

**STATEMENT OF JUSTIFICATION
DETAILED SITE PLAN DSP-22023
GREENBELT SQUARE
SEPTEMBER 20, 2022**



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1.0 INTRODUCTION/OVERVIEW

The applicant for this Detailed Site Plan is Armory Place, LLC ("Applicant"). The Applicant is also the owner of the property which is the subject of this application and is pleased to present Greenbelt Square, which is apartment housing for the elderly.

The property which is the subject of this application is located at 7010 Greenbelt Road, Greenbelt, Maryland (the "Subject Property"). As will be described in greater detail below, the Applicant has owned the Subject Property since 2005. Throughout its ownership, the Applicant has worked with the City of Greenbelt to bring a project to the Greenbelt area which will provide opportunities to existing residents to remain in the City as they age. The instant application includes a Detailed Site Plan and a companion Departure from Design Standards.

2.0 SUBJECT PROPERTY

The Subject Property is a 4.5-acre parcel of land more particularly described as Parcel "G" on a plat of subdivision entitled "Charlestowne Village", as per plat thereof recorded among the Land Records of Prince George's County, Maryland in Plat Book REP 205 at Plat No. 91. A copy of the subdivision plat is marked Exhibit "A" and attached hereto. This plat was recorded in April 2005.

The Subject Property is located on the north side of Greenbelt Road within the municipal boundaries of the City of Greenbelt. It is located approximately 150 feet east of the intersection of Greenbelt Road and Lakecrest Drive. The Subject Property is zoned RMF-20 (formerly R-18) and is currently vacant. The Subject Property is abutted on the east, north and south by the University Square Apartments, also zoned RMF-20 (formerly R-18). To the south, across Greenbelt Road, is the Holy Cross Lutheran Church in the R-R Zone. Greenbelt Road is classified as an arterial roadway by the Master Plan of Transportation. Access to the Subject Property is provided from a service road which also provides access to the University Square Apartments and the former National Guard Armory. A median break exists on Greenbelt Road at this service road.

3.0 JUSTIFICATION FOR FILING APPLICATION PURSUANT TO OLD ZONING ORDINANCE

The Zoning Ordinance which went into effect on April 1, 2022 permits applications to be filed pursuant to the provisions of the prior Zoning Ordinance. The Applicant submits this application pursuant to the provisions of the prior Zoning Ordinance. Section 27-1904(b) requires that a of Justification Statement be included with any application filed under the provisions of the prior Zoning Ordinance. In satisfaction of this requirement, the Applicant would submit that this

application has been under design and preparation for a substantial period under the provisions of the prior Zoning Ordinance. As will be detailed below, the Applicant has been working with the City of Greenbelt to design apartment housing for the elderly which will be age restricted, for sale and elevator served. The product which is proposed consists of four apartment buildings, each with 24 units. At the request of the City of Greenbelt, one of those units will be replaced with a community meeting room, resulting in a total of 95 dwelling units. In the R-18 Zone, apartment housing for the elderly or physically handicapped is permitted by right under the circumstances set forth in Section 27-441(b) (footnote 148). Specifically, the project must a) obtain approval of a detailed site plan; b) be located within Transportation Service Area 1; c) be the subject of a condominium plat setting forth each dwelling as a separate unit; d) propose a density which is not greater than 10% higher than that normally allowed in the zone; and e) age restrictions in conformance with the Federal Fair Housing Act must be approved with the Detailed Site Plan. In this instance, the Subject Property conforms with each of these criteria. This detailed site plan is submitted as required for the use. The Subject Property is located within Transportation Service Area 1. A condominium plat will be recorded such that each dwelling will be a separate unit to be sold. The maximum density normally

allowed in the R-18 zone is 20 dwelling units per acre, which would permit a total of 90 units on the Subject Property. The proposed development is 95 dwelling units, which is within 10% of the maximum density permitted. Finally, a draft Declaration of Covenants is attached as Exhibit "B" setting forth age restrictions in conformance with the Federal Fair Housing Act. Since the Subject Property qualifies for this modest increase in density, which is not available in the RMF-20 Zone, this Detailed Site Plan will be filed pursuant to the provisions of the prior Zoning Ordinance.

