

CONSISTENCY OF THE PROJECT WITH THE COMPREHENSIVE PLAN

The Project is not inconsistent with the guiding principles, policies, and goals of the Comprehensive Plan for the National Capital, including the land use designation assigned to the Site on the Future Land Use Map (the “FLUM”), the policy designation on the Generalized Policy Map (the “GPM”), and the text of the Brookland-CUA Small Area Plan (the “SAP”).

A. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District; and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. (D.C. Code § 1-245(b)).

The Project significantly advances these purposes by promoting the social, physical and economic development of the District through the provision of two high-quality residential buildings on the Site. The proposed buildings will help improve the surrounding neighborhood through the replacement of incompatible industrial uses, and will assist the District in achieving its housing and transportation goals by providing new housing, including affordable housing, and improvements to the public space adjacent to the Site. The Applicant is also working with District Department of Transportation (“DDOT”) to ensure that the Project coordinates with potential future improvements to the Metropolitan Branch Trail (“MBT”) that are planned for 8th Street adjacent to the Site.

B. Future Land Use Map

The Future Land Use Map (“FLUM”), which is adopted as part of the Comprehensive Plan Land Use Element, sets forth a generalized depiction of intended land uses over a period of approximately 20 years. The Framework Element of the Comprehensive Plan states that the FLUM is not a zoning map. *See* 10A DCMR § 226.1(a); *see also* Z.C. Order No. 11-13; Z.C. Order No. 10-28. Whereas zoning maps are parcel-specific and establish detailed requirements for setback, height, use, parking, and other attributes, the FLUM does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. *Id.* By definition, the FLUM is to be interpreted broadly. *Id.* Decisions on requests for rezoning shall be guided by the [FLUM] read in conjunction with the text of the Comprehensive Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. *Id.* at § 2504.5.

The FLUM designates the Site as Mixed Use (Low Density Commercial/Moderate Density Residential). A “Mixed Use” designation on the FLUM is not intended to be interpreted in terms of its separate land use designation. Rather, “Mixed Use” on the FLUM is a specific land use category unto itself, and is assigned to areas where the mixing of two or more land uses is encouraged, but is not mandatory. It is generally applied to: (i) established, pedestrian-oriented commercial areas that also include substantial amounts of housing; (ii) commercial corridors or districts which may not currently contain substantial amounts of housing but where more housing is desired, such as the Site; and (iii) large sites where opportunities for multiple uses exist but a plan dictating the precise location of these uses has yet to be prepared. 10A DCMR § 225.18.

The Low Density Commercial designation is used to define shopping and service areas that are generally low in scale and character. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the

surrounding neighborhoods to larger business districts that draw from a broader market area. Their common feature is that they are comprised primarily of one- to three-story commercial buildings. The corresponding zone districts are generally C-1 and C-2-A, although other districts may apply. 10A DCMR § 225.8.¹

The Moderate Density Residential designation is used to define the District's row house neighborhoods and its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. The R-3, R-4, and R-5-A zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 10A DCMR § 225.4.²

The Applicant's proposal to rezone the Site to MU-4 is not inconsistent with the FLUM designation for the Site. For areas with a Mixed Use designation, the general density and intensity of development is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other, the FLUM may note the dominant use by showing it at a slightly higher density than the other use(s) in the mix. 10A DCMR § 225.19. In this case the Site is designated as Mixed Use (Low Density Commercial/Moderate Density Residential); and therefore, the desired outcome favors greater residential use than commercial use.

The proposed MU-4 zoning is not only expressly identified as corresponding to the Low Density Commercial land use designation on the FLUM, but is also described within ZR16 as being "intended to permit moderate-density mixed-use development" and "be located in low- and

¹ The current Comprehensive Plan was adopted prior to the 2016 Zoning Regulations ("ZR16") and thus refers to the zone districts contained in the 1958 Zoning Regulations. Under the 2016 Zoning Regulations, the zone districts that correspond to those identified in the Framework Element description of the Low Density Commercial designation include MU-3 and MU-4.

