

## COMPREHENSIVE PLAN ANALYSIS

### A. Consistency with the Comprehensive Plan

The addition of a proposed hotel and/or educational uses at the Property are fully consistent with the Comprehensive Plan. In Z.C. Order No. 08-34, the Commission found that the Overall Project advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use and Generalized Policy Maps, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan. *See* Z.C. Order No. 08-34, Finding of Fact (“FF”) No. 87. As described below, the modified project with the additional permitted uses continues to fulfill these and other guiding principles and elements of the Comprehensive Plan.

#### 1. Consistency with the Future Land Use and Generalized Policy Maps

In reviewing the Overall Project, the Commission found that the Applicant's proposal to construct a mixed-use development that includes office, retail, residential, and institutional uses on the Overall PUD Site is consistent with the Future Land Use and Generalized Policy Maps. *See* Z.C. Order No. 08-34 FF No. 87(a).

The Future Land Use Map designates the Overall PUD Site for High-Density Commercial land uses. The High-Density Commercial land use designation defines the central employment district of the city and other major office employment centers on the downtown perimeter. It is characterized by office and mixed office/retail buildings greater than eight stories in height, although many lower scale buildings (including historic buildings) are interspersed. Permitting hotel and/or educational uses in addition to the office and retail uses at the Property will continue to be consistent with the High-Density Commercial designation because these are all commercial uses that fall within that designation and the improvements will be constructed to a height and density that is consistent with the original approval in Z.C. Order No. 08-34. Moreover, the addition of proposed hotel and/or educational uses will help to serve the office, retail, and institutional uses in the surrounding area by providing overnight accommodations at the Property that would not have previously existed and/or attracting a new diverse population of students, faculty, staff, and other college/university employees that will expand and enhance the growing downtown economy.

The Generalized Policy Map designates the Overall PUD Site within Central Washington and in the Central Employment Area. The Commission previously found that the Overall Project is consistent with these designations. The Central Employment Area is the business and retail heart of the District and has the widest variety of commercial uses, including but not limited to major government and corporate offices; retail, cultural, and entertainment uses; and hotels, restaurants, and other hospitality uses. *See* 10A DCMR § 223.21 (emphasis added). Thus, developing the Property with office, hotel and/or educational uses will advance the goals for the Central Employment Area of providing commercial and retail uses, accommodating visitors, and creating new employment opportunities in a variety of industries at the Property.

## 2. Consistency with Guiding Principles of the Comprehensive Plan

The Commission also found that the Overall Project was consistent with many guiding principles in the Comprehensive Plan. As described below, both the hotel and/or educational uses are consistent with the Commission's prior findings.

- Managing Growth and Change. In Z.C. Order No. 08-34, the Commission found that the Overall Project was consistent with the guiding principle of Managing Growth and Change because the mix of uses, including office, retail, residential and institutional uses, was consistent with the Comprehensive Plan's acknowledgement that the growth of both residential and non-residential uses is critical. The Commission also found that the proposed development would respect the broader community context, particularly given its location in close proximity to Metrorail. *See* FF No. 87(b)(1).

The proposed additional commercial uses for the Property will continue to support these goals by further diversifying the mix of uses in the area by adding a hotel or educational component to the Overall Project, in addition to the commercial, retail, residential, and institutional uses already approved. Expanding the permitted mix of uses supports the Comprehensive Plan's recognition that the growth of both residential and non-residential uses is critical. The Managing Growth and Change principle also promotes the creation of safe neighborhoods that offer quality education and the expansion non-residential growth to create jobs and opportunities for less affluent households to increase their income. 10-A DCMR §§ 217.2 and 217.4. Office, hotel and/or educational uses would all be fully consistent with these goals.

- Creating Successful Neighborhoods. The Commission previously found that the Overall Project furthers the guiding principle for Creating Successful Neighborhoods by improving the residential character of neighborhoods and encouraging commercial uses that contribute to the neighborhood's character and make communities more livable. *See* FF No. 87(b)(2). Permitting a hotel use at the Property will improve the neighborhood by providing accommodations for a variety of business and leisure travelers and encouraging individuals and families to visit the District and stay overnight. Providing an educational use at the Property will attract a diverse range of students, faculty, and related staff/employees to immediate area, and encourage residents, visitors, and employees to take advantage of the area's diverse mix of uses and the goods and services available in the downtown core throughout the day and into the evening.

In addition, office, hotel and/or educational uses will create a significant number of new jobs in a wide variety of industries for employees with diverse skill sets and levels of education. Providing well-paying jobs with benefits is essential in narrowing the income gap and creating successful, diverse neighborhoods. Moreover, the application proposes to expand the types of permitted commercial uses on the Overall Project, such that the mix of uses for the overall PUD will continue to be consistent with the Comprehensive Plan's goal of encouraging commercial uses that contribute to the neighborhood's character and make communities more livable. A diverse range of uses is required to truly create a successful neighborhood that makes a community more livable. Adding a hotel and/or educational component to the Overall Project will serve residents, visitors, students, and employees,

thus successfully contributing to the neighborhood's overall mix of uses and helping to establish the community's overall success.

Increasing Access to Education and Employment. In Z.C. Order No. 08-34, the Commission found that the Overall Project was fully consistent with the goals set forth for Increasing Access to Education and Employment because it would increase economic activity and access to jobs, encourage a variety of private and public growth, support land development policies that create job opportunities for District residents with varied job skills, and increase the amount of shopping and services for many District neighborhood. The Commission found this to be true as a result of the office and retail uses in the Overall Project that would attract new jobs to the surrounding area. *See* FF No. 87(b)(3).

