

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: *JL for* Jennifer Steingasser, Deputy Director

DATE: October 9, 2015

SUBJECT: **Setdown Report** for ZC #11-03C, Wharf Parcel 1 and Market Square
Second Stage Planned Unit Development

I. SUMMARY RECOMMENDATION

Hoffman-Struever Waterfront, LLC, has submitted an application for a Second Stage Planned Unit Development (PUD) to construct a mixed use building on Parcel 1 of the Wharf. The building would include retail uses on the ground floor and offices above, with a proposed restaurant or similar use at the penthouse level. The application also includes a design for the Market Square adjacent to Parcel 1, and the Market Shed within the square. The proposal is not inconsistent with the first stage PUD approval, the Comprehensive Plan, or the Zoning Regulations. The Office of Planning (OP), therefore, recommends that the application be set down for public hearing.

II. APPLICATION-IN-BRIEF

Location: 1100 Maine Avenue, SW, adjacent to the Fish Market and across from Banneker Overlook

Ward and ANC: Ward 6, ANC 6D

Applicant: Hoffman-Struever Waterfront, LLC, dba Hoffman-Madison Waterfront

PUD-Related Zoning: C-3-C

Property Size: 32,229 sf (Parcel 1) + 25,320 sf (Market Square) = 57,549 sf total

Proposal: The applicant proposes a design for a mixed use building at Parcel 1, the Market Shed building, and for Market Square itself, all at the northern end of the Wharf development.

Background: The Zoning Commission approved a First Stage PUD for the entire Wharf project on October 17, 2011. That approval established the PUD-related zoning for the property, the site plan, the general use mix, the general massing of buildings, the maximum heights for buildings and the maximum FAR for the entire development.

The Zoning Regulations describe a Second Stage PUD as a detailed review that examines the architecture of the proposed buildings, uses within the buildings, design of open spaces, site circulation, site infrastructure and compliance with the intent and purposes of the PUD process, the Regulations and the First Stage PUD. (§§ 2402.2(b), 2406.12 and 2408)

III. SITE AND AREA DESCRIPTION

The Wharf project site is generally bounded on the north by the fish market, on the northeast east by Maine Avenue, and on the west by the proposed extent of the piers of the new development. To the south the Wharf extends approximately to N Street. The northern half of the Wharf site, from Maine Avenue and 7th Street north to the Fish Market, is currently under construction, along with Parcel 11 at M and 6th Streets. Parcel 11 includes a 57 foot, five story residential building, which is progressing toward completion, and a church which has yet to break ground. The northern portion of the Wharf was excavated and construction has begun on the parking garage that will be underneath Parcels 1 through 5. Utility work has also been done in Maine Avenue.



Wharf Parcel 1 – 2015 Aerial Photo

Maine Avenue and 7th, 9th and M Streets provide auto access to the site. The Waterfront and L'Enfant Plaza metro stations are within walking distance of the property. The surrounding neighborhood is developed with a mix of housing types as well as churches, schools, the Fish Market and Arena Stage. Office uses are clustered around the Waterfront Metro, where additional residential and office development is underway or approved. To the north of the Wharf site, the L'Enfant Promenade connects Banneker Overlook to the National Mall, though at present there is limited pedestrian connectivity between Maine Avenue and the overlook.

The subject site for the current application is Parcel 1 of the Wharf along with the Market Square, which is immediately adjacent to the Fish Market. The Fish Market is not part of the PUD. Parcels 2 through 5, along with most of the project's piers and open spaces, have already received Second Stage approval in cases 11-03A and 11-03B. Parcel 2, immediately south of Parcel 1, would include two apartment towers above retail and above a large entertainment and concert venue. The loading functions of Parcel 2 would use the alley adjacent to Parcel 1.