² Under ZR16, the corresponding zones would be R-3, RF-1, and RA-1, with RA-2 applying in some locations.

moderate-density residential areas with access to main roadways or rapid transit stops.” *See* 11-G DCMR § 400.3. Furthermore, consistent with the FLUM’s desired outcome for greater residential than commercial density on the Site, the MU-4 zone favors residential development by allowing all permitted density to be devoted to residential use while limiting the amount of overall density that can be devoted to non-residential use. *See* 11-G DCMR § 400.3(a).

C. Upper Northeast Area Element

The Site is located within the boundaries of the Upper Northeast Area Element (the “UNE”). The UNE calls for capitalization on the presence of the Metro station at Brookland-CUA to provide new transit-oriented housing. *See* Policy UNE-1.1.3 Metro Station Development. The PUD includes the creation of approximately 375 dwelling units, including approximately 45 IZ units, within 0.3 miles of the Brookland-CUA Metro station. In addition, the UNE encourages compatible residential infill development that is consistent with the FLUM and includes housing for persons of low incomes. *See* Policy UNE-1.1.2: Compatible Infill. As stated above, the proposed MU-4 is consistent with the FLUM and the PUD includes units that will be reserved for households at varying levels of MFI, including for households earning equal to or less than 30% MFI. The UNE also supports long-term land use changes on industrially zoned land in the station vicinity, particularly southwest of the Brookland-CUA Metro station along 8th Street. *See* Policy UNE-2.6.3: Long-Term Land Use Changes. As a result, the Applicant’s proposal is not inconsistent with the policies of the UNE.

D. Brookland-CUA Small Area Plan and Ward 5 Industrial Land Transformation Study

The Comprehensive Plan requires zoning to be “interpreted in conjunction with... approved Small Area Plans.” 10A DCMR § 266.1(d). The Comprehensive Plan also states that small area policies appear in “separately bound Small Area Plans for particular neighborhoods and business

districts. As specified in the city's municipal code, Small Area Plans provide supplemental guidance to the Comprehensive Plan and are not part of the legislatively adopted document." 10A DCMR § 104.2. The SAP encourages moderate-density mixed use development on vacant and underutilized properties and, consistent with the UNE, calls for long-term land use changes on industrially zoned land in the station vicinity, particularly in the area to the southwest along 8th Street. SAP at pg. 11.

The Site is located within the SAP's Commercial Area South of Metro Station Subarea, which states that development south of Kearny Street should consist of low to moderate density residential and limited commercial facilities. *See* SAP at pg. 52. As such, the Applicant's proposal, and specifically the proposed Zoning Map amendment, is consistent with the SAP since it consists of moderate density zoning and development with limited commercial facilities. The SAP references moderate density development as having building heights between 60 and 70 feet, with appropriate heights to transition to adjacent lower scale residential structures. *See* SAP at pgs. 47 and 52. Moreover, the SAP specifically calls for building setbacks of ½ to one above 50 feet, which the Applicant is providing. *Id.*

The SAP also encourages "work with community residents and ANCs to address design and scale issues of new development through the PUD process. *See* SAP at pg. A3, note 3. As is further discussed in Section V of the Applicant's application statement, the Applicant has engaged in extensive community outreach, which has informed elements of the Project's design as well as the proffered public benefits and project amenities. In fact, prior to submitting this PUD application, the Project and the related benefits and amenities received an 11-0 vote of support from the Edgewood Civic Association, which is the applicable civic association for this area.

The PUD also includes the fulfillment of the Commercial Area South of Metro Station subarea's "Framework Plan" which calls for new residential infill development, improved streetscape, landscape and lighting, integration of MBT, and buffering and screening from tracks and PDR uses. In addition, the Applicant will contribute \$75,000 to Dance Place for their Energizers Program as detailed in the Applicant's application statement. This contribution will foster artistic uses in the neighborhood as called for in the SAP. *See* SAP at pg. 52.

