
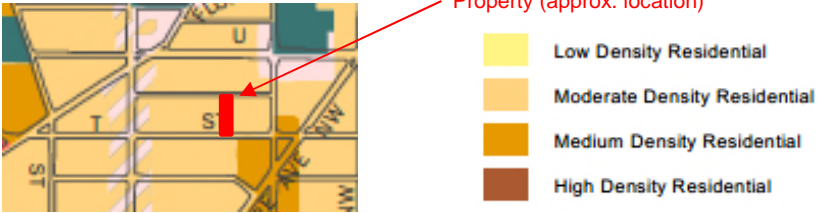


### Consistency with the Comprehensive Plan

The zoning relief requested in the instant application can be granted without substantial detriment to the intent and purposes of the Zoning Regulations and Zoning Map. One item enumerated in such intent and purposes is that the request for zoning relief must not be inconsistent with the Comprehensive Plan. As set forth herein, the Project affirmatively advances numerous individual objectives of the Comprehensive Plan and is inconsistent with none. This analysis summarizes the application of the Project to only approximately three dozen of the specific policy objectives articulated in the Comprehensive Plan; objectives not identified here are generally not relevant to or required for the Project. The Property is not within the boundary of any District Small Area Plan.

Element	Map Designation	Application to the Project
<p><b>Generalized Policy Map</b></p>	<p>The subject Property is designated on the Generalized Policy Map as a “Neighborhood Conservation Area,” which is defined as being generally residential with only modest-scale, infill type housing development. 10-A DCMR § 223.4.</p> 	<p>The Project is a modest-scale, infill housing development and therefore consistent with the “Neighborhood Conservation Area” designation.</p>
<p><b>Future Land Use Map</b></p>	<p>The subject Property is designated on the Future Land Use Map as “Moderate Density Residential,” which is defined as appropriate for 2-4 unit residential buildings, rowhouses, and low-rise apartment buildings. <i>Id.</i> § 225.4.</p> 	<p>The Project is a 4-story rowhouse-type development and therefore consistent with the “Moderate Density Residential” designation.</p>

Element	Policy Objective	Application to the Project
<p><b>Land Use Element</b></p>	<p><b><i>Policy LU-1.4.1: Infill Development</i></b>—Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. <i>Id.</i> § 307.5.</p>	<p>The Project is an infill development that complements the character of the surrounding area and does not create sharp changes in physical development pattern.</p>
	<p><b><i>Policy LU-1.4.3: Zoning of Infill Sites</i></b>—Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development. <i>Id.</i> § 307.7.</p>	<p>Even with the requested zoning relief, the Project is compatible with the prevailing development pattern surrounding the Project. Many of the surrounding buildings have lot occupancies and FARs higher than the Project and many also have nonconforming closed courts.</p>
	<p><b><i>Policy LU-2.1.1: Variety of Neighborhood Types</i></b>—Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. <i>Id.</i> § 309.5.</p>	<p>The Project’s use, form, architectural detailing, and density preserves and enhances the positive elements of the surrounding neighborhood.</p>

Element	Policy Objective	Application to the Project
	<p><b><i>Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods</i></b>—Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. <i>Id.</i> § 309.8.</p> <p><b><i>Policy LU-2.1.4: Rehabilitation Before Demolition</i></b>—In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition. <i>Id.</i> § 309.9.</p> <p><b><i>Policy LU-2.1.6: Teardowns</i></b>—Discourage the replacement of quality homes in good physical condition with new homes that are substantially larger, taller, and bulkier than the prevailing building stock. <i>Id.</i> § 309.11.</p> <p><b><i>Policy LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings</i></b>—Reduce the number of vacant and abandoned buildings in the city through renovation, rehabilitation, and where necessary, demolition. Implement programs that encourage the owners of such buildings to sell or renovate them, and apply liens, fines, and other penalties for non-compliant properties. <i>Id.</i> § 310.4.</p>	<p>The Project strikes an appropriate balance between the parallel goals of increasing housing supply and not over-developing in a historic district.</p> <p>Although the Project involves the demolition of a 1970s-era single-family residence, it is not inconsistent with these objectives, because the existing building is not consistent with the design objectives of the historic district, is not in good physical condition, and the Project is not substantially larger, taller, or bulkier than the prevailing building stock. Read together, these three objectives suggest demolition should be “generally” discouraged but may be “necessary” in some instances. The Project is one such instance where it is necessary given the condition of the existing building, its inconsistency with historic design objectives and its underutilization of the Property.</p>

