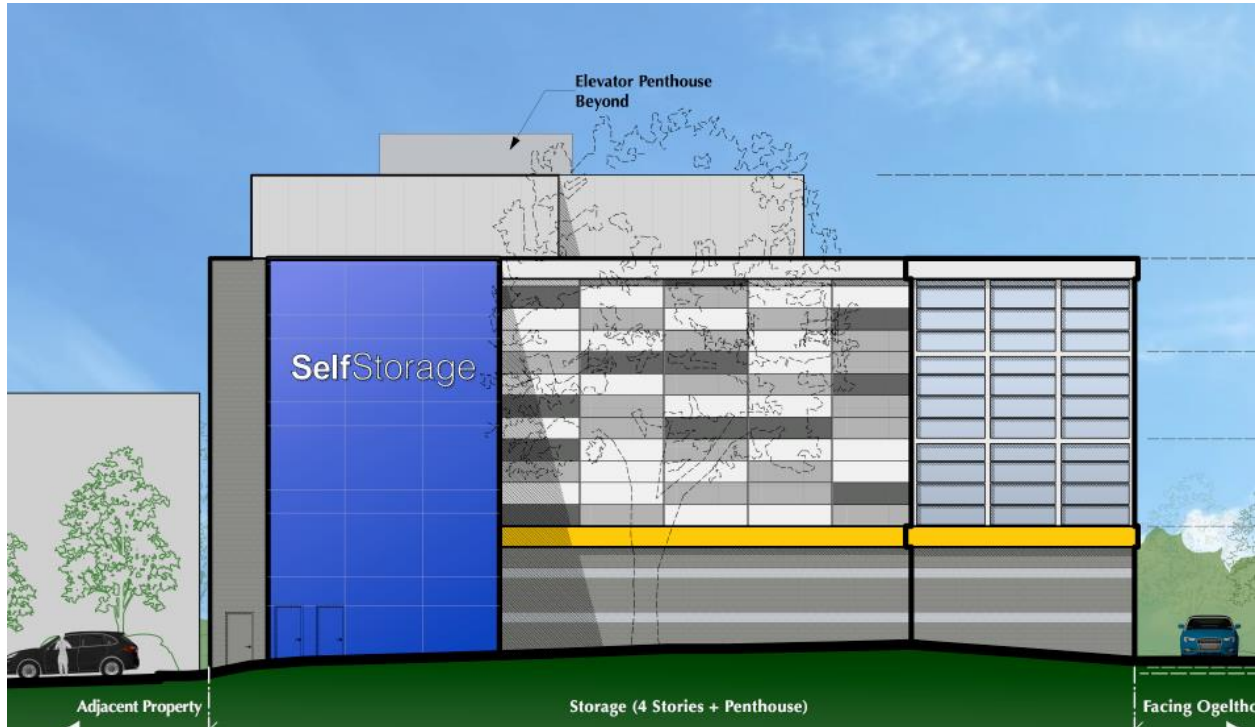


**STATEMENT IN SUPPORT OF
APPLICATION FOR LARGE TRACT REVIEW**



**FOR DEVELOPMENT OF
5901 BLAIR ROAD NW SELF-STORAGE BUILDING
ON SQUARE 3379, LOT 0817 BY
5901 BLAIR RD, LLC**

TABLE OF CONTENTS

	Page
I. Summary	1
II. Jurisdiction, Scope of Review, and Compliance with Filing Requirements.....	1
III. Description of the Property and Surrounding Neighborhood	3
IV. Description of the Project	4
V. Relationship of Project to the Comprehensive Plan	7
a. Future Land Use Map and Generalized Policy Map.....	7
b. District Elements of the Comprehensive Plan	8
c. Contribution of Project to City and Community Goals and Policies.....	15
VI. Project Impacts.....	17
a. Traffic Impact	17

DEVELOPMENT TEAM

APPLICANT:	5901 Blair Rd, LLC 1501 11 th Street NW, Ste 2 Washington, DC 20001
ARCHITECT:	Butz-Wilbern Ltd 800 West Broad Street, Suite 400 Falls Church, VA 22046
CIVIL ENGINEER/LANDSCAPE:	CAS Engineering 1001 Connecticut Avenue, NW, Suite 401 Washington, DC 20036
TRANSPORTATION ENGINEER:	Gorove/Slade Associates, Inc. Transportation Planners and Engineers 1140 Connecticut Avenue, NW, Suite 600 Washington, DC 20036
LAND USE COUNSEL:	Cozen O'Connor 1200 19 th Street NW, Suite 300 Washington, DC 20036

I. Summary

This statement and the attachments hereto comprise the application (the “**Application**”) of 5901 Blair Rd LLC (the “**Applicant**”) for Large Tract Review (“**LTR**”) by the District of Columbia Office of Planning (“**OP**”) and other District agencies for construction of an approximately 94,660¹ gross square foot, four-story (plus penthouse), self-storage building (the “**Project**”) at the property with an address of 5901 Blair Road, NW (Square 3379, Lot 0817) (the “**Property**”). The Property is located in the PDR-1 zone.