4.0 DEVELOPMENT HISTORY OF PROPERTY

As noted above, the Subject Property is zoned RMF-20 (formerly R-18). The Subject Property is a former nursing home site constructed pursuant to a special exception. At the time the property was acquired by the Applicant, the nursing home was vacant and in dilapidated condition. At the request of the City, the Applicant razed the building. Prior to doing so, the Applicant recorded a vesting plat under the provisions of Section 24-107(c)(7)(D) and Section 24-111(c)(4) to allow the building to be razed and to allow future development exempt from the requirement to file a preliminary plan of subdivision. Following this, the Applicant obtained approval of Detailed Site Plan DSP-05060 to construct a 90-unit apartment building with structured parking. However, this site plan was approved prior to the Great

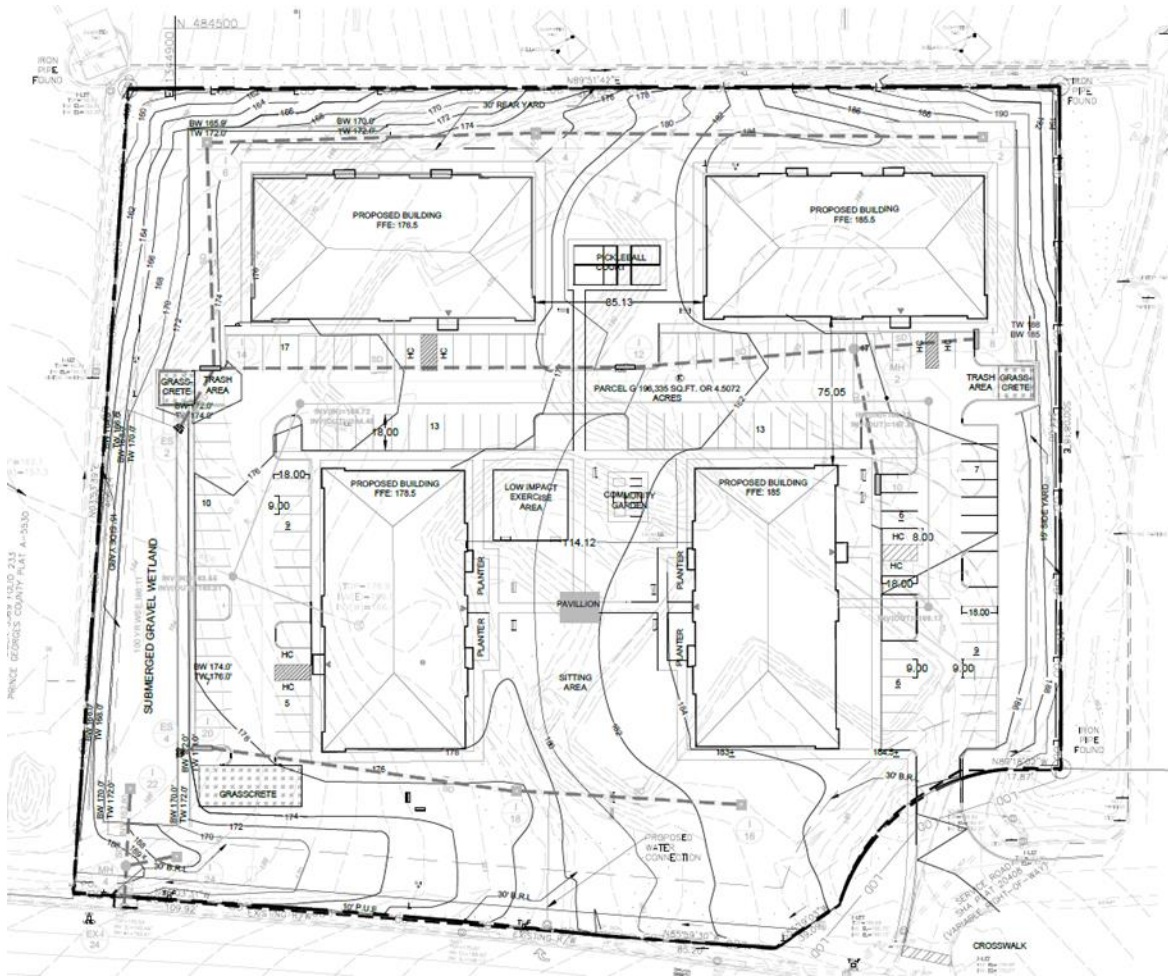
Recession and was not economically viable. The Detailed Site Plan formally lapsed on December 31, 2021.