Element	Policy Objective	Application to the Project
	<p><b>Policy LU-2.1.7: Conservation of Row House Neighborhoods</b>— Protect the character of row house neighborhoods by requiring the height and scale of structures to be consistent with the existing pattern, considering additional row house neighborhoods for “historic district” designation, and regulating the subdivision of row houses into multiple dwellings. Upward and outward extension of row houses which compromise their design and scale should be discouraged. <i>Id.</i> § 309.12.</p>	<p>The Project is consistent with the existing pattern of development in the vicinity of the Property. Where the Project is slightly taller than the surrounding buildings, it is set back so as to not be visible from the street.</p>
<p><b>Housing Element</b></p>	<p><b>Policy H-1.1.1: Private Sector Support</b>—Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. <i>Id.</i> § 503.2.</p>	<p>The Project provides a net of four new units at a variety of sizes that reflect current demographic demands in the District.</p>
	<p><b>Policy H-1.1.3: Balanced Growth</b>—Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. <i>Id.</i> § 503.4.</p>	<p>The existing building on the Property underutilizes the site. The addition of four net new units contributes to the need for additional housing supply in the District.</p>
	<p><b>Policy H-1.3.1: Housing for Families</b>—Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. <i>Id.</i> § 505.6.</p>	<p>The Project includes two units with three bedrooms and one unit of two bedrooms, all of which accommodate families with children.</p>

Element	Policy Objective	Application to the Project
	<p><b>Policy H-4.2.4: Barrier-Free Housing for the Disabled</b>—Work toward a target of designing eight (8) percent of the new housing units added to the city’s stock over the next 20 years specifically to meet the accessibility needs of persons with physical disabilities. These units should be spread evenly across affordability brackets. <i>Id.</i> § 516.10.</p>	<p>The Project includes an accessibility lift in order to accommodate individuals with physical disabilities. This feature is relatively uncommon in the neighborhood, which is largely made up of buildings that pre-date accessibility requirements.</p>
<p><b>Env’tl. Protection Element</b></p>	<p><b>Policy E-1.1.2: Tree Requirements in New Development</b>—Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. <i>Id.</i> § 603.5.</p>	<p>As part of the Project, new landscaping including one or more street trees will be installed in the public space along the street in front of the Property.</p>
	<p><b>Policy E-1.1.3: Landscaping</b>—Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. <i>Id.</i> § 603.6.</p>	<p>The Project’s landscaping beautifies the street, enhances the street, reduces stormwater, and contributes to the strong sense of character that exists on T Street now.</p>
	<p><b>Policy E-2.2.3: Reducing Home Heating and Cooling Costs</b>—Encourage the use of energy-efficient systems and methods for home insulation, heating, and cooling, both to conserve natural resources and also to reduce energy costs for those members of the community who are least able to afford them. <i>Id.</i> § 610.5.</p>	<p>The Project significantly improves upon energy efficiency relative to the existing building on the Property.</p>

Element	Policy Objective	Application to the Project
	<p><b>Policy E-3.1.1: Maximizing Permeable Surfaces</b>—Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. <i>Id.</i> § 613.2.</p>	<p>The Project’s surface parking spaces feature permeable materials to absorb stormwater and reduce runoff.</p>
	<p><b>Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff</b>—Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. <i>Id.</i> § 613.3.</p>	<p>The Project features a green roof to reduce stormwater runoff.</p>
<p><b>Urban Design Element</b></p>	<p><b>Policy UD-1.1.2: Reinforcing the L’Enfant and McMillan Plans</b>—Respect and reinforce the L’Enfant and McMillan Plans to maintain the District’s unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L’Enfant Plan reservations (green spaces), limits on street and alley closings, and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds. <i>Id.</i> § 903.7.</p>	<p>T Street, NW in the vicinity of the Project is part of the historic L’Enfant Plan. The Project’s placement, orientation, massing, height, and articulation all reinforce the historic street layout as envisioned in the L’Enfant plan.</p>
	<p><b>Policy UD-2.2.1: Neighborhood Character and Identity</b>—Strengthen the defining visual qualities of Washington’s neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. <i>Id.</i> § 910.6.</p>	<p>The Project strengthens the defining visual quality of T Street. The scale of the Project relates strongly to the neighborhood context.</p>

