Consistency with the District of Columbia Comprehensive Plan

Map Designation Application to the Project Parcel I (the "Property") is designated on the Generalized Policy Map as a "Land Use The Project* is part of a new mixed-use community containing Change Area (Federal)," which areas are intended "to encourage and facilitate new housing, retail, services, office uses, outdoor areas and other development . . . to become mixed-use communities containing housing, retail shops, civic facilities. As part of the overall redevelopment of the services, workplaces, parks and civic facilities, . . . [and] to create high quality environments Southeast Federal Center into The Yards, the Project that include exemplary site and architectural design and that are compatible with and do contributes to a high quality environment with exemplary site not negatively impact nearby neighborhoods." 10-A DCMR §§ 223.11, 223.12. and architectural design that is compatible with and does not negatively impact nearby neighborhoods. HUUUT Parcel I (approx. location) SE SE Neighborhood Conservation Areas Neighborhood Enhancement Areas Land Use Change Areas (*Unless otherwise defined in this Exhibit, all capitalized terms Land Use Change Areas (Federal) used herein have the meaning first set forth in the Statement to which this Exhibit is attached.) The Property is shown on the Future Land Use Map as mixed-use "High Density The Project is a high-rise, mixed-use building consistent with Residential" and "High Density Commercial" allowing for high-rise apartment and/or the Future Land Use Map designation applicable to Parcel I. commercial buildings in excess of 8 stories and expressly contemplating C-3-C zoning. Id. §§ The Zoning Map designation applicable to the Property is 225.6, 225.11. consistent with the zone designations contemplated in the high density zones. Parcel I (approx. location) Low Density Residential Low Density Commercial Moderate Density Commercial Moderate Density Residential Medium Density Residential Medium Density Commercial High Density Residential High Density Commercial

Policy Objective	Application to the Project
Framework Element: Guiding Principles	
1. Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives such as poverty, crime, and homelessness. <i>Id.</i> § 217.1	The Project represents positive, desirable change, and improvement of a vacant lot.
3. Diversity also means maintaining and enhancing the District's mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples. <i>Id.</i> § 217.3	The Project includes a substantial amount of new housing including several large units that add unit type diversity to the housing stock.
4. The District needs both residential and non-residential growth to survive. Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. <i>Id.</i> § 217.4	The Project adds both residential and non-residential uses in support of this principle.
5. Much of the growth that is forecast during the next 20 years is expected to occur on large sites that are currently isolated from the rest of the city. Rather than letting these sites develop as gated or self-contained communities, they should become part of the city's urban fabric through the continuation of street patterns, open space corridors and compatible development patterns where they meet existing neighborhoods. Since the District is landlocked, its large sites must be viewed as extraordinarily valuable assets. Not all should be used right away-some should be "banked" for the future. <i>Id.</i> § 217.5	The Project is located on a large site that will be developed in a manner that improves the surrounding street grid to become integrated into and compatible with surrounding development.
6. Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. <i>Id.</i> § 217.6	The Project is a redevelopment of an infill site near transit. The Project respects the surrounding community.
15. Public input in decisions about land use and development is an essential part of creating successful neighborhoods, from development of the Comprehensive Plan to every facet of its implementation. <i>Id.</i> § 218.8	The Project's design and mix of uses are the result of several months of community engagement and public participation. The Applicant expects that such engagement and participation will continue through the design review process.
25. Increased mobility can no longer be achieved simply by building more roads. The priority must be on investment in other forms of transportation, particularly transit. Mobility can be enhanced further by improving the connections between different transportation modes, improving traveler safety and security, and increasing system efficiency. <i>Id.</i> § 220.1	The Project encourages multi-modal access given the location to the Metrorail, its prioritization of walking and bicycling, and its relative de-emphasis of vehicles.
26. Transportation facilities, including streets, bridges, transit, sidewalks, and paths, provide access to land and they provide mobility for residents and others. Investments in the transportation network must be balanced to serve local access needs for pedestrians, bicyclists, transit users, autos and delivery trucks as well as the needs of residents and others to move around and through the city. <i>Id.</i> § 220.2	The Project supports and serves pedestrians and cyclists. Loading for the Project occurs entirely out of the public realm.

31. The District's communities are connected by a shared heritage of urban design, reflecting the legacy of the L'Enfant Plan, the McMillan Plan, the Height Act of 1910, and preservation of much of the historic urban fabric. After more than two centuries of building, the nation's capital is still a remarkable place. Urban design and streetscape policies must retain the historic, majestic, and beautiful qualities that make Washington unique among American cities. <i>Id.</i> § 220.7 34. As the nation's capital, the District should be a role model for environmental sustainability. Building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. <i>Id.</i> § 221.3	The Project applies urban design principles that are compatible with the surrounding buildings and that reinforce contemporary best practices such as orientation to the street and a lack of surface parking. The Project is constructed on an infill, unforested location and will result in the planting of new trees. The Project is designed with environmentally-progressive principles and will be certified LEED Silver. The Project adds many other green features. The Project's transit-oriented location is	
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35. Planning decisions should improve the health of District residents by reducing exposure to hazardous materials, improving the quality of surface and groundwater, and encouraging land use patterns and land uses that reduce air pollution and facilitate pedestrian and bicycle travel. <i>Id.</i> § 221.4	·	
Land Use Element		
Policy LU-1.1.2: "Greater" Downtown—Promote the perception of Downtown Washington as a series of connected business districts, including Metro Center/Retail Core, Golden Triangle/K Street, Federal Triangle, Northwest Rectangle, Gallery Place/Penn Quarter, Downtown East/Judiciary Square, Mount Vernon District, NoMA, Near Southwest/L'Enfant Plaza, South Capitol, and the Southeast Federal Center. The traditional definition of Downtown (roughly bounded by 16th Street, the National Mall, and Massachusetts Avenue) does not fully convey the geographic extent of Washington's Central Business District, or the many unique activities it supports. Id. § 304.7	The Project is a part of extending The Yards to the west and toward the core of economic activity around The Ballpark and the Navy Yard Metrorail station, and as a result it advances this objective of connecting business districts in the growing "Greater" downtown area.	

Policy LU-1.1.3: Central Employment Area—Continue the joint federal/District designation of the Central Employment Area ["CEA"] within the District of Columbia. The CEA shall include existing "core" federal facilities such as the US Capitol Building, the White House, and the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States Government. Additionally, the CEA shall include the greatest concentration of the city's private office development, and higher density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses. Given federally-imposed height limits, the scarcity of vacant land in the core of the city, and the importance of protecting historic resources, the CEA may include additional land necessary to support economic growth and federal expansion. The CEA may be used to guide the District's economic development initiatives, and may be incorporated in its planning and building standards (for example, parking requirements) to reinforce urban character. The CEA is also important because it is part of the "point system" used by the General Services Administration to establish federal leases. The boundaries of the CEA are shown in Figure 3.2. Id. § 304.8	The Project is within the boundaries of the CEA. It includes a relatively high overall density of residential and commercial uses. The Project's density supports economic growth and the Project's design reinforces the urban character encouraged within the CEA.
Policy LU-1.1.5: Urban Mixed Use Neighborhoods—Encourage new central city mixed-use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas: 1. Mt. Vernon Triangle; 2. North of Massachusetts Avenue (NoMA); 3. Downtown East; 4. South Capitol Street corridor/Stadium area; 5. Near Southeast/Navy Yard; 6. Center Leg Freeway air rights; and 7. Union Station air rights The location of these areas is shown in the Central Washington and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should ensure that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land-use mix Id. § 304.11	The Project is within the prioritized central city mixed-use neighborhoods identified in the Lower Anacostia Waterfront/Near Southwest Area Element. The Project and the overall redevelopment of The Yards is part of an attractive pedestrian-oriented neighborhood with high-quality architecture and interesting, high-quality urban spaces.
Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites—Recognize the potential for large, government-owned properties to supply needed community services, create local housing and employment opportunities, remove barriers between neighborhoods, provide large and significant new parks, enhance waterfront access, and improve and stabilize the city's neighborhoods. <i>Id.</i> § 305.5	The Project is part of a comprehensive redevelopment of a large, formerly government-owned site that is anticipated to include a mix of housing, retail and office uses. The Project continues with efforts to improve and stabilize Southeast and Capital Riverfront neighborhoods.
Policy LU-1.2.2: Mix of Uses on Large Sites—Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses. Id. § 305.7 Policy LU-1.2.3: Federal Sites—Work closely with the federal government on re-use planning for those federal lands where a change of use may take place in the future. Even where such properties will remain in federal use, the impacts of new activities on adjacent District neighborhoods should be acknowledged and proactively addressed by federal parties. Id. § 305.8	The Project's mix of uses are compatible with adjacent uses and provide a benefit to surrounding existing neighborhoods. The Project's mix of uses follows the Future Land Use Map and other Elements of the Plan. The Project is the result of re-use of a former federal office site and represents a mix of federal- and District-led community-focused planning.