The Project replaces an existing underutilized one-story commercial structure² and will activate Blair Road increasing safety and eyes on the street.

II. Jurisdiction, Scope of Review, and Compliance with Filing Requirements

The Project is subject to LTR because it contains more than 50,000 square feet of gross floor area, as shown on the plans attached at Exhibit E (the “Plans”) and is not otherwise exempt from LTR. *See* 10 DCMR §§ 2300.1(a) and 2304 (10 DCMR § 2300, et seq. are hereby referred to as the “**LTR Regulations**”). The scope of review for this Application is limited to the Project’s consistency with District laws, regulations, and the Comprehensive Plan for the National Capital (“**Comprehensive Plan**” or “**Plan**”) and its traffic, neighborhood, design, quality of life, and environmental impacts. *Id.* § 2302.1. The attached Zoning Determination Letter memorializes the Project’s general consistency with the applicable Zoning Regulations. The Project is also consistent with applicable elements of the Comprehensive Plan. None of the Project’s impacts, as

¹ The total GFA of the Project is 94,660 square feet. Including the penthouse and bays, the total GFA is 106,305 square feet. For purposes of calculating vehicle parking, bicycle parking, shower and changing facilities and loading requirements, the GFA is 95,794 square feet.

² Applicant received a clearance letter from the Historic Preservation Office, attached at Exhibit I.

described herein, are adverse to the neighborhood of the District as a whole. Accordingly, the Project satisfies the review criteria of Section 2302.1 of the LTR Regulations.

Provided below are the following exhibits and explanations in satisfaction of the filing requirements of Section 2301.3 of the LTR Regulations:

- A completed certification form, in accordance with Section 2301.3(a), is attached at Exhibit A.
- The name, address and signature of all owners, and address of property included in the area to be developed and written evidence of agent authorization, in accordance with Section 2301.3(b), are attached as Exhibits B and C, respectively;
- A map showing the location of the proposed Project and the existing zoning of the site, in accordance with Section 2301.3(c), as well as a photos of the existing conditions of the site and a copy the Future Land Use Map showing the site of the proposed Project, are attached as Exhibit D:
- A statement indicating the contribution of the Project toward implementing City and community goals and policies, in accordance with Section 2301.3(d), is provided in Section IV(c) below;
- A statement indicating the relationship of the proposed development to the objectives of the District Elements of the Comprehensive Plan, in accordance with Section 2301.3(e), is provided in Sections IV(a) and (b) below;
- A general site and development plan, indicating the proposed use, location, dimensions, number of stories and height of building, in accordance with Section 2301.3(f), is included in the Plans attached as Exhibit E;
- A general circulation plan, including the location of vehicular and pedestrian access ways, other public space and the location and number of all off-street parking and loading spaces, loading berths and service delivery spaces, in accordance with Section 2301.3(g), is included in the Plans and Comprehensive Transportation Review (“CTR”) attached as Exhibits E and F;
- Typical floor plans, in accordance with Section 2301.3(h), are included in the Plans attached as Exhibit E;
- A general statement of the approximate schedule of building construction, in accordance with Section 2301.3(i), is discussed in Section III below; and

- Vehicular trip generation, trip assignment and before and after capacity analysis and level of service at critical intersections, in accordance with Section 2301.3(j), is included in the attached Exhibit F.
- Civil Plans, including a storm water management plan illustrating storm water management compliance and a draft Green Area Ratio (“**GAR**”) scorecard are included in the attached Exhibit G.
- Zoning Determination Letter memorializing the Project’s general compliance with the Zoning Regulations is attached at Exhibit H.
- Applicant’s clearance letter from the Historic Preservation Office is attached at Exhibit I.

Accordingly, upon review of this statement and the enclosed materials, the Applicant requests that OP find that this Application satisfies the requirements of LTR.

III. Description of the Property and Surrounding Neighborhood

The Property is owned by the Applicant and consists of approximately 27,074 square feet of land area. The site currently contains a vacant one-story industrial warehouse and adjacent surface parking lot.

The Property is located in the PDR-1 zone in the Ward 4 Brightwood-Manor Park neighborhood. The Property is located at the corner of Blair Road NW and Oglethorpe Street NW. To the northwest of the Property is a Pepco building and directly to the north of the Property is Secure Self-Storage, a self-storage facility. Immediately to the south of the Project, across Oglethorpe Street NW, and to the west, is federal parkland that is part of the District’s Fort Circle Park system. To the east, the Property is adjacent to the Humane Rescue Alliance and Medical Center. Other surrounding industrial uses include, Budget Car and Truck Rental, City Wildlife, LJ Auto Repair, a used-car lot, and industrial buildings owned by Galliher & Huguely Associates. The closest single family residential homes are more than 350 feet to the south.

