

September 20, 2021

VIA Email: plancomm@alexandriava.gov; karlmortiz@alexandriava.gov

To: Nathan Macek, Chair-Term
Melissa McMahon, Vice Chair
David Brown, Commissioner
Melinda Lyle, Commissioner
Stephen Koenig, Commissioner
Vivian Ramirez, Commissioner
John Goebel, Commissioner

Alexandria City Hall
301 King Street #2100
Alexandria, VA 22314

RE: Support for the Columbus Flats Development Project
Tax Map No. 054.04-02-02, 08,09,10,11
805-823 N Columbus Street

Dear Chair and Commissioners:

My name is Steve Porzio of ASA (American Statistical Association) which resides at 728 N Washington Street. I am writing on behalf of my organization to express our full support for the Columbus Flats Development. P.T. Blooms Development shared their plans for the project with us directly. Based on our review we found their project to be sensitive to the neighborhood scale and a very valuable asset in the continuing growth of the neighborhood. Their approach to in-depth traffic and parking analysis was very valuable in addressing any concerns I had about impact on our employees across the street and the neighborhood. Patrick Bloomfield has been forthright and engaging about his plans and we encourage the city planning commission to vote unanimously for approval.

Sincerely,

DocuSigned by:

61448100B3134A2...

Steve Porzio
American Statistical Association
732 N Washington Street

September 21st , 2021

VIA Email: plancomm@alexandriava.gov; karlmortiz@alexandriava.gov

To: Nathan Macek, Chair-Term
Melissa McMahon, Vice Chair
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RE: Support for the Columbus Flats Development Project
Tax Map No. 054.04-02-02, 08,09,10,11
805-823 N Columbus Street

Dear Chair and Commissioners:

My name is John Curry of the Beulah Baptist Church congregation which resides at 320 S Washington Street. I am writing on behalf of my congregation to express our full support for the Columbus Flats Development. At community meetings, P.T. Blooms Development shared their plans which show 70 market rate condominium units and 8 affordable for-sale condominiums. We are excited that there will be more affordable options in the ever-changing neighborhood. The project has been carefully designed to be compatible with the scale of the surrounding community and we are looking forward to seeing this beautiful building come to fruition. Columbus flats will be a great addition to the neighborhood and we urge you to approve this project since it provides a number of benefits to the City.

Sincerely,

DocuSigned by:

4AE9A530FBDD421...

John Curry
Beulah Baptist Church
320 S Washington Street
Alexandria, VA 22314

September 21st, 2021

VIA Email: plancomm@alexandriava.gov; karlmortiz@alexandriava.gov

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RE: Support for the Columbus Flats Development Project
Tax Map No. 054.04-02-02, 08,09,10,11
805-823 N Columbus Street

Dear Chair and Commissioners:

My name is Nilesch Patel of Point Alexandria Investments, which is currently developing the hotel site at the corner of N. Washington Street and Madison Street. I am writing on behalf of my company to express our full support for the Columbus Flats Development. We have had a great open line of communication throughout construction with Patrick Bloomfield. PT Blooms Development has been straightforward and collaborative in communicating his plans and working with us to assist us in developing our site. The design of the building will bring great character to the community and complement the design of our hotel site. We are looking forward to seeing this beautiful building finished and to continuing the open dialogue as we bring both of our projects towards the finish line. Columbus flats will be a great addition to the neighborhood, and we hope that Mayor Wilson and the council members approve this project.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Nilesch Patel', with a stylized, overlapping flourish at the end.

Nilesch Patel
Point Alexandria Investments
802-808 N.Washington Street

City of Alexandria, Virginia

MEMORANDUM

DATE: OCTOBER 4, 2021
TO: PLANNING COMMISSION
FROM: KARL MORITZ, DIRECTOR, DEPARTMENT OF PLANNING & ZONING
SUBJECT: DSUP #2021-10020 / COLUMBUS FLATS

ISSUE:

Staff's recommendation for approval of the DSUP is based on extensive consideration of the most appropriate zoning to achieve the City's broader goals, objectives and policies related to a number of issues including, but not limited to, the creation of additional housing and affordable housing in transit-oriented neighborhoods, improvements to the public realm, consistency with the applicable small area plans, and the compatibility of new infill construction to the existing built environment. All development projects go through an iterative review process among staff, the applicant team, the community and relevant boards and commissions where project parameters are proposed, tested, reviewed and refined. This case is no exception and staff responded to applicant's initial interest in constructing townhouses, an appropriate zoning classification and extensive design review process with the Board of Architectural Review. In addition, staff ensures that a project is reviewed equitably and consistently with similar projects.

