

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** *JL for* Jennifer Steingasser, Deputy Director, Development Review/Historic Preservation

**DATE:** July 15, 2016

**SUBJECT:** Preliminary Report on Zoning Commission Case No. 16-13, Consolidated Planned Unit Development and Related Map Amendment for 1109 Congress Street, NE

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**I. SUMMARY RECOMMENDATION**

**The Office of Planning (OP) recommends the Commission set down the application** by JS Congress Holdings, LLC for a consolidated PUD to construct a mixed-use development at 1109 Congress Street, N.E., with a related map amendment from C-M-1 to C-2-B and with flexibility from the requirements for the minimum size of a PUD site, penthouse setbacks, rear yard depth, residential lot occupancy, open court width, number of parking spaces, loading facilities and penthouse setbacks.

The proposals is not inconsistent with the Comprehensive Plan and the filing generally meets the requirements of 11DCMR §§ 2406 to an extent sufficient to schedule a public hearing.

As summarized in Section VI, additional information and the resolution of certain concerns would be needed by a public hearing. In particular, OP has encouraged the applicant to:

- Refine the design of the building;
- More fully comply with the Production, Distribution and Repair (PDR) goals of the Comprehensive Plan;
- Provide a more robust affordable housing component,
- Clarify compliance with the habitable penthouse space requirement;
- Explore ways to bring the penthouse into compliance with setback requirements
- Continue working with ANC 6C to identify the public benefits of special value to the neighborhood that would be commensurate with the related map amendment and increases in height and density.

The applicant and the District Department of Transportation (DDOT) have agreed on the scope of work for the transportation and parking consultant's report.

**II. APPLICATION-IN-BRIEF**

<b>Property Location and Legal Address</b>	1109 Congress Street, NE is located on the east side of Congress Street and the north side of L Street. The PUD site includes Lots 78 and 819 in Square 748, and a portion of an east west alley for which closing will be requested. The Square is bounded by 2 <sup>nd</sup> Street/Delaware Avenue, L, M, and 3 <sup>rd</sup> Streets, NE. Congress Street runs north-south and bisects the southern 40% of the Square. The Uline Arena occupies the north end of the Square.
<b>Ward, ANC</b>	Ward 6, ANC 6C
<b>Property Size</b>	10, 124 square feet
<b>Applicant</b>	JS Congress Holdings, LLC
<b>Current Zoning</b>	C-M-1, Industrial / Commercial
<b>Proposed Zoning</b>	C-2-B, Medium Density Mixed Use
<b>Existing Conditions</b>	The irregularly shaped site is occupied by an unoccupied two-story warehouse devoted to industrial use, and a recently-constructed three story building with two floors of offices and one floor of parking. A portion of the property is vacant. There is a positive grade difference of 10 feet from south to north. A 9-foot wide alley, entered and exited only from Congress Street runs east-west from Congress Street and turns north-south on the east side of the applicant's property.
<b>Neighborhood Context</b>	As shown in Figure 1, below, the site is surrounded by recently-developed or soon-to-be-developed properties, many of which are PUDs. A substantial number of the new developments are converting former industrial or light-industrial properties to residential and retail uses. All of the nearby PUDs involve a PUD-related C-3-C zone. Smaller-scale residential buildings predominate east of 3 <sup>rd</sup> Street. The southern entrance to the NoMA/NY Avenue/ Gallaudet Metro station is 1 ½ blocks northwest of the property on M Street, west of the rail tracks.
<b>Comprehensive Plan Maps</b>	<u>Future Land Use Map</u> : Mixed Use Medium Density Residential and PDR <u>Generalized Policy Map</u> : Land Use Change Area