The site is well-served by mass transportation. The K2 and K6 Metrobus routes, which connect passengers to the Fort Totten and Tacoma Metrorail stations, provide access to multiple

Metrorail lines, MARC and VRE commuter trains, as well as numerous other bus lines, are within a short walk from the Property. The Fort Totten Metro Station is 0.8 miles from the Property. The Property is within the boundaries of Advisory Neighborhood Commission (“ANC”) 4B and is in the 4B06 Single-Member District.

IV. Description of the Project

The Applicant proposes to develop the Property with a four (4) story self-storage establishment with penthouse, all as shown on the Plans. The Project fronts on Oglethorpe Street NW. The Project is in accordance with the Zoning Regulations and will reactivate the site.

Zoning Regulations. The Project is designed to satisfy all of the applicable requirements of the Zoning Regulations and be constructed as a matter-of-right. Therefore, the Project has been designed to be consistent with the Zoning Regulations of the District. The Project is also designed to be consistent with the Building Code as well as environmental and other applicable laws and regulations of the District. Accordingly, this Application satisfies Section 2302.1(a) of the LTR Regulations.

The Zoning Regulations expressly allow a self-storage establishment of this size and height as a matter of right in the PDR-1 zone without location restrictions. 11-U DCMR §§ 801.1(bb); 803.2. Therefore, the Zoning Regulations affirm that the Project is an appropriate use for the Property. In addition, the Project is designed to comply with the noise, emissions, glare, heat, dust, vibration, perimeter security, and power system provisions of the Zoning Regulations. *Id.* § 804.

The Project includes approximately 94,660³ square feet of gross floor area all of which is devoted to self-storage and related uses (e.g., a service office and restrooms). As shown on the Plans, the Project is a compliant four (4) stories, plus an activated penthouse. The building properly

³ The GFA of the Project is 94,660 square feet excluding penthouse and bays. The total GFA, including penthouse and bays, is 106,305 square feet.

utilizes the measuring point for height (“BHMP”) along the Property’s frontage on Oglethorpe Street, NW. The Project will have a maximum height of 50 feet as allowed in the PDR-1 zone and is compliant with the additional height requirements of Subtitle J § 204, as shown on the attached plans and described in the Zoning Determination Letter, attached at Exhibit H. The proposed penthouse is compliant, having one story that will have a maximum height of 10 feet. The overall floor area ratio (“FAR”) of the Project is approximately 3.5, which is permissible for a self-storage use (Production, Distribution and Repair use) pursuant to Table Subtitle J § 202.1. The Project has a compliant rear yard of 22 feet and is compliant with the transitional setback requirements as described in the attached Zoning Determination Letter (Exhibit H). The Project will meet the required GAR of 0.3 via a green roof and permeable pavers, as detailed on the draft GAR scorecard included on Exhibit G. The Project satisfies the parking requirements by including twenty-five (25) parking spaces and two (2) car share spaces as well as five (5) long term bicycle parking spaces for the use of the customers and employees of the Project⁴. As required under Subtitle C § 806, four shower and changing facilities will be located at the same level as the long term bicycle storage. Two (2) compliant loading berths and two compliant (2) loading platforms are also included as part of the Project, as well as a trash area. The Project includes a compliant penthouse with approximately 10,757 square feet of self-storage uses.

Design. The Property is an irregular five-sided lot. The Project accommodates the lot configuration and complies with the Zoning Regulations. The facility will contain a business office, covered parking/loading, bicycle storage with showers and changing facilities that support the self-storage use in addition to the self-storage units. The façade of the Project will consist of

⁴ Pursuant to Subtitle C § 701.5, storage use requires one parking space for every 3,000 square feet of GFA in excess of 3,000 square feet. Therefore $(\text{GFA} - 3,000 \text{ sf}) / 3,000 = (95,794 - 3,000) / 3,000 = 31$ standard spaces required. 31 spaces – 6 per Car Share Reduction = 25 standard spaces + 2 car share spaces required.

split-face masonry along the first floor with decorative insulated metal panels on the upper floors. To break up the visual impact of the building proportions, Exterior Insulation and Finish System (EIFS) cladding will be provided in select locations of the façade. The business office located at the first floor and the upper floors at the intersection of Blair Road and Oglethorpe Street will have storefront glazing systems. The structure of the Project will be supported on shallow foundations, a 1-HR fire rated structural steel grid supporting a 1-HR rated floor system, and a 1-HR fire rated roof. A green roof system design will be located on a majority of the roof which will also house the mechanical equipment. The building will be designed to achieve LEED v4 Certified level per the DC Green Building Act of 2006.

The Project improves upon the current use of the Property by replacing the existing vacant building with a thoughtfully designed Project that serves an in-demand need for self-storage. Such use supports the continued development of residential uses in the District and surrounding neighborhood, many of which are small-footprint residents. It will also enhance safety of the area by reactivating the property.