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	<p><b>Policy UD-2.2.2: Areas of Strong Architectural Character</b>—Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development within such areas does not need to replicate prevailing architectural styles exactly but should be complementary in form, height, and bulk. <i>Id.</i> § 910.7.</p>	<p>The Project preserves the architectural continuity and design integrity of the Strivers’ Section Historic District and is complementary to the surrounding historic and contributing buildings in form, height, and bulk.</p>
	<p><b>Policy UD-2.2.5: Creating Attractive Facades</b>—Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street. <i>Id.</i> § 910.12.</p>	<p>The Project creates visual interest through a well-designed and articulated façade and avoids the negative design features the Comp. Plan discourages.</p>
	<p><b>Policy UD-2.2.6: Maintaining Facade Lines</b>—Generally maintain the established facade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic facade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing facades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm. <i>Id.</i> § 910.14.</p>	<p>The Project maintains the prevailing façade line of the block that it is on and is moreover consistent with the façade and cornice line of the two immediately adjacent buildings. The Project’s details and articulation complements the established rhythm of the block.</p>
	<p><b>Policy UD-2.2.7: Infill Development</b>—Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. <i>Id.</i> § 910.15.</p>	<p>The Project does not present any overpowering contrasts.</p>

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	<p><b>Policy UD-2.2.10: Surface Parking</b>—Encourage the use of shade trees and landscaping or screening of surface parking areas. Parking should be designed so that it is not the dominant element of the street, and should be located behind development rather than in front of it. <i>Id.</i> § 910.19.</p>	<p>The Project’s parking is located at the rear of the Property rather than in the front of it.</p>
	<p><b>Policy UD-3.1.1: Improving Streetscape Design</b>—Improve the appearance and identity of the District’s streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street “furniture”, and adjacent building facades. <i>Id.</i> § 913.8.</p>	<p>The Project’s landscaping and streetscaping improve upon the appearance of T Street NW.</p>
<p><b>Historic Preservation Element</b></p>	<p><b>Policy HP-2.3.2: Historic Image of the City</b>—Protect and enhance the views and vistas, both natural and designed, which are an integral part of Washington’s historic image. Preserve the historic skyline formed by the region’s natural features and topography and its historically significant buildings and monuments from intrusions such as communication antennas and water towers. Preserve the horizontal character of the national capital through enforcement of the 1910 Height of Buildings Act. <i>Id.</i> § 1010.4.</p>	<p>The Project preserves the horizontal character of its neighborhood and the District more generally and is respectful of the District’s historic image.</p>
	<p><b>Policy HP-2.3.3: Spatial Character of L’Enfant Plan Streets</b>—Protect the generous open space and reciprocal views of the L’Enfant Plan streets, avenues, and reservations. Protect the integrity and form of the L’Enfant system of streets and reservations from inappropriate new buildings and physical incursions. Support public and private efforts to provide and maintain street trees to help frame axial views and reinforce the city’s historic landscape character. <i>Id.</i> § 1010.5.</p>	<p>As noted above, the Project respects and reinforces the integrity of the L’Enfant Plan.</p>

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	<p><b>Policy HP-2.4.3: Compatible Development</b>—Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, preserve the established form of development as evidenced by lot coverage limitations, yard requirements open space, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, repair, maintenance, and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail. <i>Id.</i> § 1011.8.</p>	<p>The Project preserves the established form of development, and with the lot occupancy variance is nonetheless consistent with the surrounding historic buildings (many of which are nonconforming). The Project is in scale and respectful of its historic context and uses historically appropriate materials and detail.</p>
	<p><b>Policy HP-2.4.4: Suitability to the Historic Context</b>—Apply design standards in a manner that accounts for different levels of historic significance and different types of historic environments. Encourage restoration of historic landmarks while allowing enhancements of equivalent design quality, provided such enhancements do not damage the landmark. Exercise greater restraint in residential historic districts and areas with a clear prevailing development pattern or architectural style. Allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more dramatic new design, for example, in non-residential areas and in areas without a significant design pattern. <i>Id.</i> § 1011.9.</p>	<p>The Project’s design accounts for the historic context and is consistent in form and character with the prevailing development pattern and architectural style of the Historic District.</p>
<p><b>Area Element</b></p>	<p><b>Policy NNW-1.1.1: Residential Neighborhoods</b>—Maintain and enhance the historic, architecturally distinctive mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, Foggy Bottom, Dupont Circle, Sheridan-Kalorama, Logan Circle, Mount Vernon Square, and Shaw. Ensure that infill development within these areas is architecturally compatible with its surroundings and positively contributes to the identity and quality of each neighborhood. <i>Id.</i> § 2108.2.</p>	<p>The Project, as an infill development in an architecturally distinctive Near Northwest residential neighborhood, is architecturally compatible with its surroundings and contributes positively to the identity of the neighborhood.</p>