Policy LU-1.2.6: New Neighborhoods and the Urban Fabric—On those large sites that are redeveloped as The Project is part of a large site new neighborhoods (such as Reservation 13), integrate new development into the fabric of the city to the redevelopment that has been reintegrated greatest extent feasible. Incorporate extensions of the city street grid, public access and circulation into the fabric of the DC street grid. The improvements, new public open spaces, and building intensities and massing that complement adjacent Project's new circulation improvements, open developed areas. Such sites should not be developed as self-contained communities, isolated or gated from spaces, and massing complements adjacent their surroundings. Id. § 305.11 developed areas. It is not isolated or gated. Policy LU-1.3.1: Station Areas as Neighborhood Centers—Encourage the development of Metro stations as The Project contributes to the emergence of anchors for economic and civic development in locations that currently lack adequate neighborhood The Yards as a Metro-anchored economic shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail development area with ample amounts of stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, new housing. The Project advances the provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood individual aspects of this policy objective stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development (e.g., it increases jobs, provides a range of and public transportation opportunities which the stations provide. This policy should not be interpreted to retail goods and services, and a stronger outweigh other land use policies which call for neighborhood conservation. Each Metro station area is sense of place, among other items). unique and must be treated as such in planning and development decisions. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. Id. § 306.1 Policy LU-1.3.2: Development Around Metrorail Stations—Concentrate redevelopment efforts on those The Project represents concentrated Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly development around a Metrorail station that, stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the upon initial creation of the SEFC zones, had vicinity of the station entrance. Ensure that development above and around such stations emphasizes land great opportunity for redevelopment given uses and building forms which minimize the necessity of automobile use and maximize transit ridership the large amount of previously-vacant or while reflecting the design capacity of each station and respecting the character and needs of the government-held land. The Project's design surrounding areas. Id. § 306.11 minimizes auto usage and encourages transit ridership without overcrowding the station. Policy LU-1.3.4: Design To Encourage Transit Use—Require architectural and site planning improvements The Project features urban architecture and around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, site planning aspects that, given the proximity comfort and convenience of passengers walking to the station or transferring to and from local buses. These of the Metrorail station, encourage improvements should include lighting, signage, landscaping, and security measures. Discourage the pedestrian and bicycle access and safety to development of station areas with conventional suburban building forms, such as shopping centers such station. Streetscaping and landscaping surrounded by surface parking lots. Id. § 306.13 details serve pedestrians and enhance safety. The Project has no surface parking lots. Policy LU-1.3.6: Parking Near Metro Stations—Encourage the creative management of parking around All of the Project's parking is located belowtransit stations, ensuring that automobile needs are balanced with transit, pedestrian, and bicycle travel grade and does not encourage all-day needs. New parking should generally be set behind or underneath buildings and geared toward short-term commuters. The Project's parking and loading users rather than all day commuters. Id. § 306.15 moves Project users' and visitors' automobiles out of the public realm in favor of pedestrian, transit and cyclist needs.

Policy LU-2.1.1: Variety of Neighborhood Types —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	The Project advances this objective of having a range of residential neighborhoods that includes high-density mixed-use types. The mixed-use character of the Project is a positive element that enhances the character of the surrounding area.
Policy LU-2.1.2: Neighborhood Revitalization —Facilitate orderly neighborhood revitalization and stabilization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need. Use social, economic, and physical indicators such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate as key indicators of need. <i>Id.</i> § 309.7	The Project is a part of an orderly neighborhood revitalization effort in Southeast DC made possible through disposition of now and formerly government-owned land, a type of government action contemplated in this objective.
Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods —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	The Project increases housing supply and expands retail presence, which will not harm the character of other neighborhoods but will instead strengthen neighborhood character.
Policy LU-2.1.10: Multi-Family Neighborhoods —Maintain the multi-family residential character of the District's Medium and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible. <i>Id.</i> § 309.15	The blocks surrounding the Project are generally planned as High-Density in nature, and the Project maintains that character while adding neighborhood-serving ground floor uses.
Policy LU-2.1.11: Residential Parking Requirements—Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. Id. § 309.16 Policy LU-2.2.4: Neighborhood Beautification—Encourage projects which improve the visual quality of the	The Project's parking is responsive to the expected demand generated by its users in light of the Project's proximity to transit. The off-street parking and loading minimize disruptions to traffic resulting from the Project. The Project includes TDM measures. The Project's landscaping and streetscaping
District's neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. <i>Id.</i> § 310.5	efforts advance this beautification objective.
Policy LU-2.3.2: Mitigation of Commercial Development Impacts—Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts on surrounding residential areas. Before commercial development is approved, establish requirements for traffic and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid such adverse effects. Id. § 311.4	The Project's impacts from traffic, litter, shadows, and the like are all carefully managed and mitigated as part of its design and operational planning efforts.

Policy LU-2.3.3: Buffering Requirements—Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. Id. § 311.5 Policy LU-2.3.4: Transitional and Buffer Zone Districts—Maintain mixed use zone districts which serve as transitional or buffer areas between residential and commercial districts, and which also may contain institutional, non-profit, embassy/chancery, and office-type uses. Zoning regulations for these areas (which currently include the SP-1 and SP-2 zones) should ensure that development is harmonious with its surroundings, achieves appropriate height and density transitions, and protects neighborhood character. Id. § 311.6	The Project's commercial uses are not adjacent to lower density residential areas, but the Project nonetheless includes appropriate buffers. The Project is part of a mixed-use zone that integrates residential and commercial uses at heights and densities appropriate for the nearby transit infrastructure.
Policy LU-2.4.1: Promotion of Commercial Centers—Promote the vitality of the District's commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, and sustain the city's role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and ease of access for nearby residents. Id. § 312.5	The Project promotes the vitality of The Yards as an emerging node of economic and housing activity. The Project expands economic and job opportunities and invites social interaction.
Policy LU-2.4.2: Hierarchy of Commercial Centers—Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Activities in each type of center should reflect its intended role and market area, as defined in the Framework Element. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. Id. § 312.6	The Yards exists within a spectrum of commercial centers based on its intended neighborhood-serving market area. The Project's mix of residential and commercial uses reinforce the regional-serving scale of The Yards.
Policy LU-2.4.5: Encouraging Nodal Development —Discourage auto-oriented commercial "strip" development and instead encourage pedestrian-oriented "nodes" of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them. <i>Id.</i> § 312.9	The Project encourages the nodal nature of The Yards around the Navy Yard Metrorail station. The Project's height, mass, and scale do not unreasonably impact the immediate surrounding context, which is generally of comparable heights and scale.
Policy LU-2.4.6: Scale and Design of New Commercial Uses —Ensure that new uses within commercial districts are developed at a height, mass, scale and design that is appropriate and compatible with surrounding areas. <i>Id.</i> § 312.1	The Project's single-level commercial uses are of an appropriate scale and design relative to the economic goals for The Yards.
Policy LU-2.4.8: Addressing Commercial Parking Impacts —Ensure that the District's zoning regulations consider the traffic and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery. <i>Id.</i> § 312.12	The Project includes transportation demand management measures and a loading plan that mitigates potential demand and congestion problems.