As approved in 11-03A, the wharf itself would be a multi-modal transportation spine connecting the entire project and connecting to the fish market. It would be open to pedestrians, bicycles and auto traffic, though the auto traffic is expected to be minimal, and for special events the wharf can be closed to cars completely. The wharf would also provide room for formal outdoor seating for restaurants as well as informal outdoor space for visitors. Maine Avenue would have improved pedestrian and bicycle amenities and significant landscaping, as well as space for outdoor retail activities. A new signalized intersection has been constructed at Maine Avenue and Market Square to allow easier pedestrian and vehicular movement in the immediate vicinity, including into the fish market. Across Maine Avenue from Parcel 1 is Banneker Overlook, the terminus of the L'Enfant / 10th Street promenade. Currently pedestrian access from Maine Avenue to the Overlook is highly circuitous via paved sidewalks, but the hillside is often traversed via a worn path. A semi-permanent stair and ADA ramp is contemplated by various stakeholders and its construction was included as a proffer of the First Stage PUD for the Wharf. A permanent grand staircase would be constructed if the Banneker Overlook site is ever redeveloped for a museum, memorial or other use.

IV. PROJECT DESCRIPTION AND ANALYSIS

The basic parameters of the proposed development are as follows:

	Parcel 1	Market Square / Market Shed
Land Area (sf)	32,229	25,320
Height	130' 10 stories plus a 15' foot tall occupiable penthouse (18'6" for mechanical)	14' – 21' 1 story

Building Area (sf)		
Retail	12,925 (22,334*)	3,050
Office	232,787 (223,378*)	0
Total	245,712 7.6 FAR	3,050 0.1 FAR
Penthouse	11,292 (habitable) <u>2,320 (mechanical)</u> 13,612 (total) 0.35 FAR	n/a

* Option with second floor retail on the north side of the building.

Parcel 1

The development on Parcel 1 would consist of a 130 foot tall building with a retail ground floor and office above. The applicant has also requested the ability to use a portion of the penthouse level as a restaurant or similar use. The body of the building would generally form a “V” shape, with a slightly offset core to allow a two story lobby running from Maine Avenue through to the water-side of the building, and a four story atrium facing the water. The walkway at the second story crossing over the lobby would allow the best views through the building if it were completely open, or if it was enclosed by glass. On the ground floor, retail uses would face Market Square (see Sheet 1.17). On the south side of the lobby some retail area would face the water. Loading and parking access from the east alley and back of house spaces would fill out the ground floor. The proposed ground floor plan shows a trash room and fire control room occupying the Maine Avenue frontage next to the alley, but OP has requested to the applicant that some sort of street-activating space be provided at this location. Across the alley, the ground floor Maine Avenue frontage for Parcel 2 is proposed to house retail uses, and an active use at the corner of Parcel 1, even if small, would help to animate this portion of the street.

The second floor would have some mechanical space, office-related amenity space, and office or retail space facing Market Square. Floors 3 through 10 would be entirely office. On Sheet 1.21 the occupiable portion of the penthouse is labeled as “Office/Retail”, but the written statement indicates that the applicant only seeks the ability to pursue a “bar, restaurant, nightclub, or cocktail lounge use” (Page 8).

Market Square and Market Shed

The Market Square is the northernmost section of the Wharf PUD and provides access and a transition to the adjacent fish market. A new operational traffic signal on Maine Avenue marks the location of Market Square, and the intersection will help pedestrians and vehicles more safely navigate this portion of the waterfront. Vehicles could enter into the square and either turn into the fish market or circle back around toward Maine Avenue. Visitors travelling by car to the fish market would also be able to park in the Wharf’s parking garage and exit on the northwest side of Parcel 1 directly into Market Square via an elevator and stair lobby.

The Market Shed would sit within the square and house one or two retail users. The shed is bifurcated by a passage that would allow pedestrian movement from the elevator and stair lobby in the Parcel 1 building through to the fish market. The shed uses the “butterfly” roof line seen in other pavilion buildings throughout the wharf.

The design of the wharf itself adjacent to Parcel 1 was largely approved with application 11-03A, and those same materials and design would continue along the entire western face of Parcel 1. The applicant has already received a building permit for construction of that part of the wharf. At Market Square, the materials would change from stone to asphalt block, as described on Sheets 2.1 and 2.2 of the plan set. The change in materials would signal the change from the more finished environment of the Wharf to the more active, wholesale or even gritty nature of the fish market.

V. COMPREHENSIVE PLAN

The Commission found during its review of the first stage PUD that the Wharf project is not inconsistent with the Comprehensive Plan. OP finds that the current second stage PUD application is generally consistent with the first stage as approved and does not detract from project’s correlation with the tenets of the Plan.

