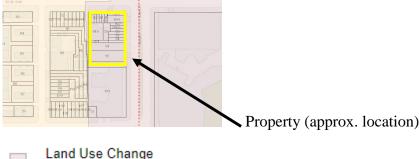
Consistency with the Comprehensive Plan and Southwest Neighborhood Plan

Comprehensive Plan Policy	Application to the Project
Map Designations	
The Future Land Use Map ("FLUM") designates the property as Medium Density Residential and Moderate Density Commercial. 10-A DCMR §§227.7 and 227.11. Property (approx. location) CMOD, RMED	The Project is not inconsistent with its FLUM designation. The CG-2 zone is "intended to permit medium-density mixed-use development with a focus on residential use and provide for the establishment of South Capitol Street as a monumental civic boulevard." Subtitle K, §502.1. The Project's height and massing not only are matter-of-right in the CG-2 zone, but also contribute to the framing of the Capitol and establishment of South Capitol Street as a "monumental civic boulevard." With the Camden South Capitol building directly south of the Property and the Ballpark across the street to the east, the Project's density fits within the context of the surrounding area, filling in a gap along the viewshed of the Capitol. The Project will replace an underutilized lot consisting mostly of surface parking with high quality architectural design and new residential units. Accordingly, the Project is consistent with the FLUM.
The Generalized Policy Map ("GPM") designates the Property as part of a Land Use Change Area. These areas represent parts of the District consisting of vacant and	The Project is consistent with the Property's GPM designation as a Land Use

underutilized land where "change to a different land use from what exists today is anticipated." 11-A DCMR §§225.9 and 225.11. The intent of the Land Use Change Areas is to "encourage and facilitate new development and promote the adaptive reuse of existing structures" as well as to demonstrate exemplary architectural design and provide affordable housing. §§225.11 and 225.12.



Change Area. The current use of surface parking on the Property is not consistent with the "monumental civic boulevard" of South Capitol Street and, therefore, the Project will further the District's goal of encouraging and facilitating new development and providing more housing in this area.

Land Use Change Areas

Framework Element

Land Use Changes: While there is substantial room for growth under current zoning. various non- regulatory factors restrict this capacity. In some areas, a real or perceived lack of services, amenities, and assets, such as transit, libraries, quality schools, grocery stores, or retail, discourages investment. In other areas, opportunities to develop above existing buildings, such as adding several stories of housing above an existing office or retail building along a commercial corridor, are intentionally deferred. In these cases, property owners wait until market conditions make redevelopment more financially lucrative, And, there are sites potentially suitable for additional development through an entitlements process (a Planned Unit Development) that instead are developed "matter-of-right" (to existing zoning standards), forgoing additional capacity. These factors, particularly to the extent they limit housing and affordable housing production or other desired uses, represent missed opportunities for the District to grow inclusively. Id. § 205.6

The Project provides new residential development as a matter-of-right under current zoning. Further, the Project does not displace any existing residents.

Fitting such development into the fabric of a mature city creates a number of challenges. One is displacement, a threat that has become more real in the District as the cost of housing and other real estate has increased due to rising demand that has not been met with proportional supply. Displacement not only affects District residents ~ particularly those of lower income — it also affects businesses, non-profits, and municipal operations that may be displaced by rising rents and land prices. *Id.* § 205.7

Housing Cost Changes: The rising cost of housing is one of the most pressing and critical issues facing the District and the region. To achieve our goal of an inclusive city, we must meet the challenge of providing housing for a variety of household types, including families, the elderly, and the homeless: housing for owners and renters; housing for existing and new residents; workforce housing; and housing affordable at all income levels. Tied in with housing cost issues are deeper concerns about displacement, the impacts of gentrification, and long-term competitiveness. *Id.* § 206.1

By increasing the housing supply in the District, the Project will contribute to meeting the overwhelming demand for housing. Additionally, because the Project does not displace any existing residents or replace significant existing housing, the Project does not remove existing affordable housing from the supply in Southwest. Instead, the Project will increase the supply of housing and affordable housing in this area all in a manner consistent with matter-of-right development in the CG-2 zone.