Consistency with Regional Housing Initiative

The density and location of the project within a half-mile of the Braddock Metro Station and near numerous bus routes are consistent with the housing production goals of the 2019 Regional Housing Initiative Resolution. The Metropolitan Washington Council of Governments (COG) determined that, to fulfill the Metropolitan area's future economic development goals, an additional 75,000 new housing units must be produced by 2030, beyond those already forecast, to house the anticipated workforce needed to support upcoming economic growth. An accompanying assessment by the Urban Institute determined that 75% of these additional units should be affordable to low- and middle-income households and that 75% should be located in activity centers or near high-capacity transit, such as Metro. Subsequently in March 2020, City Council endorsed COG's 2019 Regional Housing Initiative Resolution, including its allocation to Alexandria of a goal to produce or preserve an additional 2,250 new committed affordable units, beyond the Housing Master Plan goal, by 2030. Mounting demand, coupled with an increased level of City investment required to support affordable housing, underscores the necessity for the City to explore all options to expand housing opportunity and affordability through the development process and through consideration of financial and regulatory tools.

Criteria for Rezoning without a Master Plan Study

1. Small Area Plan

The proposal is consistent with the intent of the 2008 Braddock Metro Neighborhood Plan (BMNP) overlay and underlying 1992 Braddock Road Metro Station SAP, which provide guidance and a framework for redevelopment. The intent of the Plans applies to any site within the Plan boundaries. The applicant is also providing the developer contribution (+/- \$ 360,000) required by the Small Area Plan.

As stated in the staff report, the proposed master plan amendment meets the criteria for rezoning without a master plan study as the proposed use is consistent with the existing residential land use and intent of the Plans, creating more diverse housing options in a transit-rich neighborhood.

As this site borders both the boundaries of the Braddock and Old Town North plans, the requested increase of five feet from the existing height limit of 45' and the increase in density is in proportion with adjacent uses on N. Washington Street. The proposal offers a transition from those uses into the Braddock neighborhood.

2. Type of Area

The proposal is consistent with the intent of the BMNP and is not a departure from the other existing uses in the area. The three-story portions of the building are intended to reflect the residential character immediately across the street. The four and five-story portions step back so the height is focused in the middle and rear of the site, closer to N. Washington Street.

3. Isolated Parcels

Further study is not warranted given that this proposal is in keeping with the existing Plans, which provide the framework for redevelopment.

4. Status of Planning for Area

N/A

5. Application's Consistency with City Goals

As stated in the staff report, the project complies with applicable City policies, such as being served by mass transit, the Green Building Policy, Public Art Policy, Affordable Housing Policy, and stormwater management.

Mixed-Use Requirement for CRMU Zones

CRMU zoning designations encourage and promote mixed-use developments and a diversification of uses in general, but do not require that a project be mixed use nor prohibit an entirely residential project. Specifically, Section 5-305 of the Zoning Ordinance, outlines the permitted floor area ratios in the CRMU-H zone and (c) allows for a "mixed use or residential/SUP" clearly indicating that an acceptable project could be exclusively for a residential building. This has been a consistent

practice applied and several projects with a CRMU zone are exclusively residential, including: The Lineage (formerly Ramsey Homes), zoned CRMU-M; the Slade townhouse development, zoned CRMU-L; the Bradley and the adjacent townhouse development on the west side of the 1200 block of Madison Street, zoned CRMU-H; the Alexan (formerly the WMATA bus barn), zoned CRMU-X; Chatham Square, zoned CRMU-X; and Portner's Landing, zoned CRMU-X.

Use of 7-700 Density Bonus for the Provision of Affordable Housing

As was noted in Commissioner Brown's memo dated September 28, 2021, the City's policy is to fully utilize the FAR permitted through a SUP-based density increase before tapping into the bonus density permitted through Sec. 7-700. It is accurate that the affordable housing requirement on density increases associated with the 2020 Housing Contributions Policy Update is lower (10%) than that required by Sec. 7-700 (33.33%). The reasoning behind that is that primary benefit associated with Sec. 7-700 is affordable housing, whereas there are a range of other community benefits, in addition to affordable housing, that are generated through a rezoning, such as a variety of developer contributions.