The proposal would further a number of the Plan’s Guiding Principles and major policies from Plan elements such as the Land Use; Transportation; Economic Development; Urban Design; and Lower Anacostia Waterfront / Near Southwest Area Elements. The application is also not inconsistent with the Plan’s Generalized Land Use Map or the Future Land Use Map. The proposal is also consistent with the Development Plan & Anacostia Waterfront Initiative Vision for the Southwest Waterfront (the SWW Plan). For a complete analysis of the project against relevant planning policies, please refer to Attachment 1.

VI. ZONING

In the first stage PUD, the Commission approved PUD-related zoning of C-3-C for the northern portion of the project, including Parcel 1. Also in the first stage PUD, the Commission granted zoning flexibility for the exact mix of uses, within certain ranges. The current proposal is consistent with the approved zoning as well as the uses approved in the first stage PUD.

The current second stage application requests flexibility from the specific zoning regulations listed below. A summary of each area of relief is given and OP will provide a complete analysis of the requested flexibility at the time of the public hearing.

1. Penthouse Requirements (§ 411)

The application requests flexibility for:

- Setbacks – The penthouse wall on the western side of the building facing the Washington Channel is directly above the exterior wall of the 10th floor, and therefore has a zero setback. While OP supports the appearance of the building in that location, it informed the applicant that setback relief above the Height Act limit of 130’ could not be granted through zoning.
- Enclosing walls with multiple heights – The design proposes a height of 15’ above the proposed habitable portion of penthouse, and 18’6” above the mechanical penthouse.
- Maximum penthouse heights – The application requests flexibility to increase penthouse heights up to a maximum of 20’, a height contemplated under the proposed penthouse regulations (ZC #14-13). Plans for the building should be updated to include elevation drawings and renderings that would show what the taller penthouse would look like.
- Habitable space – The application requests the ability to provide a bar or restaurant use at the penthouse level, an option that is being considered as part of the proposed penthouse regulations.

2. Loading Requirements (§ 2201)

The application requests flexibility from loading requirements for the project as shown in the table below.

Facility Type	Required	Provided
55 Foot Berths	0	0
30 Foot Berths	3	2
20 Foot Delivery Spaces	1	0
100 sf Loading Platforms	3	One 250 sf loading platform
200 sf Loading Platforms	0	

In general OP does not object to relief from loading, provided the applicant justifies the reduction in size or number of facilities and commits to loading management techniques such as limited loading hours and a loading coordinator for the building. The written statement indicates that the forthcoming traffic study will analyze the loading needs of the building.

3. Other Minor Flexibility

The application also requests other minor flexibility that is often included as part of PUD applications. This includes the ability to vary interior components; vary the exact selection of exterior materials; vary landscaping materials; and make minor refinements to exterior details. If the application is approved, OP will work with OAG to craft language for the Order that allows necessary flexibility for the developers while also assuring the project is built largely and substantially as shown in the plans approved by the Commission, and built to a high quality of design as expected in the PUD process.

VII. PURPOSE AND EVALUATION STANDARDS OF A PUD

The purpose and standards for Planned Unit Developments are outlined in Chapter 24 of the Regulations. The PUD process is “designed to encourage high quality developments that provide public benefits.” Through the flexibility of the PUD process, a development that provides amenity to the surrounding neighborhood can be achieved.

The applicant is requesting approval of a second stage PUD. The PUD standards state that the “impact of the project on the surrounding area and upon the operations of city services and facilities shall not be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project” (§2403.3). Based on comments to be supplied by referral agencies, OP will provide at the time of the public hearing an analysis of the project’s impact on city services.

VIII. PUBLIC BENEFITS AND AMENITIES

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, §2403.8 states that “the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” Sections 2403.9 and 2403.10 state that a project must be acceptable in all the listed proffer categories, and must be superior in many. To assist in the evaluation, the applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to typical development of the type proposed...” (§2403.12).

The first stage PUD included a number of benefits, including urban design, affordable housing, workforce housing, the creation of a BID, First Source Employment and CBE agreements, funding for a workforce intermediary program, coordinating apprenticeships with the construction contractor, setting aside space for local or unique retailers, and environmental design. As part of the first stage PUD, the Commission required that the applicant prepare a benefits implementation chart with each subsequent second stage PUD. That chart is shown at Exhibit 3 of the written statement. Benefits are also briefly described beginning on page 16 of the written statement. The benefits proffered with the current application are consistent with the first stage approval, and are described briefly below. While some of the benefits are not specific to Parcel 1 (affordable housing, for example), the benefits listed for ZC #11-03 would still apply to this Stage 2 PUD application. OP will provide further analysis of all benefits should the Commission choose to set down the application.

