R-5-A Zone District). The Applicant is proposing a First Stage PUD application and Zoning Map Amendment for the community service center campus (rezoning this portion of the Subject Property to the SP-1 Zone District).

The residential community will consist of approximately 203 residential units included in six buildings. The residential units will vary in size from 1-3 bedrooms. Approximately 30 of the residential units will be reserved for permanent supportive housing units. The proposed residential buildings will be 52-63 feet in height and will include approximately 200,000 square feet of gross floor area. The Floor Area Ratio (“**FAR**”) for the residential community will be

approximately 0.97. The residential community will include approximately 161 parking spaces. The community service campus is expected to include two buildings with each building having a height of two-three stories, approximately 40 feet, and approximately 28 parking spaces. The buildings are expected to include approximately 80,000 – 120,000 square feet of gross floor area. This will result in a FAR of 0.6 – 0.88. The plans, elevations, and drawings of the proposed PUD project are included in Exhibit A.

B. The Development Team

Horning Brothers

Horning Brothers has served the Washington, D.C., metropolitan area with high-quality residential communities and commercial properties for more than 50 years. Horning Brothers has built and manages over \$600 million in apartment communities and retail shopping centers. The 2,500 units of housing in the City owned and managed by Horning Brothers provide homes to over 5,000 residents of the District of Columbia. Throughout its history, Horning Brothers has been active in the revitalization of Washington D.C.'s neighborhoods. Horning Brothers' first development (Riverbend Apartments) was in Ward 8. Currently, Horning Brothers, owns and manages almost 500 units in Ward 8.

Community of Hope

Founded in 1980, Community of Hope's ("COH") mission is to improve the health and quality of life of low-income, homeless, and underserved families and individuals in the District of Columbia by providing healthcare, housing with supportive services, educational opportunities, and spiritual support. COH was pleased to be the winner of the 2012 Washington Post Award for Excellence in Nonprofit Management.

COH has been contracting with the District Department of Human Services since 2008 to provide services for chronically homeless families under the Permanent Supportive Housing Program. Today, COH is one of the largest providers of housing services to families experiencing homelessness in the District of Columbia. COH's housing services are offered at all levels of the homeless continuum of care, including temporary housing, transitional housing, permanent supportive housing, and rapid rehousing. COH currently serves about 220 families who are or have been homeless by providing case management, assistance with job placement, housing and landlord relationships, mentoring for youth, and access to a wellness coordinator. Goals for clients in all programs are to ensure they find stable, affordable housing; increase their income and work on self-identified goals to strengthen their families.

COH is a Federally Qualified Health Center (FQHC) and provides care to all persons, regardless of ability to pay. COH has operated one health center in the Adams Morgan neighborhood of D.C. since 1980, which is now located in the Marie Reed Elementary School. At the long-standing Marie Reed Clinic, COH offers a wide range of primary care services including prenatal care, pediatric care, immunization and adult well and sick visits. In 2011, COH assumed operations of Family Health and Birth Center (FHBC) in Ward 5. COH is also in the process of building a new Health and Resource Center in Ward 8, which will provide over 10,000 new patients critical access to care and is scheduled to open at the end of 2013. COH's headquarters will also be moving to that location.

II. THE PROPOSED PUD PROJECT

A. Description of the Subject Property and Surrounding Area

The Subject Property is located in the Fort Stanton neighborhood approximately one-half mile north of the Suitland Parkway. The Subject Property is irregularly shaped and is bound by

Stanton Road to the west, Elvans Road to the south and east, the former Wilkinson Elementary School directly to the north, and Pomeroy Road to the northwest. The Subject Property is currently undeveloped and heavily wooded with steep topography. The upper portion of the Subject Property, along Elvans Road, is at an elevation that is approximately 72 feet above the elevation of the lower portion of the Subject Property.