Office, hotel and/or educational uses will all further increase the area's economic activity by creating new jobs, including jobs in the hospitality and/or higher education industries. The new permitted uses within the Overall Project will increase the type and variety of job opportunities for District residents, which is consistent with this principle's goal of creating a "mix of employment opportunities to meet the needs of residents with varied job skills." 10A DCMR § 219.6. By creating new employment opportunities, the proposed uses will also further increase the city's tax base and help reinvigorate the existing neighborhood fabric.

With respect to the education use specifically, this principle acknowledges that colleges and universities make the District an intellectual capital and are an essential part of the District's plan to grow its knowledge based economy, improve access to learning, and broaden economic prosperity for all District residents. The principle indicates that "sustaining our colleges and universities is important, as is protecting the integrity of the communities of which they are a part. Encouraging access to higher education for all residents is vitally important, as is locating higher education facilities in neighborhoods currently underserved by such facilities." 10-A DCMR § 219.5. The proposed educational use will fully support these goals.

### 3. Consistency with Major Elements of the Comprehensive Plan

- Land Use Element. In Z.C. Order No. 08-34, the Commission found that the Overall Project is consistent with the policy of concentrating redevelopment efforts near Metrorail station areas which offer the greatest opportunities for infill development and growth. FF No. 87(c). The Overall PUD Site is located two blocks from the Judiciary Square Metrorail Station and four blocks from Union Station. As such, the Overall Project has been designed to encourage transit use. The option to incorporate hotel and/or educational uses into the Commercial Building will further transit use even more, since hotel visitors and college/university students and faculty frequently use public transportation on a regular basis. The Property's centrally-located and transit-accessible location, particularly its proximity to Union Station, will encourage visitors, students, and employees to utilize public transportation options. Moreover, the Commission's previous findings regarding the reopening of F and G Streets and the redevelopment of streetscapes will continue to remedy the gap in the urban fabric that has detracted from the character of the surrounding area.

- Transportation Element. The Commission previously found that the Overall Project is an example of transit-oriented development by providing a mix of uses in a location that is in close proximity to two Metrorail stations. The option to incorporate hotel and/or educational uses at the Property will continue to encourage public transportation use by providing visitors, students, and employees with convenient access to multiple transportation options, thus relieving congestion downtown and creating a more vibrant streetscape. The range of permitted uses will not impact the Overall Project's commitment to reconnect the Overall PUD Site to the urban fabric of the District with the creation of three new city blocks and the reopening of F and G Streets.
- Housing Element. The Commission found in Z.C. Order No. 08-34 that the approved residential portion of the project will help to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. It also found that the project would promote mixed use development, as it includes housing, office, and retail uses in close proximity to a Metrorail station. The subject application does not modify the approved housing or affordable housing proffer, and in fact increases the mix of uses in close proximity to public transportation by incorporating hotel and/or educational uses. Thus, the proposed uses will bring the PUD into greater compliance with the Housing Element.
- Environmental Protection Element. In Z.C. Order No. 08-34, the Commission found that the Overall Project incorporates cutting-edge sustainable design elements that will set a new standard for urban infill and air rights development projects. The proposed addition of hotel and/or educational uses will not impact the sustainable design elements approved as part of the project, and the Applicant will continue to employ environmentally conscious elements into the design of the building. Details on the specific sustainable design elements will be provided as part of the second-stage PUD application for the Property.
- Economic Development Element. The Commission found that the Overall Project would provide almost two million square feet of commercial office space, which would accommodate growth in a diverse array of office industries, as well as over 60,000 square feet of retail use, which would increase access to basic goods and services. This application does not propose to modify the proposed square footage devoted to retail use, and in fact will increase the range of commercial uses permitted on the Property in addition to retail use by allowing office, hotel, and/or educational uses. These diverse uses will continue to reinforce the existing and encourage new commercial development in the area. Although adding hotel and/or educational components to the Overall Project will result in reduced square footage being devoted to office use, it will continue to create new jobs for District residents, further enhance the mix of uses in the area, encourage more visitors to stay overnight in the city, and attract a more diverse population to the downtown core, thus further supporting the local economy. As noted above, both hotel and educational uses will generate a significant number of new and stable jobs with fair wages and benefits for District residents, and will add a greater diversity to the approved uses within the PUD Site and surrounding neighborhood.
- Parks, Recreation and Open Space Element and Urban Design Element. In Z.C. Order No. 08-34, the Commission found that the Overall Project would support these elements by

developing open spaces and parks over below-grade freeways, restoring closed streets, and enhancing the urban form and associated views. The proposed uses at the Property will continue to advance these priorities, thus reducing the negative effects of the freeway and improving pedestrian and bicycle access through new functional and aesthetically-pleasing streetscapes.

- Historic Preservation Element. The modified project will continue to advance the Historic Preservation Element by reopening F and G Streets to preserve the defining features of the L'Enfant and McMillan plans and relocating and highlighting the historic JHS Synagogue.
- Central Washington Area Element. The Commission previously found that the Overall Project's development of office, retail, residential, and institutional uses would attract a broad variety of activities and help to sustain Central Washington as the hub of the metropolitan area. It found that the approved office use would advance the goal of retaining Central Washington as the premier office location in the region, and that the retail, residential, and institutional uses would lend vibrancy to the area.

The office, hotel and/or educational uses at the Property will continue to support these findings and the goals for Central Washington. The hotel use will bring new users to the area and attract tourists and business travelers to the neighborhood. The educational use will draw a diverse range of new student, faculty, and staff populations, thus creating new economic opportunities in the downtown core. Office, hotel and/or educational uses will provide a wide range of job options for District employees and continue to encourage development of a variety of activities to sustain Central Washington as the hub of the surrounding area. The approved uses for the Commercial Building within the PUD encourage residents, visitors, and employees to come into the District and support the surrounding office, retail, and institutional uses and overall economic activity.