Policy LU-2.4.10: Use of Public Space within Commercial Centers—Carefully manage the use of sidewalks and other public spaces within commercial districts to avoid pedestrian obstructions and to provide an attractive and accessible environment for shoppers. Where feasible, the development of outdoor sidewalks cafes, flower stands, and similar uses which "animate" the street should be encouraged. Conversely, the enclosure of outdoor sidewalk space with permanent structures should generally be discouraged. Id. § 312.14	The Project's proposed ground level uses enhance the pedestrian realm and further animate that environment with sidewalk cafés and other similar uses. The Project does not permanently enclose outdoor public space but instead facilitates the creation of
Policy LU-3.5.1: District/Federal Joint Planning—Coordinate with the National Capital Planning Commission ["NCPC"], the National Park Service, the General Services Administration ["GSA"], the Architect of the Capitol, and other federal agencies to address planning issues involving federal lands, including the monumental core, the waterfront, and the park and open space network. Encourage the use of master plans, created through participatory planning processes, to guide the use of large federal sites. <i>Id.</i> § 318.6	new privately-owned public spaces The Project is part of the master planned neighborhood in The Yards, which master planning has involved input from NCPC, GSA, CFA, and other federal and District agencies. The Yards master plan is a fantastic example of participatory planning for the reuse of large federal sites.
Policy LU-3.5.2: Federal Sites and Adjacent Neighborhoods —Support expansion of the federal workforce and redevelopment of federal sites in a manner that is consistent with neighborhood revitalization, urban design, economic development, and environmental quality goals. Federal land uses should strive to maintain land use compatibility with adjacent neighborhoods. <i>Id.</i> § 318.7	The Project is part of a redevelopment of a former federal site in a manner that is compatible with adjacent neighborhood land uses.
Transportation Element	
Policy T-1.1.2: Land Use Impact Assessment—Assess the transportation impacts of development projects using multi-modal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment to land use impacts. Id. § 403.8	This application will include a Comprehensive Transportation Review to assess the Project's transportation impacts using multi-modal standards to allow for more accurate measurements and mitigation techniques. The Project will adhere to rigorous environmental standards established by the USGBC and will include multiple features that mitigate its environmental impacts, as outlined in a LEED scorecard and GAR checklist to be filed with this application.
Policy T-1.1.3: Context-Sensitive Transportation —Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. <i>Id.</i> § 403.9	The Project supports the development of a private street that will be compatible with the Project's mix of uses and will advance goals for compact, transit-accessible development.

Policy T-1.1.4: Transit-Oriented Development —Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. <i>Id.</i> § 403.1	The Project represents textbook transit- oriented development given its proximity to the Metrorail station.	
Policy T-1.1.5: Joint Development —Attract new riders to the transit system by fostering transit-supportive commercial and residential joint development projects on Washington Metropolitan Area Transit Authority (WMATA) owned or controlled land and on private properties adjacent to Metrorail stations. <i>Id.</i> § 403.11	The Project has potential to attract new riders to the transit system through new development on property adjacent to Metro.	
Policy T-1.2.3: Discouraging Auto-Oriented Uses —Discourage certain uses, like "drive-through" businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. <i>Id.</i> § 404.8	The Project does not feature any auto- oriented uses. The new adjacent private street is designed as a multi-modal public amenity. The Project's design minimizes curb cuts and places them away from pedestrian entrances.	
Policy T-1.3.1: Transit-Accessible Employment —Work closely with the federal government and suburban jurisdictions to support transit-oriented and transit-accessible employment throughout the region. <i>Id.</i> § 405.11	The Project's new ground floor uses add transit-accessible employment opportunities.	
Policy T-2.3.3: Bicycle Safety —Increase bicycle safety through traffic calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improving bicycle access where barriers to bicycle travel now exist. <i>Id.</i> § 409.1	The Project provides both curbside bicycle parking for short-term visitors and long-term bicycle parking inside the building.	
Policy T-2.4.1: Pedestrian Network —Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city. <i>Id.</i> § 410.5	The Project improves sidewalk and pedestrian areas along the existing public streets and the proposed private street.	
Policy T-3.1.1: Transportation Demand Management (TDM) Programs —Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. <i>Id.</i> § 414.8	The Project will include TDM measures to reduce automobile usage and increase transit usage.	
Policy T-3.2.1: Parking Duration in Commercial Areas —Encourage the supply and management of public parking in commercial areas to afford priority to customers and others on business errands, and discourage the use of these spaces by all-day parkers, including establishment employees. <i>Id.</i> § 415.3	The Project's parking is not designed to serve all-day parkers, but includes parking intended to serve residents, customers, and patrons.	
Housing Element		
Policy H-1.1.1: Private Sector Support —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	The Project is a public-private partnership to provide new housing and affordable housing consistent with other District policies and objectives.	
Policy H-1.1.2: Production Incentives —Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing. <i>Id.</i> § 503.3	The Project is the subject of a mix of regulatory (e.g., design review) and other financial incentives (e.g., federal disposition) to achieve District housing production goals.	

Policy H-1.1.3: Balanced Growth —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	The Project is part of a development on vacant, underutilized land that is planned and zoned to meet the District's long-term highdensity housing needs. Because of the Project's location near the Metro station, high-density housing is the most appropriate form of housing.
Policy H-1.1.4: Mixed Use Development —Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. <i>Id.</i> § 503.5	The Project exemplifies this objective because it is a mixed-use development with housing on commercially-zoned land around a Metrorail station that is at a center of commercial activity.
Policy H-1.1.6: Housing in the Central City—Absorb a substantial component of the demand for new high-density housing in Central Washington and along the Anacostia River. Absorbing the demand for higher density units within these areas is an effective way to meet housing demands, create mixed-use areas, and conserve single family residential neighborhoods throughout the city. Mixed income, higher density downtown housing also provides the opportunity to create vibrant street life, and to support the restaurants, retail, entertainment, and other amenities that are desired and needed in the heart of the city. Id. § 503.7 Policy H-1.1.7: New Neighborhoods—Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition to housing, these neighborhoods must include well planned retail, public schools, attractive parks, open space and recreation, as well as needed supportive services. The new neighborhoods should include a variety of housing types, serving a variety of income levels. Id. § 503.8	The Project satisfies this goal of absorbing new high-density housing along the Anacostia River in a mixed-income, mixed-use environment that conserve single-family housing elsewhere in the District. The Project supports a vibrant street life and the nearby retail and dining/entertainment uses. The Project provides a large amount of new housing, at a mix of income levels, in a "new neighborhood" (i.e., new as of the adoption of the Comprehensive Plan) that was formerly a government complex and that also now includes a mix of uses as well as supporting public spaces and transportation connections.
Policy H-1.3.1: Housing for Families —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	The Project includes some three-bedroom units in support of this objective. However, the Project's transit-oriented location and its Future Land Use Map designation make it an inappropriate location for single-family homes, duplexes or row houses.
Policy H-1.3.2: Tenure Diversity —Encourage the production of both renter-occupied and owner-occupied housing. <i>Id.</i> § 505.7	The Project includes renter-occupied housing. Nearby buildings, including buildings in The Yards, have or will have owner-occupied units.