Access. The Project is integrated into the Blair Road pedestrian network and is accessible via the K2 and K6 Metrobus routes, which provide significant access to other forms of transportation. The Project also accommodates vehicular and bike access via a curb cut from Oglethorpe Street, NW that will be narrowed to 24 feet to satisfy DDOT's standards. The Project will provide a pedestrian entry from Oglethorpe Street NW, and the property line is only 4 feet from the curb line on Oglethorpe Street NW.

Timeline. The Applicant intends to construct the Project in one phase and it anticipates breaking ground on the Project in September 2019 and completing construction in late 2020.

V. Relationship of Project to the Comprehensive Plan

Pursuant to Section 2301.3(e) of the LTR Regulations, this Section V includes a statement indicating the relationship of the proposed Project and the objectives of the District Elements of the Comprehensive Plan. The Project is consistent with the Comprehensive Plan and therefore satisfies Section 2302.1(a) of the LTR Regulations.

a. Future Land Use Map and Generalized Policy Map

The Project is consistent with the designation for the Property on the Comprehensive Plan's maps. The Comprehensive Plan's Future Land Use Map ("FLUM") places the Property in the Production, Distribution, and Repair ("PDR") designation, as shown on Exhibit D. The Property's low-density industrial use is not inconsistent with the FLUM. Also, there are no other non-industrial uses that would be consistent with the FLUM recommendation and the PDR zone. The Property is located within a large, continuous swath of Production, Distribution, and Repair designated land running adjacent to the Metrorail tracks and extending from Riggs Road to the south and Aspen Street to the north. The Property is predominately bounded by other Production, Distribution, and Repair designations, as the PDR zone extends to the northwest, north and east of the Property. Areas designated as Parks, Recreation and Open Space are located to the south and west of the Property. While an area to the northwest of the Property is designated as Low Density Residential, there is currently a Pepco facility located in the portion of that area closest to the northwest corner of the Property, and therefore, there are no residential areas adjacent to the Property. As a more residential-serving PDR use, the Property is appropriately located near the boundary of the PDR areas and nearby residentially zoned areas.

The Property is designated as a Neighborhood Conservation Area on the Comprehensive Plan's Generalized Policy Map, as shown on Exhibit D. The Generalized Policy Map does not recommend the Property for a use change. The Guidelines for interpreting the Generalized Policy

Map note that such Map is “not a zoning map” and is “to be interpreted broadly”. 10-A DCMR § 226(a). As the Property is currently within an area designated for Production, Distribution, and Repair, the Project will be in line with the Neighborhood Conservation Area designation. Therefore, the Neighborhood Conservation Area designation for the Property, the adjacent commercial uses, and the current use of the Property all counsel that the Project is consistent with the Generalized Policy Map. No other, non-industrial use, would be consistent with the Comprehensive Plan.

b. District Elements of the Comprehensive Plan

The Project directly advances relevant District Elements of the Comprehensive Plan. Identified below is the Project’s relationship to policy objectives of the Comprehensive Plan.

1. Land Use Element

The Land Use Element of the Comprehensive Plan establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. The goal of the Land Use Element is to: “Ensure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents and businesses; to sustain, restore or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries” (10 DCMR § 302.1).

Improvement of an underutilized and inefficient use of the lot, protection of PDR uses, and contextual design are attributes of the Project consistent with numerous objectives of the Land Use Element of the Comprehensive Plan. In particular, the Project advances the following policies of the Land Use Element:

- *Policy LU-1.4.1: Infill Development*

- *Policy L U-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings*
- *Policy L U-2.3.1: Managing Non-Residential Uses in Residential Areas*
- *Policy LXJ-2.3.2: Mitigation of Commercial Development Impacts*
- *Policy L U-2-3.3: Buffering Requirements*
- *Policy L U-2.3.4: Transitional and Buffer Zone Districts*

The Project advances the Land Use Element's objectives of encouraging development and revitalization in existing developed areas. The Project is an infill development, as the term is defined in the Plan, and the Project complements the established industrial and commercial character of the surrounding buildings. *See id.* § 307.5. The Project affirmatively advances a pair of the policies that aim to improve the appearance of the District with respect to vacant or underutilized structures. *Id.* §§ 310.3, 310.4. Furthermore, through this LTR process, the Project is subject to review for consistency with District of Columbia laws, potential traffic, neighborhood and design impacts, as well as quality of life and environmental impacts on the surrounding area. As set forth below, the Project's impacts are generally beneficial and not adverse to the neighborhood or are otherwise mitigated. Accordingly, this LTR review and enhanced development standards advance the Plan's policies regarding non-residential uses near residential areas. *Id.* §§ 311.3-311.6.

More broadly, the Project, by virtue of its relatively low-impact use and location in the PDR zone, serves as a buffer between the higher intensity PDR uses that may exist in the area and the nearby uses. Since the Project is in a PDR zone, is designated as PDR in the FLUM, and not recommended for a use change in the Generalized Policy Map, and has a residential- and business-serving function (as opposed to a more intensive industrial or transportation-related use), it is appropriately sited in the PDR area.