In Commissioner Brown's memo dated September 28, 2021, a question was raised regarding the number of committed affordable units yielded by the project. The project results in just under 9 units. The fraction of the ninth unit is being provided through larger affordable units and the inclusion of five additional dens (only two of the seven dens would have been required to ensure the unit mix was proportional). The addition of dens was deemed important to enabling future homebuyers to be able to grow into their units and remain over the longer-term contributing to housing stability.

It is noted that the eight affordable units constitute 10.2% of the 78 total units which is highest amount of affordability provided in a market-rate project without city and/or federal subsidies.

Parking Reduction

While reducing the number of bedrooms in the project would potentially remove the need to request a parking reduction, the City's broader goals are to provide more housing opportunities and to lessen dependence on single occupancy vehicles. This walkable location is well-served by Metro, multiple bus lines and bicycle facilities and staff fully supports the modest parking reduction requested.

Crown Coverage

Modifications to the crown coverage requirement are common in the historic districts and reflective of historic building patterns which typically featured buildings located at lot lines. Further, a building with a lower height or less density would not automatically increase the provided crown coverage. In addition, the project will add nine street trees where there are currently two, increasing the overall urban canopy.

Open Space

The counting of above-grade open space is not against the Zoning Ordinance in certain zones. While the general zoning ordinance open space definition states open space is at grade, for the CRMU-H zone, Section 5-307 continues with: “a portion of the space which would otherwise be required as green area may be met by comparable amenities and/or facilities provided in lieu thereof if such amenities or facilities meet or exceed the beneficial purposes which such green areas would accomplish.” The staff report is the Director’s determination that above-grade open space in the form of terraces and rooftop amenities are “comparable amenities” and meet the technical definition of open space as well as are functional and useable. Further, in urban settings, it is often preferable site design to include both at-grade and above-grade open space to provide for both site design and a mix of forms of open space. Nothing in the CRMU-H zone prescribes that open space must be publicly accessible or accessible by all residents. Many approved projects include a variety of open spaces with some open to the public, such as entry courtyards, some available as common areas for residents, such as found on rooftop amenity spaces with pools, gardens and lounge areas, and other spaces for individual residents in the form of balconies or terraces. This range of spaces for vibrant urban living. The interpretation is consistent with how staff has reviewed similar projects.

Condition Addition

At the request of Commissioner Lyle, to allow for upgrades and changes related to sustainability requirements, the following condition addition is proposed:

15a. The applicant may propose additional strategies to the sustainability conditions outlined below and these additional sustainability strategies may be incorporated administratively to the satisfaction of the Directors of T&ES and P&Z. (PC)

STAFF:

Karl Moritz, Director, P&Z

Jeff Farner, Deputy Director, P&Z

Robert M. Kerns, AICP, Chief of Development, P&Z

Catherine Miliaras, AICP, Principal Planner, P&Z

Stephanie Sample, Urban Planner, P&Z

Tamara Jovovic, Office of Housing

ATTACHMENT:

1 – Memo from Commissioner Brown to Jeff Farner regarding the Columbia Flats, September 30, 2021

MEMO

September 30, 2021

TO: Jeff Farner, Deputy Director, P & Z

FROM: Dave Brown



SUBJECT: Comments on Columbia Flats Project

Preliminary Comment:

Staff says that the SAP and zoning changes are “consistent with the City’s priority of increasing density and affordable housing within proximity to Metro and other transit opportunities. . .” Staff Report 11. But this “Smart Growth” rationale is already reflected in the land use configurations and recommendations set forth in both the 1992 and 2008 Braddock Area SAP’s that are relevant here. Moreover, as I have detailed in a separate memo, after a close look at the numbers that lead to a staff-endorsed yield of eight Affordable Dwelling Units, I conclude that even if the overriding land use goal today is maximizing the provision of affordable housing, a more neighborhood-compatible project can measure up to the yardstick set by this project: 8 ADUs, along with 57 or 58 market rate units, instead of 70. Staff has advised that the Applicant first came forward with a proposal for 18 townhouses. But that, too, would be a project requiring both SAP and zoning changes, as the allowed RB/Townhouse density is 22 units per acre, and at the site size of .5726 acres, 18 units translates to over 31 units per acre. Staff apparently felt this was not the way to maximize ADU’s on the property. But maximizing ADU’s effectively subordinates all other planning and zoning considerations reflected in the SAP’s. If that is an accurate reflection of City policy, then the Braddock Area SAP’s, and perhaps many others, need much revision.