The Project is part of a whole neighborhood development, with parks, transit access, jobs,
and an early childhood education use.
Because the Project is constructed on vacant land there is no loss of any existing housing and consequently no displacement of existing residents.
The Project does not directly impact any existing low income households.
The Project is designed in accordance with applicable accessibility laws including the Americans with Disabilities Act ("ADA"). Fifteen percent (15%) of the Project's units are specifically designed to be accessible units in compliance with the ADA.
The Project includes new street trees and plantings as part of a comprehensive landscaping plan that beautifies and enhances the street network, provides stormwater retention benefits, and offers amenities for visitors and residents alike.
The Project is within the boundaries of the Anacostia Waterfront Development zone, which imposes heightened stormwater retention requirements on publicly-assisted projects, including the Project. The Project's enhanced stormwater retention program helps achieve this policy objective.

Policy E-1.3.1: Preventing Erosion —Ensure that public and private construction activities do not result in soil erosion or the creation of unstable soil conditions. Support the use of retaining walls and other "best management practices" that reduce erosion hazards. Erosion requirements should be implemented through building permit and plan reviews, and enforced through the permitting and regulatory processes. Id. 6.605.2	The Project's redevelopment of a vacant lot is subject to erosion control best management practices. An erosion control plan is included in the Plans
building permit and plan reviews, and enforced through the permitting and regulatory processes. <i>Id.</i> § 605.2	in the Plans.
Policy E-2.1.1: Promoting Water Conservation —Promote the efficient use of existing water supplies through	The Project's internal water efficient fixtures
a variety of water conservation measures, including the use of plumbing fixtures designed for water	are part of the Project's overall effort to
efficiency, drought-tolerant landscaping, and irrigation systems designed to conserve water. <i>Id.</i> § 609.3	achieve a LEED Silver level of design.
Policy E-2.2.1: Energy Efficiency—Promote the efficient use of energy, additional use of renewable energy,	The Project's LEED Silver level of design
and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions	includes a number of energy efficient
in per capita energy consumption by DC residents and employees. Id. § 610.3	features in furtherance of these policy
Policy E-2.2.2: Energy Availability—Improve energy availability and buffer District consumers from	objectives.
fluctuations in energy supply and prices. This should be achieved through the District's energy purchasing	
policies, financial assistance programs for lower income customers, incentives for "green" power, and	
regulatory changes that ensure that local energy markets are operating efficiently. Id. § 610.4	
Policy E-2.2.3: Reducing Home Heating and Cooling Costs—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. Id. § 610.5	
Policy E-2.2.5: Energy Efficient Building and Site Planning—Include provisions for energy efficiency and for	
the use of alternative energy sources in the District's planning, zoning, and building standards. The planning	
and design of new development should contribute to energy efficiency goals. Id. § 610.7	
Policy E-2.2.7: Consumer Education on Energy—Promote citizen awareness concerning energy issues	
through educational and demonstration initiatives and other programs. Id. § 610.1	
Policy E-3.1.1: Maximizing Permeable Surfaces—Encourage the use of permeable materials for parking lots,	The Project employs a variety of permeable
driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. <i>Id.</i>	surfaces, green roofs, and other landscaping
§ 613.2	to achieve these policy objectives. In
Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff—Promote an increase in tree planting	addition, the Project does not include any
and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction	parking lots.
and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large	
paved surfaces. Id. § 613.3	
Policy E-3.2.1: Support for Green Building—Encourage the use of green building methods in new	The Project will be designed and constructed
construction and rehabilitation projects, and develop green building methods for operation and	in "green" building practices to a LEED Silver
maintenance activities. <i>Id.</i> § 614.2	level.
Policy E-3.2.2: Green Building Education and Awareness—Support programs that educate District	The Project will display its certification of its
employees, the building and real estate communities, and the public regarding the benefits and techniques	LEED Silver status as a means of raising public
of green building. <i>Id.</i> § 614.3	awareness of its green status.
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Policy E-3.4.1: Mitigating Development Impacts—Take measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited. Id. § 616.3	The Project mitigates environmental impacts to the maximum extent feasible. Because the Project site is generally flat, there are no grade or slope challenges for the Project.
Policy E-3.4.2: Transparency of Environmental Decision-Making —Ensure that discussions and decisions regarding environmental impacts and mitigation measures occur through a transparent process in which the public is kept informed and given a meaningful opportunity to participate. <i>Id.</i> § 616.4	The Project's environmental decision-making has been and will continue to be part of the discussion of the Project's public and transparent review and impact evaluation.
Policy E-3.4.3: Environmental Assessments—Ensure full and meaningful compliance with the District of Columbia Environmental Policy Act of 1989, effective October 18, 1989 (D.C. Law 8-36; D.C. Official Code § 8-109.01 et seq.) ["DC EPA"], including the use of procedures to assess the environmental impacts of major development projects comparable to the regulations developed by the Council on Environmental Quality for the National Environmental Policy Act of 1969, approved January 1, 1970 (83 Stat. 852; 42 U.S.C. 4321 et seq.). The environmental review should include all pertinent information about the effects of the project on the human environment, including information about existing conditions, projected impacts, and mitigation measures. Carbon dioxide and other greenhouse gas (GHG) emissions impacts should be included in the environmental impact assessments. The process should ensure that the information is available when a development is proposed and is available to the public and decision-makers before any decision is made. <i>Id.</i> § 616.5	To the extent applicable, the Project will comply with the DC EPA as part of its building permit review process. By virtue of the Project's LEED Silver rating and transit-oriented location, the Project generates far lower GHG emissions than a typical development of the same size. In addition, the DC EPA includes a process for evaluating air quality impacts pursuant to applicable law and regulation.
Policy E-4.1.3: Evaluating Development Impacts On Air Quality—Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. Id. § 618.8 Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency—Promote strategies that reduce motor vehicle emissions in the District and surrounding region. As outlined in the Land Use and Transportation Elements of this Comprehensive Plan, this includes the development of a fully integrated regional system of buses, streetcars, rail transit, bicycles, taxis, and pedestrian facilities to make it easier and more convenient to travel without an automobile. It also includes the promotion of trip reduction measures such as videoconference facilities, telecommuting, flextime, and carpooling. Strategies to reduce congestion and idling time, such as improved signal timing and reversible commute lanes also should contribute to air quality improvement. Id. § 618.1	The Project's TDM measures mitigate any possible adverse impacts of air emissions from new development. The Project also includes construction and landscaping controls that provide air quality mitigation. The Project reduces motor vehicle emissions by virtue of its proximity to transit, its Project-wide TDM, and its overall pedestrian-supportive design.
Policy E-4.1.6: Clean Fuels —Encourage the use of clean fuel vehicles and enhance efforts to place refueling and recharging equipment at facilities accessible for public use. Where feasible, provide financial incentives for District residents and business to use clean vehicles, such as reduced motor vehicle tax and license fees. <i>Id.</i> § 618.11	The Project advances this policy objective by including electric vehicle charging stations in prominent locations within its below-grade garage.

