

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director Development Review and Historic Preservation

DATE: August 31, 2016

SUBJECT: **Final Report** for ZC Case No. 15-21, Kenilworth Courts – First Stage PUD, Consolidated PUD and PUD Related Map Amendment

This OP report for Zoning Commission Case 15-21, Kenilworth Courts, is being submitted less than 10 days prior to the Zoning Commission’s Public Meeting because additional information from the applicant necessary to complete the analysis was not provided to OP until shortly before it was due to be filed. The Office of Planning respectfully requests that the Commission waive its rule and accept this report into the record.

I. BACKGROUND

The subject application was reviewed by the Commission at its meeting of November 23, 2015, at which time the Commission did not set the application down because:

1. The applicant did not submit a letter from DHCD requesting to waive the normal hearing fee to permit the construction of a low or moderate income subsidized housing development that receives funding from a recognized District or Federal government housing subsidy program; and
2. The list of issues contained in the OP setdown report.

The “Request for Waiver of Portion of Hearing Fee,” dated December 7, 2015 (Exhibit 15) was submitted by the applicant on December 9, 2015. At its public meeting on December 14, 2015, the Commission set down the subject application for the following:

1. A First-Stage Planned Unit Development (PUD);
2. Consolidated PUD for a portion of the site; and
3. Related Map Amendment from R-5-A to R-5-B and C-2-A, and R-1-B to R-5-B, as the application was filed and set down prior to the effective date of ZR-16, the old zoning regulations, ZR-58, apply to this application.

A summary of the Zoning Commission comments from the setdown meeting with the applicant’s responses can be found in Section VI of this report.

II. SUMMARY

The Office of Planning (OP) discussed with the applicant a number of issues that require clarification regarding the application. The applicant has positively responded to many of them, particularly building design related concerns raised by OP and the Commission at the setdown meeting. A number of issues remain to be fully resolved, as raised by OP, DDOT and DOEE (noted below). Many are issues that could be addressed at or subsequent to the public hearing.

However, recently the Kenilworth Courts Residents Council, which represents residents of the existing Kenilworth Courts neighborhood, submitted a party status request in opposition to the application (Exhibit 29), particularly citing concerns regarding the Relocation Plan and the adequate provision and placement of larger sized units. The need for an acceptable and proactive relocation plan has been discussed with the applicant since the earliest stages of this PUD review and OP understands from the applicant that there have been many discussions with residents on this issue. The applicant informed OP that revisions to the Relocation Plan are being discussed with the residents, and meetings between the applicant and the residents have been scheduled for August 31 and September 1, 2016. OP supports these continuing conversations and the resolution of these issues. Pending the resolution of these continued discussions, OP is withholding making a final recommendation, which will be provided at or prior to the public hearing on this case.

In addition to resolving the relocation and unit size issues, OP also recommends that the applicant adequately address the following issues brought forward by OP, SHPO, DDOT, DC Water and DOEE in the record:

1. Continue to work with the DC State Historic Preservation Officer (SHPO) on the preparation of a detailed work plan for review and approval by SHPO for a Phase 1B Archeological Investigation before any construction may begin;
2. Work with DDOT on a more substantial TDM plan and a Loading Management Plan;
3. Work with DC Water to ensure the adequacy of the sanitary sewer system to service the proposed development before construction may begin;
4. Work with DOEE on the provision of electric charging stations within the private townhouse garages;
5. Update Sheets S-16, Building Identification Diagram, and Sheet S-18, Stage I PUD Lot Analysis for consistency, and update S-16 to clearly differentiate between the buildings requiring side yard versus rear yard relief, and specifically how much relief is necessary for each individual structure;
6. Provide additional information documenting that the proposed private alley north of Quarles Street will be adequate to provide the functions it is intended to serve;
7. Submit Sheet L-510, Tree Canopy Requirements, to the record for adequate review;
8. Submit an Enterprise Green Communities Checklist, required of sites within the Anacostia Watershed Development Zone; and
9. Provide fencing around all sides of all townhouse rear yards.

Finally, OP supports the following comments made to OP by ANC SMD 7D06 Commissioner:

1. Consider locating a retail food store on the first floor space of the apartment building within the consolidated portion of the site for the Consolidated portion of the site to serve the community; and
2. Work with the Public Space Committee to locate additional trash receptacles within public space for the collection of incidental trash throughout the PUD.