A number of institutional uses (Moten/Wilkinson Education Campus, Our Lady of Perpetual Hope Church) are clustered around the upper portion of the Subject Property along Elvans and Morris Roads. There are numerous parks and recreational facilities located in close proximity to the Subject Property. These include: Fort Stanton Park (approximately 0.25 miles to the east of the Subject Property); Douglass Park (approximately 0.5 miles to the southeast of the Subject Property); and Barry Farms Park (approximately 0.5 miles to the northwest of the Subject Property). All of these parks have recreation centers, outdoor pools and tennis courts (except for Barry Farms, which does not have tennis courts).

B. Zoning History of the Subject Property

As noted above, the Subject Property is currently included in the R-3 Zone District. In November of 2007, the Zoning Commission approved a PUD project and Zoning Map Amendment application (ZC Case No. 05-35) which authorized the construction of 187 townhomes on the Subject Property and re-zoned the Subject Property to the R-5-A Zone District.

The Applicant returned to the Zoning Commission in November of 2010 seeking an extension of the time in which it was required to start construction activity for the approved PUD project. That extension was granted in ZC Case No. 05-35A. However, despite the Applicant spending in excess of \$1.5 million in moving the PUD approved plans from a design/development stage, to a construction drawing stage, to the filing of numerous building

permit applications and the payment of significant fees to the District of Columbia, the Applicant was not able to make the approved townhouse project a reality. The Applicant was not able to commence construction activity by November 23, 2012 and the Zoning Commission's approval of ZC Case No. 05-35 lapsed. Therefore, the Subject Property returned to the underlying R-3 Zone District.

C. Project Description

1. Consolidated PUD Application

The Applicant and its design team have created a truly mixed-income residential community on the lower five acres of the Subject Property. This residential community will include three components:

Market Rate and Affordable Housing Units (approximately 173 units) – These units will include one and two bedroom options with average unit sizes of approximately 800 square feet. In addition to fully satisfying the Inclusionary Zoning Regulations requirements, all of the other residential units in this project will be reserved for residents earning up to 60% of the Area Median Income (“AMI”), for at least 15 years, and more likely for at least 30 years.

Permanent Supportive Housing Units (30 units) – Horning Brothers and COH are applying for funding under the Consolidated Request for Proposals to provide 30 units of Permanent Supportive Housing for families. Permanent Supportive Housing (PSH) is the combination of long-term rental subsidies and intensive home-based support services for people who have a history of homelessness and difficulty in maintaining their housing. PSH is a nationally recognized best practice that generally has about a 98% success rate in people maintaining their housing.

PSH is targeted towards families and individuals who have been homeless in the past, have barriers to finding housing such as poor credit history, and often include a family member with disabilities which makes it difficult for them to find employment. Families hold leases in their own names and are expected to comply with all terms of the lease, including paying rent monthly. Rent is often set at about 30% of income and the subsidy covers the balance. Families stay in their units for as long as they wish to. A client in PSH has the same rights and responsibilities as any other tenant, with the added help of supportive services.

The supportive services provided by COH include regular face-to-face meetings in the home to help families set and achieve goals that they set for themselves. Goals usually revolve around maintaining housing (i.e. paying rent, communicating with the landlord if there are any problems, making sure tenants know lease requirements, etc), increasing income through maximizing benefits or finding employment for members of the family as applicable, and strengthening the family. Examples of family goals might be making sure children are doing well in school, making sure the family is getting needed healthcare, working with an employment specialist on a resume, connecting children to summer camp or after-school programs, etc. Historically, COH has one case manager assigned to only 12 families, with supplemental assistance from an Employment Specialist, Wellness Coordinator, Youth Specialist, and a Housing Specialist. Interested children are also connected with volunteer mentors.

Community Supportive Services - The vision of the Community Services Campus (the subject of the First Stage PUD application) is to provide services to all families in the community, with a special emphasis on supporting the needs of young children. A key anchor will be an early

childhood development center that would accept children from families with a range of incomes. The Applicant is still in the process of identifying that anchor organization. Other supportive services on the campus may include job training programs, activities for youth such as mentoring, parenting support, space for health education or screening, and activity space for neighborhood organizations and civic groups.

The goals of this early childhood development center include:

- Mothers experiencing healthy pregnancies and births.
- Infant and toddlers entering pre-school demonstrating appropriate levels of development for their age and stage.
- Parents enjoying tangible support, role models, education, and feelings of acceptance and well-being that assist them to support their children's healthy development.
- Families having a safe and stable place to live and thrive.