<p><b>Proposed Use of Property</b></p>	<p>Existing buildings would be demolished and replaced by a mixed use, primarily residential building, with separate non-residential spaces on two different levels and below-grade parking. The east-west portion of the public alley would be closed, and a “public pass-through easement” would be provided at the site’s northern end.</p> <ul style="list-style-type: none"> <li>- <u>Height</u>: 90’ (8 stories) plus a two-story 18’6” high penthouse</li> <li>- <u>Bulk</u>: ~ 6.0 FAR; 60,744 sf             <ul style="list-style-type: none"> <li>o Residential: 5.6 FAR; 56,744 sf, 69 units</li> <li>o Non-Residential, possibly PDR: 0.4 FAR; 4,000 sf</li> </ul> </li> <li>- <u>Penthouse</u>: additional 0.38 FAR, including 3,847 sf of habitable space devoted to either private residential or communal uses. (Unless devoted to amenity space, this square footage would trigger a separate affordable housing requirement, which the applicant should detail).</li> <li>- <u>Parking</u>: 16 below-grade spaces</li> <li>- <u>Loading</u>: one 24 ft. long loading berth</li> <li>- <u>Uses</u>: 63-69 dwelling units, of which 8% would be IZ units for families earning up to 80% of the area median income. Two separate non-residential spaces totaling 3,700 sf, each located at ground level due to grade changes, and each intended to be devoted to PDR uses.</li> </ul>
<p><b>Main Differences from By-Right Development</b></p>	<p>The building would be 50 feet taller and twice as dense as a by-right development. The residential uses to be provided could not be developed in the existing C-M-1 zone.</p>
<p><b>Requested Flexibility</b></p>	<ol style="list-style-type: none"> <li>1. PUD-related map amendment from C-M-1 to C-2-B;</li> <li>2. § 2401.2 -- minimum site size for a PUD;</li> <li>3. § 411.18 – penthouse setbacks</li> <li>4. § 772 - residential lot occupancy (2<sup>nd</sup> floor only)</li> <li>5. § 774.7 – rear yard depth;</li> <li>6. § 776 - open court width;</li> <li>7. § 2101– number of residential parking spaces</li> <li>8. § 2202 –loading facilities;</li> <li>9. Flexibility to vary the location of all interior components, the exact number parking spaces within the minimum set by a PUD order, and final material selection and details, within range of colors, types and quality specified by PUD order</li> </ol>
<p><b>Additional Clarification or Flexibility that May Be Needed</b></p>	<ul style="list-style-type: none"> <li>• § 411.9 – penthouse walls of no more than a single height for habitable space, which may be no more than one story high</li> </ul>



Figure 1. Site Location and Context (Green – Approved PUDs; Blue – In-process PUDs)