Planning for Resilience and Equity: As an example, the stress of poverty, combined with substantial population growth, has created a housing affordability crisis that must be addressed. The need for more housing, and more affordable housing, has become an important policy goal that, if addressed and achieved, will help the city be more resilient. *Id.* § 213.5

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services. health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income

The Project provides a development designed with a focus on land-use, transportation, housing, environmental, and cultural conditions. The significant supply of housing, including 25 affordable housing units and family-sized units, in a transit-oriented development that memorializes the previous homes on the site and pays homage to the surrounding buildings furthers these goals of the Framework Element regarding resiliency and equity.

communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. *Id.* § 213.7

MANAGING GROWTH AND CHANGE: GUIDING PRINCIPLES

- 1. The District seeks to create and support an equitable and inclusive city. Growth must be managed equitably to support all District residents, including vulnerable communities and District protected classes. We must recognize that managing growth and change includes addressing the historic, structural, and systemic racial inequities and disenfranchisement of many District residents. And, we must recognize the importance of longtime businesses, as well as educational and cultural institutions. An equitable and inclusive city includes access to housing that is healthy, safe, and affordable for a range of household types, sizes, and incomes in all neighborhoods. A citywide problem requires citywide solutions ones that overcome the legacy of segregation, avoid concentrating poverty, and afford the opportunity to stay in one's home and not be displaced.
- 2. 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, such as local cultural heritage, and reduce negatives such as poverty, crime, food deserts, displacement, and homelessness.
- 3. A city must be diverse to thrive, and the District cannot sustain itself by only attracting small, affluent households. To retain residents and attract a diverse population, the city should provide services that support families. A priority must be placed on sustaining and promoting safe neighborhoods offering health care, quality education, transportation, childcare, parks, libraries, arts and cultural facilities, and housing for families.
- 4, Diversity also means maintaining and enhancing the District's mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples, and for all income levels.

The Project is consistent with the guiding principles of the Framework Element for managing growth and change. The Project does not displace any existing residents, provides significant new housing and affordable housing in a variety of sizes. Additionally, the Project is a model infill site on an underutilized, largely vacant site, making productive use of the land.

- 5. The District needs both residential and non-residential growth to survive. Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income.
- 6. A large component of current and forecasted growth in the next decade 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 be integrated into the city's urban fabric through the continuation of street patterns, 'open-space corridors and compatible development patterns where they meet existing neighborhoods. Since the District is landlocked, its large sites must be viewed as extraordinarily valuable assets. Not all should be used right away some should be "banked" for the future.
- 7. 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 be designed to respect the integrity of stable neighborhoods and the broader community context, and encourage housing and amenities for low-income households, who rely more on transit. Adequate infrastructure capacity should be ensured as growth occurs.
- 8. 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.

Id. §§ 219.1 – 219.8

Land Use Element

Policy LU-1.1.5: Urban Mixed Use Neighborhoods--Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas:

The Project provides housing, including affordable housing and family-sized units, on South Capitol Street, contributing a "vital component" of future land use in the area. The architecture is high-quality and

- 1. Mt Vernon Triangle;
- 2. North of Massachusetts Avenue (NoMA);
- 3. Downtown East;
- 4. South Capitol Street corridor/Stadium area;
- 5. Near Southeast/Navy Yard;
- 6. Center Leg Freeway air rights; and
- 7. Union Station air rights.

The location of these areas is shown in the Central Washington and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should ensure that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land use mix. *Id.* §304.11

Policy LU-1.1.7: Central Employment Area Edges-- Support the retention of the established residential neighborhoods adjacent to the Central Employment Area. Appropriate building setbacks, lot coverage standards, and a stepping down in land use intensity and building height shall be required along the edges of the CEA to protect the integrity and historic scale of adjacent neighborhoods and to avoid creating sharp visual distinctions between existing and new structures. *Id.* §304.13

designed to fit in with the context of the surrounding neighborhood, with the rear façade specifically mirroring building elements of the nearby historic Syphax School building. The building design also integrates components of the South Capitol and N Street rowhouses, along with other nearby neighborhood buildings.