Policy E-4.2.3: Control of Urban Runoff—Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. Id. § 619.8 Policy E-4.2.5: Groundwater Protection—Protect Washington's groundwater from the adverse effects of urban uses. Contaminated groundwater should be investigated to determine whether long term monitoring or treatment is necessary or feasible. Future land uses and activities should be managed to minimize public exposure to groundwater hazards and reduce the likelihood of future contamination. Id. § 619.1	The Project controls stormwater runoff to an enhanced degree by virtue of its compliance with standards for development in the Anacostia Watershed Development zone. The Project is designed to avoid public exposure to any groundwater hazards and to reduce the risk of future contamination, all in compliance with applicable laws.
Policy E-4.7.4: Flood Plains —Restrict development within FEMA-designated flood plain areas. Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within these areas that could pose public health or safety hazards in the event of a flood. Regulation of land uses in flood plains, waterfronts, and other low-lying areas should consider the long-term effects of global warming and sea-level rise on flood hazards. <i>Id.</i> § 624.7	The Project will be elevated out of the 100-year floodplain.
Policy E-5.1.1: Low Impact Development and Green Building Methods for the District—Strongly encourage the use of low impact development (LID) methods and green building design methods and materials in new construction and major rehabilitation projects undertaken by the District of Columbia government. Id. § 627.3	The Project's stormwater retention and green area features and other LID methods are all demonstrated by the Project's commitment to LEED Silver.
Policy E-5.1.4: Sustainable Landscaping—Encourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides. <i>Id.</i> § 627.6	The Project's landscaping is designed to employ best management practices with respect to low-impact watering and chemical usage.
Economic Development Element	
Policy ED-1.1.3: Diversification —Diversify the District's economy by targeting industries with the greatest potential for growth, particularly technology-based and creative industries, retail, international business, and the building trades. <i>Id.</i> § 703.11	The Project includes retail and other neighborhood-serving uses that will help diversify the Southeast DC economy.
Policy ED-2.2.1: Expanding the Retail Sector —Pursue a retail strategy that will allow the District to fully capitalize on the spending power of residents, workers and visitors, and that will meet the retail needs of underserved areas. <i>Id.</i> § 708.4	The Project's ground floor uses advance and enhance this expanded retail strategy by bringing retail uses to Southeast DC and stabilizing existing nearby retail uses. In addition, the Project's residents will help patronize and support other nearby commercial uses.

Policy ED-2.2.3: Neighborhood Shopping—Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences. Id. § 708.7 Policy ED-2.2.5: Business Mix—Reinforce existing and encourage new retail districts by attracting a mix of nationally-recognized chains as well as locally-based chains and smaller specialty stores to the city's shopping districts. Id. § 708.9 Policy ED-2.2.7: Planning For Retail—Coordinate neighborhood planning efforts with the District's economic	The Project is a key component in making The Yards' commercial uses successful in supporting neighborhood needs. The Project's ground floor uses support other neighborhood uses along that corridor. The applicant has a strong local business and nonnational chain presence in The Yards. The Project is part of a coordinated effort to
development planning and implementation programs to improve retail offerings in local commercial centers. Consolidate retail according to existing and forecasted demand and consider converting retail to other uses where an increased consumer base is required. <i>Id.</i> § 708.11	establish The Yards as a commercial center and economic development driver.
Policy ED-2.2.9: Clustered Retail at Transit—Cluster retail around areas of high-foot traffic, including Metrorail exits, bike trails, future streetcar stops, and other multi-modal meeting points. Create strong nodes of character to effectively link retail and transit. Id. § 708.11b	The Project's ground floor uses support and augment the existing retail uses in The Yards which has strong pedestrian connections to transit.
Policy ED-3.1.1: Neighborhood Commercial Vitality —Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents. <i>Id.</i> § 713.5	The Project promotes a vital and diverse neighborhood center and attracts new business and services to improve access for Southeast DC residents.
Policy ED-3.1.5: Public-Private Partnerships —Leverage the expenditure of public funds to produce private sector investments, including joint development on publicly-owned land and redevelopment in areas considered to be high risks by investors. Support the involvement of local community development corporations in commercial development and revitalization efforts within these areas. <i>Id.</i> § 713.9	The Project is a collaborative effort of public and private resources that leverages a public resource (the property) using private investment and development expertise.
Parks, Recreation, and Open Space Element	
Policy PROS-1.2.2: Improving Access —Improve access to the major park and open space areas within the city through pedestrian safety and street crossing improvements, bike lanes and storage areas, and adjustments to bus routes. <i>Id.</i> § 805.6	The Project improves access to parks and public spaces in and adjacent to The Yards and provides bicycle storage.
Policy PROS-1.4.6: Parks in Employment Growth Areas—Provide new parks and open spaces in areas of expected employment growth. Small pocket parks, plazas, and other open spaces should be created in the vicinity of the New York Avenue Metro Station, the Southeast Federal Center, the east end of Downtown, and the South Capitol Street Corridor to provide visual relief and space for outdoor seating and passive recreation. Id. § 807.9	The Project's private street frontage is part of a new public plaza amenity which provides opportunity for outdoor cafés and gathering areas with room for outdoor seating and passive recreation.
Policy PROS-2.2.1: Maintenance and Renovation —Provide for the continuing maintenance, renovation, and upgrading of the District's parks and recreational facilities to prevent their deterioration and ensure that they continue to meet community needs. <i>Id.</i> § 810.5	Because the Project's outdoor spaces are part of a privately-owned development, they will be privately maintained and operated.

Policy PROS-2.2: Park Safety and Security—Design parks, trails, and recreational facilities to improve public safety. Avoid creating hidden and difficult to access areas where security problems or vandalism could result. Lighting, fencing, building materials, and other design components should be selected to enhance the safety of park users. Park lighting shall be compatible with adjacent residential neighborhoods. Id. § 810.6 Policy PROS-4.3.2: Plazas in Commercial Districts—Encourage the development of outdoor plazas around Metro station entrances, in neighborhood business districts, around civic buildings, and in other areas with high volumes of pedestrian activity. Use the planned unit development process to promote such spaces for public benefit and to encourage tree planting, public art, sculpture, seating areas, and other amenities within such spaces. Id. § 819.4	The Project's publicly-accessible outdoor areas are designed with public safety and security in mind and feature numerous safety elements, including fencing and lighting. The Project's outdoor area along the new private street fulfills a need for an outdoor plaza in an area of high pedestrian activity.
Policy PROS-4.3.3: Common Open Space in New Development—Provide incentives for new and	The Project includes green roofs and private
rehabilitated buildings to include "green roofs", rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. <i>Id.</i> § 819.5	outdoor amenity spaces that provide visual relief and balance for residents and visitors.
Urban Design Element	
Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans—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 (see Figure 9.3), 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	The Project respects and reinforces the L'Enfant Plan in Southeast DC through its orientation and view corridor protection and its part of the larger redevelopment of The Yards, which reopened many previously-closed streets that had been a part of the original grid.
Policy UD-1.1.4: Height Act of 1910 —Protect the civic and historical character of the city, particularly the "horizontal" urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910. <i>Id.</i> § 903.1	The Project conforms to the limits of the Height Act and contributes to the prevailing horizontality of the CEA and the emerging horizontality of The Yards.
Policy UD-1.3.5: River Views —Protect and enhance river views in the design of buildings, bridges, and pedestrian walkways on or near waterfront sites. The scale, density and building form along the city's waterfronts should define the character of these areas as human-scale, pedestrian-oriented neighborhoods and should protect views from important sites. <i>Id.</i> § 905.1	The Project maintains vertical continuous views to water on the grid and allows for views from project to the west and east. It is part of a human-scaled, pedestrian-oriented neighborhood.
Policy UD-1.3.7: Neighborhood Connectivity —Improve the physical connections between neighborhoods and nearby waterfronts. Where feasible, extend the existing city grid into large waterfront sites to better connect nearby developed areas to the shoreline (see Figure 9.6). <i>Id.</i> § 905.12	The build out of private and public streets immediately adjacent to the Project improves physical connections to the waterfront from neighborhoods to the north.