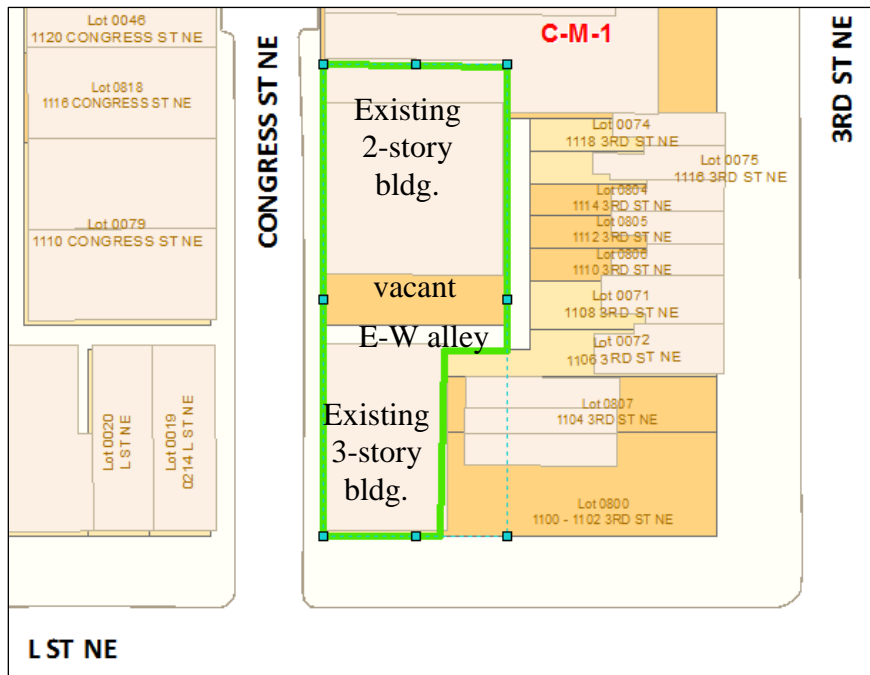


Figure 2. Existing Site

Figure 3 Proposed Site Plan with closed east-west alley and proposed east-west easement

### III. COMPREHENSIVE PLAN AND OTHER PUBLIC POLICIES

#### *Comprehensive Plan*

The proposed PUD is not inconsistent with the Comprehensive Plan's maps or written elements.

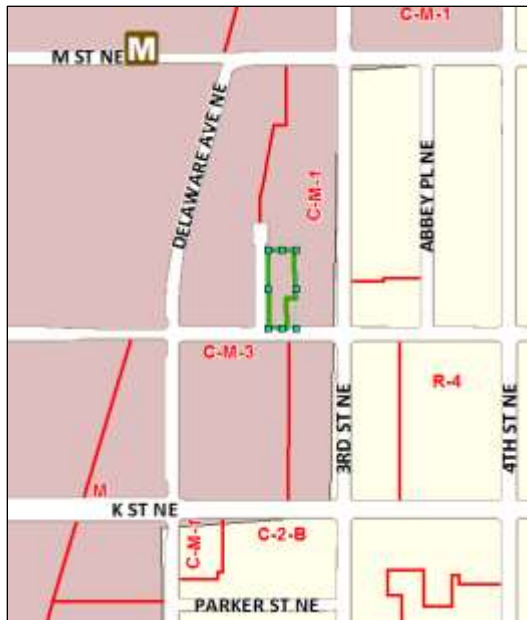


Fig. 4. Comprehensive Plan Future Land Use Map

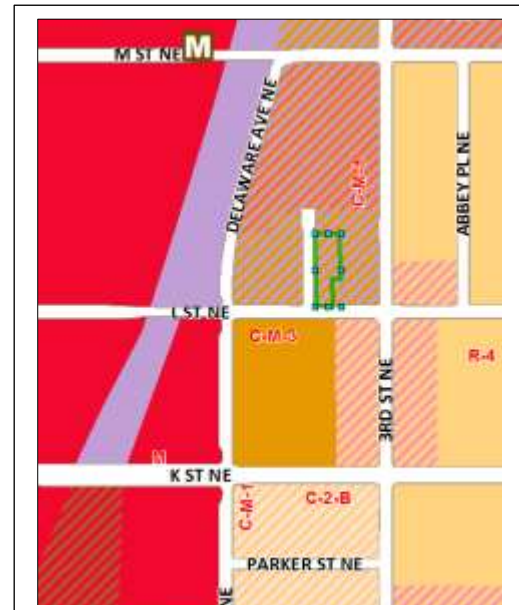


Fig. 5. Generalized Policy Map

Policy Map indicates that a change in land use is expected and encouraged for the site; the proposed project would introduce residential uses to a site where it is now prohibited, and its location would not intrude into the areas to the east that are designated for neighborhood conservation.

The Future Land Use Map (FLUM) indicates that the site is appropriate for medium density residential and production, distribution and repair uses. The proposed height and bulk are within the upper end of the medium density category and the proposed uses are not inconsistent with the FLUM. However it is not clear how the proposal is fully consistent with the PDR designation on the site. OP will continue to work with the applicant prior to a public hearing on the appropriate level and specificity of the commitment to PDR uses.