Rezoning without a Master Plan Study: Staff comment on compliance with the Criteria for Rezoning Without a Master Plan Study is limited to the observation that “the 1992 land use map

identifies the site as residential, consistent with the use being proposed.” Staff Report 11-12. This touches upon only one aspect of the five Criteria, and does so unconvincingly. The use may still be residential, but the change in zoning is from residential to mixed-use, regardless of the fact that the only use immediately contemplated is residential, and even the residential use is broadened from single-family residential to include the more intense multifamily residential. The argument is also self-refuting. If consistency of use as between the 1992 land use map and the requested changes is key, how can the SAP amendment be principally about modifying the 1992 land use map? On a broader look at the Criteria, my view is that (1) the proposal is not consistent with the SAP for the area or its intended development, because this is not one of the several areas designated in the SAP for either multifamily or mixed-use zoning; (2) while the property is vacant, it is not due to any undesirability or unsuitability for development, and it is on a street that block-after-block is dominated by two and three story single-family residences, so a significant change to mid-rise multifamily could reverberate widely, a result that should be preceded by re-evaluation of a broad swath of the multiple blocks like this one designated RM (residential, medium) in the 1992 land use map and at a height limit of 45 feet; (3) if staff feels that the 1992 land use map is more generally outdated in light of developments that have taken place in the plan area since then, and given the increased redevelopment interest in this area, that is good reason to revise the SAP before considering the sort of catalytic change envisioned by this project; and (4) with noncompliance as to parking, crown coverage and (properly applied) open space, one cannot conclude, speaking in terms of the Criteria, that the project complies “with all city policies other than the land use called for in the Master Plan,” nor with the goal of “protecting existing residential neighborhoods.”

Master Plan Conformity: Staff makes a master plan conformity argument from the fact that certain of the SAP goals will be furthered by the project, such as providing a secure and safe walkable neighborhood. Staff Report 10-11. But staff does not explain how the goals are furthered in some more significant way or to some more significant degree than would be the case with a zoning change more in line with the “Residential Medium” land use designation in the SAP, even if at a greater density and height than RB/Townhouse allows. More fundamentally, the discussion seems to downplay the obvious: the reason an SAP amendment is sought is because the plan **does not conform** to the SAP, either as to land use or building height. Further, even with the proposed SAP land use amendment from RM to RH, “Residential High,” there is still a lack of master plan conformity. Among the multifamily residential zones, only the RMF zone would permit the density proposed here, whether measured as FAR or dwelling units per acre. The limit outside RMF, which may be the real zone of choice for furthering affordable housing in proximity to public transit, the most that can be done is 100 dwelling units per acre in the RD/High zone, and an FAR of 1.5 in the RM/Townhouse zone (both pre bonus density). By contrast, the project has a pre bonus density of 2.5, and with the added 7-700 density comes it at a stunning 136.22 dwelling units per acre (78 units on .5726 acres).

Rezoning: The zoning of choice for the property is none of the residential multifamily zones, even though the property is going to be devoted exclusively to residential multifamily use. But as noted above, none of those zones produces the density level proposed here. Under CRMU-H, the top multifamily residential limit of 1.25 FAR can be stepped up by as much as 1.25, to 2.5 with an SUP. But the reason that increase is or should be made available ought generally to be because of the nature of mixed use zones: their purpose is to facilitate mixed use, not to increase the density of single uses. Specifically, the intent of the CRMU-H zone “is to establish a zoning classification

which permits developments that include a **mixture** of residential, commercial, cultural and institutional uses in a single structure or multiple but integrated and related structures; to encourage a diversification of uses in **unified projects** located in proximity to Metro stations . . .; and to promote the development of **mixed use** projects by allowing greater densities than would otherwise be permitted to the extent the proposed **mix of uses**, design and location warrant.” While the CRMU-H zone does allow a single use project, and that use can be multifamily, as I read the statutory purpose, it would rarely, if ever, be appropriate to shower a single-use project with anything close to a 1.25 FAR increase. And while merely getting a passing grade on the generic criteria for the grant of an SUP should be regarded as a **necessary** approval requirement, it ought not be a **sufficient** one. There should be a reason for the increase, tied to fulfilling the specialized intent and purpose of the zone, which most certainly is not to increase the density of a single use regulated elsewhere in the Ordinance, regardless of the relatively minor collateral impact that increase may have on the amount of affordable housing that results, which I address next.