Policy UD-2.1.1: Design Character—Create a more coherent design character for Central Washington by improving the physical linkages between the monumental core, the business sub-districts on the perimeter of the National Mall, and the expanding mixed use areas to the east and southeast of Downtown. Urban design strategies should focus on making the entire area more walkable, discouraging monolithic architecture, improving signage and streetscape features, and adding new land uses which make the area more lively, interesting, and dynamic. Id. § 909.7	The Project helps to make The Yards more walkable and pedestrian-friendly and adds interesting and attractive architecture and improved streetscaping.
Policy UD-2.1.2: Downtown Street and Block Pattern —Maintain a fine-grained pattern of Downtown blocks, streets, and alleys, with intersections and frontages that encourage pedestrian movement and reduce the potential for immense variations in scale and "fortresslike" office buildings. <i>Id.</i> § 909.8	The Project helps break down the scale of the existing superblocks in The Yards and encourages pedestrian activity. The Project conforms to the prevailing scale of The Yards.
Policy UD-2.2.2: Areas of Strong Architectural Character—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. Id. § 910.7	The Project is part of a rationally-planned effort to develop two components of The Yards: the Historic Zone, and the Redevelopment Zone. New development in the Historic Zone must maintain the integrity of the historic Navy Yard buildings, whereas new development in the Redevelopment Zone is intended to be more contemporary and denser and taller than the Historic Zone.
Policy UD-2.2.5: Creating Attractive Facades —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	The Project's pedestrian-scale façades are highly-designed and articulated, and they avoid the monolithic elements that are discouraged.
Policy UD-2.2.7: Infill Development —Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. <i>Id.</i> § 910.15	The Project avoids any overpowering contrasts of scale, height, or density.
Policy UD-2.2.8: Large Site Development —Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. <i>Id.</i> § 910.16	The Yards redevelopment breaks down the existing superblocks into parcels that conform to the prevailing scale of those elsewhere in Southeast (which also includes larger, block-long development).
Policy UD-2.2.9: Protection of Neighborhood Open Space —Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. <i>Id.</i> § 910.18	The Project is designed to optimize solar orientation for residents and along public spaces.
Policy UD-2.2.10: Surface Parking —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	The Project has no surface parking and instead employs below-grade structured parking.

Policy UD-2.2.11: Parking Structures—Encourage creative solutions for designing structured parking to	
minimize its visual prominence. Where feasible, the street side of parking structures should be lined with	
active and visually attractive uses to lessen their impact on the streetscape. Id. § 910.21	
Policy UD-2.2.12: Strip Shopping Centers —Ensure that zoning and parking standards discourage strip commercial shopping centers and auto-oriented building designs within designated neighborhood centers. <i>Id.</i> § 910.23	The Project's commercial uses are pedestrian —rather than automobile—oriented.
Policy UD-2.3.1: Reintegrating Large Sites —Reintegrate large self-contained sites back into the city pattern. Plans for each site should establish urban design goals and principles which guide their subsequent redevelopment. <i>Id.</i> § 911.2	The Project is part of a large formerly self- contained federal site that has been reintegrated back into the L'Enfant grid.
Policy UD-2.3.2: Large Site Scale and Block Patterns—Establish a development scale on large sites that is in keeping with surrounding areas. "Superblocks" (e.g., oversized tracts of land with no through-streets) should generally be avoided in favor of a finer-grained street grid that is more compatible with the texture of Washington's neighborhoods. This also allows for more appropriately scaled development and avoids large internalized complexes or oversized structures. Id. § 911.4	The former superblock of the Project will be broken down into contextually-appropriately scaled parcels including the Project site and the creation of a fine-grained street grid.
Policy UD-2.3.3: Design Context for Planning Large Sites—Ensure that urban design plans for large sites consider not only the site itself, but the broader context presented by surrounding neighborhoods. Recognize that the development of large sites has ripple effects that extend beyond their borders, including effects on the design of transportation systems and public facilities nearby. Id. § 911.6	The master plan for The Yards considered effects on surrounding areas, and the Project is designed in accordance with that master plan.
Policy UD-2.3.4: Design Trade-offs on Large Sites—Balance economic development and urban design goals on large sites. In some cases, it may be appropriate to develop a site in a manner that does not capitalize on its full economic value in order to achieve an important urban design objective, such as creation of new waterfront open space or preservation of a historic landmark. Id. § 911.7	The Project strikes an appropriate balance between revitalization and preservation of Southeast neighborhoods (e.g., part of The Yards is a historic zone).
Policy UD-3.1.1: Improving Streetscape Design —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	The Project includes high-quality and contextually-appropriate streetscaping and landscaping.
Policy UD-3.1.2: Management of Sidewalk Space —Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic. <i>Id.</i> § 913.9	The Project preserves and enhances the width of sidewalks along the streets it faces and promotes additional pedestrian activity around the Project site.
Policy UD-3.1.3: Streetscape Design and Street Function —Use variations in lighting and landscaping to highlight and clarify the function of different streets. The design features of streets should make the city's circulation system easier to navigate and understand for residents and visitors. <i>Id.</i> § 913.1	The Project employs variation in pavers and other materials and furniture to separate pedestrians and vehicles along the new private street to the west of the Project.
Policy UD-3.1.4: Street Lighting —Provide street lighting that improves public safety while also contributing to neighborhood character and image. <i>Id.</i> § 913.11	The Project employs street lighting on both public and private streets.

Policy UD-3.1.5: Streetscape and Mobility —Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Transit shelters, benches, bicycle parking, safe-pedestrian connections, and clear way-finding signage should be provided to facilitate multi-modal travel. <i>Id.</i> § 913.12	The Project's street improvements foster pedestrian and cycling connections.
Policy UD-3.1.6: Enhanced Streetwalls —Promote a higher standard of storefront design and architectural detail along the District's commercial streets. Along walkable shopping streets, create street walls with relatively continuous facades built to the front lot line in order to provide a sense of enclosure and improve pedestrian comfort. <i>Id.</i> § 913.13	The Project's streetwalls are highly designed and articulated to create a comfortable and inviting pedestrian experience.
Policy UD-3.1.7: Improving the Street Environment—Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall. Id. § 913.14	The Project's streetscaping and private street/public plaza areas promote ground level commercial uses, enhance walking, and promote an enjoyable pedestrian experience.
Policy UD-3.1.8: Neighborhood Public Space —Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the "activation" of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas. <i>Id.</i> § 913.15	The Project's private street/public plaza together activate The Yards' redevelopment zone. Outdoor dining areas and multiple shop entrances are envisioned on key pedestrian streets.
Policy UD-3.1.10: Sidewalk Cafes —Discourage the enclosure of sidewalk cafes in a manner that effectively transforms them into indoor floor space. The design of sidewalk cafes should be compatible with the architectural qualities of the adjoining buildings, should complement the street environment, and should not impede pedestrian movement. <i>Id.</i> § 913.17	The Project's sidewalk café(s) will not impede pedestrian activity in the public realm.
Policy UD-3.1.11: Private Sector Streetscape Improvements —As appropriate and necessary, require streetscape improvements by the private sector in conjunction with development or renovation of adjacent properties. <i>Id.</i> § 913.18	The Project includes private and public sector-financed streetscape improvements in conjunction with the Project.
Policy UD-3.1.12: Programming of Outdoor Space —Encourage the programming of outdoor space with events and activities (such as performances, arts, and farmers markets) that stimulate streetlife and active use. <i>Id.</i> § 913.19	The Project's private street is capable of being reserved for temporary outdoor neighborhood events, such as festivals.
Policy UD-3.1.13: Signage—Encourage high standards of signage throughout the District, particularly for signs that designate landmarks, historic districts, and other areas of civic importance. Id. § 913.2 Policy UD-3.2.3: Site Planning and Design Measures to Increase Security—Encourage architectural design	The Project includes high quality signage that will be reviewed as part of this application. The Project employs design elements and an
and site planning methods that minimize perimeter security requirements and have a reduced impact on the public realm. Such measures include separating entryways, controlling access, "hardening" of shared walls, and the selection of more resilient building materials. <i>Id.</i> § 914.8	overall design strategy that minimizes the intrusiveness of security elements while still protecting pedestrians and plaza areas. The