As shown in the site plan included in Exhibit A, the PSH units will be completely integrated among all of the residential units in the six buildings. The community supportive services will be included in the building furthest from Stanton Road and will include approximately 1,500 square feet.

Each of the buildings will be four stories tall with a hip or gabled roof. The height of these buildings, measured to the highest point of these roofs, vary from 52 feet – 63 feet depending on the measuring point along Stanton Road or Pomeroy Road. Access to the individual units will be into common breezeways from the parking lots with individual access to some of the ground floor units along Pomeroy and Stanton Roads. The exterior treatment of the buildings will include predominately masonry facades with substantial embellishments, including porches, bay windows, and gabled roofs with deep overhangs and brackets. Together these enliven the architecture of the buildings and create a scale of elements in keeping with the character and scale of the surrounding community.

Surface parking lots are located behind the buildings, and are not visible from the perimeter public streets, ensuring a pedestrian-friendly and active streetscape. New street tree plantings will be introduced along the perimeter public streets, creating additional shade and a more pedestrian-friendly environment. A central green with a large rain garden is located off of Stanton Road, at the entry to the project, creating a signature event along the street. Three additional green spaces are located within the development, offering areas for passive recreation for residents. The parking lots will be equipped with adequate lighting, shade trees and other landscape elements and will, at a minimum, meet the District's requirements for the landscape treatment of surface parking lots. Special paving will be included at the entrance green to set it off as a unique and special place. A retaining wall is located on the eastern boundary of the residential portion of the site and will adjust the grade between it and the upper Community Service Campus.

2. First-Stage PUD Approval

A key component of the PUD project is the creation of a community service center campus on the upper portion of the Subject Property. The Applicant notes the success of THEARC (located at 1901 Mississippi Avenue, SE) and would like to create a similar community service center along Elvans Road. The Applicant currently anticipates that the community service center use will be housed in two buildings as shown in the site plan included in Exhibit A.

At this point, the development team is continuing to gather information on the types of uses that would be included in this campus. As discussed in greater detail above, the current thinking is that the focus of this community service center will be on early childhood education and family supportive services. The Applicant will limit the proposed uses on this campus to

those uses that are permitted as a matter-of-right in the SP-1 District, or with special exception approval in the SP-1 Zone District.

D. Development Data

1. Consolidated PUD Application

The total gross floor area included in the consolidated PUD application is approximately 206,000 square feet for a total Floor Area Ratio (“**FAR**”) of approximately 0.97. The height of the proposed buildings will range from 52 - 63 feet. The consolidated PUD project will have a lot occupancy of approximately 25%. The consolidated PUD project will include approximately 161 parking spaces.

The R-5-A District permits a maximum FAR of 0.9 as a matter-of-right and a maximum FAR of 1.0 in a PUD project. The maximum height allowed as a matter-of-right in the C-2-B Zone District is 40 feet. A PUD project in the R-5-A Zone District is permitted a maximum building height of 60 feet¹.

2. First Stage PUD Approval

The total gross floor area included in the first stage PUD approval is 80,000 – 120,000 square feet for a total FAR of 0.6-0.88. The height of the proposed buildings will be approximately 40 feet and the buildings will have a lot occupancy of approximately 30%. The community service center campus will include approximately 28 vehicular parking spaces. The proposed mass, scale and height of the buildings proposed for the community service center campus is significantly less than the matter-of-right standards in the SP-1 Zone District.

The SP-1 Zone District permits a maximum FAR of 4.0 for residential use and 2.5 for other uses as a matter-of-right. A PUD project in the SP-1 Zone District is permitted a maximum

¹ The Zoning Commission may authorize an increase of not more than 5% in the maximum height (63 feet in the R-5-A Zone District) provided the increased height is essential to the successful functioning of the project and consistent with the purpose and evaluation standards of Chapter 24 of the Zoning Regulations.

FAR of 4.5 for residential use and 3.5 for other uses. The maximum height allowed as a matter-of-right in the SP-1 Zone District is 65 feet. A PUD project in the SP-1 Zone District permits a maximum height of 75 feet.

E. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require the approval of the Board of Zoning Adjustment (“BZA”).

The Applicant is requesting relief from the parking requirements. The Zoning Regulations require that one parking space is required for each residential unit in the R-5-A Zone District. The Applicant is proposing a parking ratio of approximately 0.8 parking spaces per residential unit. Given that 15% of the residential units in the project will be PSH units (and those residents will not likely have their own cars), and that the ratio of parking spaces provided is generally in keeping with the car ownership rates in Ward 8 and the surrounding community, the Applicant believes that granting this requested relief will not adversely impact the surrounding community. The Zoning Commission has the authority to grant this relief pursuant to Section 2405.6 of the Zoning Regulations.

The Applicant is also requesting that the Zoning Commission approve multiple structures on a single record lot. Pursuant to Section 2516.2 of the Zoning Regulations, multiple buildings are permitted on a single record lot with BZA special exception approval, provided that each building satisfies applicable zoning requirements (such as use, height, bulk and open spaces around each building). In order to locate the multiple structures on the Subject Property, it is necessary to obtain relief from some elements of Section 2516.2 of the Zoning Regulations. The

Zoning Commission has the authority to grant this flexibility pursuant to Section 2405.7 of the Zoning Regulations.

The Applicant is also requesting flexibility from the side yard requirement for the building sited along Pomeroy Street. The measured side yard between this building and the adjacent DCPS property ranges from 6.5 feet to 20 feet. The required side yard for this building is 13 feet. The Zoning Commission has the authority to grant this relief pursuant to Section 2405.6 of the Zoning Regulations. The Zoning Commission has the authority to grant this relief pursuant to Section 2405.5 of the Zoning Regulations.

As noted above, the residential buildings have a measured building height ranging from 52 feet to 63 feet. The PUD guidelines for the R-5-A Zone District generally permit a maximum building height of 60 feet. The Applicant is requesting that the Zoning Commission use its authority to approve a height increase of up to 5% over the PUD guidelines for the R-5-A Zone District pursuant to Section 2403.5 of the Zoning Regulations. In order for the Zoning Commission to approve this request, the Applicant must show that the increase in height “is essential to the successful functioning of the project and consistent with the purpose and evaluation standards of this chapter.” The additional three feet of height for the residential buildings is necessary to adjust the site grades and to include the gable roofs, which serve to break down the scale of the buildings and integrate the development into the character of the surrounding residential structures.

III. PLANNING ANALYSIS

A. Introduction

Through the PUD process, the Applicant will create a mixed-income residential community with permanent supportive housing (and associated supportive services), and a

community service center campus. The architectural treatment of the proposed buildings is complementary and in scale with the surrounding neighborhood. The high quality housing units provided in this project and the proposed streetscape treatments along the surrounding public streets will turn a somewhat foreboding and unwelcoming property into an integral part of the fabric of the neighborhood.

B. Zoning Impact

The proposed Zoning Map Amendment application can be granted without adversely affecting nearby and adjacent Zone Districts. The Zoning Map Amendment that is associated with this PUD project seeks to rezone the lower portion of the Subject Property, which will include the residential community to the R-5-A Zone District. The upper portion of the Subject Property, which will include the community service center campus, will be rezoned to the SP-1 Zone District. The proposed R-5-A Zone District is entirely consistent with the Comprehensive Plan's moderate density residential land use designation for this property. The PUD related SP-1 Zone District for the Community Service Center Campus is consistent with the surrounding institutional uses along Elvans and Morris Roads.

IV. EVALUATION STANDARDS

Section 2403 of the Zoning Regulations provides the standards for evaluating a PUD application. In deciding a PUD application, the 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" (See Section 2403.8). In order to approve a PUD application, the Commission must find that the impact of the project on the surrounding area is either favorable,

capable of being mitigated, or acceptable given the quality of the public benefits in the project.
(See Section 2403.3.)

A. Public Benefits and Project Amenities

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high quality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning.