- *Policy L XJ-2.4.1: Promotion of Commercial Centers*
- *Policy LU-2.4.2: Hierarchy of Commercial Centers*
- *Policy L U-2.4.5: Encouraging Nodal Development*
- *Policy LU-2.4.6: Scale and Design of New Commercial Uses*

The Project provides a low density industrial use along Blair Road NW that is permitted by the zoning and, importantly, offers job opportunities, albeit geared towards a smaller number of employees, for the local community. *See id.* § 312.5. Along the same lines, the Project's space allows nearby commercial uses a place to store their materials and products. The Project's height and overall density appropriately reinforce the PDR character of the area along Blair Road NW. Further, the building will provide a service use to residents and businesses.. *Id.* §§ 312.6, 312.10. The scale of the Project is consistent with the zoning for the Property and with the surrounding intensities of land use. *Id.* § 312.9

- *Policy LU-3.1.1: Conservation of Industrial Land*
- *Policy LU-3.1.2: Redevelopment of Obsolete Industrial Uses*
- *Policy LU-3.1.3: Location of PDR Areas*
- *Policy L U-3.1.5: Mitigating Industrial Land Use Impacts*

The Comprehensive Plan notes the importance of preserving PDR-zoned areas for uses permitted within such zones, *id.* § 314.7, and the Project advances such objectives. At the same time, the Plan encourages the redevelopment of underutilized and non-productive buildings with modern, higher-value uses in a way to ensure such uses are appropriately buffered and mitigated. *Id.* §§ 314.8, 314.9, 314.11. Clearly, these policy elements are achieved with the Project.

2. Transportation Element

The Project advances the following specific objectives of the Transportation Element of the Plan:

- *Policy T-1.1.4: Transit-Oriented Development*
- *Policy T-l. 3.1: Transit-Accessible Employment*

The Project is well served by public transportation due to its proximity to the K2 and K6 bus lines, which connect the Property to a myriad of other transportation options. *Id.* § 403.10. The Project is less than a mile from the Fort Totten Metro Station and its location relative to bus lines

allows for access by employees and customers who would not need to utilize vehicles to access their storage areas. In addition, the site has access to on-street and off-street bicycle facilities, including bicycle lanes on Kansas Avenue and signed routes on Peabody Street and 3rd Street. In the future, the Metropolitan Branch Trail will pass the Property via a section of Blair Road NW adjacent to the site, making bicycle transportation an increasingly attractive option.

By providing transit-accessible employment to employees of the Project, the Project advances the “Transit-Accessible Footprint” policy of the Transportation Element. *Id.* § 405.11.

- *Policy T-2.4.1: Pedestrian Network*
- *Policy T-2.4.2: Pedestrian Safety*
- *Policy T-2.4.4: Sidewalk Obstructions*

The Project is located in an excellent walking environment along Blair Road and is well-connected to the surrounding pedestrian network. The Project improves the pedestrian experience around the Property by upgrading the streetscape along Blair Road NW, decreasing the existing curb cut on Oglethorpe Street NW, and creating a pedestrian entry from Oglethorpe Street NW. The result is that the Project makes the pedestrian environment more hospitable. *Id.* §§ 410.5, 410.6. As much as is feasible for a PDR use in a PDR zone, the Project is pedestrian-serving, while still accommodating and designed for vehicular users.

3. Environmental 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 including, among others, tree canopy restoration, improving waterways, conserving water and energy, encouraging green building techniques, and reducing storm water runoff. The proposed Project is not inconsistent with the policies of the Environmental Protection Element. Specifically:

- *Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff*
- *Policy E-4.2.3: Control of Urban Runoff*
- *Policy E-2.2.5: Energy Efficient Building and Site Planning*
- *Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency*
- *Policy E-4.3.5: Noise and Land Use Compatibility*

The existing building does not utilize sustainable storm water management practices. While the proposed self-storage facility will occupy the majority of the site, the Project will further the first two policies listed above by reducing runoff and providing improved storm water management through the substantial green roof system. Further, the green roof system will assist in urban heat island reduction, conserve energy, and reduce noise and air pollution. The Project will meet GAR requirements and will be LEED certified.

The Project's GAR and stormwater management infrastructure and plan will satisfy the District's GAR and storm water requirements, as detailed on by Exhibit G. Id. § 613.3. The Project will have an extensive green roof that will cover 12,911 square feet of the roof. In addition, the Project will have 1,552 square feet of permeable pavers, located on the portion of the parking that is not covered by the upper stories and on the east side of the Project along the property line abutting the Humane Society.

The Project furthers the Policy E-2.2.5: Energy Efficient Building and Site Planning by complying with the District's Green Building Act, which includes a heightened level of energy efficiency relative to comparable structures in the regional marketplace. *Id.* § 610.7. Specific Project elements relating to energy efficiency and similar sustainable features are as follows:

- The building will be designed to achieve LEEDv4 Certification pursuant to the District of Columbia Green Building Act of 2006.
- The building design will include an energy efficient thermal envelope and a low-E storefront glazing system.