Policy UD-3.2.4: Security Through Streetscape Design —Develop and apply attractive, context-sensitive security measures in the design of streets, plazas, and public spaces. These measures should use an appropriate mix of bollards, planters, landscaped walls, vegetation, and street furniture rather than barriers and other approaches that detract from aesthetic quality. <i>Id.</i> § 914.9	Project's security elements are architectural and ornamental in additional to having functional value.
Policy UD-4.1.2: Design Review —Support expanded design review programs in the District, with a priority on areas not currently protected by historic district designation. <i>Id.</i> § 916.7	The Project is undergoing a multi-agency design review process for an area not currently protected by a historic district designation.
Infrastructure Element	
Policy IN-1.2.1: Modernizing and Rehabilitating Water Infrastructure—Work proactively with WASA [now DC Water] to repair and replace aging infrastructure, and to upgrade the water distribution system to meet current and future demand. The District will support water system improvement programs that rehabilitate or replace undersized, defective, or deteriorating mains. The District will also support concurrent programs that ensure that lines are flushed in order to eliminate the potential for stagnant water to accumulate at the ends of water mains. ANCs and community organizations should be consulted in the siting of any new facilities to ensure that the potential for adverse impacts are appropriately addressed. Id. § 1304.3	The applicant will work with DC Water to determine infrastructure needs for the Project and will pay and required system fees.
Policy IN-1.2.2: Ensuring Adequate Water Pressure—Work proactively with WASA to provide land for new storage tanks and other necessary operations so that adequate water supply and pressure can be provided to all areas of the District. The siting and design of water storage tanks and similar facilities should be consistent with the policies of the Urban Design and Environmental Protection Elements, and should minimize visual impacts and "skylining" effects on ridges or hills. <i>Id.</i> § 1304.4	The Project is designed so as not to adversely affect water pressure in the surrounding area.
Policy IN-2.1.1: Improving Wastewater Collection —Provide for the safe and efficient collection of wastewater generated by the households and businesses of the District. Ensure that new development does not exacerbate wastewater system deficiencies, and instead supports improved system efficiency and reliability. <i>Id.</i> § 1306.7	The Project employs efficient wastewater fixtures and systems and is designed to maintain system reliability.
Policy IN-2.1.2: Investing In Our Wastewater Treatment Facilities—Provide sustained capital investment in the District's wastewater treatment system to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment. Id. § 1306.8	The Project will contribute additional funds to maintain infrastructure through user fees and charges.
Policy IN-2.2.1: Improving Stormwater Management —Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process with clear lines of responsibility with regard to oversight, guidelines, and resources. <i>Id.</i> § 1307.3	The Project employs a highly-efficient stormwater capture and retention system.
Policy IN-3.1.1: Solid Waste Collection —Ensure safe, reliable, adequate solid waste collection from residences, business establishments, institutions and other facilities. <i>Id.</i> § 1310.5	The Project's solid waste collection occurs via a shared private alley at the rear of the

Policy IN-3.1.3: Reducing Community Impacts —Reduce the adverse effects of solid waste facilities, including noise, odors, and truck traffic, on District neighborhoods. <i>Id.</i> § 1310.6	Project in order to reduce any noise, odor, or traffic effects on surrounding residential areas.
Policy IN-5.1.1: Adequate Electricity —Ensure adequate electric supply to serve current and future District of Columbia needs. This will require collaboration with PEPCO and other service providers. <i>Id.</i> § 1314.6	The Project is supplied by an adequate source of electricity.
Policy IN-5.1.2: Undergrounding Electric Distribution Lines—Plan for the undergrounding of electric distribution lines throughout the District to provide increased reliability of service and enhanced aesthetics and safety, and seek equitable means to cover the high costs associated with undergrounding. Use the opportunity for undergrounding to bury other above-ground communication lines, such as telephone lines, wherever feasible. Id. § 1314.7	The Project is served exclusively by underground electric power lines.
Policy IN-6.1.1: Coordination of Infrastructure Improvements —Ensure that infrastructure upgrades are carefully scheduled and coordinated with development and redevelopment plans in order to minimize traffic rerouting, pavement cuts for laying cable or placement of other infrastructure within the street right-of-way, street closings, disruptive subsurface excavation, and utility shut-offs. <i>Id.</i> § 1317.2	To the extent required for the Project, any infrastructure upgrades will be carefully scheduled and coordinated with the applicable District agencies in order to minimize any impacts on neighbors.
Policy IN-6.1.3: Developer Contributions —Require that private developers fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to water and wastewater infrastructure, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project. <i>Id.</i> § 1317.5	The Project will contribute a system accessibility fee to DC Water, which fee advances the objectives of this policy.
Lower Anacostia Waterfront/Near Southwest Area Eler	nent
Policy AW-1.1.2: New Waterfront Neighborhoods—Create new mixed use neighborhoods on vacant or underutilized waterfront lands, particularly on large contiguous publicly-owned waterfront sites. Within the Lower Anacostia Waterfront/ Near Southwest Planning Area, new neighborhoods should be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, Southeast Federal Center and Carrollsburg areas. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Id. § 1908.3	The Project is part of The Yards, an emerging mixed-use neighborhood identified in this policy objective at the time it was written. The Yards were previously an underutilized waterfront space that is now being built out. The Property is currently a surface parking lot.
Policy AW-1.1.4: Waterfront Development Amenities—Leverage new development in the Waterfront Planning area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements. Id. § 1908.5	The Project, as part of the overall redevelopment of The Yards leverages its location to create amenities and benefits that serve new and existing residents. The Yards' amenities include public plazas and parks, employment benefits, historic preservation, and affordable housing, among other items.