The Property is located immediately to the west of the South Capitol border of the Central Employment Area. The Project respects the principles of this policy by incorporating significant setbacks and the retention of several existing rowhouses. The proposed building and renovated rowhomes will present a varied streetscape along the important South Capitol Street boulevard, framing the viewshed of the

	Capitol. The height and massing of the Project are matter-of-right in the CG-2 zone and appropriately fit in within the context of the immediate vicinity. The Comp Plan's priority on additional housing and affordable housing and the primacy of the South Capitol boulevard support the proposed height and density.
Policy LU-1.3.2: Development Around Metrorail Stations Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. <i>Id.</i> §306.11	The Navy Yard-Ballpark Metrorail station is located less than 0.5 mile from the Property. The Project's proximity to the station will promote transit ridership for future residents and minimize the necessity of vehicular transportation. The Project will redevelop the underutilized land on the Property, which currently consists mostly of a surface parking lot.
Policy LU-1.4.1: Infill Development— Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create "gaps" in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. Id. §307.5	The Project will fill in a conspicuous gap along South Capitol Street. Between the Camden South Capitol building, which is 110 feet, and the existing rowhouses along South Capitol Street and N Street SW, the existing parking lot disrupts the continuity of the streetscape. The Project will eliminate this gap and unite the building to the south of the Property with the rowhouses to the north and create a cohesive, highly articulated and context sensitive composition along South Capitol Street.

Policy LU-2.1.1: Variety of Neighborhood TypesMaintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. Id. §309.5	The Project will provide up to approximately 310 residential units, ranging from studios to three-bedrooms, with and without dens. The Project will also retain and restore rowhouses and include units designed as live/work units. This variety in housing types, including affordable housing, will enhance the character of the neighborhood.
Policy LU-2.1.7: Conservation of Row House NeighborhoodsProtect the character of row house neighborhoods by requiring the height and scale of structures to be consistent with the existing pattern, considering additional row house neighborhoods for "historic district" designation, and regulating the subdivision of row houses into multiple dwellings. Upward and outward extension of row houses which compromise their design and scale should be discouraged. Id. §309.12	The Project will both construct a new residential building and also retain several rowhouses currently existing on the Property. The proposed building's height of 110 feet matches that of the building immediately to the south of the Property, the Camden South Capitol. The Project also incorporates the four rowhouses along N Street SW and two of the rowhouses along South Capitol Street. The Project's conservation of these rowhouses, a result of community collaboration, thus complements both sides of the Property and creates a continuous and varied fabric along South Capitol Street.
Policy LU-2.1.10: Multi-Family NeighborhoodsMaintain the multi-family residential character of the District's Medium and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible. Id. §309.15	The Project provides multi-family residential units and makes the area more attractive by filling in a parking lot and creating a more cohesive vista across the street from the stadium. The Project is also pedestrian-friendly and transit accessible with the Navy Yard-Ballpark Metrorail station less than 0.5 mile away and

	multiple bus routes one block north along M Street.
Policy LU-2.2.4: Neighborhood Beautification—Encourage projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. Id. §310.5	The Project will help to beautify the neighborhood by creating an attractive redevelopment of vacant land and restoring the existing older rowhouses on the Property. The landscaping of the Project includes the incorporation of ornamental trees, evergreen shrubs, perennials, and a street level dog relief area. The Project also sets aside several potential locations for public art and commemorative components that will reference the history of the neighborhood. As noted in the Comprehensive Transportation Report ("CTR") (Exhibit ("Ex.") 11A in the record), the Project will enhance sidewalks along the perimeter of the Property. According to the CTR, the Project's improvements to the surrounding sidewalks will meet both District Department of Transportation ("DDOT") and Americans with Disabilities Act ("ADA") standards, providing curb ramps and crosswalks, as needed, and meeting or exceeding width requirements.
<i>Policy LU-2.3.3: Buffering Requirements</i> Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. <i>Id.</i> §311.5	The proposed building will be set back from the N Street SW rowhouses, allowing each rowhouse to appear independent from the building while actually connecting to the amenities of the building at the rear and increasing the size of these units. The

	Project also provides robust landscaping design, retaining existing trees in the public space and installing a new double row of trees along certain portions of South Capitol Street. The Project will also include an urban plaza programmed with landscaping and hardscaping and allowing a unique buffering element between the Project and adjacent rowhouses.
Policy LU-2.4.5: Encouraging Nodal DevelopmentDiscourage auto-oriented commercial "strip" development and instead encourage pedestrian-oriented "nodes" of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them. Id. §312.9	The Project's proximity to mass transit promotes a pedestrian-friendly development. The rowhouses retained at the request of the community may incorporate a retail component at the ground level which would further encourage pedestrian activity. The proposed height and mass are similar to that of the immediately adjacent property to the south, and comply with the applicable development standards.
Transportation Element	
Policy T-1.1.2: Land Use Impact AssessmentAssess the transportation impacts of development projects using multimodal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment to land use impacts. <i>Id.</i> §403.8	The application includes a CTR assessing the Project's potential transportation impacts on the surrounding area. The CTR concludes that the Project will not have a detrimental impact to the surrounding transportation network, assuming certain mitigation measures are implemented, to which the Applicant has agreed.