III. SITE AND AREA DESCRIPTION

Location: Square 5113, Lots 5 through 9; Square 5114, Lot 10; and Square 5116, Lots 164, 165, 172 through 180 and 186

Ward and ANC: Ward 7, ANC 7D 03

Applicants: District of Columbia Housing Authority, The Michaels Development Company and The Warrenton Group

PUD-Related Zoning: R-5-A to R-5-B and C-2-A; and R-1-B to R-5-B

Property Size: 766,650 square feet (17.6 acres)

Proposal: Redevelopment of the property into a mixed-use mixed-income development of approximately 530 townhouse and apartment dwelling units, and office, retail and/or community space. The application includes a Consolidated PUD portion (an apartment building, a senior citizen apartment building, townhouses and stacked flats) and a Stage 1 portion (three apartment buildings, townhouses and stacked flats).

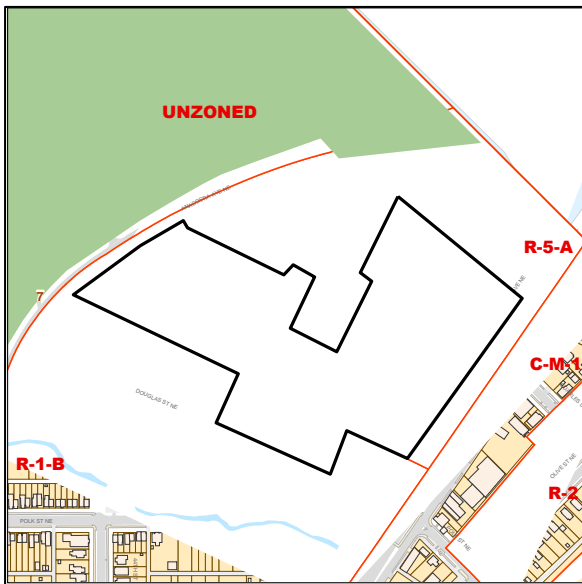
The entire PUD is shown on the following page with a solid black line on the Zoning Map above. Properties surrounding the site include:

North: Public housing, a small commercial building and privately owned vacant land within the R-5-A zone.

South: Along Douglas Street, single-family detached dwellings and churches within the R-1-B zone.

East: Across Kenilworth Avenue, a mixture of residences, houses of worship and auto-related uses within the C-M-1 zone.

West: Across Anacostia Avenue, Kenilworth Aquatic Gardens (National Park Service), including athletic fields, on unzoned land.



Zoning Map (with existing development)



Proposed Site Plan

IV. CHANGES TO THE PROPOSAL SINCE SETDOWN

A complete discussion of the originally proposed PUD can be found in the OP Setdown Report dated November 13, 2015 (Case 15-21, Exhibit 13, Section IV, Project Description and Analysis, including a complete description of the three phases of the PUD, and the consolidated and first phase requests. Since setdown, the applicant has completed revisions to the plan and supplemented the application to address some of the comments received at the meeting.

A First Source Employment Agreement (Exhibit 18D) and a Relocation Plan (Exhibit 18C) were prepared and submitted to the file by the applicant.

Changes to the plans were also made in response to comments from the Commission and OP, described more fully below. Additional detail was provided for the buildings contained within the consolidated portion of the PUD, which includes apartment buildings 3 and 4, and some of the lower density housing.

Apartment Building 3 (Multi-family Building): Minor changes are proposed for this building and details were added to the plan. Two benches and a trash receptacle are proposed for the Kenilworth Avenue frontage. The benches would be in colors to match the building. Foundation shrubbery would be provided along the Ponds Street frontage.

Apartment Building 4 (Senior Building): Similar to Apartment Building 3, minor changes were made to this building and details added to the plan. A raised planter and flag pole are proposed to be added to the public plaza at the corner of Kenilworth Avenue and Ponds Street extended, and foundation shrubbery planted around the base of the building facing Kenilworth Avenue and Ponds Street. The plaza would be paved with permeable paving. Benches and a trash receptacle are proposed to be provided around the building entrance, with pedestrian light poles to illuminate the area after dark. Six-foot wide sidewalks and street trees would be

provided along the Ponds Street and Kenilworth Avenue frontages, and a bicycle rack would be provided adjacent to the plaza. Ground floor units facing Ponds Street would be improved with patios connecting to the public sidewalk. Colors used in the façade depicted on the sheets submitted to the file have been made bolder. Submission of material samples at hearing will be necessary to more accurately assess the colors.