Policy AW-1.1.7: Multi-modal Waterfront Streets —Design streets along the waterfront to be truly multi-modal, meeting the needs of pedestrians, bicyclists, and transit users as well as motor vehicles. Safe pedestrian crossings, including overpasses and underpasses, should be provided to improve waterfront access. <i>Id.</i> § 1908.8	The Project's new adjacent private street will be multi-modal as will the applicant's redevelopment of adjacent public streets.
Policy AW-2.2.2: Ballpark Entertainment District—Leverage the construction of the Washington Nationals Ballpark to catalyze development of the South Capitol Street corridor with retail, high density residential, entertainment, and commercial uses. Id. § 1912.8	The Project is part of an effort to develop around and capitalize on the economic opportunities afforded by virtue of The Ballpark with high-density residential and ground floor retail uses.
Policy AW-2.3.1: Restoring the Urban Pattern of the Near Southeast—Facilitate redevelopment of the Near Southeast by breaking down large contiguously owned government properties into individual development parcels in scale with the traditional urban street grid. Encourage high density mixed use development and open space on newly configured parcels, with new buildings designed and oriented to make the most of their waterfront or near-waterfront settings. Id. § 1913.7	The Project breaks down the former large scale Navy Yard site into an individual development site with human scale and mixed used development. The Project maximizes water views.
Policy AW-2.3.2: Near Southeast Shoreline Access —Improve shoreline access and movement to and through the Near Southeast by eliminating real and perceived barriers, improving public space and street corridors, reducing the amount of land occupied by surface parking and industrial uses, and encouraging new land uses that maximize public activity near the waterfront. <i>Id.</i> § 1913.8	As noted above, the Project and the construction of adjacent public and private streets improves physical access to the Anacostia waterfront from nearby existing and emerging neighborhoods. The Project replaces and reduces surface parking uses.
Policy AW-2.3.3: Near Southeast Housing Opportunities—Significantly increase residential land uses in the Near Southeast, particularly in the Southeast Federal Center, Capper Carrollsburg, Canal Blocks, and South Capitol Gateway areas. Consistent with the existing zoning for these areas, mixed use development that includes housing as well as commercial uses should be strongly encouraged. The mix of housing should accommodate residents of all incomes and household types. Id. § 1913.9	The Project adds to the increase in residential land uses in the former Southeast Federal Center neighborhood and adds a mix of uses to such neighborhood.
Implementation Element	
Policy IM-1.1.1: Mitigation of Development Impacts —To the greatest extent feasible, use the development review process to ensure that impacts on neighborhood stability, traffic, parking and environmental quality are assessed and adequately mitigated. <i>Id.</i> § 2502.5	The Project will undergo a public design review by the Zoning Commission to ensure that satisfies the requisite standards of review, which includes an impact review.
Policy IM-1.1.3: Relating Development to Infrastructure Capacity —Ensure that development does not exceed the capacity of infrastructure. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit and other travel modes as well as streets and highways, and the availability of water, sewer, drainage, solid waste, and other public services. <i>Id.</i> § 2502.7	The Project's impact assessment provides the analysis showing that the Project does not exceed infrastructure capacity. The Project appropriately balances the need for new housing with mobility capacity and utility infrastructure availability.

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Policy IM-1.1.4: Incentives for Achieving Goals and Policies —Allow the use of zoning incentives such as increased height and density in appropriate locations as a tool for achieving Comprehensive Plan goals and	The Project utilizes the design review process to obtain additional density in a designated
policies. Id. § 2502.8	redevelopment area near transit as a means
pointing 3 200210	to achieve the numerous other goals and
	policies described herein.
Policy IM-1.1.5: Development Approvals and the Comprehensive Plan—To the extent they are relevant,	This analysis identifies the relevant goals and
consider the goals and policies of the District Elements in the approval of planned unit developments,	policies of the District Elements of the
variances, campus plans, special exceptions, large tract reviews, and other projects requiring review. <i>Id.</i> §	Comprehensive Plan for the Zoning
2502.9	Commission's consideration in the instant
	design review application.
Policy IM-1.1.6: Studies Preceding Zoning Case Approvals—Ensure that zoning case approvals such as	The instant application includes a
Planned Unit Developments (PUDs) utilize: (1) transportation and infrastructure studies and recommended	transportation review and other impact
conditions of approval to mitigate potential impacts; (2) agreements for financing any necessary	analyses. The applicant has previously
improvements, including public and private responsibilities; (3) agreements to comply with "first source	entered into financing and other privately-
employment" requirements and other regulations that ensure public benefits to District residents. <i>Id.</i> §	financed public improvements agreements
2502.1	for the overall redevelopment of The Yards.
Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions—Require the Board of Zoning	The instant application requires the Zoning
Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision	Commission to consider and evaluate the
making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its	Project's consistency with the District
accompanying Maps. Decisions on requests for rezoning shall be guided by the Future Land Use Map read in	Elements (including the attendant Maps), and
conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to	the applicable Area Element, and this analysis
the area proposed for rezoning. <i>Id.</i> § 2504.5	is intended to guide the Commission's
Delia 1844 2.4 Internativia of the District Florence - December the condensity action of the	evaluation.
Policy IM-1.3.4: Interpretation of the District Elements—Recognize the overlapping nature of the	This analysis identifies the overlapping and
Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or	occasionally competing nature of the
more of the other elements. As noted at Section 300.2, since the Land Use Element integrates the policies of all other District elements, it should be given greater weight than the other elements. <i>Id.</i> § 2504.6	objectives of the Comprehensive Plan. Particular focus is given to the Land Use
all other district elements, it should be given greater weight than the other elements. Id. 9 2504.0	Element given its weighted status.
Policy IM-1.5.1: Involvement of Advisory Neighborhood Commission—Include the Advisory Neighborhood	The applicant has met with and will continue
Commissions and area residents in the review of development to assist the District in responding to resident	to seek the input of the ANC in which the
concerns. Consistent with the statutory requirements of the DC Code, feedback from the ANCs should be	Project is located. The Project has and will
given "great weight" as land use recommendations and decisions are made. <i>Id.</i> § 2507.3	continue to evolve in response to ANC
0 - 0 0	considerations and recommendations.
	considerations and recommendations.

Policy IM-1.5.2: Promoting Community Involvement —Encourage the community to take a more proactive	In addition to meeting with the ANC, the
role in planning and development review, and to be involved in Comprehensive Plan development,	applicant has met or discussed the Project
amendment, and implementation. A variety of means should be used to secure community input, including	with neighbors and other community
advisory and technical committees, community workshops, review of draft texts, public forums and hearings	, stakeholders. The Zoning Commission's
and other means of discussion and communication. Id. § 2507.4	review procedures also invite and
	accommodate public comment and
	participation in support of this objective.
Policy IM-1.5.4: Transparency in Decision-Making—Strongly encourage transparent decision-making in all	The Zoning Commission's review procedures
land use and development matters, making information available and accessible to residents and	are public and transparent with all
maintaining open lines of communication with the public as plans are developed. Id. § 2507.6	information on which the Commission makes
	its decisions available to the general public.
Anacostia Waterfront Framework Plan ¹	
Near Southeast Waterfront, Vision—"Re-establish" this "neighborhood along the Anacostia River, with	The Property is within the "Near Southeast"
unprecedented public access to the waterfront. It will be an active, transit-oriented neighborhood with a	area of the AWF Plan. The Project is in line
combination of mixed-income housing, offices, retail uses, and cultural destinations. The area will contain a	with the AWF Plan's vision for Near
network of public spaces, including parks, waterfront esplanades, and maritime piers that are linked	Southeast. The Project is mixed-use, transit-
together by the Anacostia Riverwalk."	oriented, and inspires street activity and
	connectivity to parks and other destinations.
Near Southeast Waterfront, Planning Principle 7—Emphasize mixed-use development, integrating	The AWF Plan's detailed strategies for the
commercial and residential areas, to form a lively and active neighborhood throughout the Near Southeast.	Near Southeast Waterfront includes eleven
, , ,	"Planning Principles". The Project advances
	the principle of developing mixed use
	projects with neighborhood-focused uses.
Near Southeast Waterfront, Table of Initiatives—	The Project advances several of the specific
Low impact development standards	initiatives set forth in for the Near Southeast
Extension of neighborhood street network to waterfront	waterfront and as part of the overall
New park at SEFC waterfront	development of The Yards and The Yards Park
Significant new public plaza at the SEFC waterfront	substantially advances several others. The
1000 residential units at SEFC	Project adds residential units, retail, and jobs,
	and supports the creation of the new public
• 25,000 new jobs over a 15-year period	spaces on 1 ½ Street as well as the general
 2,000,000 square feet of retail 	

¹ District of Columbia Office of Planning, THE ANACOSTIA WATERFRONT FRAMEWORK PLAN (Nov. 2003), available at https://planning.dc.gov/node/897542