Policy T-1.1.4: Transit-Oriented Development Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. <i>Id.</i> §403.10	The Project is located within walking distance of the Navy Yard-Ballpark Metrorail station as well as several bus routes. The Project will provide 110 long-term and 17 short-term bicycle parking spaces.
Policy T-1.2.3: Discouraging Auto-Oriented UsesDiscourage certain uses, like "drive-through" businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. Id. §404.8	The Project replaces an existing surface parking lot with much-needed residential units, including affordable housing. The Project does not propose any new curb cuts and would close the existing curb cut which provides access from South Capitol Street to the existing surface parking lot located on the site. The Project relocates vehicular parking below grade, thus minimizing vehicle access points and improving pedestrian safety.
<i>Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning</i> Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks. <i>Id.</i> §409.8	The Project provides both long-term and short-term bicycle parking for residents and improves the landscaping and hardscaping adjacent to the public space to improve pedestrian accessibility.
Policy T-2.3.3: Bicycle Safety Increase bicycle safety through traffic calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improving bicycle access where barriers to bicycle travel now exist. <i>Id.</i> §409.10	The Project satisfies the bicycle parking requirements and will provide 110 long-term and 17 short-term bicycle parking spaces.
Policy T-2.4.1: Pedestrian Network Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city. <i>Id.</i> §410.5	The Project's landscaping plan will enhance the public space around the Property and improve the pedestrian network. The removal of the surface

	parking lot and a curb cut along South Capitol Street also improves pedestrian safety.
Policy T-2.4.2: Pedestrian Safety Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals. <i>Id.</i> §410.6	The proposed building will be set back to the south of the existing alley and one existing rowhouse to the north of the alley will be razed so as to create sufficient open space around the alley to provide greater visibility for vehicles and ensure pedestrian safety. The Project proposes no new curb cuts and will eliminate an existing curb cut.
Policy T-2.5.1: Creating Multi-Modal Corridor Transform key District arterials into multi-modal corridors that incorporate and balance a variety of mode choices including bus or streetcar, bicycle, pedestrian and auto. <i>Id.</i> §411.11	The Project encourages pedestrian, bicycle, and mass transit modes of transportation, but also provides a below-grade parking garage with up to 180 spaces. Thus, the Project provides future residents with a variety of transportation choices.
Policy T-3.1.1: Transportation Demand Management (TDM) ProgramsProvide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. Id. §414.8	The CTR includes a TDM Plan that will mitigate any impacts the Project may have on the surrounding transportation network and will promote future residents' use of mass transit and bicycle options.
Housing Element	
Policy H-1.1.1: Private Sector SupportEncourage the private sector to provide new	The Project provides new housing,
housing to meet the needs of present and future District residents at locations consistent	including affordable housing, financed
with District land use policies and objectives. <i>Id.</i> §503.2	through the private sector. The Project will provide approximately 269,661 square feet or 7.2 floor area ratio ("FAR") of residential use. Up to approximately 3,800

	square feet of such space might be utilized for commercial and/or neighborhood serving uses. By replacing a surface parking lot with approximately 310 residential units, the Project helps to meet the District's need for new, quality housing.
Policy H-1.1.2: Production Incentives Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing. <i>Id.</i> §503.3	The Project will achieve a higher height and higher density based on its inclusion of affordable units.
Policy H-1.1.3: Balanced Growth Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. <i>Id.</i> §503.4	The Project will provide new housing on land which is currently underutilized, consisting mostly of a surface parking lot. The proposed higher-density housing, which includes affordable housing, will help the city meet its long-term housing needs.
Policy H-1.1.4: Mixed Use Development Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. <i>Id.</i> §503.5	The Project incorporates potential ground floor commercial uses in three live-work units and in the two standalone rowhomes, potentially contributing a mix of uses in close proximity to the Navy Yard-Ballpark Metrorail station.
Policy H-1.2.1: Affordable Housing Production as a Civic PriorityEstablish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. <i>Id.</i> §504.6	The Project will provide approximately 23,016 gross square feet of affordable housing. The applicant will work to locate a component of the 25 affordable units in family-sized units. Providing affordable