The proposed project would be not inconsistent with written elements of the Comprehensive Plan. The Land Use, Transportation, Housing, Environmental Protection, Urban Design and Central Washington Area Elements all include policies and recommended actions with which the proposal is congruent. The proposal would be transit-oriented (policies LU-1.3 and T-1.1.4); would help to revitalize the neighborhood through new housing and retail or PDR uses where now there are vacant and underutilized lots (policies LU-2.1.3, CW 1.1.1, CW-1.1.4, CW-1.1.9, H-1.1.1, H-1.1.4 and, to some extent H-1.2.3); would use a related map amendment to further the mix of uses in an underperforming industrially-zoned area (policy LU-3.1.4); would enhance environmental and sustainability objectives through the various green elements that would be

built into the project in pursuit of a LEED-Gold certification (policies E-1.1.1, E-1.1.3, and E-2.2.1); and would be generally consistent with policies supporting a more vibrant Central Washington Area (e.g., policies CW-2.8.1 and CW-1.1.13), although the project should seek ways to more completely fulfill the goal of Policy CW-2.8.2, that redevelopment should include live/work space, artists' studios and similar uses. These and other relevant policies are attached to this report.

As discussed in Section V of this report the applicant may need to reconsider certain design elements to ensure the project would provide superior architecture and urban design with high-quality materials, varied massing and fenestration and attention to ground floor details affecting pedestrians (policies UD 2.2.1, 2.2.7 and UD-2.2.5).

### *Small Area Plan*

The Council-adopted Small Area Plan (SAP), titled the NoMA Vision Plan and Development Strategy (NoMA Plan) designates the subject site as part of the "Creative Industries/Mixed-Use" transition area, which is described as "a mixed-use precinct with a diversity of uses including creative industries, residential and non-profit office uses, studio and live-work spaces..." (NoMA Plan, p. 5.12). The SAP lists a number of recommendations for this sub-area (pages 5.12 and 5.13). Relevant items include:

- Work with DC Commission on the Arts and Humanities to ensure a strong art presence in streets and public spaces, to include artists in early phases of projects, and to fund artist/underpass projects;
- Encourage diverse of housing types, including live-work/flexible space for artists/ artisans;
- Encourage public art in public realm and in individual projects.
- Provide for arts and design-oriented businesses and creative industries that create jobs in fields such as technology, furniture manufacturing and design, architecture, engineering, electronics distribution, sign-making, metal fabrication, jewelry-making, art graphic design, software engineering, video, radio, and television production, motion picture and sound recording, broadcasting, publishing, and internet-related services, in addition to other uses;
- Include non-profit office uses;
- Provide for smaller-scale neighborhood-serving retail, particularly at the ground floor level, including design-related retail, showrooms component of live-work space for makers of local goods and arts.

OP has encouraged the applicant to examine ways to more fully meet the goal of providing a diversity of housing types, a stronger arts / creative economy presence, and a mix of PDR uses.

