



# COALITION FOR SMARTER GROWTH

---

January 4, 2012

Mr. Anthony Hood  
Chairman, D.C. Zoning Commission  
441 4th Street NW, Suite 210S  
Washington, D.C. 20001

Re: Support for Case No. 11-12, West End Square 37 PUD & Related Map Amendment

Dear Commissioners:

Please accept these comments on behalf of the Coalition for Smarter Growth. My organization works to ensure that transportation and development decisions in the Washington, D.C., region accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas.

We wish to express our support for this project. The proposed project will leverage the value of public land to build a new West End Library, a new fire station on Square 50, along with complementary retail and residential units. The combined project of the new library on Square 37 and the new fire station offer a tremendous public benefit for the residents of the District of Columbia that is not otherwise possible. We are only able to create these new state-of-the-art public facilities due to a joint public-private partnership where the full subsidy for the public benefits is derived from the air rights above the public facilities. This project renews important outdated public facilities, and does it at no cost to the District.

This deal offers additional benefits to the public. By building a mixed-use building with the library rather than a stand-alone facility, visitors can enjoy the added convenience and comfort of a café connected to the library. The full library will be on one floor – the ground floor, rather than separated into two stories. The project will also bring additional ground floor retail that will improve the pedestrian experience. The community meeting rooms designed to be available when the library is not open is also a welcome benefit. Both the café attached to the library and accessible community meeting spaces are features that communities throughout the city have requested for new libraries. We were disappointed that other mixed-use library proposals, such as for Tenleytown and Benning Road, were not built and instead were rebuilt as single-use, stand-alone facilities. Thus the West End library plan offers an important opportunity to show how a mixed use library can provide additional community benefits and savings for the city. The addition of housing along with the public uses and retail space add to the vitality of the area, within walking distance of Metro stations, grocery stores, and downtown jobs.

## **Inclusionary Zoning – off-site compliance option**

We support this project and welcome its substantial public benefits, but we have a few recommendations to improve it. First, regarding Inclusionary Zoning (IZ): while we would prefer on-site IZ units, we suggest alternative compliance instead of a waiver. We recommend the applicant provide off-site compliance by building the 8 percent inclusionary zoning units for Square 37 on the fire station parcel (Square 50) (per §2007 of the Zoning Code on Inclusionary Zoning). This would mean roughly doubling IZ units or square footage at the fire station site. If this is financially infeasible, the Zoning Commission

should make a finding that the Applicant's and DMPED's claims are correct – the entire public subsidy of development rights is consumed by the public benefits of the library and fire station, and no value is left to bridge the gap between 80 percent of Area Median Income (AMI) IZ unit prices and the cost of the units.

We note Eastbanc was the only proposer (one of only two) that proposed building both a new library and a new fire station without public subsidy. This is a unique case of a developer offering significant contributions for public facilities. Other mixed-use library proposals (which did not ultimately occur) did not rely on the developer to pay the entire cost of the new facilities.

We would not be discussing the question of an IZ waiver for this PUD if DMPED had committed to the original plan for the 52 affordable units above the fire station, which would be a far greater affordable housing resource than inclusionary zoning (all units affordable at 60 percent AMI). However, the city has not committed to financing for the affordable housing component. Thus, Eastbanc is asking for relief to on-site IZ units as part of the library PUD. Eastbanc has stated that if the city does not provide the financing for the affordable housing, Eastbanc will build housing above the fire station and include the requisite number of IZ units for the Square 50 matter of right project (around 8 percent affordable to households earning 80 percent AMI). As we have stated, we suggest that the Zoning Commission provide for off-site IZ compliance by adding the library site's 8 percent IZ units to the fire station residential build-out and its IZ units.

We agree that the library and fire station are exceptional public amenities that make this case no typical PUD case that only addresses private land uses. The question is if there's enough subsidy left to not only provide a new library and fire station, but also some affordable units, at least IZ units at the 80 percent AMI level. In other public lands deals, we'd expect a much more ambitious affordable housing program on par with the Anacostia Waterfront lands affordable housing requirements which require a 30 percent set aside of affordable housing for households earning 30 percent AMI and 60 percent AMI.

### **Lower parking ratio alternative – more carsharing on-site**

Regarding the proposed parking ratio, we share DDOT's and Office of Planning's concern that the parking ratio is too high for this location. We suggest as an alternative to building this number of parking spaces for the residential units that the developer provide additional carsharing vehicles so that new residents could be reassured they don't need to own additional cars to always have access to one if they need one. We also note that we support DDOT's recommended additional Transportation Demand Management (TDM) measures (real-time transit information displays, WMATA passes, carsharing or bike sharing memberships).

Overall, we want to express our enthusiasm for this project, which leverages the District's public land value to build a state-of-the-art library and fire station for the West End neighborhood and saves the city millions of dollars. This is a major benefit to the community and the entire city.

Thank you for the opportunity to testify.

Sincerely,



Cheryl Cort  
Policy Director