- Self-storage facilities such as the Project are typically a low occupancy use, therefore each floor is lit by high efficiency fluorescent and LED hallway fixtures that are tied to motion sensors to only come on when triggered by a customer. Therefore, for a majority of the day, hallway fixtures will be turned off so to not waste energy in non-occupied spaces.
- The Project's site lighting will utilize light pollution reduction techniques with full cut-offs and programmable time clocks to reduce usage.
- Any site plantings will be locally appropriate and follow xeriscaping techniques to reduce water use while insuring healthy plant materials.
- The building's mechanical systems will be energy efficient and operate at a wide temperature set to maximize energy savings.
- Plumbing is also kept to a minimum in the Project. With the low number of occupants, restrooms are few and the fixtures within have water sense features. This combination of low use by the customer and demand by the fixture means the total water use of the Project is minimal.
- An approximately 12,911 square foot green roof system will be included that will assist in storm water management, noise reduction, energy conservation, and mitigate the urban heat island.
- Permeable pavers will cover approximately 1,552 of area located on the portion of the parking not covered by the upper stories and on the east property line.

Transportation efficiency is achieved by virtue of the Project's location in the District. The District location reduces the length of District customer's and employee's travel to obtain self-storage services, a facet of the Project that is in keeping with the Plan's objective of "promot[ing]

strategies that reduce motor vehicle emissions in the District and surrounding regions.” *Id.* § 618.10. In this case, the Project provides a service that typically exists primarily in the District’s suburbs and that is typically accessed by vehicle. By locating such service in the District, District residents’ travel time and resulting vehicle emissions are reduced. Further, the Project is not encouraging driving by over-parking spaces for the proposed use.

The Project furthers the District’s goal of noise and land use compatibility by achieving the Plan’s objective of avoiding the siting of noise-generating land uses near residential areas. *See id.* § 620.8. The Project occupies PDR land that could be utilized for much more noise intensive uses. Instead the Project involves a use with a comparatively low noise-profile, thereby buffering the nearby areas from the more intensive activities in the PDR areas that might arise nearby. Also, the Project’s green roof will help buffer noise. Further, as described above, the proposed land use is compatible with other nearby industrial uses.

4. Economic Development Element

The Project advances specific policies of the Economic Development Element of the Comprehensive Plan in many ways, including providing neighborhood-serving commercial activity and PDR-related jobs. In particular, the Project is consistent with the following objectives:

- *Policy ED-2.5.1: Industrial Land Retention*
- *Policy ED-3.1.1: Neighborhood Commercial Vitality*
- *Policy ED-3.1.2: Targeting Commercial Revitalization*
- *Policy ED-2.2.1: Expanding the Retail Sector*

The Project supports the PDR-related objectives of the Plan’s Economic Development Element. *Id.* §§ 711.5, 711.6. Perhaps most importantly, the Project preserves the Property for industrial uses, which are the only uses permitted in the zone.

The Project reactivates an unutilized property, increasing safety and adding to the existing Ward 4 business base. *Id.* §§ 713.5, 713.6. As stated above, the Project also allows nearby small

businesses to utilize its storage space for their goods and materials. This type of storage space is at a premium for District residents and small businesses.

Although the Project's use is not a retail establishment, the Project advances the Plan's objective of providing outlets for District residents to spread their spending within the District rather than to outlying jurisdictions. *See id.* § 708.4. It also allows for small retail and other types of businesses to expand in the vicinity of the Property.

5. Urban Design and Arts and Culture Elements

The Project's thoughtful urban design and architecture advance several of the policies and goals of the Urban Design Element, including:

- *Policy UD-2.2.5: Creating Attractive Facades*
- *Policy UD-2.2.7: Infill Development*

As described above, the Project complements the scale of the surrounding industrial uses, yet strengthens the visual quality of its surroundings. The Project's height is in compliance with the underlying zoning's maximum allowable height of 50 feet. Similarly, by adhering to the bulk and density requirements of the Zoning Regulations, the Project "avoid[s] overpowering contrasts of scale, height and density", in compliance with Policy UD-2.2.7. *Id.* §§ 910.7, 910.15. In bringing a non-active site alive, the Project also allows for infill development on this particular parcel.

c. Contribution of Project to City and Community Goals and Policies

The Property is located in the Rock Creek East ("RCE") Area of the Comprehensive Plan which encompasses 7.4 miles of land area. As projected in the 2006 Comprehensive Plan, the population of the RCE Planning Area is growing, largely as a result of significant developments around the Metrorail stations within and in proximity to the Planning Area. The RCE and UNE Planning Areas contain several policies that are focused on achieving a balance between

encouraging economic development, retaining existing concentrations of industrially zoned properties that permit PDR-type uses, and protecting the character of existing neighborhoods in part by improving buffering between incompatible land uses.