#### IV. ZONING ANALYSIS

<b>Table 1: Existing and Proposed Zoning, Development Potential, and Proposed Development.</b> (Based on applicant's summary figures for the 10,124 sf site. Some numbers vary between the applicant's statement and the architectural drawings).				
	<b>Permissions and Requirements</b>		<b>Proposed by Applicant</b>	
<b>Item</b>	<b>C-M-1 Zone - By Right</b>	<b>C-2-B PUD</b>	<b>Proposed</b>	<b>Compliance</b>
<b>Lot Size § 2401.1</b>	15,000	<b>15,000 min.</b>	<b>10,124</b>	<b>Relief requested for 4,876 sf</b>
<b>Height (ft.) § 770.6</b>	40 3 stories	90	90	Complies
<b>Lot Occ. Of total site (%) § 772</b>	100%. Res. Not permitted	<b>100% non-res. 80% res.</b>	<b>100%, 1<sup>st</sup> floor 88% on 2<sup>nd</sup> floor (residential) 76% 3<sup>rd</sup> floor 79% 4<sup>th</sup>-8<sup>th</sup> flrs.</b>	<b>8% Relief Requested for 2<sup>nd</sup> floor</b>
<b>FAR §771</b>	3.00	6.00 total (≤ 2.0 non-res.)	6.00	Complies.
<b>Total SF</b>	30,372	60,744 max.	60,744 sf	Complies
<b>Non- Res. SF</b>	30,372	20,248 max.	3,680 – 4,000 SF	Complies
<b>Residential SF</b>	residential prohibited	60,744 max.	57,064	Complies
<b>Res. Units</b>	prohibited	~60-70	63-69	n/a
<b>Affordable SF (IZ Chap. 24)</b>	residential prohibited	8% of 57,064 @ 80% AMI = 4,565.12 sf	8% of 57,064 @ 80% AMI 4,565 SF	<b>Appears to minimally comply</b>
(IZ)Units	n/a	Approx. 5	TBD	Complies with IZ
Penthouse Habitable Space § 411	n/a	Up to 0.4 FAR allowance	0.38 FAR 3,847 SF	Complies
	<b>Permissions and Requirements</b>		<b>Proposed by Applicant</b>	
<b>Item</b>	<b>C-M-1 Zone - By Right</b>	<b>C-2-B PUD</b>	<b>Proposed</b>	<b>Compliance</b>
<b>Penthouse Related Affordable Hsg. § 411.16</b>	n/a	<b>Non-communal habitable penthouse space subject to IZ</b>	<b>Not addressed</b>	<b>TBD</b>
<b>Parking § 2101.1</b>	1.300 sf greater than 3000 sf	<b>1/3 du's = 23 1/750 non-residential sf ≥ than 3000 = 0</b>	<b>16 res. pkg. spaces</b>	<b>Relief Requested for 7 fewer spaces</b>
<b>Bicycle Parking § 2119.1</b>	n/a	1/3 du's = 21-23	42	Complies

<b>Loading Residential §2201</b>	residential use prohibited	<b>For more than 50 residential units 1 berth @ 55 ft., 1 platform @ 200 sf, 1 service space @20 ft.</b>	<b>1 berth @ 24 ft.</b>	<b>Relief requested for all loading</b>
<b>Loading, Non-Residential</b>	n/a	n/a	n/a	Complies
<b>Rear Yard (ft.) §774.7</b>	None for first 20 ft. Above that, greater of 12 ft. or 2.5 in. / ft. of bldg.	<b>15 ft. measurable from alley centerline for 1<sup>st</sup> 20 feet of height; from property line thereafter</b>	<b>9'7" below 20' ht. 5'3" above 20'</b>	<b>Relief requested (5'5" to 9'4")</b>
<b>Side Yard (ft.) §775.5</b>	Required only if abutting a R zone, which site does not	If provided, ≥ 3 in./ foot of height or 8 ft.,	None	Complies
<b>Open Court (ft.) § 776</b>	If provided, the greater of 2.5 in. width / ft. of height or 12 ft.	<b>If provided, greater of 15 ft. or 4 in / ft. of ht. i.e., 22 ft.</b>	<b>15 ft., Ct. 1 15 ft., Ct. 2</b>	<b>Relief requested (7 ft., each court)</b>
<b>Penthouse Dimensions § 411, particularly § 411.118</b>	<u>Height:</u> 12-15 ft. <u>Stories:</u> 2 (1 habitable, 1 mech.) <u>Setback:</u> 1:1 <u>FAR</u> 0.4 <u># Wall Heights:</u> 2, 1 habitable	<u>Height:</u> 20 ft. <u>Stories:</u> 2 (1 residential) <u>Setback:</u> 1:1 <u>FAR</u> 0.4 <u># Wall Heights:</u> 2, (only one for habitable)	<u>Height:</u> 18.5 ft. <u>Stories:</u> 2 <u>Setback:</u> no setback in one location; <u>FAR</u> 0.38 <u># Wall Heights:</u> 3, (possibly 2 for habitable)	<b>Relief requested for no setback from north wall ; May also be needed for ≥ 2 wall heights for habitable space; and # of stories for residential space</b>
<b>GAR</b>		0.3	.2	Complies

The applicant requests the following flexibility, which OP will analyze in more detail prior to a public hearing. In general, additional justification of the requested flexibility is needed.