Lower Density Housing: Significant modifications were made to the architectural elements of the lower density housing. Individual townhouses were made to appear distinct from the adjoining units and not as one large building. End units were redesigned in a manner reminiscent of some of the existing housing within the surrounding neighborhood. OP is supportive of this design direction. Perspectives were provided to better depict the roof lines as they would appear from the street. Down spouts were added to the elevation drawings of the townhouses (sheets A-22 and A-23).

Six longer strings of townhouses, resulting in groups of between seven and ten townhouses, some with three-unit apartment buildings on the end, were created, reducing the amount of side yard relief required. Side yard relief would still be required for three townhouses. Six-foot high board-on-board fencing was added to separate the rear yards of those townhouses provided with rear yards, but for some of the units only along the sides. Additional fencing across the back of every rear yard would add an element of privacy and utility and therefore should be provided.

Transportation: Since setdown the applicant has provided additional detail on the widths of the public streets and alleys (see sheets CIV 400-430.) A portion of the alley serving the three apartment buildings north of Quarles Street has now been designated as private to assuage DDOT concerns regarding the design of this alley. The applicant should continue to work with DDOT to ensure that although the alley will no longer need to be designed to public alley standards, that it can accommodate the needs it is intended to serve.

Street lights are proposed to be in conformance with DDOT standards, with public space lighting utilizing teardrop pedant fixtures and spaced between sixty and ninety feet on center. Alley lighting would be placed on poles or attached to structures as required.

Environment: The applicant provided additional information regarding tree canopy requirements, as the site is located within the Anacostia Waterfront Development Zone (AWDZ). The application indicates that this is documented on Sheet L-510, which has not been submitted to the record and needs to be for adequate review.

Sites within the AWDZ are required to conform to Enterprise Green Communities, including the subject property. As yet no checklist has been submitted to the record, and the applicant has indicated that this will be provided at the public hearing.

Photovoltaic panels are proposed for the roofs of the apartment building and the senior citizen building to provide energy for the common spaces within those buildings within the consolidated portion of the PUD, and on the roofs of the townhouses to provide energy to the owners of those units. OP and DOEE are supportive of this initiative. A revised Sheet A-18 depicts the locations of those panels on the apartment buildings only. No additional information was provided on the

provision of electric car charging facilities for the townhouse units improved with a private garage.

V. FLEXIBILITY

The applicant is requesting a PUD-related map-amendment from:

- R-5-A to R-5-B and C-2-A for a portion of the site fronting on Kenilworth Avenue within Phase I;
- R-1-B to R-5-B for the lots fronting on Douglas Street; and
- R-5-A to R-5-B for the remainder of the site.

Within the portion of the PUD for which Stage 1 approval is requested, relief from parking and loading is requested for each of the three multi-family buildings north of Quarles Street, and side and rear yard is requested for the smallest of the three buildings. Within the consolidated portion of the PUD flexibility is requested for the large apartment building for lot occupancy, parking and loading. Relief from parking, side yard and rear yard is requested for the townhouses and three-family apartment buildings. Since the application was set down by the Commission the applicant has reduced the extent to which relief from side yard is required.

First Stage PUD

- a. **Off-Street Parking:** The application requests flexibility for the rental units only, with off-street parking provided as required for all home-ownership units. Two-hundred spaces are required for the rental units, with 150 proposed. Relief is requested primarily for the apartment buildings, the housing located closer to Kenilworth Avenue and public transportation and the Deanwood Metrorail station, with less relief requested for the lower density housing. The applicable Zoning Regulations require one parking space for every townhouse unit, and one space for every two apartment style dwelling units. However, Sheet S-16, Building Identification Diagram/Areas of Flexibility, which includes a table indicating the lots for which parking relief is requested, is not consistent with Sheet S-18, Stage I PUD Analysis. The applicant should correct these plans be in agreement with other.
- b. **Side Yard:** The application requests flexibility for one of the apartment buildings north of Quarles Street (8 feet required; 5 feet proposed) and for some of the lower density housing west of 45th Street (eight feet is required, with side yards between four and six feet proposed). The applicant should provide additional detail on Sheet S-16, specifically identifying which units require how much relief.
- c. **Rear Yard:** A fifteen-foot deep rear yard is required for most of the structures within the first-stage PUD, although two of the apartment buildings require a rear yard of 16.67 feet. The majority of the rear yards are proposed to be five feet deep. Additional information should be provided describing specifically which of the rental units require how much relief.
- d. **Lot Occupancy:** The largest increases in lot occupancy are requested for the two larger apartment buildings north of Quarles Street, with 60% required and 79.32 and 83.77

percent proposed. For the remainder of the Stage 1 portion of the PUD the request is less, with 61.54 to 68.63 percent proposed.