1. Housing and Affordable Housing

Pursuant to Section 2403.9(f) of the Zoning Regulations, the PUD guidelines state that the production of housing and affordable housing is a public benefit that the PUD process is designed to encourage. This project will create approximately 203 residential units on a five acre parcel that is currently unimproved. The project will fully satisfy the Inclusionary Zoning requirements and all of the other residential units in the project will be reserved for families earning up to 60% of AMI.

2. Social Services/Facilities

Section 2403.9(g) lists social services/facilities as a public benefits and project amenities for a PUD project. This project will include 30 PSH units and related social services, as well as an entire community services campus. The social services programs and facilities included in this project will benefit residents of the surrounding neighborhood, as well as the residents of this project.

3. Urban Design, Architecture, Landscaping, or Creation of Open Spaces

Section 2403.9(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. As shown in the detailed plans, elevations, and sections included in Exhibit A, the proposed project exhibits all of the characteristics of exemplary urban design and

architecture. The massing, height, and articulation of the residential buildings have been carefully studied in order to create a project that provides new housing opportunities for the surrounding community, yet is also in keeping with the surrounding buildings and uses.

4. Site Planning, and Efficient and Economical Land Uses

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 proposed site plan effectively utilizes the significant grades on the site to create a significant number of new residential units. The parking spaces are effectively screened from the surrounding public streets and include appropriate landscaping and shading treatments. Green areas are provided throughout the project, as well as public sidewalks and street trees. A series of landscaped retaining walls seamlessly integrates the upper and lower parts of the property together.

5. Effective and Safe Vehicular and Pedestrian Access

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities. The proposed residential community will only require one curb cut along Stanton Road and one curb cut along Pomeroy Road. The proposed parking ratio of 0.83 parking spaces per residential unit is generally consistent with car ownership rates in Ward 8 and the surrounding neighborhoods. The number of vehicular trips generated by the proposed amount of parking is not likely to result in any adverse impact on the surrounding transportation network.

In addition, the Applicant is proposing to construct sidewalks along Stanton and Pomeroy Roads adjacent to the Subject Property. There are currently no sidewalks in these locations. The creation of these sidewalks will create a safer and pedestrian friendly environment.

The Applicant and its traffic and parking consultant will work with representatives of the District Department of Transportation (DDOT) and OP, as well as members of the surrounding Fort Stanton community, to address any traffic or parking related impacts associated with this PUD project.

6. Environmental Benefits

The Applicant is committed to creating an environmentally sensitive and sustainable development. The PUD project is designed to be able to achieve Green Communities certification. A conceptual green communities checklist is attached as Exhibit F. No adverse environmental impact will result from the construction of this project. The project's proposed stormwater management and erosion control plans will minimize impact on the adjacent properties and existing stormwater systems. The requisite erosion control procedures stipulated by the District will be implemented during construction of the project.

7. Uses of Special Value

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 PUD approved by the Zoning Commission in Case No. 05-35 included financial contributions for:

- Public Space Improvements in the Community – the Applicant was to purchase trash cans, decorative pole banners, and decorative pole brackets for placement in the surrounding neighborhoods;
- Fort Stanton Recreation Center – for the purchase of computers to be located at the Fort Stanton Recreation Center; and
- Signage in the Fort Stanton and Hillsdale Neighborhoods – the Applicant was required to create and install three signs welcoming visitors to the Fort Stanton and Hillsdale neighborhoods.

Representatives of the Applicant have already met with the ANC 8B04 Commissioner regarding this project and a community presentation is scheduled for June 22, 2013. As this case moves towards a public hearing, the Applicant will continue to engage with community

stakeholders in creating an appropriate community amenities package and to see if any of the components of the previous community amenities package should be retained or amended.

8. Revenue for the District

Section 2403.9(i) states that “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 creation of approximately 200 new households will result in the generation of significant additional tax revenues in the form of real estate and income taxes for the District.

9. First Source Employment Program

According to Section 2403.9(e), “employment and training opportunities” are representative public benefits and project amenities. Therefore, the Applicant will enter into an agreement to participate in the Department of Employment Services (“DOES”) First Source Employment Program to promote and encourage the hiring of District of Columbia residents. The Applicant will also enter into a CBE agreement with the Department of Small and Local Business Development.