1. Affordable and Workforce Housing

Although no housing is proposed for Parcel 1, phase 1 of the Wharf and the entire Wharf project would provide significant levels of income-restricted housing. Affordable housing is being

provided on various parcels within the Wharf, consistent with the first stage PUD approval. The project will provide a total of 160,000 square feet of affordable housing on Parcels 1 through 10, plus IZ housing at Parcel 11. In addition, an estimated 140,000 square feet of workforce housing could be provided throughout the project.

2. Environmental Design

Exhibit 3 of the written statement indicates that the building on Parcel 1 will achieve a LEED Gold Core and Shell (CS) equivalent. The applicant had previously committed that the entire Wharf development would achieve LEED Gold Neighborhood Development (ND) standards. These standards are consistent with the first stage approval.

3. Business Improvement District

The original PUD discussed the potential for a business improvement district, and the Southwest BID has since begun operations, with the assistance of this applicant. The project association specifically for the Wharf will be responsible for maintenance of private roadways, alleys, bicycle paths, promenades, sidewalks, piers, parks, and signage within the Wharf development, as well as event programming. According to the applicant it will be functional prior to the first building opening on site. The developer will create the association, and it will eventually be funded by assessments to each use in the project.

4. CBE and First Source Employment Agreements and Related Actions

As noted in the first stage PUD, the applicant has entered into a CBE agreement with the Department of Small and Local Business Development (DSLBD), which requires 35% participation by CBE firms in the project development costs. The applicant has already begun, with the help of DSLBD, to employ CBE firms for construction activities. OP has requested that the applicant update the Commission on the effectiveness and success of these efforts prior to or at the public hearing.

The applicant also committed to reserve 20% of the retail space in the SWW project for unique or local retailers, although the application does not describe whether any of the unique or local retail space would be located at Parcel 1 or the Market Shed.

The applicant has also committed to help fund a workforce intermediary program (WIP) with a total contribution of \$1,000,000. Exhibit 3 of the written statement indicates that the operational mechanisms of the WIP are not yet fully in place, and OP has asked the application to provide more detail on the WIP's status, as well as that of the overall local hiring and job training initiatives.

5. Other Benefits

In addition to the above-referenced benefits, other benefits have begun to be implemented or will be implemented during construction of the second stage PUD, including the urban design of the project, improvements to Maine Avenue, reservation of private property along Maine Avenue for additional public space, reconstruction of the seawall, construction of temporary dock facilities including utility connections, and the inclusion of approximately 1,450 bicycle parking spaces.

OP has asked the applicant to provide, prior to a public hearing, an update on the status of the temporary staircase and ramp to Banneker Overlook. Its construction was a proffer of the Stage 1 PUD, but it was anticipated that the stair and ramp, similar to improvements to Maine Avenue and the seawall, for example, would be paid for through TIF funds. The applicant stated to OP, however, that they have now been informed that TIF funds cannot be used on Federal property. Because the stair would be so important to the Wharf, and especially to Parcel 1, the applicant should provide an update on the status of the stair's Environmental Assessment (EA) review and its funding.

The Office of Planning feels that the information regarding benefits and their implementation are sufficient for setdown and that they are generally consistent with the first stage approval.

IX. AGENCY REFERRALS

If this application is set down for a public hearing, the Office of Planning will consult with the following government agencies for review and comment:

- Department of Energy and the Environment (DOEE);
- Department of Transportation (DDOT);
- Department of Employment Services (DOES);
- Department of Parks and Recreation (DPR);
- Department of Public Works (DPW);
- Fire and Emergency Medical Services Department (FEMS);
- Metropolitan Police Department (MPD); and

X. COMMUNITY COMMENTS

The site is located in ANC 6D. As of this writing neither the ANC or community members have contacted OP, but the applicant maintains a dialogue with the ANC and conducts regular Development Advisory Group meetings to keep the community up to date on progress and respond to questions.