ADU Requirements: My separate memo untangles and inspects the differing ADU requirements associated with SUP-based density increases and bonus density under 7-700, and concludes that the 7-700 provision produces much more “bang for the buck” in ADU’s in return for the density that is added to the project. I suggested that, as a general rule, we should not allow SUP-based density increases where the applicant has failed to first use all the available density bonus under 7-700. Such a failure is what is proposed here: only two-thirds of the 7-700 density bonus is proposed to be used. Staff’s response, if I have understood it correctly, is that the process currently in use is to the contrary: no 7-700 density bonus is awarded until all the available SUP-based density increase is used. I see nothing in the Zoning Ordinance mandating this sequence, and we are shooting ourselves in the foot to continue it. Moreover, it seems to be based on the

presumption, which I think is unfounded, that in every case where an SUP-based density increase is appropriate, the increase ought to be 100% of the maximum available.

Parking Reduction: After all the proper reductions in the parking requirement, the number of spaces is 73, but there is only room in the garage for 69. So a modification has been requested to reduce the parking requirement by four spaces. The obvious alternative approach would be reducing the number of units by at least five. This would reduce the parking requirement by $.8 \times 5 = 4$ spaces, obviating the modification request. This possibility is not even mentioned in the Staff Report. That small a reduction in the number of units could come entirely from the top floor and not alter the footprint of the building or the number of parking spaces provided, which are projected to be unbundled and sold for over \$2 million ($69 \times \$30,000$). Further, a four-story building would presumably not require a 5-foot increase in the SAP height limit of 45 feet.

Open Space: The required open space is 40% of the site area, or 9978 sq ft. At-grade space is 2660 sq ft, or 26.65% of the required amount. Another 4479 sq ft is above grade, but evidently accessible to all homeowners, either on the 4th floor balcony or the rooftop. Staff Report at 16. This above-grade space is not “open space” as that term is defined in the Ordinance. Unless and until the Ordinance is changed, no areas above ground can be termed “open space” in the absence of explicit language in individual zones authorizing such. In the CRMU-H zone, “comparable amenities and/or facilities” can take the place of open space if the Director deems it functional and usable, and it meets or exceeds the beneficial purposes of ground-level open space.” In the past, we have deemed this “amenity space,” so as not to conflate it with true, ground-level open space. With an appropriate finding by the Director, this amenity space is arguably counted in the tabulation of open space, but even so, the sum is 7139 sq ft, still short of the 9978 sq ft requirement by 2839 sq ft, i.e., by over 28%. The Staff Report goes even further afield in counting as open

space private balconies and terraces in individual homeowner units that add up to 5755 sq. ft. That's all well and good for each homeowner, but not the residents as a whole nor the public. In any case, that third space category should not count in the open space calculation, and does not justify the staff assertion that "the project well exceeds the 40 percent open and usable open space requirement by eleven percent." *Id.*

Crown Coverage: While the City will be aspiring in the future to meet a crown coverage of 40% City wide, in this case the applicant does not meet the 25% requirement currently applicable here, coming up 35% short of the 10,350 sq ft requirement. Staff Report 22. The reason is obvious: so much of the ground is taken up by the building that 6815 sq ft is apparently the best that can be done. While the 25% requirement is perhaps unlikely to be achieved by any multifamily building in this location, a reduction in the footprint (should approval be for a dozen fewer market rate units) would increase the level of compliance.

Project Benefits: The Staff Report begins with the traditional recounting of project benefits. This listing would be much more useful in evaluating all of the requested modifications, SUP's and the zoning and SAP amendments if it distinguished benefits flowing from the granting of all the requested zoning relief from benefits that would accrue to the City if the land were developed under by-right zoning, which, of course, requires neither a zoning nor SAP amendment. In addition, as noted above, in my separate memo on the yield of affordable housing, I concluded that the project could achieve a yield of 8 ADU's with the market rate unit total of 57 or 58, rather than 70. A recounting of the benefits that would be anticipated from a three-story project (with perhaps a set back fourth story) configured to these totals would also be most helpful in evaluating project benefits.