**1. PUD-related map amendment from C-M-1 to C-2-B**

The proposed zone would be not inconsistent with the Comprehensive Plan.

**2. § 2401.2 -- Minimum size of PUD-Site**

The 10,124 square foot site is smaller than the 15,000 square foot minimum. § 2401.2 permits the Commission to waive up to 50% of the minimum lot area subject to the provision of minimum residential requirements that the proposed PUD would provide.



**3. § 772 –Maximum Residential Lot Occupancy**

The design proposes 88% residential lot occupancy on the 2<sup>nd</sup> floor, when no more than 80% lot occupancy is permitted for residential uses.

**4. § 774.7 – Rear Yard Depth**

A 15 foot rear yard is required. The rear yard would be 9’7” for the first 20 feet of building height and 5’4” above that. The applicant states that the narrowness of the site and the building’s double-loaded corridor layout justify the requested flexibility.

**5. § 776– Open Court**

The applicant proposes two 15 foot wide courts on either side of a stair tower at the northern end of the proposed building. 22 foot wide courts are required.

**6. § 2101 - Parking**

Relief is requested to provide 16 rather than the 21-23 spaces that would be required, depending on the final number of units. *The applicant should address this further in its transportation analysis and Transportation Demand Management (TDM) proposals.*

**7. § 2201 –Loading**

The applicant requests flexibility to provide a 24 foot long loading berth adjacent to the proposed east-west surface easement that would replace the alley segment for which closure would be requested. The applicant would not provide a 55’ loading berth, a 200 square foot loading platform, or a 20 foot service delivery space. *This should be addressed in the transportation analysis and TDM proposals and will need evaluation by DDOT.*

**8. § 411.5 – Penthouse Setbacks**

The applicant has requested complete setback relief for the 12-foot high northern stair tower, which abuts a side property line. *Sheets A5.01 through A5.03 should be modified to reflect that penthouse heights and setbacks are measured from the adjacent roof, not from building wall parapets.*

**9. Flexibility is requested to vary** the location of all interior components, the exact number parking spaces within the minimum set by a PUD order, and final material selection and details, within range of colors, types and quality specified by a PUD.

In addition, relief may be required from the following, but has not been requested:

- **§ 411.16 – IZ Requirements for Habitable Penthouse Space**

Habitable penthouse space not devoted to communal recreation or amenity space for building residents is subject to Inclusionary Zoning requirements. The majority of the habitable penthouse space is devoted to private residential units. *The proposed PUD’s compliance with IZ requirements for habitable penthouse space needs to be addressed.*

- **§ 411.9 – Penthouse Wall Heights**

Penthouse walls enclosing habitable space may be of only one height; the design appears to show two heights for such walls. *Clarification is needed on this, the differences between the text and the plans in heights shown for habitable space, and additional information is needed about the number of stories within the residential space.*

## V. COMPLIANCE WITH PUD REGULATIONS

### A. Zoning Relief / Flexibility Under PUD Guidelines

With the related map amendment, the project would be 50 feet taller and twice as dense as what would otherwise be permitted by-right on the site. Although flexibility is requested in several areas, the types of relief requested is not unusual for a PUD and the proposed building would be within the height and FAR limits contemplated for the site’s land use designation and the related map amendment that is requested. As summarized in Section VI of this report, additional information or clarification is needed for many of the items for which flexibility is requested and for the impact of the penthouse’s habitable space on IZ requirements.