The Project is not inconsistent with the policies set forth in the RCE Planning Area Element of the Comprehensive Plan. The proposed self-storage facility will put a relatively underutilized industrial property to a more productive use and will improve the existing site by adding sustainable storm water management components and a LEED certified building. Specifically, the Project contributes to the community goals and policies of the Area as described below.

- *Policy RCE-1.1.1: Conservation of Low Density Neighborhoods*
- *Policy RCE 1.1.2 Design Compatibility*
- *Policy RCE 1.1.8 Industrial Zone Buffering*
- *Policy RCE 1.1.12 Enforcement*
- *Policy RCE 1.1.C Industrial Zone Buffers (Small Area Plan Priority)*

The Project advances these objectives by providing a business that will promote the vitality and economic well-being in the area by assisting small Ward 4 businesses and providing a service that will assist businesses and residents by providing a convenient self-storage option. The Project also “upgrades” traditional Production, Distribution, and Repair use to one that will benefit the surrounding residential area by improving an underutilized site. The Project furthers the RCE Planning Area’s enforcement objective and preservation of low density residential neighborhoods objective because the Project is well removed from single family homes and the Project’s use and design are compliant with the District’s Zoning Regulations and Comprehensive Plan. Additionally, self-storage is a low impact and relatively quiet industrial use that creates a buffer between other more intense uses permitted in the PDR zone and nearby residential zones. Finally, the Project will include a green roof that will improve the environmental quality in this area

through storm water management, noise reduction, energy conservation, and mitigate the urban heat island.

VI. Project Impacts

Section 2302.1(b), (c) of LTR Regulations requires OP and the other District departments and agencies engaging in the LTR process to review the Project's potential traffic, neighborhood, design, quality of life, and environmental impact. As stated below, the Project does not have such adverse impacts.

a. Traffic Impact

The Project does not have an adverse impact on traffic in the surrounding neighborhood. The Applicant has retained Gorove/Slade Associates, Inc. to perform a Comprehensive Transportation Review for the Project, attached as Exhibit F ("CTR"). The CTR identifies vehicular trip generation, trip assignment, and before and after capacity analysis, all as set forth in Section 2301.3(j) of the LTR Regulations. The CTR concludes that the Project will not have a detrimental impact on the surrounding transportation network.

Parking and Loading Impacts. The Project satisfies the requirements for vehicle parking, bicycle parking, and loading required by the Zoning Regulations.. The Project includes twenty-five (25) parking spaces, two (2) car share parking spaces, five (5) long-term bicycle parking spaces, two (2) loading berths, and two (2) loading platforms.

The parking provided is sufficient to meet the demands of the Project, as detailed further in the CTR. Therefore, the Project provides adequate parking and loading without creating adverse parking impacts on the surrounding area. The Project's loading and parking areas are appropriately screened and buffered as required under the Zoning Regulations. The Applicant expects the majority of the Project's users to load using smaller vehicles and therefore not create adverse noise

and light impacts for abutting residential uses. Of note, the loading does not require any turn movements over public space.

Vehicle Trips and Traffic. As detailed in the CTR, the Project is expected to generate fewer than 25 vehicles in the peak direction during any peak hour. The CTR found that the Project would be expected to generate nine morning trips during peak hours and 14 trips during afternoon peak hours. Therefore, the threshold for additional vehicular analysis is not triggered and no vehicular capacity analysis is proposed.

Additionally, the Project's proximity to public transit minimizes the impact on traffic the Project would have. The K2 and K6 bus routes, which connect passengers to city arteries such as North Capitol Street, Riggs Road and New Hampshire Avenue, and importantly to the red, green and yellow lines at the Fort Totten Metro Station and the red line at the Tacoma Metro Station. Therefore, the Project will not negatively impact the vehicular traffic in the surrounding area.

Pedestrian Impacts. The Project will create a better pedestrian environment than currently exists today by improving the streetscape along Blair Road NW and improving the walkability along Ogleshorpe by decreasing the width of the current curb cut from 72 feet to 24 feet, in compliance with DDOT requirements. Further, the CTR assessed the Property as well connected to surrounding neighborhoods and having excellent walkability.

Bicycle Impact. As described in the CTR, the Project has access to several on and off street bicycle facilities, including bicycle lanes on Kansas Avenue and signed routes on Peabody Street and 3rd Street. Further, the Project is located along the future path of the Metropolitan Branch Trail, which will run along the east side of Blair Road. As all site-generated bicycle trips will be able to be accommodated on the existing infrastructure, and the long term bicycle storage and shower

facilities required by the Zoning Regulations will be provided (along with a bicycle repair area), bicycle access is well provided for and there will be no adverse impact on bicycle transit.