Over the past few years, the Applicant has worked with the City of Greenbelt to identify an alternative development proposal which the City could support. The Applicant has appeared before the City Advisory Planning Board and the City Council on several occasions with development concepts that the City has considered. Over the years, the City has consistently expressed an interest in an elevator served, age-restricted project. No such product exists within the City. The Applicant has sought out builders who would be interested in constructing such a product. The Applicant is now working with NVR, which has developed a similar project elsewhere in the Washington Region. Working with the City, this product has been modified to provide the type of dwelling unit and the amenities which the City has indicated it can support.

5.0 DEVELOPMENT PROPOSAL

The development which is proposed in the Detailed Site Plan is apartment housing for the elderly, consisting of 95 for-sale age-restricted units on this site which will be sold as condominiums. These 95 units are proposed to be distributed throughout four (4) buildings. Each of the buildings will be four (4) stories in height. Three of the buildings will have 24 units and the fourth building will have 23 units and a community

room for use by residents in the community. The Applicant is proposing 119 surface parking spaces (8 accessible, 111 standard, and 2 electric vehicle charging stations). The detailed site plan, reproduced below, also proposes a community garden, a pavilion, a low impact exercise area, and a pickleball court.



In the design of the buildings and the location of the recreation facilities, noise exposure from MD 193 was considered. For example, a substantial setback is provided along Greenbelt Road and the buildings closest to Greenbelt Road are oriented perpendicular to the road. The outdoor amenities (the low impact

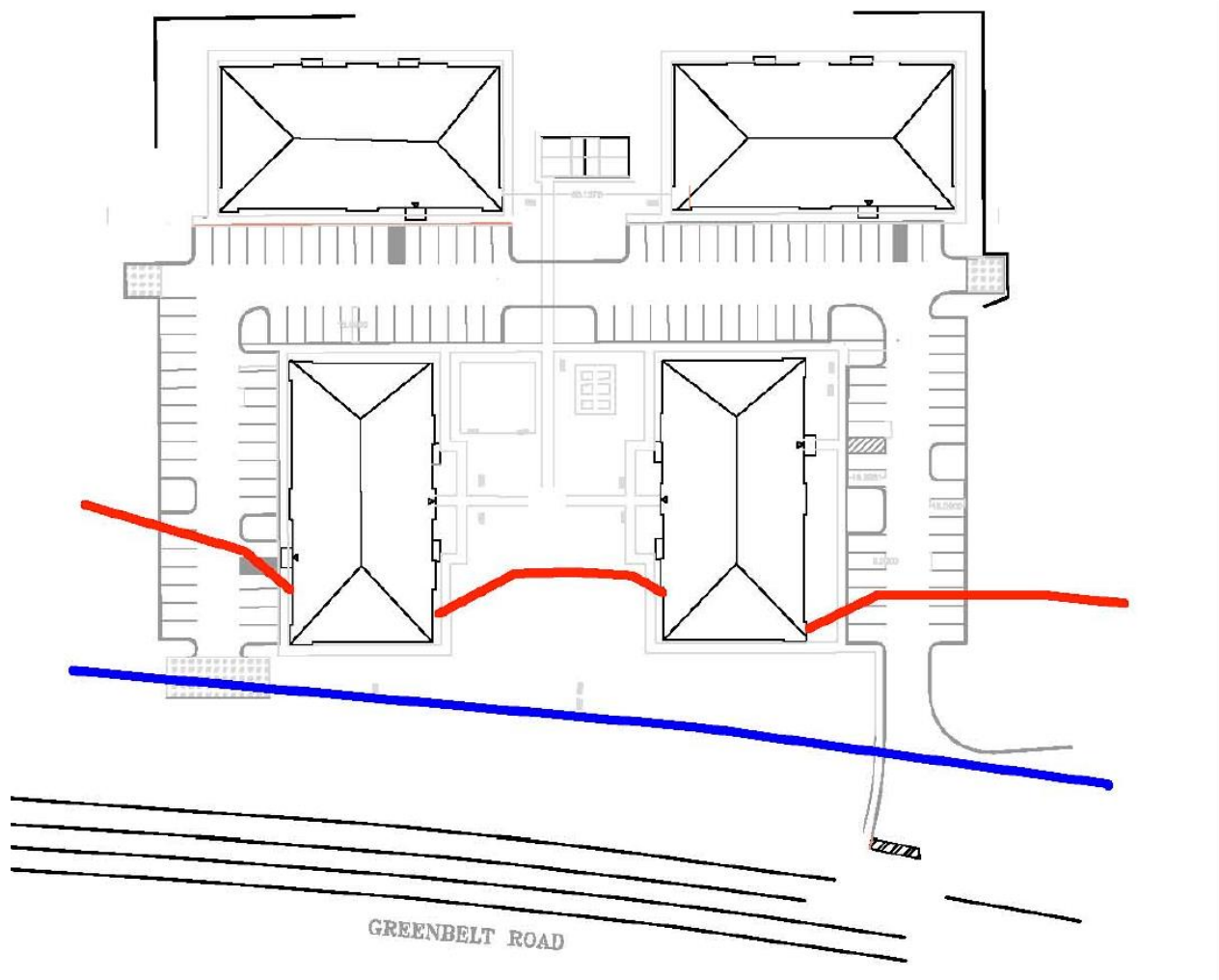
exercise area, community garden, pickleball court, and sitting area) are also setback to avoid exposure to excessing noise and either minimize or eliminate the need for artificial noise barriers.