The SAP was also created in response to the Ward 5 Industrial Land Transformation Study, which recommends that areas along the CSX Tracks and WMATA red line be redeveloped. Ward 5 Industrial Land Transformation Study at 12. The proposed Zoning Map amendment will facilitate the creation of new residential uses, including approximately 45 affordable dwelling units that range between 30% - 80% MFI, that could not otherwise be provided if the Site remained under its existing PDR zoning. As a result, the Applicant's proposal is fully consistent with the SAP and Ward 5 Land Industrial Land Transformation Study.

E. Generalized Policy Map

The purpose of the Generalized Policy Map ("GPM") is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow-up plans, to manage this change. 10A DCMR § 223.1. The GPM is intended to "guide land use decision-making in conjunction with the Comprehensive Plan text, the FLUM, and other Comprehensive Plan maps." *Id.* at § 223.2. Boundaries on the map are to be interpreted in concert with these other sources, as well as the actual physical characteristics of each location shown. *Id.*

The GPM designates the Site as a Neighborhood Conservation Area. The guiding philosophy for Neighborhood Conservation Areas is to conserve and enhance established

neighborhoods. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. Densities in Neighborhood Conservation Areas are guided by the FLUM, 10A DCMR § 223.5. The proposed Zoning Map amendment will help implement the policies embodied in the GPM by allowing for a new residential development that is not inconsistent with the FLUM, consistent with the height and density contemplated in the SAP, and fits in well with surrounding development patterns and land uses.

D. Compliance with Guiding Principles of the Comprehensive Plan

The Project is consistent with many of the guiding principles of the Comprehensive Plan for managing growth and change, creating successful neighborhoods, increasing access to education and employment, connecting the city, and building green and healthy communities.

1. Managing Growth and Change

The Project is consistent with several of the principles that focus on overcoming physical, social, and economic obstacles to ensure that the benefits and opportunities available to District residents are equitably distributed. Specifically, in order to manage growth and change, the Comprehensive Plan encourages, among other factors, growth in both residential and non-residential sectors, with residential uses comprising a range of housing types to accommodate households of varying sizes and income levels, and nonresidential uses that include services that support residents. The Comprehensive Plan also states that redevelopment and infill opportunities along corridors and near transit stations are an important part of reinvigorating and enhancing District neighborhoods as well as the surrounding region.

The Project is fully consistent with these principles. Overall, the Project will replace an underutilized industrial site that is incompatible with the surrounding residential community with

two residential buildings including affordable housing units in proximity to public transportation. In addition, the proposed buildings will help grow the District's tax base and help reinvigorate the existing neighborhood fabric. The new residential units will greatly assist in addressing the continuing demand for additional housing, including affordable housing, in the District.

2. Creating Successful Neighborhoods

One of the guiding principles for creating successful neighborhoods is to protect and stabilize neighborhood businesses, retail districts, parks, and other facilities, and to reinforce neighborhood identity and provide destinations and services for residents. In addition, noting the crisis of affordability that has resulted from the continued housing boom in the District, the guiding principles recognize the importance of preserving existing affordable housing and producing new affordable housing to avoid deepening of racial and economic divides in the city. Citizen participation and quality, responsive neighborhood services are also recognized as keys ingredients to creating successful neighborhoods, such participation includes garnering public input in decisions about land use and development, from development of the Comprehensive Plan to implementation of the Plan's elements.

The Project is consistent with each of these principles. Prior to filing this application, the Applicant attended approximately nine community meetings to solicit feedback from the surrounding community. The Applicant will continue to work closely with ANC 5E, the Edgewood Civic Association, and other neighborhood stakeholders and associations to ensure that the Project provides uses that respond to the neighborhood's current demands. The Project responds to the community's input by providing a substantial number of additional residential units, including affordable units at various levels of MFI, within a walkable environment that is in close proximity to several modes of transit, including Metrorail and the MBT.