	units in a popular part of the city, across the street from the stadium, promotes the District's goal of prioritizing affordable housing.
Policy H-1.2.2: Production Targets—Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the areawide median income (AMI). Newly produced affordable units should be targeted towards low-income households in proportions roughly equivalent to the proportions shown in Figure 5.2. Id. §504.7	The affordable housing provided by the Project will be entirely 60% of the Median Family Income ("MFI"). These 25 affordable units will contribute to the District's goal of 12,000 affordable units by 2025.
Policy H-1.2.3: Mixed Income Housing Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. <i>Id.</i> §504.8	The Project provides a mix of affordable and market rate units in a part of the city historically subject to disinvestment.
Policy H-1.2.7: Density Bonuses for Affordable Housing Provide zoning incentives to developers proposing to build low- and moderate-income housing. Affordable housing shall be considered a public benefit for the purposes of granting density bonuses when new development is proposed. Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood. <i>Id.</i> §504.14	The Project proposes a building height of 110 feet and FAR of 7.2 and thus will benefit from the density bonuses achieved based on the provision of affordable housing.
Policy H-1.3.1: Housing for Families Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. <i>Id.</i> §505.6	The Project provides a range of unit sizes, including two- and three-bedroom units and several townhouse units. The Property's close proximity to a Metrorail station as well as its FLUM designation make it appropriate for the proposed residential construction.

Policy H-2.1.1: Protecting Affordable Rental Housing Recognize the importance of preserving rental housing affordability to the well-being of the District of Columbia and the diversity of its neighborhoods. Undertake programs to protect the supply of subsidized rental units and low-cost market rate units. <i>Id.</i> §509.5	The Project does not pose a threat to the preservation of affordable housing, but rather will create 25 affordable units.
Policy H-2.1.3: Avoiding Displacement Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units. <i>Id.</i> §509.7	Since the Project is built almost entirely on vacant land and the existing buildings are unoccupied, it will not lead to any displacement of existing residents. The Project will avoid displacement and construct approximately 23,016 square feet of affordable housing.
Environmental Protection Element	
Policy E-1.1.1: Street Tree Planting and MaintenancePlant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods. Id. §603.4 Policy E-1.1.2: Tree Requirements in New DevelopmentUse planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. Id. §603.5	The Project retains a number of existing trees along both N Street SW and South Capitol Street and will incorporate two rows of trees along a portion of South Capitol Street. The Applicant has been in communication with the Urban Forestry Division ("UFD") regarding the trees on the Property.
Policy E-1.1.3: Landscaping Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. <i>Id.</i> §603.6	The Project features an urban plaza and landscaped area that will include shrubs, perennials, and lawn area, enhancing the public space, reducing stormwater runoff, and beautifying the South Capitol Street viewshed of the Capitol.

Policy E-2.2.1: Energy Efficiency--Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees. *Id.* §610.3

Policy E-2.2.2: Energy Availability--Improve energy availability and buffer District consumers from fluctuations in energy supply and prices. This should be achieved through the District's energy purchasing policies, financial assistance programs for lower income customers, incentives for "green" power, and regulatory changes that ensure that local energy markets are operating efficiently. *Id.* §610.4

Policy E-2.2.3: Reducing Home Heating and Cooling Costs—Encourage the use of energy-efficient systems and methods for home insulation, heating, and cooling, both to conserve natural resources and also to reduce energy costs for those members of the community who are least able to afford them. *Id.* §610.5

Policy E-2.2.4: Alternative Energy Sources—Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. *Id.* §610.6

Policy E-2.2.5: Energy Efficient Building and Site Planning--Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals. *Id.* §610.7

Policy E-3.1.1: Maximizing Permeable Surfaces—Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. *Id.* §613.2

The Project will incorporate a solar panel area of approximately 1,000 square feet on the roof structure, significantly enhancing the building's sustainability. The Project also exceeds the minimum Green Area Ratio ("GAR") of 0.3 for the Project. The Project will achieve, at a minimum, a LEED v.4 Gold rating and will certify to such level.

The TDM Plan includes a number of environmentally focused measures, encouraging residents to carpool, bike, or use mass transit, promoting teleworking, and exceeding the short- and long-term bicycle parking requirements of the Zoning Regulations.