In Prince George's County, when a proposed residential development is located along a roadway of arterial or higher classification source such as MD 193, there are two standards typically applied to evaluate potential noise impacts. First, the site is evaluated to determine whether a noise impact occurs on noise-sensitive outdoor areas which exceeds 65 dBA Ldn. Second, the site is evaluated to determine whether indoor areas are exposed to noise exceeding 45 dBA Ldn.

To evaluate the impact of noise on the proposed project layout, the Applicant commissioned a noise study to both evaluate the exterior ground level noise exposure for outdoor activity areas as well as the impact of noise on the interior of the buildings. The noise study, dated July 21, 2022, was prepared by Polysonics Accoustics and Technology Consultants. The study was based upon an actual noise measurement taken on the Subject Property during PM peak hour traffic. The results were then modeled to determine both current noise exposure as well as projected noise exposure in the year 2040 based on State Highway Administration traffic growth estimates. Ground level noise exposure (5' above ground) was calculated as well as 40' above

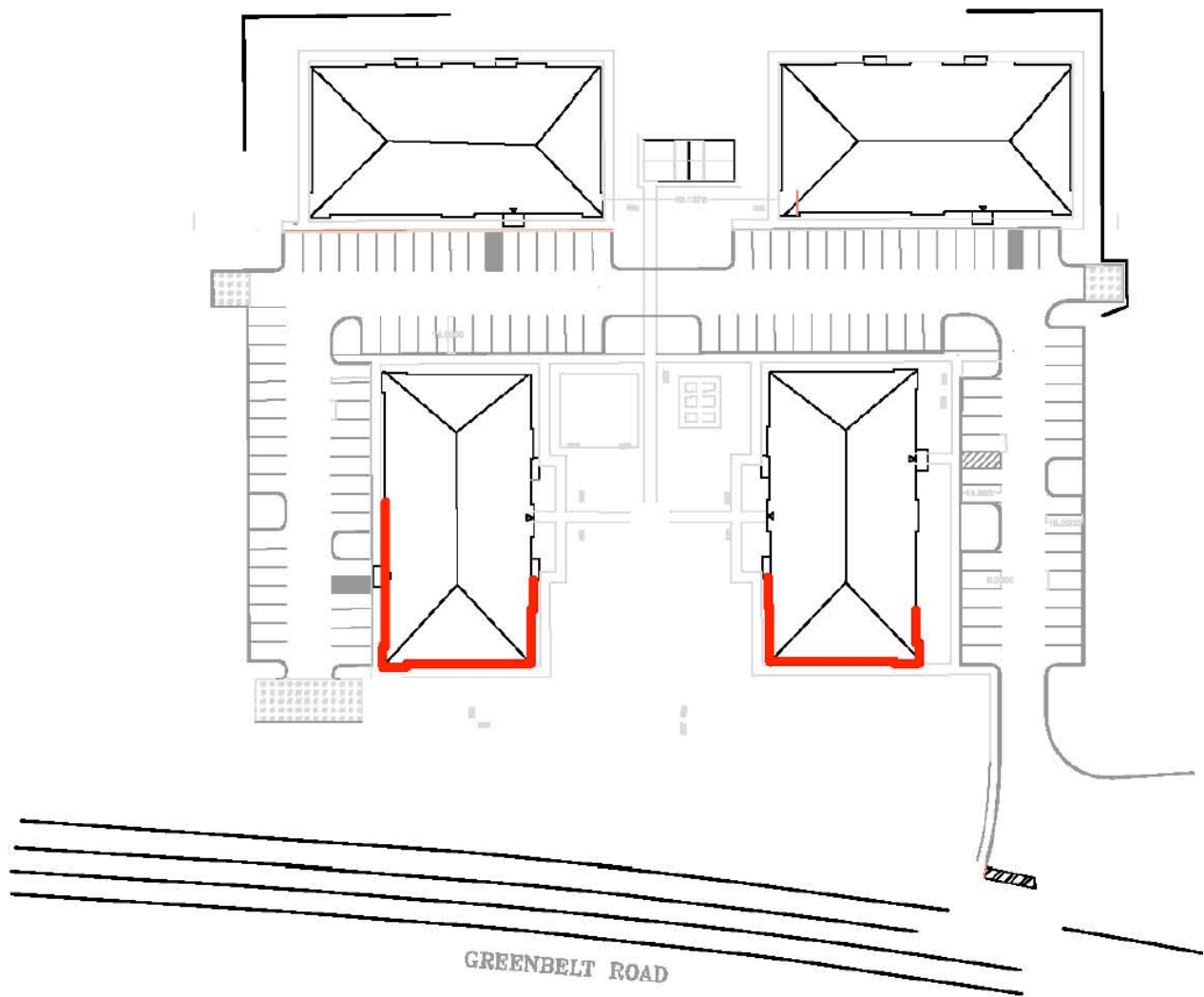
ground level to evaluate the impact of noise on the interior to the buildings.