3. Increasing Access to Education and Employment

The guiding principles pertaining to increasing access to education and employment focus on growing economic activity in the District, as well as improving the lives and economic well-being of District residents. To do this, the Comprehensive Plan recognizes the importance of improving access to education and jobs by capitalizing on the city's location at the center of the region's transportation systems. Providing more efficient, convenient, and affordable transportation for residents increases resident access to jobs within the District and the surrounding region. Moreover, expanding the economy means increasing shopping and services for many District neighborhoods, and creating more opportunities for local entrepreneurs and small businesses.

The Project will advance the District's goals of improving access to jobs and education by redeveloping an underutilized site with two residential buildings that will provide a substantial amount of new housing adjacent to the MBT, and in close proximity to other modes of public transportation. The close proximity to transit will increase resident's ability to access educational opportunities and jobs without owning a vehicle and without the added expenses associated with vehicle ownership. This is especially relevant to those residents living in the affordable dwelling units that will be integrated into the Project.

4. Connecting the City

The Site is well-served by public transportation, including numerous Metrobus routes and is in close proximity to the Brookland-CUA Metrorail station (0.3 miles). The Project includes streetscape improvements that will improve mobility and circulation around the Site and throughout the neighborhood, including for students walking from the schools to the south of the Site to the after-school enrichment programs at Dance Place and the Metrorail station. The

streetscape and landscape design for the Project fosters a pedestrian-friendly environment along the perimeter of the Site. The Applicant is also working with DDOT to ensure that the Project coordinates with potential future improvements to the MBT that are planned for 8th Street adjacent to the Site.

5. Building Green and Healthy Communities

The Project is fully consistent with the Comprehensive Plan's guiding principles pertaining to building green and healthy communities. A major component to successfully building green and healthy communities is the use of sustainable building construction and renovation techniques that minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. The Project is designed to integrate a host of sustainable features and will be designed to LEED Gold standards under the LEED v4 Multifamily Midrise standard. The LEED v4 Multifamily Midrise standard is tailored to the unique aspects of multifamily buildings and includes prescriptive requirements for onsite testing and performance. In addition to the standard LEED features and credit categories, the Multifamily Midrise standard requires mandatory compartmentalization, reduced duct leakage, and verified performance of exhaust and ventilation systems, all of which are unique in comparison with LEED BD+C for New Construction.

E. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. This element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District of Columbia, and because of the role it plays in integrating

the policies and objectives of all the other elements of the Comprehensive Plan, the Land Use Element is given greater weight than the other elements as competing policies in different elements are identified and balanced. The overarching goal of the Land Use Element is to ensure that the District's limited land resources are efficiently utilized in a manner that meets a wide range of long-term needs and helps foster other District goals; protects the health, safety, and welfare of District residents, institutions, and businesses; maintains and improves the character and stability of all neighborhoods; and balances competing land demands to support the many activities that take place within the District. For the reasons discussed below, the proposal is consistent with this overarching goal through its advancement of a number of Land Use Element policies:

2. Policy LU-1.3 Transit-Oriented and Corridor Development
3. Policy LU-1.3.1: Station Areas as Neighborhood Centers
4. Policy LU-1.3.2: Development Around Metrorail Stations

These policies recognize the importance of capitalizing on the investments made in Metrorail by maximizing the use of land around transit stations and along transit corridors. When addressing the management of land around Metrorail stations, the Comprehensive Plan encourages the application of principles that favor mixed use rather than single purpose buildings, and particularly a preference for a diverse range of housing types (market-rate and affordable) above ground floor uses; well-designed, programmed, and maintained public space; and convenient connections to the transit.

The Project exemplifies the principals of transit-oriented development. The Project is located near the MBT, which serves the rapidly expanding use of bicycles as a major form of transportation in the District. In addition, the Site is located within 0.3 miles from the Brookland-CUA Metrorail station, which is serviced by the red line. Development of the Site utilizes the Metrorail station and MBT as anchors for economic, artistic and civic development, and helps

reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, enhance neighborhood stability, and create a stronger sense of place. The Brookland- CUA Metrorail station in particular is an excellent location for new growth, particularly residential growth, and the Applicant will ensure that the Project respects the character of the surrounding area and maximizes transit ridership.