Consolidated PUD

- a. **Off-Street Parking:** Thirty-six to forty off-street parking spaces would be required for the apartment building proposed for Lot 3B. Flexibility is sought from this regulation to permit thirty spaces. Fifty-two spaces are required for the lower density housing within this portion of the PUD, and forty-seven are proposed, a reduction of five. The applicant should provide adequate justification for this relief.
- b. **Side Yard:** Regulations require a minimum side yard of eight feet and the applicant proposes six-foot side yards. By combining strings of townhouses the applicant has minimized the extent to which side yard relief is necessary without reducing the number of dwelling units proposed. OP supports this request.
- c. **Rear Yard:** Regulations require a rear yard for the lower density housing of between fifteen and 16.67 feet, and the applicant proposes a minimum of ten feet for some of the townhouses and stacked flats. Although Sheet S-16 depicts which units require either side or rear yard relief, it fails to differentiate between the units that require which form of relief. Additional information is required indicating specifically which units require what type of yard relief.
- d. **Lot Occupancy:** Regulations permit maximum lot occupancy of sixty percent for apartment buildings. The applicant proposes 87 percent for the apartment building and seeks flexibility. OP supports this request as it will enable the applicant to provide additional units, including a variety of sizes, to accommodate a variety of sizes and types of households.
- e. **Loading:** Regulations require a 55-foot loading berth for the apartment building and the application requests relief for a 30-foot loading berth. Provision of a larger loading berth within this building would reduce the amount of retail space available. As the project is located within an area with few retail choices, OP supports the requested flexibility to loading, but has requested the applicant provide a loading management plan for DDOT review.
- f. **Penthouse Regulations:** One penthouse is proposed for the senior citizen apartment building without the required one-to-one requirement from the south side or rear of the building. Shifting the penthouse toward the center of the building to provide the required setback would interfere with the double-loaded corridor serving the residential floors below, interfering with access to individual units. As it is located at the rear of the building, where it will be less visible from the street. OP supports the requested flexibility to the penthouse regulations.
- g. **IZ Compliance Waiver:** The application requests a waiver from Section 2602.1, Inclusionary Zoning (IZ). Although the development would be 100 percent affordable, it would be financed with Tax Exempt Bonds and 4% Low Income Housing Tax Credits (LIHTC). Additional financing from Housing Production Funds, HOME and CDBG, which are inconsistent with IZ requirements.

VI. COMMISSION CONCERNS AND OFFICE OF PLANNING SETDOWN COMMENTS

On April 29, 2016 the applicant filed revised plans (exhibits 18A1 through 18A14) in response to comments received at the Commission’s public meeting on December 14, 2015. A prehearing statement was also filed on April 29, 2016 (Exhibit 18G). A summary of the Commission’s comments together with the applicant’s responses is listed below. Additional information was forwarded to OP on August 26, 2016.

Commission/OP Comment	Applicant Response	OP Analysis
<p>1. Additional information regarding the relocation strategy for current tenants that would be displaced during construction, especially for the consolidated portion of the PUD.</p>	<p>The “Kenilworth Courts Relocation Plan” dated April 29, 2016 was submitted to the file (Exhibit 18C).</p>	<p>See additional discussion under Section X of this report.</p>
<p>2. Clarity and detail on the overall unit count and target incomes. Is the application in compliance with IZ? How long are the units to remain affordable? What monetary resources are being used?</p>	<p>A waiver is requested from Sec. 2602.1, IZ applicability. Although 100% affordable, it will be financed with Tax Exempt Bonds and 4% Low Income Housing Tax Credits (LIHTC), which include 15 to 30 year affordability periods with extended use agreements. Additional financing will be applied for in response to DC Department of Housing & Community Development Consolidated Request for Proposals Funding, including Housing Production Funds, HOME, and CDBG, which entail term and other requirements inconsistent with IZ.</p>	<p>The applicant has indicated that a waiver to IZ applicability is requested; OP is supportive of the overall affordability proposed for the development.</p>
<p>3. Additional details, including roof plans and streetscape renderings.</p>	<p>Sheet A-18, Roof Plans, depicts the elevator overrides, stairwell access and condenser units on the roofs of the multi-family buildings within the consolidated PUD. Additional streetscape renderings were provided.</p>	<p>Sheet A-18 should either document that all roof structures are zoning compliant or the application should request flexibility.</p>