### B. Transportation, Parking and Loading

The applicant has provided a preliminary transportation review under Exhibit F of the application, and, on pages 20 – 21, a preliminary list of TDM measures. The applicant will continue to coordinate additional study of the adequacy of the proposed facilities, circulation, mitigation proposals and enhancements with DDOT and with the neighborhood.

### C. Environmental Stewardship

The project would be LEED-Gold eligible. 5,457 square feet would be devoted to a green roof.

### D. Architecture and Urban Design



**Figure 6. Proposed Design from Southwest**

The applicant states that the massing of the building, the type and quality of the materials and the curved shape of the southern façade are evocative of the industrial past of the neighborhood and constitute a superior design. While the architectural plans are sufficient for a setdown, *additional attention and refinement to the design of the building, materials, landscaping and the treatment of public space is needed.* Specific issues include:

- The extensive area of grey-painted metal panels, particularly on the south side;
- The transition of massing and materials on the south side between the building’s base and upper floors;
- The garage entrance gate;

- The detailing of the areas of the eastern wall that abut the property line and may be visible for several years;
- Refinement of the drawings is needed to provide additional details and greater accuracy, including how access from the building interior to the south-facing terraces will be provided;
- Provision of sections with interior floor levels for the penthouse habitable spaces to clarify if habitable penthouse interior spaces will be 12 feet high, as is stated in the text, or approximately 18 feet high, as indicated in the drawings;
- Public space treatments; and,
- Standards for proposed upper level signage should be provided.

**E. Affordable Housing**

The applicant states the project would be providing the minimum IZ-required set-aside of 8% of the residential square footage for the affordable housing, targeted to households earning no more than 80% of the Area Median Income (AMI). The figures in the following table are based on information supplied in the application. OP has requested clarification of whether the residential and affordable housing totals have accounted for habitable penthouse space.

Residential Unit Type	Res. GFA	Units	Income Type	Affordable Control Period	Affordable Unit Type
<b>Residential Total</b>	<b>57,064 GSF</b>	<b>63-69</b>			
Market Rate	~ 52,499	~ 58-64			
IZ Total Required @ 8% of Res. GFA	4,565	~ 5	Moderate	Project duration	Rental
IZ Total Provided	4,565	~ 5	Moderate	Project duration	
Affordable/Non IZ	None	None	n/a	n/a	n/a

OP has encouraged the applicant to enhance its commitment to affordable housing, through the provision of more or larger units, and deepening the level of affordability for some or all units.

**F. PUD Benefits, Amenities and Proffers**

The PUD process is “designed to encourage high quality developments that provide public benefits” and provides for a flexible process to help achieve this. The public benefits and project amenities that are described on pages 16-21 of the application are sufficient for setdown, but are not yet commensurate with either the additional height/density the PUD is requesting through the related map amendment or with the several areas of requested zoning flexibility. The applicant will need to work closely with OP, DDOT, the Department of Energy and Environment, ANC 6C and other community groups to develop a fuller set of proposals. In addition to greater attention to affordable housing needs, appropriate enhancements might include contributions to upgrades for the NoMA /Gallaudet Metro station, streetscape and bio-retention improvements, and contributions to specific improvements for the park being planned on the southwest corner of 3<sup>rd</sup> and L Streets, N.E.