Most notably, the Project provides approximately 375 new residential dwelling units adjacent to the MBT, with approximately 12% of the residential gross floor area reserved as affordable units that will be devoted as follows: 6% of the of the affordable gross floor area will be reserved for households earning equal to or less than 30% MFI, 14% of the affordable gross floor area will be reserved for households earning equal to or less than 50% MFI, 67% of the affordable gross floor area will be reserved for households earning equal to or less than 60% MFI, and 13% of the affordable gross will be reserved for households earning equal to or less than 80% MFI. As a result, the PUD results in the creation of a mixed income community in a location where residential use is the desired outcome under the Comprehensive Plan but is currently prohibited under the Site's existing zoning.

5. Policy LU-1.3.3: Housing Around Metrorail Stations

The Project is consistent with this policy, which seeks to build housing, including affordable housing, near Metrorail stations, particularly given the reduced necessity of auto ownership in such locations.

6. Policy LU-1.3.4: Design to Encourage Transit Use

The Project has been designed to encourage transit use and helps to enhance the safety, comfort, and convenience of passengers walking to the Brookland-CUA Metrorail station and to local Metrobus stops since the Project includes the construction of sidewalks adjacent to the Site

along 8th Street, where none currently exist. The Applicant is also working with DDOT to ensure that the Project supports planned improvements to the MBT, which will increase bicycler safety surrounding the Site.

7. Policy LU-1.4.1: Infill Development

Currently, the Site is underutilized PDR property that is surrounded by residential uses to the northwest and west. The PUD will result in the creation of a mixed-income community that is consistent with the Site's designation on the FLUM.

8. Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Consistent with this policy, in designing the Project, the Applicant sought to balance housing supply in the area and expanded neighborhood commerce, with the parallel goal of protecting neighborhood character and restoring the environment. The Project satisfies these goals by providing a new residential community with different levels of affordable units that will take advantage of the Site's location along a major artery for alternative forms of transportation. The Project will be compatible with, and invigorate, these important neighborhood amenities and has also been designed to respect the lower-scale residential uses the surrounding the Site. In addition, the Project replaces uses that are incompatible with the surrounding neighborhood.

9. Policy LU-2.2.4: Neighborhood Beautification

This policy encourages projects to improve the visual quality of the District's neighborhoods. As shown on plans, the design of the proposed buildings will substantially improve the visual aesthetic of the Site compared to what currently exists and will create a buffer between the train tracks and the existing neighborhood. The Project also includes a significant amount of landscaping and open spaces which will enhance the streetscape and improve the visual quality of the surrounding area. The Applicant has focused on creating a pedestrian-friendly streetscape,

especially along 8th Street, which includes substantial improvements including new paving for sidewalks, street lighting fixtures, new and replacement shade trees, and approximately 20 short-term bike parking spaces. Moreover, the Project includes a landscaped entry plaza that includes an outdoor seating area that is aligned with Jackson Street and open to the public. The design of the entry plaza includes specialty paving, custom seating, mounded planting islands and turf areas, all of which will create an inviting space filled with texture. Since the entry plaza will be open to the public, it will function as a neighborhood pocket park.

F. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District's transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comprehensive Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving mobility and accessibility. As discussed above, the proposal will increase the amount of housing available near Metrorail, thereby making it easier for District residents to access transit and decrease the need, and associated environmental impact and economic burden, of owning a vehicle. In addition, the Site is uniquely located along one of the District's major arteries for alternative modes of transportation, the MBT. The Applicant is also working with DDOT to ensure that improvements to the MBT are supported by the Project. Thus, the proposal is well positioned to advance the policies and goals of the Transportation Element including:

1. Policy T-1.1.4: Transit-Oriented Development

As described above, the Project is an example of transit-oriented development due to its location near the Brookland-CUA Metrorail station. The Project also includes various

transportation related improvements, including support for future improvements to the MBT. Other related improvements include bicycle storage areas and public space improvements, including new lighting, trees, benches, bicycle parking spaces, paving, and a landscaped entry plaza.

2. Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

The Applicant is also working with DDOT to ensure that the Project coordinates with potential future improvements to the MBT that are planned for 8th Street adjacent to the Site. These improvements will increase safety on the MBT for those who commute and travel by bicycle. The Applicant carefully considered and integrated bicycle and pedestrian safety considerations in the design of the Project. The building incorporates secure indoor bicycle parking and exterior short-term bicycle parking to encourage residents, visitors, and employees of the building to travel by bike. The Applicant will also reconstruct the streetscape surrounding the proposed buildings in accordance with DDOT's standards, and will otherwise improve the public realm by planting trees and making other landscape and lighting improvements to improve the pedestrian experience.

All access to parking and loading for the Project is from 8th Street, N.E., which will minimize pedestrian and vehicular conflicts. In addition, to minimize conflicts between cars, trucks and pedestrians accessing the Site the loading facilities have been designed for front-in/front-out access.

3. Policy T-2.3.3: Bicycle Safety

This policy promotes increasing bicycle safety through various measures including the provision of public bicycle parking and compliance with regulations requiring private bicycle parking. This policy is supported by a Comprehensive Plan action that requires new commercial and residential buildings to be designed with amenities that accommodate bicycle users. The

Project is consistent with this policy since it will provide secure indoor bicycle parking and short-term bicycle parking spaces in public space to accommodate and encourage bicycle use. Furthermore, as discussed above, the Project supports improvements to the MBT to address much needed bicycle safety along the trail. In addition, the Project is designed to minimize conflict between bicycles and trucks accessing the Site.

4. Policy T-2.4.1: Pedestrian Network

5. Policy T-2.4.2: Pedestrian Safety

The Project incorporates significant improvements to the public space that will improve the city's sidewalk system to form a network that links residents across the city. As a result, the proposed improvements will improve safety and security in the neighborhood and will incorporate new pedestrian amenities that will encourage residents, visitors, and employees to walk within and around the Site.

Since the Site is presently improved with industrial uses, the streetscape adjacent to the Site is unimproved. In addition, a majority of the streetscape along 8th Street is also unimproved, which creates an unsafe environment for students at the Hope Community Public Charter School and other nearby schools that commute to school via the Brookland-CUA Metrorail station or who use the after-school enrichment programs at Dance Place. As a result, the PUD will include substantial streetscape improvements that will help provide safe pedestrian access for students attending school in the vicinity of the Project.

6. Policy T-3.1.1: Transportation Demand Management (TDM) Programs

Consistent with this policy, the Applicant will incorporate a TDM program that is developed to reduce the number of car trips and increase the efficiency of the transportation system.

G. Housing Element

The overarching goal of the Housing Element is to “[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia.” 10 DCMR § 501.1. The Project will help achieve this goal by advancing the policies discussed below.

1. Policy H-1.1.1: Private Sector Support

The Project helps meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the approximately 375 new residential units proposed will be a substantial contribution to the supply of District housing that is in close proximity to Metrorail stations.

2. Policy H-1.1.3: Balanced Growth

This policy strongly encourages the development of new housing on surplus, vacant, and underutilized land in all parts of the city, and recommends ensuring that a sufficient supply of land is planned and zoned to enable the city to meet its long term housing needs, including the needs for affordable housing and higher-density housing. The Project supports these policy goals by developing new moderate-density housing on underutilized land in a growing mixed-use area of the District. Housing provided on the Site will include market rate and affordable housing at varying levels of affordability to ensure that a sufficient housing supply is provided for District residents of all income levels, including at the very low and low incomes levels of 30% and 50% MFI, respectively.