Commission/OP Comment	Applicant Response	OP Analysis
4. A plan for refuse collection.	Refuse to be collected from the alleys from all residences except for large apartment building, for which refuse collection will be private.	A trash room would be provided in each of the multi-family buildings for refuse storage. Cans for the collection of incidental trash are proposed to the front of the senior building and the apartment building proposed within the consolidated portion of the PUD. These cans should be provided throughout the PUD.
5. Detailed information regarding specifically which buildings require flexibility for parking, rear yard, side yard and loading.	Sheet S-16 (Exhibit 18A5), dated April 29, 2016, identifies which buildings require relief from parking, lot occupancy and/or side and rear lot.	The areas for which flexibility is requested are depicted and further enumerated on sheets S-17 and S-18 (Exhibit 18A5). Additional clarity should be added to these plans depicting specifically which units require relief.
6. Information regarding the archeological resources of the site in coordination with the State Historic Preservation Officer.	The State Historic Preservation Officer (SHPO) has reviewed and approved an initial archeological work plan, and field work is underway and pending completion.	The applicant continues to work with the SHPO and additional investigation is in process.
7. A sheet indicating the building numbers and lot numbers as referenced in the Justification Statement	Sheet S-16 identifies the lot numbers as referenced in the Justification Statement.	Sheet S-16 (Exhibit 18A5) identifies the blocks of buildings, with additional identification provided for individual units for which relief is requested.
8. Consolidate rows of townhouses into strings of eight to reduce the amount of flexibility needed for side yards.	Sheet S-06, dated April 18, 2016 and titled "Illustrative Site Plan", depicts six locations where rows of townhouses were consolidated.	The consolidation of rows of townhouses reduces the amount of flexibility required and provides an improved streetscape, while not affecting the number of dwelling units provided.
9. Add privacy fencing to townhouses with rear yards.	Six-foot high board-on-board fencing proposed for portions of the townhouses with rear yards.	Fencing will add a sense of privacy and personal domain over private rear yards. However, the entire rear yard needs to be enclosed for all townhouses to accomplish this. (See Sheet L-220, Exhibit 18A13).

Commission/OP Comment	Applicant Response	OP Analysis
10. Design and details need work. Normal standards not met.	Additional details were added to the drawings.	See Section IV of this report for additional discussion on revisions to the proposed buildings.
11. Mishmash of styles. Make each townhouse appear as a separate unit. More accurately depict the townhouse roof lines.	The rows of townhouses were redesigned to appear as separate units. The small apartment buildings separating the townhouses from the large apartment houses were redesigned with a more industrial theme to bridge the transition.	The townhouses have been revised so each unit appears separate. The redesigned small apartment buildings aid in the transition between the multi-family buildings, with their more angular shape and coloring, to the lower height and number of floors of the townhouses. Downspouts were added.

VII. COMPREHENSIVE PLAN

As fully discussed in the OP setdown report dated November 13, 2015 (Exhibit 13), the application would further major policies from various elements of the Comprehensive Plan, including the Framework; Land Use; Transportation; Housing; Environmental Protection; Parks, Recreation and Open Space; Urban Design Citywide Elements, and Far Northeast and Southeast Area Element.

The proposal is not inconsistent with the Generalized Policy Map, which designates the majority of the site as Neighborhood Enhancement Area, with the exception of the portion of the lots fronting on Douglas Street, which are designated as a Neighborhood Conservation Area.

VIII. ZONING

R-5-B is requested for the majority of the site to accommodate the density, height and massing of housing proposed within the interior of the site. The R-5-B zone would allow for building heights up to 45 and fifty feet to accommodate the two and three story buildings proposed, and lot occupancies up to 47 percent to support the proposed layout of the site. C-2-A is requested for a portion of the site fronting on Kenilworth Avenue to accommodate the potential of commercial uses on the ground floor of the buildings facing Kenilworth Avenue, as well as the apartment style of residential units.