XI. SUMMARY OF OP COMMENTS

OP supports the overall design for Parcel 1, Market Square and the Market Shed, and feels they will contribute positively to pedestrian activity and the overall vitality and mix of uses of the Wharf. The proposal is in conformance with the First Stage PUD and is not inconsistent with the Comprehensive Plan, so OP therefore recommends setdown of the application. The following

summarizes OP comments from this report, all of which can be addressed prior to a public hearing.

OP Comment	Planning and / or Zoning Rationale
The walkway at the second story crossing over the lobby would allow the best views through the building if it were completely open, or if it was enclosed by glass.	The lobby through the building could provide an additional interesting view from Maine Avenue to the waterfront, an important goal of planning for the site. Because the elevator core blocks much of the potential view, other methods to open up the view should be employed.
The corner of Parcel 1 on Maine Avenue and next to Parcel 2 should include some sort of street-activating use, rather than a trash room and fire control room.	An active use at the corner of Parcel 1, even if small, would help animate this portion of the street.
The building design should conform to the Height Act.	While OP generally supports the appearance of the building and the appearance of the penthouse, the western side of the penthouse is non-conforming to the Height Act, and flexibility from the Height Act cannot be granted through zoning.
Provide an update on the status of the temporary stair and ramp to Banneker Overlook.	The stair and ramp will be very important as a connection to the L'Enfant Plaza metro and for visitors walking to and from the National Mall.

XII. ATTACHMENT

1. Comprehensive Plan Analysis
 - A. Guiding Principles
 - B. Plan Policies
 - C. Land Use Maps
 - D. Development Plan & AWI Vision for the Southwest Waterfront

Attachment 1

Comprehensive Plan Analysis

A. GUIDING PRINCIPLES

The proposal would further the following Guiding Principles of the Comprehensive Plan, as outlined and detailed in Chapter 2, the Framework Element:

- (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. 217.1
- (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... 217.5
- (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. 217.6
- (7) Growth in the District benefits not only District residents, but the region as well. By accommodating a larger number of jobs and residents, we can create the critical mass needed to support new services, sustain public transit, and improve regional environmental quality. 217.7
- (13) Enhanced public safety is one of the District's highest priorities and is vital to the health of our neighborhoods.... 218.6
- (24) Despite the recent economic resurgence in the city, the District has yet to reach its full economic potential. Expanding the economy means increasing shopping and services for many District neighborhoods, bringing tourists beyond the National Mall and into the city's business districts, and creating more opportunities for local entrepreneurs and small businesses. The District's economic development expenditures should help support local businesses and provide economic benefits to the community. 219.9
- (27) Washington's wide avenues are a lasting legacy of the 1791 L'Enfant Plan and are still one of the city's most distinctive features. The "great streets" of the city should be reinforced as an element of Washington's design through transportation, streetscape, and economic development programs. 220.3

- (30) Residents are connected by places of “common ground,” such as Union Station and Eastern Market. Such public gathering places should be protected, and should be created in all parts of the city as development and change occurs. 220.6

B. PLAN POLICIES

The application is also consistent with major policies from various elements of the Comprehensive Plan, including the Land Use; Transportation; Economic Development; Urban Design; and Lower Anacostia Waterfront / Near Southwest Area Elements.

Land Use Element

The Land Use Element calls for the reuse of large, publicly owned sites, and says that their redevelopment should improve their neighborhoods, provide improved waterfront access, where applicable, and provide new parks (Policy LU-1.2.1). Policy LU-1.2.2 says that the mix of uses on such sites should be compatible with existing uses and provide benefits to the immediate and larger communities. In conformance with Policy LU-1.2.6, the proposed design seeks to integrate into the existing urban fabric to the greatest extent possible. The Land Use Element also encourages infill development and development near metro stations (Policies LU-1.3.1 and LU-1.3.2).

Transportation Element

The Transportation Element supports transit-oriented development and discourages auto-oriented uses (Policies T-1.1.4 and T-1.2.3). The proposed development would concentrate office uses within walking distance of Metro and bus service, and provide a walkable and bikeable environment. This element also seeks to improve major boulevards through “transportation, economic development, and urban design improvements” (Policy T-1.2.1) The proposed design would also improve the pedestrian network and pedestrian safety, as called for in Policies T-2.4.1 and T-2.4.2.