The conclusion of the noise study was that while portions of the site will be exposed to traffic noise exceeding 65 dBA Ldn all of the outdoor activity areas have been set back sufficiently from MD 193 such that they are not exposed to noise levels exceeding 65 dBA Ldn, the applicable standard for such areas. As shown below, the impact of the 70 dBA Ldn noise contour is shown in blue while the 65 dBA Ldn noise contour is shown in red:



Locating the outdoor activity areas further from MD 193 removes them from problematic noise exposure and eliminates the need to construct artificial noise barriers that would enclose the site and alter the views of the property from the road.

Regarding the impact on the interior of the proposed buildings, the noise study determined that only the southern ends of the two buildings closest to MD 193 will be exposed to noise levels exceeding 65 dBA Ldn, as shown below in red:



While these portions of the two buildings will require enhanced construction methods to ensure that the interior of the buildings will not be exposed to noise levels exceeding 45 dBA Ldn (as outlined in the noise study), the vast majority of the buildings will not require enhanced construction material as they are not subject to the highest noise exposure.

The architecture of the proposed buildings is attractive, with balconies and a variety of materials and colors, as can be seen in the rendering below:



As noted above, each building will be four stories in height and all levels will be accessible by elevator. While these buildings are typically 24 units per building, the City expressed a strong

desire to provide an interior space on site for community meetings. Thus, one of the units will be utilized as a community room, reducing the number of units in one of the buildings to 23. The total of 95 units will provide a unique, one level product, accessible by elevator and which will afford a sense of community due to the amenities and meeting area which are provided.

Finally, a companion Departure from Design Standards has also been filed to allow all the parking spaces (with the exception of handicapped spaces) to be a universal 9' X 18'. Reducing the size of the spaces provides more room for the older residents than utilizing compact vehicle spaces and also allows the applicant to increase green area to ensure that the minimum green area requirements are satisfied. The parking is provided convenient to the front door of each building.

6.0 ZONING ORDINANCE SITE PLAN CRITERIA

Pursuant to Section 27-436(e)(1) of the prior Zoning Ordinance, "a Detailed Site Plan shall be approved for all attached and multifamily dwellings, including any associated community building or recreational facilities" in the R-18 Zone. A detailed site plan is also required pursuant to Section 27-441(b) (footnote 148). This Detailed Site Plan is submitted in conformance with these requirements.

7.0 DETAILED SITE PLAN REQUIREMENTS

The general purposes of a Detailed Site Plan are set forth in Section 27-281 et. seq. of the Zoning Ordinance.