The following tables are a comparison of the R-5-A and R-5-B PUD, and R-5-A and C-2-A PUD for the consolidated portion of the PUD. Within the portion of the PUD proposed for R-5-B, the applicant would gain ten feet in building height and an increase in FAR of 0.3. Within the portion of the PUD proposed for C-2-A, the applicant would gain ten feet in building height and increase in FAR of 2.54.

	R-5-A	R-5-B PUD	Proposal
Height (max.)	40 feet/3 stories	60 feet	50 feet
FAR (max.)	0.9	3.0	1.2
Lot Occupancy (max.)	40% (60% for churches or public schools)	60%	40-90%
Rear Yard (min.)	20 feet	15 feet	Min. 13 feet
Side Yard (min.)	8 feet	8 feet	Min. 6 feet
Parking (min.)	1/unit (apts., flats, one-family)	1/ unit for flats, one-family; ½ for apts. or 53 spaces	46 spaces

Area	R-5-A	R-5-B PUD	C-2-A PUD	Proposal
Height (max.)	40 feet/3 stories	60 feet	65 feet	Up to 50 feet
FAR (max.)	0.9	3.0	3.0 residential 2.0 nonresidential limited	2.63 (C-2-A and 1.20 (R-5-B)
Lot Occupancy (max.)	40% (60% for churches or public schools)	60%	60% residential 100% nonresidential	Up to 87% (multi-family bldg.)
Rear Yard (min.)	20 feet	15-16.67 feet	15 feet	16.67 feet
Side Yard (min.)	8 feet	8 feet	8 feet	6 feet (THs & stacked flats)
Parking (min.)	1/unit for apt bldg. (non-senior)		1/ 2 units for apt bldg. (non-senior) or 36-40 spaces	30 spaces
-Senior Bldg.	1/6 units		1/6 units	1/6 units

IX. PURPOSE AND EVALUATION STANDARDS OF A PUD

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Chapter 24. The PUD process is “designed to encourage high quality developments that provide public benefits.” Through the flexibility of the PUD process, a development that provides amenity to the surrounding neighborhood can be achieved.

The applicant is requesting approval of a consolidated PUD for a portion of the site. The PUD standards state that the “impact of the project on the surrounding area and upon the operations of city services and facilities shall not 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” (§ 2403.3).

X. PUBLIC BENEFITS AND AMENITIES

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, § 2403.8 states that “the

Commission shall 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.” Sections 2403.9 and 2403.10 state that a project must be acceptable in all the listed proffer categories, and must be superior in many. To assist in the evaluation, the applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to typical development of the type proposed...” (§ 2403.12).

The PUD related map amendments would increase the FAR from applicant 0.9 to 1.2 and increase the building height by ten feet for the portion of the PUD proposed for R-5-B, and from 0.9 to 2.63 and ten feet for the portion proposed for C-2-A.

The first stage PUD includes a number of benefits for the entire project, including:

1. Stabilizing and Improving the District’s Neighborhoods: The proposed housing will provide additional housing and introduce a greater mix of housing affordability. This, combined with the addition of neighborhood-serving retail and support services, improved circulation patterns, and the elimination of the superblocks will result in a more stable, complete community. However, the provision of a comprehensive and acceptable relocation plan is a critical component of this objective, and it remains to be resolved with the tenants.

2. Housing and Affordable Housing (Sec. 2403.9(f)): The proposed PUD includes affordable housing, including a majority of units for very low income (less than 50% AMI), above and beyond that which is required through Inclusionary Zoning or required for replacement of existing units, in addition to new market rate housing.

Phased Program	LITHC/DCHA	LITHTC	Other Rental	For Sale	TOTAL
	Extreme & Very Low 30 and 50% AMI	Low Income 60% AMI	Moderate 60-80% AMI	Workforce / Market rate 80-120% AMI	
Affordability Period	Minimum 40 years	Minimum 30 years	Minimum 30 years	N/A	
Consolidated PUD/Phase 1 Rental	118	49		0	167
Stage 1 PUD/Phases II and III	172	84	65	0	321
Stage 1 PUD/Phase III (For Sale)	0	0		42	42
TOTAL	390	133	65	42	530