<b>TABLE 2: ITEM</b>	<b>MITI- GATION</b>	<b>PUBLIC BENEFIT</b>	<b>PROJECT AMENITY</b>	<b>REQUIRED</b>	<b>PROFER</b>	<b>NOTES FOR POST- SETDOWN</b>
<b>Urban Design, Architecture, Landscaping Open Space, Streetscape</b>	No	No	No	No	No	See Section V. e, above.
<b>Transportation Features, including transportation coordinator, digital multimodal display, double the required bike parking; one year bikeshare member-ship for initial tenants; \$50 transit subsidy to initial tenants &amp; employees</b>	To be assessed with transportation and TDM study	Indirectly , perhaps	Yes	Not known until DDOT report submitted prior to hearing	Not yet known	Applicant will need to explain what it is providing to enhance TDM and TOD sufficiently to be considered a benefit
<b>PDR Uses</b>	No	If provided	Yes	Strongly encouraged by Compre- hensive Plan	No	The list of PDR uses the applicant will strive to provide should be augmented, and include strategies to encourage PDR leasing
<b>Environmental Benefits –Sustainable Design Features and LEED Gold</b>	No	Yes	No	No	Yes	Clarify if LEED-Gold eligible or certified
<b>Uses of Special Value to the Neighborhood (none yet indicated)</b>	TBD	TBD	TBD	TBD	TBD	---
<b>Market Rate Housing</b>	No	Yes. now prohibits	No	Inherent in project	No	---

## **VI. MATTERS REQUIRING CLARIFICATION OR ADDITIONAL CONSIDERATION**

OP will continue to work with the applicant to ensure the timely submissions of additional information, as noted in this report and summarized below:

- Report/Plans on Traffic, Parking and TDM
- Landscaping and Public Space design plans
- Additional information for flexibility requests

- Address IZ implications for habitable penthouse space
- Enhance affordable housing proffers
- Clarify height(s) of enclosing walls and number of stories for penthouse habitable penthouse space and correct penthouse height and setback diagrams
- Provide more detailed drawings of roof structures and perspective views of overall roofscape
- Enhance Community Benefits Proffers
- Further Study and Address Concerns about Architectural Design
- Provide Written Commitment to First Source Agreement
- Provide Upper Level Signage Standards
- Provide Materials samples

## **VII. AGENCY REFERRALS**

If this application is set down for a public hearing, the Office of Planning will refer it to the following District agencies for review and comment:

- Energy and the Environment (DOEE)
- Parks and Recreation (DPR)
- Transportation (DDOT)
- Public Works (DPW)
- Housing & Community Development (DHCD)
- DC Public Schools (DCPS)
- Employment Services (DOES);
- Fire and Emergency Medical Services Department (FEMS)
- Metropolitan Police Department (MPD)
- DC Water

Jls/slc

Stephen Cochran, project manager

## **Attachment 1**

### **Selected Comprehensive Plan Policies with Which the Proposal is Not Inconsistent**

#### ***Guiding Principles of Framework Element***

*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*

*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*

*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*

*The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. 218.3*

*Increased mobility can no longer be achieved simply by building more roads. The priority must be on investment in other forms of transportation, particularly transit. Mobility can be enhanced further by improving the connections between different transportation modes, improving traveler safety and security, and increasing system efficiency. 220.1*

*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*

#### ***Land Use Element***

The project would generally further Policy LU-1.1.5, which encourages the development of high density mixed use neighborhoods in central Washington, including in NoMA. The Land Use Element also encourages infill development and development near metro stations (Policies LU-1.3.1 and LU-1.3.2). The policies of this element also generally encourage the conservation of industrially-zoned lands, but this site has been identified in the Comprehensive Plan for a

transition from industrial to mixed use, including residential and low-impact PDR uses (Policy LU-3.1.1 and Action LU-3.1.A).

### ***Economic Development Element***

The Economic Development Element notes that “PDR jobs are particularly desirable in the District, as they offer competitive wages to persons with limited education an academic credentials” (§ 711.1). It goes on to state that “the areas that currently accommodate many of the city’s PDR jobs have come under scrutiny as developers have run short of more favorably-located sites. This is particularly true around the New York Avenue Metro station... The production, distribution, and repair sector plays an important role in supporting other sectors of the economy.” (§§ 711.2 and 711.3)

### ***Central Washington Area Element***

The Central Washington Area Element envisions the NoMA neighborhood with a diverse mix of uses (Policy CW-2.8.1). Policy CW-2.8.2 states that industrial uses in this location can be redeveloped to other uses, including housing, but that redevelopment should include live/work space, artists’ studios and similar uses. .