3. Policy H-1.1.5: Housing Quality

The Applicant will devote an amount equal to 12% of the Project's residential gross floor area to affordable dwelling units at the following income levels: 6% of the of the affordable gross floor area will be reserved for households earning equal to or less than 30% MFI, 14% of the affordable gross floor area will be reserved for households earning equal to or less than 50% MFI, 67% of the affordable gross floor area will be reserved for households earning equal to or less than 60% MFI, and 13% of the affordable gross will be reserved for households earning equal to or less than 80% MFI. More importantly, the Project provides more affordable housing than would otherwise be provided if the Site was developed solely under the current PDR zoning since residential uses are not permitted in PDR zones.

The affordable housing will be designed and constructed according to the same high-quality architectural design standards used for the market-rate dwelling units. Finally, the Project will relate to the scale and design of adjacent properties, open space, and the surrounding neighborhood as a whole.

5. Policy H-1.2.3: Mixed Income Housing

The residential component of the Project is mixed-income and includes market-rate and affordable housing units as stated above. Thus, the Project will advance the District's policy of distributing mixed-income housing equitably across the city, rather than concentrating it within areas of the city that already have substantial affordable housing.

I. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biological resources. This element provides policies and actions on important issues such as restoring the city's tree canopy, energy

conservation, and air quality. The Project includes an extensive green roof, bioretention planters, permeable pavers, grass and plantings, and solar panels, which will generate approximately 1% of the energy for the PUD. Additionally, the Project has been designed to achieve LEED Gold under the LEED v4 Multifamily Midrise standard. Therefore, the Project is fully consistent with the policies of the Environmental Protection Element.

1. Policy E-1.1.1: Street Tree Planting and Maintenance

As part of the Project, the Applicant will construct the streetscape adjacent to the Site along 8th Street. The Project also includes new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value along 8th Street and the MBT. Since the Site is presently improved with industrial uses, there are no street trees adjacent to the Site.

2. Policy E-1.1.3: Landscaping

The Project will also incorporate landscaping, which will enhance and beautify the streetscape, reduce stormwater runoff, and strengthen the character of the public realm. Specifically, the Project includes a landscaped courtyard with a pool in the north building. The south building also includes two additional landscaped courtyards. In addition, the Project includes a landscaped dog run in the rear of the south building that will be made available to the buildings' residents.

In addition, the Project includes a landscaped entry plaza that includes an outdoor seating area that is aligned with Jackson Street. The design of the entry plaza includes specialty paving, custom seating, mounded planting islands and turf areas, all of which will create an inviting space that will be open to residents of the PUD and the public.

3. Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff

The design of the Project, and the public space surrounding the proposed building, includes landscaping and green roofs that will reduce stormwater runoff.

4. Policy E-3.2.1: Support for Green Building

This policy encourages the use of green building methods in new construction, as well as use of green building methods for operation and maintenance activities. The Project is consistent with this policy. As stated above, the Project is designed to achieve LEED Gold standards under the LEED v4 Multifamily Midrise standard.

J. Urban Design Element

The goal of the Comprehensive Plan's Urban Design Element is to "[e]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces." 10A DCMR §901.1. The Project will greatly assist in achieving this Comprehensive Plan goal. The height and massing of the building is consistent with the surrounding context as well as the FLUM and the SAP.

1. Policy UD-2.2.1: Neighborhood Character and Identity

The Project will strengthen the defining visual qualities of the Site and the Edgewood neighborhood. Directly to the north of the Site is the District Artspace Lofts, which was approved as a PUD (Z.C. Case No. 09-08, subsequently modified by Z.C Case Nos. 09-08A-B). The PUD included new facilities for Dance Place, which has been located in the neighborhood since 1986. The District Artspace Lofts include a four-story building that is 48 feet in height and includes open space between the buildings generally at the terminus of Kearney Street. Further to the north is the Brookland-CUA Metrorail station and adjacent to the Metrorail is Monroe Street Market, which

was approved as a PUD (Z.C. Case No. 08-24, subsequently modified by Z.C Case Nos. 08-24B-C). These two PUDs, as well as the PUD that is the subject of this application, create a spine of development that traverses from Michigan Avenue to the Brookland-CUA Metrorail station and down 8th Street along the WMATA tracks.