7.1 Section 27-281 – General Purposes of Detailed Site Plans

Section 27-281(b) (1) of the Zoning Ordinance sets forth the General Purposes of a detailed site plan. These are:

- (A) To provide for development in accordance with the principles for the orderly, planned, efficient and economical development contained in the General Plan, Master Plan, or other approved plan.***

The Applicant's proposed use is in conformance with the Master Plan and SMA. The Subject Property is located within the boundaries of the 2013 Approved Greenbelt Metro and MD 193 Corridor Sector Plan and Sectional Map Amendment. The Subject Property was placed within a Neighborhood Preservation Area along the MD 193 Corridor and retained in the R-18 zone (P.33). The Master Plan notes (p. 64) that the median year of construction within the trade area of the Sector Plan is 1965, and that the age of existing housing affects the competitiveness and ability of the area to attract a diverse range of households. The Master Plan also notes that the aging housing stock impacts homeowners in terms of rising home and maintenance costs. The Master Plan notes that the concept of Neighborhood Preservation recognizes the opportunities new development can create for high quality new

senior/age restricted and owner-occupied housing. Strategies through the Sector Plan area include the promotion of additional opportunities for active adult and senior housing to meet identified housing needs (see Strategy 5.4, P. 150). One of the key goals of the Housing and Neighborhood Preservation vision is to diversify the mix of available housing types and price points to attract empty nesters and seniors. (P. 153) Finally, one of the Housing and Neighborhood Implementation objectives is to "provide a mix of housing options, active adult or senior housing opportunities, and mixed income housing within the Sector Plan. (HN7, P. 194)

One of the common threads throughout the Sector Plan is the desire for age-restricted or senior housing to diversify the housing stock and encourage residents to age in place. The proposed development is responsive to all of these visions and strategies and will therefore provide for development in accordance with the principles for the orderly, planned, efficient and economical development contained in the Master Plan.

(B) To help fulfill the purposes of the zone in which the land is located;

The purposes of the R-18 Zone are set forth in Section 27-436 of the Zoning Ordinance. This section provides as follows:

(a) Purposes.

(1) The purposes of the R-18 Zone are:

(A) To make available suitable sites for multifamily developments of low and moderate density and building bulk;

COMMENT: The proposed development clearly conforms to the purposes of the R-18 zone. One of the purposes is to make available sites for multifamily developments of low to moderate density and bulk. In this instance, the multifamily housing will be apartment housing for the elderly, and will be subjected to a condominium regime to allow the units to be sold. The density proposed, 21.11 dwelling units per acre, is less than 10% higher than the standard 20 units per acre permitted in the R-18 zone as limited by Section 27-441(b) (footnote 148).

(B) To provide for this type of development at locations recommended in a Master Plan, or at other locations which are found suitable by the District Council;

COMMENT: The Subject Property has been zoned R-18 for many years and this zoning was reaffirmed through the adoption of the 2013 Approved Greenbelt Metro Area and MD 193 Corridor Sector Plan, which, as noted above, encourages age-restricted or senior housing to expand the diversity of housing in the City of Greenbelt and allow residents to age in place.

(C) To provide for this type of development at locations in the immediate vicinity of the moderate-sized commercial centers of the County; and

COMMENT: The Subject Property is located approximately one third of a mile from the Greenway Village Shopping Center and

approximately a half mile from the retail in downtown Greenbelt. The Subject Property is surrounded by other multifamily developments and continues is a suitable location for multifamily development.

- (D) To permit the development of moderately tall multifamily buildings, provided they are surrounded by sufficient open space in order to prevent detrimental effects on the use or development of other properties in the general vicinity.**

COMMENT: The Detailed Site Plan proposes the construction of four 4-story multifamily buildings, each of which will be served by an elevator. As can be seen from the detailed site plan, substantial green area is retained along MD 193 and a central green area is provided for the benefit of the residents. As designed, the proposed buildings will be surrounded by a sufficient open space network and will have no detrimental effect on the use or development of other properties in the general vicinity.

- (2) To simplify review procedures for residential, commercial, and mixed residential and commercial development in established communities;**

The Subject Property is located within the established communities area designated by the General Plan and is surrounded by existing multifamily development. The Detailed Site Plan will ensure that all applicable regulations are adequately addressed.