Economic Development Element

Development of the subject site would help achieve the several Economic Development Element policies. A mix of uses along the waterfront would help draw visitors away from the Mall, and the waterfront itself would be an attraction for tourists. New restaurants would also capture tourist dollars. Please refer to Policies ED-2.3.3 and ED-2.3.3.

Urban Design Element

Policy UD-1.1.1 calls for the District to enhance its “image, character and outstanding physical qualities...in a manner that reflects its role as the national capital.” The proposed development would improve the southwest waterfront to a state that it could not only be an amenity for

residents but would also improve the city's image in the eyes of visitors to the District. The Urban Design Element also calls for the general improvement of waterfront areas, including improving access and strengthening the civic identity as a waterfront city (Policies UD-1.3.1 and UD-1.3.2). Policy UD-1.3.5 also states that views toward the rivers should be protected and enhanced. The proposed development would provide ground level views, and provides a view corridor to the Washington Channel from Banneker Overlook. This element also speaks to reinforcing major boulevards, such as Maine Avenue, and to creating successful developments on large sites and integrating them into existing neighborhoods. Both of these objectives can be achieved by the proposed development.

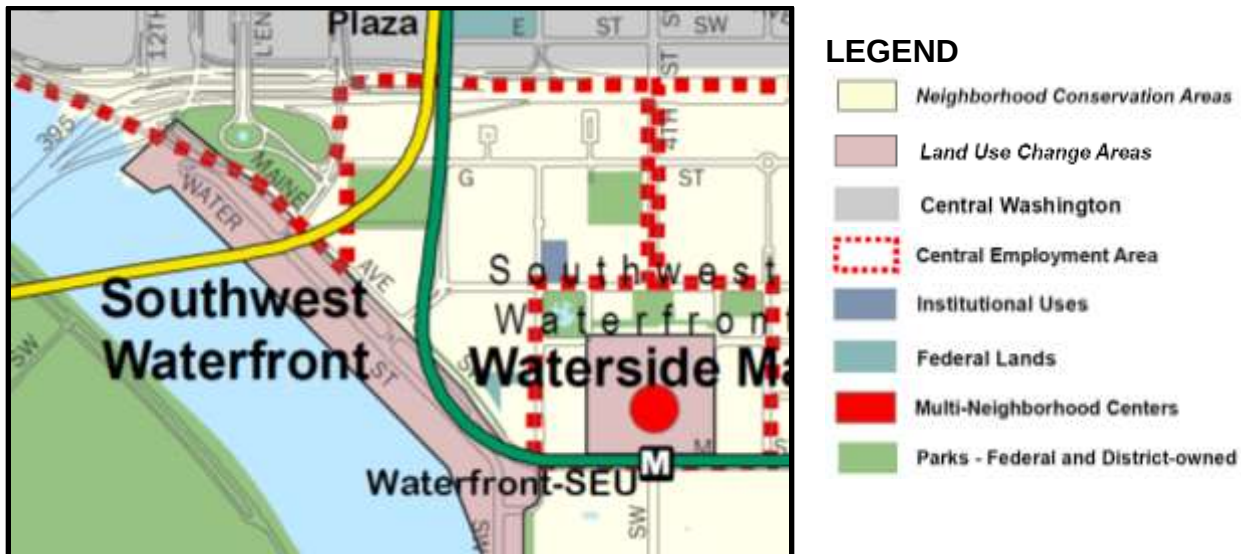
Lower Anacostia Waterfront / Near Southwest Area Element

The Lower Anacostia Waterfront / Near Southwest Area Element encourages the creation of new waterfront neighborhoods on large, contiguous, publically owned sites, including the Southwest Waterfront (Policy AW-1.1.2). Policy AW-1.1.3 states that development should be "consistent with the Future Land Use Map", provide space for offices and focus development along corridors such as Maine Avenue. The proposed mix of uses would meet that policy and the placement of a building along Maine Avenue would reinforce that important corridor.