10. Comprehensive Plan

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 in Section V, the PUD is consistent with and furthers many additional elements and goals of the Comprehensive Plan.

11. Public Benefits of the Project

The annotated table(s) required by Section 2403.11 of the Zoning Regulations are found in Exhibit A. Sections 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.

This PUD project will include many, if not all, of the attributes of PUD projects that have been recently approved by the Zoning Commission, including:

- exemplary/superior architecture;
- affordable housing;
- permanent supportive housing; and
- community service uses.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The District's Comprehensive Plan includes city wide elements which establish policies for the development of the District of Columbia as a whole and Area elements which highlight the policies of specific areas within the District. The proposed PUD and Zoning Map Amendment application is consistent with and fosters numerous policies and action items enumerated in both the citywide Elements and the relevant area element of the District's Comprehensive Plan.

City Wide Elements

This project is strongly supported by the Comprehensive Plan's Housing Element. The Comprehensive Plan's Housing Element includes the following policies that are supported by this project:

Policy 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.

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.

This project complies with these Policies of the Housing Element by providing over 200 residential units and by meeting the needs of some of the District's most vulnerable population. Thirty of the 200 units in this project are permanent supportive housing units that are reserved for people that have a history of homelessness. Although families living in these units are not technically defined as "special needs", the families in this project and those of special needs share many similarities. The housing element stresses that housing for special needs should be permanent, integrated throughout the city instead of segregated and accompanied by services that support the population being housed (H-4.1). This project meets each of those requirements. It is permanent, it is inconspicuously integrated into the other residential units, and the services that the residents need will be provided directly on the property.

In addition to expanding the supply of affordable housing and assisting residents with special needs, this project also includes a community service center campus. The campus is anticipated to include an early childhood development center, job training programs, activities for youth such as mentoring and parenting support, space for health education or screening, and activity space for neighbor organization and civic groups. The community service center campus is strongly supported by the housing, economic development, and community services and facilities elements of the Comprehensive Plan. The Housing Element states that development should take a whole neighborhood approach by ensuring that construction of housing is accompanied by concurrent programs to improve neighborhood services (H-1.4.6). The Community Services and Facilities Element has a goal of providing high quality, accessible, efficiently managed community facilities that enhance the well being of current and future District residents . It specifically highlights the importance of affordable health services and permitting new early childhood development centers (CSF 2.1/2.2). Additionally, the Economic

Development Element focuses on the future of the District's economy and the importance of workforce development(ED-4.2). This project will be successful in accomplishing each of these Element's goals.

The Comprehensive Plan's Urban Design Element includes the following policies which are furthered by the PUD project:

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.

The high levels of architectural design and quality of materials used in this project will serve as the standard for future development in the area.

Area Element

The Comprehensive Plan breaks the city down into different areas. This project is located in the Far Southeast/Southwest area and is consistent with the Comprehensive Plan's goals and policies. The plan for the Far Southeast/ Southwest area seeks to concentrate housing. The plan seeks to support low to moderate housing density and seeks to support infill housing development (FSS- 2.3.3/1.1.4). The plan also supports the inclusion of workforce development centers and additional health care and social service facilities (FSS- 1.1.11/1.2.1). This project is in compliance with these goals. The community service center campus is a social service facility where members of the community will be able to receive job training and health education/screening.

As noted above, the proposed PUD and Zoning Map Amendment application is consistent with and fosters numerous policies and action items enumerated in the Comprehensive Plan.

VI. CONCLUSION

For the foregoing reasons, the Applicant submits that the consolidated PUD, first stage PUD, and Zoning Map Amendment applications meet the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment (for the proposed residential community); provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD, first stage PUD, and Zoning Map amendment applications should be approved and adopted by the Zoning Commission. Accordingly, the Applicant respectfully requests that the Zoning Commission set down this project for a public hearing.

Respectfully submitted,

GOULSTON & STORRS

A handwritten signature in black ink, appearing to read "Paul T. S.", written over a horizontal line.

Paul Tummonds