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	<p><b>Policy NNW-1.1.7: Loss of Housing</b>—Strongly discourage the demolition of viable housing or the conversion of occupied housing units to non-residential uses such as medical offices, hotels, and institutions. Maintain zoning regulations that limit the encroachment of non-residential uses into Near Northwest neighborhoods, particularly around the new Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom. <i>Id.</i> § 2108.8.</p>	<p>The existing structure on the Property is not viable housing. Instead, the Project on net contributes four new housing units on a currently underutilized lot.</p>
	<p><b>Policy NNW-1.2.9: Design Review</b>—Use the historic preservation design review process to promote superior architecture and urban design in Near Northwest’s designated historic districts, including Georgetown, Sheridan-Kalorama, Strivers Section, Dupont Circle, Foggy Bottom, Massachusetts Avenue, Mount Vernon Square, Greater 14th Street, Logan Circle, Blagden Alley, and Shaw. <i>Id.</i> § 2109.9.</p>	<p>The Project underwent the historic preservation design review process and as a result is an expression of superior architecture and urban design in a designated historic district.</p>
	<p><b>Policy NNW-1.2.10: Sustainable Development</b>—Encourage the use of green building practices within Near Northwest, with a particular emphasis on green roofs. Rooftop gardens should be encouraged in new construction and major rehabilitation projects as a way to create additional green space, reduce stormwater runoff, and provide an amenity for residents. <i>Id.</i> § 2109.10.</p>	<p>The Project employs green roofs to create additional green space, reduce stormwater runoff, and provide an amenity for residents.</p>
	<p><b>Policy NNW-2.2.1: Maintaining Dupont Circle’s Residential Character</b>—Maintain the Dupont Circle neighborhood as a primarily residential area and discourage the expansion of commercial uses into currently residential areas. For the purposes of this policy, Dupont Circle shall be defined as the area generally bounded by Rock Creek Park on the west, 15th Street NW on the east, Massachusetts Avenue (east of Connecticut Avenue NW) and N Street (west of Connecticut Avenue) on the south, and Florida Avenue and U Street on the north. <i>Id.</i> § 2112.3.</p>	<p>Given the Project’s use exclusively for residential purposes, the Project reinforces the Dupont Circle neighborhood (as defined in the Comprehensive Plan) as a primarily residential area.</p>

	<p><b>Policy NNW-2.2.2: Dupont Circle Area Policies</b>—Use the following standards in evaluating new buildings and alterations in the Dupont Circle area:</p> <ul style="list-style-type: none"> <li>a. Require a scale of development consistent with the nature and character of the Dupont Circle area in height and bulk;</li> <li>b. Ensure a general compatibility in the scale of new buildings with older low-scale buildings by restricting the maximum permitted height and floor area ratio of the new buildings to that of the underlying zone;</li> <li>c. Preclude demolitions or partial demolitions that would lead to an increase in height and floor area ratio inappropriate to the area;</li> <li>d. Enhance the residential character of the area by maintaining existing residential uses and controlling the scale, location, and density of commercial and residential development; and</li> <li>e. Ensure compatibility of development with the Comprehensive Plan.</li> </ul> <p><i>Id.</i> § 2112.4.</p>	<p>The Project satisfies the standards to be used in evaluating new buildings in the Dupont Circle area:</p> <ul style="list-style-type: none"> <li>a. The Project is consistent with the prevailing height and bulk of the neighborhood;</li> <li>b. The Project is compatible in scale with the height and FAR of the existing buildings in the zone (many of which do not conform to existing FAR limits);</li> <li>c. The Project’s demolition does not lead to inappropriate height or densities; rather the Project’s ultimate height and density are compatible with those of surrounding buildings;</li> <li>d. The Project maintains the existing residential use on the Property; and</li> <li>e. The Project is otherwise compatible with the Comprehensive Plan.</li> </ul>
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