- (3) To encourage innovation in the planning and design of infill development.**

The Subject Property is an infill development site. The Applicant has been working for many years on a context sensitive design and land use which allows the development to blend seamlessly into the surrounding community. The proposed apartment housing for the elderly is compatible with surrounding development, retains sufficient green area and provides for sale, elevator served units for existing residents wishing to remain in the community or new residents desiring to live close to and benefit from the services offered by the City of Greenbelt.

(4) To allow flexibility in the process of reviewing infill development;

The proposed development is a true infill development, in that all abutting properties are already developed and utilized. The site plan process provides the flexibility to design a site which is compatible with the surrounding development.

(5) To promote smart growth principles by encouraging efficient use of land and public facilities and services;

The proposed development also constitutes redevelopment of a former nursing home site which served the community for many years. The property is well served by existing public facilities and services, many of which are offered by the City of Greenbelt.

(6) To create community environments enhanced by a mix of residential, commercial, recreational, open space, employment, and institutional uses; and

As detailed above, the proposed development conforms with the vision and recommendations of the Master Plan by providing age restricted housing within the City. This project will enhance the overall community fabric.

- (7) To permit redevelopment, particularly in areas requiring revitalization, of property owned by a municipality or the Prince George's County Redevelopment Authority.**

This purpose is inapplicable as the Subject Property is not owned by a governmental entity.

- (C) To provide for development in accordance with the site design guidelines established in this Division; and***

This project will be developed in accord with regulations applicable to multifamily development in the R-18 zone and the site design guidelines set forth in Section 27-285 and Section 27-274, which are addressed in greater detail below.

- (D) To provide approval procedures that are easy to understand and consistent for all types of Detailed Site Plans.***

The approval procedures are clearly spelled out in the Zoning Ordinance. The review procedures regarding the approval of detailed site plans are also clearly set forth in the Zoning Ordinance. Detailed site plans are approved by the Prince George's County Planning Board pursuant to Section 27-285 of the Zoning Ordinance.

7.2 SECTION 27-285(b)-DETAILED SITE PLANS

Section 27-285(b) of the Zoning Ordinance provides specific criteria which must be met and satisfied in order for a detailed site plan to be approved. The Zoning Ordinance, in Section 27-285(b), sets forth the specific requirements applicable to the approval of a detailed site plan. A point-by-point analysis of how this application complies with the criteria contained in Section 27-285(b) follows:

Required findings:

- (1) The Planning Board may approve a Detailed Site Plan if it finds that the plan represents a reasonable alternative for satisfying the site design guidelines, without requiring unreasonable costs and without detracting substantially from the utility of the proposed development for its intended use. If it cannot make these findings, the Planning Board may disapprove the Plan.**

As can be seen from a review of the site plan package filed with this application, the proposed apartment housing for the elderly satisfies the site design guidelines and the regulations applicable to the R-18 zone. The building architecture is attractively designed, and construction materials are of the highest quality. The parking provided will serve the needs of the residents and landscaping is also provided to create an attractive view from the street and surrounding properties. Ample amenities are provided on site for the future residents.

The site design guidelines are set forth in Sections 27-283 and 27-274 of the Zoning Ordinance. Section 27-283 applies to

Detailed Site Plans, and states that the site design guidelines are the same as those required for a Conceptual Site Plan, which are contained in Section 27-274. However, the guidelines shall only be used in keeping with the character and purpose of the proposed type of development.

The Site Design Guidelines address General Matters, Parking, Loading and Circulation, Lighting, Views, Green Area, Site and Streetscape Amenities, Grading, Service Areas, Public Spaces, Architecture and Townhouses. Those that are relevant are addressed below.

Section 27-274(a)(1) General. The proposed plan should promote the purposes of the Conceptual Site Plan. The purposes of Conceptual Site Plans are listed in Section 27-272. The General Purposes include providing for development in accordance with the Master Plan and helping fulfill the purposes of the zone in which the land is located. As noted above, the proposed development is apartment housing for the elderly, which is consistent with the underlying zoning category and the Detailed Site Plan demonstrates conformance with the applicable requirements.

The Specific Purposes are set forth in Section 27-274 are addressed below.

Section 27-274(a)(2) Parking, Loading and circulation.
General guidance is given regarding the location of parking and

loading facilities. Surface parking lots should be located and designed to provide safe and efficient vehicular and pedestrian circulation within the site, while minimizing the visual impact of cars. No parking is proposed between the buildings and MD 193. The parking is located convenient to the buildings they served, which is important for an age restricted community. Ample green space and landscaping is provided as well to screen the parking from MD 193. The pedestrian circulation on site is safe and efficient. The residents will have easy access to their units, with parking being provided in close proximity, while the recreational facilities are located to be easily accessed by all the residents.