The Project will achieve a GAR of at least 0.3 and will incorporate a number of stormwater reduction strategies, including

Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce RunoffPromote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. <i>Id.</i> §613.3	a green roof, landscaping, and hardscaping. The Project retains existing trees and will plant new trees, creating a double row of trees on South Capitol Street. The Project will also eliminate the existing surface parking lot.
Policy E-3.2.1: Support for Green Building Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. <i>Id.</i> §614.2	The Project will be designed to achieve a minimum of the LEED v.4 Gold level and will certify to such amount.
Policy E-3.4.1: Mitigating Development ImpactsTake measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited. Id. §616.3	The Applicant and the Southwest Neighborhood Assembly ("SWNA") executed and recorded a development agreement that incorporates mitigation measures for the demolition, excavation, and construction activities to reduce any adverse impacts on the surrounding area (Ex. 16C1 in the record). The Applicant also entered into a Good Neighbor Agreement with Syphax Village addressing construction mitigation measures and has entered into similar Good Neighbor Agreements with adjacent neighbors along South Capitol Street (Ex.16A in the record).
Policy E-3.4.2: Transparency of Environmental Decision-Making Ensure that discussions and decisions regarding environmental impacts and mitigation measures occur through a transparent process in which the public is kept informed and given a meaningful opportunity to participate. <i>Id.</i> §616.4	The Applicant has coordinated with the Department of Energy and Environment ("DOEE") regarding the Project's Environmental Impact Screening and Voluntary Clean-Up Program. The
Policy E-3.4.3: Environmental Assessments Ensure full and meaningful compliance with the District of Columbia Environmental Policy Act of 1989, effective October 18,	Applicant has agreed to provide affected residents plans for the safe remediation of

1989 (D.C. Law 8-36; D.C. Official Code § 8-109.01 et seq.), including the use of procedures to assess the environmental impacts of major development projects comparable to the regulations developed by the Council on Environmental Quality for the National Environmental Policy Act of 1969, approved January 1, 1970 (83 Stat. 852; 42 U.S.C. 4321 et seq.).. The environmental review should include all pertinent information about the effects of the project on the human environment, including information about existing conditions, projected impacts, and mitigation measures. Carbon dioxide and other greenhouse gas (GHG) emissions impacts should be included in the environmental impact assessments. The process should ensure that such information is available when a development is proposed and is available to the public and decisionmakers before any decision is made. *Id.* §616.5

chemicals and contaminants on the Property prior to the start of the clean-up, as described in the Advisory Neighborhood Commission ("ANC") 6D Report (Ex. 16 in the record).

Policy E-4.1.3: Evaluating Development Impacts On Air Quality—Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. *Id.* §618.8

The TDM Plan to which the Applicant has agreed will effectively mitigate potential adverse impacts on air quality by promoting non-auto means of transportation.

Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency--Promote strategies that reduce motor vehicle emissions in the District and surrounding region. As outlined in the Land Use and Transportation Elements of this Comprehensive Plan, this includes the development of a fully integrated regional system of buses, streetcars, rail transit, bicycles, taxis, and pedestrian facilities to make it easier and more convenient to travel without an automobile. It also includes the promotion of trip reduction measures such as videoconference facilities, telecommuting, flextime, and carpooling. Strategies to reduce congestion and idling time, such as improved signal timing and reversible commute lanes also should contribute to air quality improvement. *Id.* §618.10

The transit-oriented nature of the Project promotes transportation efficiency and improved air quality. Not only will the Project provide over 100 bicycle parking spaces and enhanced pedestrian facilities through improved sidewalks and hardscaping, but the Property's proximity to the Navy Yard-Ballpark Metrorail station and several bus routes will encourage future residents to use more environmentally-friendly modes of transportation. The TDM Plan the Project will implement will further provide mitigation measures.