3. Urban Design, Architecture and Landscaping: The proposed PUD would eliminate the super-block design of the existing neighborhood, improving the connectivity of neighborhood, with increased density at a site located approximately 0.6 miles from the Deanwood Metrorail station. The interior of the PUD would include traditional architecture, with larger apartment buildings with a modern theme buffering the traffic noise from Kenilworth Avenue, although additional information regarding how the chosen materials and details are of a high quality anticipated in a PUD.
4. Effective and Safe Vehicular and Pedestrian Access: A new pattern of public streets would provide improved connectivity, eliminating the superblocks, improving pedestrian safety and pedestrian crossing opportunities. Access to Kenilworth Aquatic Gardens and the Riverwalk Trail system would also be improved. New sidewalks would be provided along all streets, with all off-street parking accessible via public alleys only. Street parking would be permitted where appropriate. The applicant has been in contact with DDOT.
5. Revenue for the District: The new development, including additional housing and market rate housing, will have the opportunity to increase recordation, transfer, property and income taxes for the District, while maintaining a considerable number of very low income housing units.
6. Special Value for the Neighborhood: The proposed PUD would add new residents to the neighborhood, provide housing designed specifically for seniors to meet their needs, and provide for a mix of income levels to stabilize the neighborhood. A new community building with space for community meetings and programs would replace the existing one with a modern facility.
7. Affordable and Workforce Housing: The overall PUD would provide replacement housing for the existing public housing units, additional units for households making up to 120 percent of AMI, 488 rental units for households earning no more than 80 percent AMI and 167 rental units with income no greater than 60 percent AMI.
8. First Source Employment Program: The applicant has prepared and will enter into an agreement to participate with the Department of Employment Services to promote and encourage the hiring of DC residents.

The Office of Planning is supportive of the proposal and accepts that the proffered benefits and amenities would be commensurate with the relatively limited amount of flexibility gained through this PUD, in terms of additional density or height. The applicant proposes to phase in the development, which will serve to minimize displacement during construction, preserving the community to the extent possible.

XI. AGENCY REFERRALS

On July 26, 2016 an interagency meeting was convened at OP. Comments from the following agencies that were in attendance, in addition to OP, are listed below.

- Department of Energy and Environment (DOEE):
- Department of Transportation (DDOT):
- Metropolitan Police Department (MPD): MPD indicated that it had no comments but was available for questions.
- District of Columbia Water and Sewer Authority (DC Water).

The District of Columbia Public Schools (DCPS), in an email to OP dated July 25, 2016, indicated “no comment”.

The Department of Housing and Community Development (DHCD), in an email to OP dated July 25, 2016, stated “[g]iven the significant affordable housing component, I have no further comments or suggestions.”

DDOT informed OP by email on August 15, 2016, that the applicant although the applicant had satisfied most of their concerns, the TDM plan remained insufficient.

DC Water, at the interagency meeting, reported that the sanitary sewer system at the site is at capacity, that it would be difficult to add additional flow and that there are currently no plans in place for the construction of new sewers. Water and storm sewer capacity were reported to be adequate. The applicant will be required to fully address this issue as part of the first building permit applications.

DOEE, at the interagency meeting, reported that the townhouses in the northwest corner of the site adjacent to Anacostia Avenue are proposed to be constructed adjacent to the 500-year floodplain, which may require design modifications to ensure safe egress from those dwellings in the event of a flood. Installation of solar panels on the roofs of the townhouse, for which District funding is available, and electric charging stations in all units improved with private garages was recommended.

Other Comments:

The DC State Historic Preservation Officer (DC SHPO), located within OP, reported that the development team consulted with the DC SHPO and determined that archaeological investigations are required. The applicant hired a consulting firm that exceeds minimum standards, as required, Phase IA investigations were conducted in June 2016 and a management summary was submitted to SHPO for review on June 15, 2016. The results of a geo-archaeological evaluation were positive and a full Phase 1B investigation is required. The applicant discussed the survey with the DC SHPO on August 16, 2016 and the consultant is now

preparing a detailed work plan for the project to be submitted to the SHPO for review and approval before archaeological work can start. A survey schedule has yet to be determined.

XII. COMMUNITY COMMENTS

ANC 7D, at its regularly scheduled meeting of August 20, 2016, voted in opposition to the application and submitted a resolution to this effect along with a series of questions of the applicant, with applicant responses and concerns (Exhibit 31).

Comments from Single Member District Commissioner Lini, ANC 7D06, were received by OP on August 7, 2016 but have not, as of the date of this report, been posted to the record.

The Kenilworth Courts Resident Council filed a party status request in opposition to the application (Exhibit 29), principally citing concerns regarding the relocation plan, and the size and placement of new units.

JS/sjm^{AICP}