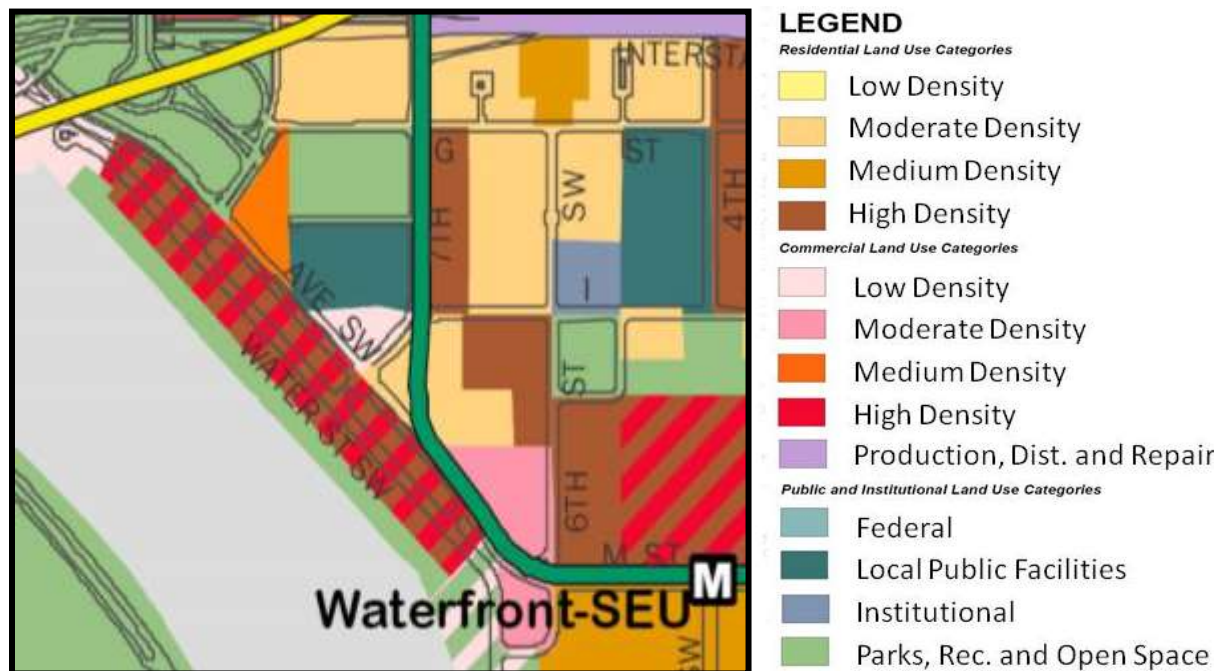
New developments in this area should provide amenities, such as parks and transportation and infrastructure improvements (Policy AW-1.1.4), and should provide significant pedestrian and multi-modal access along the shoreline (Policies AW-1.1.6 and .7). The design of the proposed building supports that policy direction. Policy AW-1.1.9 seeks the improvement of Maine Avenue as a "graciously landscaped urban [boulevard]...designed with generous pedestrian amenities, public transit improvements, landscaping, and ground floor uses that create a vibrant street environment." The proposed design could achieve that objective with more active uses along the Maine Avenue ground floor. Maine avenue itself would have improved pedestrian and bicycle facilities. The proposal is generally consistent with the policies of the Lower Anacostia Waterfront / Near Southwest element of the Comprehensive Plan.

C. LAND USE MAPS

The Comprehensive Plan's Generalized Policy Map describes the subject site as a Land Use Change Area. Land Use Change Areas are anticipated to become "high quality environments that include exemplary site and architectural design and that are compatible with and do not negatively impact nearby neighborhoods (Comprehensive Plan, § 223.12).



The Future Land Use Map (FLUM) indicates that most of the site is appropriate for high density residential and commercial mixed use.



D. DEVELOPMENT PLAN & AWI VISION FOR THE SOUTHWEST WATERFRONT

The Development Plan & Anacostia Waterfront Initiative Vision for the Southwest Waterfront (SWW Plan) is a small area plan adopted by the city council in 2003. Like any small area plan, it works together with and supplements the Comprehensive Plan. In most instances the SWW Plan gives more detailed direction and guidance than the Comprehensive Plan.

The SWW Plan has a number of guiding principles that form the basis of the Plan's policies. The guiding principles include improving access to the waterfront – including the provision of a wide promenade, improving access to the water itself, enhancing connections to the existing neighborhood, and creating new public places and a neighborhood setting (SWW Plan, p. 2-1). More detailed recommendations include varied building heights, concentrating commercial uses near the north of the property, and having a strong mix of uses including a significant affordable housing component. The development proposed with this PUD would not be inconsistent with these broad themes.