The one required loading space is located in close proximity to the community building and will not be visible from the street. The loading space is clearly marked.

Section 27-274(a)(3) Lighting. A photometric plan is included with the DSP and ensures that the lighting provided will illuminate important on-site elements, such as the entrances, recreational areas and pedestrian pathways and not spill over into abutting properties.

Section 27-274(a)(4) Views. The guidelines encourage creating scenic views from public areas. The proposed development constitutes redevelopment of a prior use. The buildings and parking areas will be set back to provide both an

adequate setback as well as adequate screening from the public road, a divided arterial roadway.

Section 27-274(a)(5) Green Area. Ample green area will be provided on site and will be accentuated by elements such as landscaping and recreational facilities. On-site green area is designed to complement other site activity areas and is appropriate in size, shape, location, and design to fulfill its intended use. To that end, the green area is easily accessible to the residents to maximize its utility and it is designed to link the on-site recreational facilities. Not only is the green area well defined, but it is also accentuated by landscaping, seating areas and other features which are set back sufficiently from the road to protect the residents from excessive noise. Street furniture is included with the DSP and 60% of the Subject Property will be retained as green area in accordance with the requirements of the R-18 zone.

Section 27-274(a)(6) Site and streetscape amenities. Site and streetscape amenities are addressed in DSP. The recreational amenities provided on site will be easily accessible to the residents.

Section 27-274(a)(7) Grading. The Detailed Site Plan was designed to work with the existing site conditions to the extent possible. Upon completion of the development, areas will be landscaped and planted to enhance the views of the residents.

Section 27-274(a) (8) Service areas. No loading space is required, given the relatively small number of units. However, two trash dumpster locations are provided that will be out of sight from MD 193 but is easily accessible not only to the residents, but to services vehicles as well. The trash dumpsters will also be adequately screened with an enclosure and attractive landscaping.

Section 27-274(a) (9) Public spaces. Buildings are organized and designed to create courtyards and sitting areas and provide access to recreational facilities. These open spaces are designed to accommodate various activities and incorporate sitting areas and landscaping and are readily accessible to the residents. Pedestrian pathways are also provided to connect the open space areas within the development.

Section 27-274(a) (10) Architecture. As discussed in detail above, the architecture of the proposed apartment housing for the elderly is attractive and includes a mixture of materials. The buildings are designed with multiple facade variations so that there is not a flat front or rear façade.

Section 27-274(a) (11) Townhouses and three family dwellings. This consideration is inapplicable to the proposed DSP as there are no townhouses or three family dwellings

- (2) **The Planning Board shall also find that the Detailed Site Plan is in general conformance with the approved Conceptual Site Plan (if one was required).**

This provision is inapplicable.

- (3) **The Planning Board may approve a Detailed Site Plan for Infrastructure if it finds that the plan satisfies the site design guidelines as contained in Section 27-274, prevents offsite property damage, and prevents environmental degradation to safeguard the public's health, safety, welfare, and economic well-being for grading, reforestation, woodland conservation, drainage, erosion, and pollution discharge.**

This provision is inapplicable.

- (4) **The Planning Board may approve a Detailed Site Plan if it finds that the regulated environmental features have been preserved and/or restored in a natural state to the fullest extent possible in accordance with the requirement of Subtitle 24-130(b) (5) .**

The Subject Property was previously developed and the prior development was razed. An NRI has been approved for the site and there are no regulated environmental features to be impacted by the proposed development. A Site Development Concept Plan has also been filed (SDCP 16485-2022-00) and will be approved prior to the acceptance of the DSP. Thus, the Planning Board can find that the regulated environmental features have been preserved and/or restored in a natural state to the fullest extent possible in accordance with the requirement of Subtitle 24-130(b) (5) .

9.0 CONCLUSION

As described above, the applicant submits that the proposed Detailed Site Plan for the proposed apartment housing for the elderly satisfies all of the approval criteria for detailed site plans as set forth in Sections 27-281 and 27-285 of the Zoning

Ordinance. For these reasons, the Applicant requests that this Detailed Site Plan be approved as submitted.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'THH', with a long horizontal flourish extending to the right.

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