To the northwest and west of the Site is the Edgewood neighborhood, which is predominantly residential in character. Existing industrial uses are clustered along the east side of 8th Street, which are incompatible with the longstanding residential neighborhood to the west. Further to the south along Edgewood Street (which is a continuation of 8th Street south of Hamlin Street) is the Tolson Campus of the Hope Community Public Charter School. Two additional schools (DC Prep Edgewood Elementary School and City Arts and Prep Public Charter School) are located south of Franklin Street. As a result, the Project is consistent with the existing neighborhood character and identity.

2. Policy UD-2.2.5: Creating Attractive Facades

The proposed building is designed in a manner that avoids large expanses of unarticulated façades through the use of projections, recesses, and a mixture of materials. Furthermore, the building includes an upper story setback as called for in the SAP to help establish an appropriate scale in relation to the existing lower scale residential uses to the west of the Site. Each building also includes courtyards above the second level fronting on 8th Street, which act as additional setbacks, breaking up the façade along 8th Street. Moreover, the project includes two residential buildings rather than one single monolithic building in order to further break down the scale of the Project. Overall, the proposed building design establishes an attractive building pattern at a prominent location adjacent to the MBT.

3. Policy UD-2.2.7: Infill Development

The Project will help strengthen the architectural quality of the immediate neighborhood by relating to the architectural scale and massing of the existing buildings in the surrounding residential neighborhood.

4. Policy UD-3.1.11: Private Sector Streetscape Improvements

With development of the Project, the streetscape along 8th Street will be significantly improved to include sidewalks where none currently exist. These new streetscape improvements will provide a connection between the schools to the south and the Metrorail station and Dance Place to the north, which serve the schools' transportation and after-school enrichment needs. The Applicant will also provide new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value.

5. Policy UD-3.2.5: Reducing Crime Through Design

Development of the Site with two buildings that contain residential use and that are separated by a neighborhood pocket park abutting the buildings' entrances and amenities will bring additional "eyes and ears" to the street and the MBT, as well as improved lighting, clear lines of sight, and visual access, all of which will help to minimize the potential for crime in the immediate area.

L. Arts and Culture Element

The Arts and Culture Element provides policies and actions dedicated to the preservation and promotion of the arts in the District of Columbia. Its focus is on strengthening the role of the arts in shaping the physical form of our city. 10A DCMR § 1400.1. One of the key issues facing the District of Columbia as it seeks to foster and enhance arts and culture include improving the distribution of arts facilities throughout the city. 10A DCMR § 1400.2. The Project is well

positioned to advance the policies and goals of the Arts and Culture Element through contributions to Dance Place over a three-year period. The Applicant's contribution will help fund the Energizers Program that is centered on-site at Dance Place's home campus in Ward 5. This program targets African American youth from the surrounding neighborhood and includes an after school program, a teenage leadership program, as well as a creative arts camp during the summer months. The Applicant's contribution will be \$25,000 per year for three years (\$75,000 total). Specifically, the \$25,000 per year will fund eight scholarships for camp, 20 weeks of job training for 14 teenagers, and five scholarships for the Energizers Afterschool Program. The multi-year support ensures the continued delivery of these services and on-going value to the neighborhood.

M. Economic Development Element

The Economic Development Element acknowledges that there are few options for accessing employment other than through driving or long bus commutes. 10A DCMR § 718.2. The Economic Development Element encourages improving access to jobs for residents through investment in the city's transportation system. Even though the Project does not include any commercial uses, the Project advances the principles of the Economic Development Element by constructing a substantial number of new residential dwelling units, both market rate and affordable, in close proximity to Metrorail and the MBT, which will provide residents in the Edgewood neighborhood with an improved transportation system to access employment in the District's major employment centers.