Mitigation. As detailed in the CTR regarding Transportation Demand Management (“TDM”), the Applicant will meet the Zoning requirements by providing 1) five long term bicycle parking spaces in the building; 2) providing a bicycle repair station in the secure long-term bicycle storage area; 3) providing all required showers, lockers, and changing facilities; and 4) providing two carshare spaces that will be available to the public. In addition, a loading dock manager will be designated who will coordinate with vendors and patrons to schedule deliveries and will be on duty during delivery hours. The dock manager will also assist in truck routing, where requested. Further, trucks using the loading dock will not be allowed to idle while loading and unloading and information will be disseminated to patrons that will include truck routing maps and DDOT’s Freight Management and Commercial Vehicle Operations document outlining how to comply with the District’s idling laws. Trash for the development will be accommodated with dumpsters near the loading area and no trash will be stored in public space.

b. Neighborhood, Design, and Quality of Life Impact

The Project positively impacts the surrounding areas and quality of life, including reactivating a vacant building, enhancing the support for nearby small businesses, adding a LEED certified building and stormwater management components, and removing an underutilized and deteriorating building and lot. The Project’s urban design and architecture also positively impact the neighborhood.

Neighborhood/Public Space Impact. The removal of the underutilized commercial building and the introduction of the Project will improve neighborhood conditions and contribute to the neighborhood. The Project’s height is appropriate given the neighborhood context, and the setback

from Blair Road, NW is consistent with the surrounding area and further buffers the neighborhood to the south. Moreover, the Project's provision of some street-adjacent landscaping and preservation of the street tree along Blair Road, NW is a welcome addition to a block that is otherwise composed of hardscape and concrete without much greenery. Therefore, the Project has positive public space impacts.

Urban Design and Architecture Impact. From an urban design perspective, the Project introduces a strong urban form, with prominent frontages and zoning-compliant massing. The Project's massing, setbacks, and modulation respect the scale and height of surrounding buildings. The Project's materials are contextual with and respectful of the surrounding industrial buildings. The Project also incorporates required setbacks and continues to allow for parking on the east side of the building, which is consistent with the design of the surrounding community.

Quality of Life Impact. This Project improves the safety of the community by redeveloping an underutilized parcel and making a substantial investment along Blair Road.

The Project minimizes detrimental impacts that may arise from the daily operations of the proposed self-storage use. Unlike many analogous retail uses, the self-storage use is subject to the performance requirements of Subtitle U § 804. This additional level of scrutiny mitigates quality of life impacts on surrounding uses. In addition to the traffic and environmental considerations noted elsewhere in this section, the Project does not have a negative noise impact on the community. The Project reserves enclosed areas for trash and recycling receptacles in order to mitigate odor or pest concerns.

The redevelopment of the Property creates convenience for District residents and businesses with storage needs, PDR-related employment opportunities, and increased tax revenues for the District.

The building will be designed to meet or exceed the standards set forth in the District of Columbia Fire Code, minimizing the burden on the District of Columbia Fire Department in the case of an emergency.

Infrastructure. As identified in Exhibit G, there are existing sanitary sewer, potable water, and storm sewer lines on all streets adjacent to the site. In addition, the Project would not be a significant user of such infrastructure. Therefore, the Project avoids unnecessary public costs such as new services or facilities that would otherwise be required from public agencies.

c. Environmental Impact

The Project does not create adverse environmental impacts on the Property or the adjacent properties and surrounding neighborhood. As stated in Section V(b)(3), the Project includes many sustainable features that ensure the Project's environmental impact will be minimized. The Project replaces the existing impervious surface parking lots and low-quality commercial building with a sustainability-improving facility, driven largely by the Project's compliance with the GAR requirements and Green Building Act. As a result of updating the Property's infrastructure, the Project also includes modern storm water management and drainage systems including storm water retention facilities. The Project's sustainability efforts are designed to improve the water quality of the District, in particular.

VII. Community Outreach

After filing, the Applicant will reach out to the project's ANC 4B Single Member District representative regarding the Project in connection with submitting this application. The Applicant intends to present to upcoming ANC 4B meetings as part of the review of this Project. The Applicant would also meet with the Manor Park Citizen's Association regarding this Project if requested.

VIII. List of Exhibits

Attached hereto are the following Exhibits in support of this Application:

- A. Application Form;
- B. List of Property Owners within 200 feet of the Property;
- C. Authorization Letter from the Owner/Applicant;
- D. Comprehensive Plan and Zoning Maps and Photos of Existing Conditions;
- E. Site, Building, and Zoning Plans; Elevations; Photographs; Zoning Tabulation Chart;
- F. Comprehensive Transportation Review;
- G. Civil and Stormwater Management Plan with draft GAR Scorecard;
- H. Zoning Determination Letter; and
- I. Clearance Letter.

IX. Conclusion

For the reasons stated herein, the proposed Project satisfies the requirements of the LTR Regulations, and the Applicant requests affirmation from OP of such satisfaction.

Respectfully Submitted,

COZEN O'CONNOR



Samantha L. Mazo

Meridith H. Moldenhauer