Policy E-4.1.6: Clean Fuels Encourage the use of clean fuel vehicles and enhance efforts to place refueling and recharging equipment at facilities accessible for public use. Where feasible, provide financial incentives for District residents and business to use clean vehicles, such as reduced motor vehicle tax and license fees. <i>Id.</i> §618.11	Four (4) Electric Vehicle (" EV ") stations will be included in the below-grade parking garage.
Policy E-4.2.3: Control of Urban Runoff Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. <i>Id.</i> §619.8	As mentioned above, the Project will employ various techniques, including a green roof, landscaping, and hardscaping, to control and slow any urban runoff.
Policy E-4.2.5: Groundwater Protection Protect Washington's groundwater from the adverse effects of urban uses. Contaminated groundwater should be investigated to determine whether long term monitoring or treatment is necessary or feasible. Future land uses and activities should be managed to minimize public exposure to groundwater hazards and reduce the likelihood of future contamination. <i>Id.</i> §619.10	
Policy E-4.7.3: Light Pollution Maintain regulations for outdoor lighting to reduce light pollution and conserve energy. Particular attention should be given to preventing glare and nighttime light trespass in the vicinity of the Naval Observatory, so that its operational needs are respected. <i>Id.</i> §624.6	As a result of input from ANC 6D, the Applicant has committed to not incorporating digital or neon signage into the Project. This restriction will diminish any light pollution emanating from the Project and also conserve energy.
Policy E-4.7.4: Flood Plains Restrict development within FEMA-designated flood plain areas. Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within these areas that could pose public health or safety hazards in the event of a flood. Regulation of land uses in flood plains, waterfronts, and other low-lying areas should consider the long-term effects of global warming and sea-level rise on flood hazards. <i>Id.</i> §624.7	The Property is not located within the 100-of 500- year flood plain.
Policy E-5.1.1: Low Impact Development and Green Building Methods for the DistrictStrongly encourage the use of low impact development (LID) methods and	The Project will achieve a LEED v.4 Gold rating and will certify to such level.

green building design methods and materials in new construction and major rehabilitation projects undertaken by the District of Columbia government. <i>Id.</i> §627.3	
Policy E-5.1.4: Sustainable LandscapingEncourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides. <i>Id.</i> §627.6	The Project's landscaping plan will incorporate low-impact watering and chemical usage. The plan minimizes lawn space and incorporates shrubbery, perennials, and trees.
Economic Development Element	
Policy ED-1.1.2: Economic Linkages Leverage the potential of core industries to provide new employment opportunities, particularly the growth of businesses that supply essential goods and services to the government, universities, hospitals, law firms, hotels, non-profits, and other major employers in the city. <i>Id.</i> §703.10	The Project's potential ground floor commercial and live/work units will provide new employment opportunities in the District.
Policy ED-1.1.3: Diversification -Diversify the District's economy by targeting industries with the greatest potential for growth, particularly technology-based and creative industries, retail, international business, and the building trades. <i>Id.</i> §703.11	The Project's potential commercial spaces will contribute to the diversification of the fast-growing area between Buzzard Point and Navy Yard.
Policy ED-2.1.1: Office Growth Plan for an office sector that will continue to accommodate growth in government, government contractors, legal services, international business, trade associations, and other service-sector office industries. The primary location for this growth should be in Central Washington and in the emerging office centers along South Capitol Street and the Anacostia Waterfront. <i>Id.</i> §707.6	The units designed to be live/work units and possible ground floor retail will contribute to office growth along South Capitol Street.
Policy ED-2.1.5: Infill and Renovation Support the continued growth of the office sector through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space. <i>Id.</i> §707.10	Although the Project is largely residential, the potential retail and live/work units will provide new space for commercial opportunities surrounding the Ballpark.

Policy ED-2.1.6: Local-Serving Office Space Encourage the development of small local-serving offices within neighborhood commercial districts throughout the city to provide relatively affordable locations for small businesses and local services (such as real estate and insurance offices, accountants, consultants, and medical offices). <i>Id.</i> §707.11	The units designed to be live/work units particularly lend themselves to affordable, smaller-sized office space that will serve the neighborhood.
Policy ED-2.2.1: Expanding the Retail Sector Pursue a retail strategy that will allow the District to fully capitalize on the spending power of residents, workers and visitors, and that will meet the retail needs of underserved areas. <i>Id.</i> §708.4	The future residents at the Project will benefit from the proposed retail. With the significant increase in teleworking, the nearby retail will help meet the daily needs of future residents and their neighbors.
Policy ED-2.2.3: Neighborhood ShoppingCreate additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences. Id. §708.7	The Project will replace an existing surface parking lot with housing and potentially retail that will serve the surrounding community.
Policy ED-2.2.7: Planning For Retail Coordinate neighborhood planning efforts with the District's economic development planning and implementation programs to improve retail offerings in local commercial centers. Consolidate retail according to existing and forecasted demand and consider converting retail to other uses where an increased consumer base is required. <i>Id.</i> §708.11a	The Project has worked closely with the neighboring community through the SWNA and ANC 6D. The inclusion of the building components designed as live/work units and potential retail arose out of this collaboration.
Policy ED-2.2.9: Clustered Retail at Transit Cluster retail around areas of high-foot traffic, including Metrorail exits, bike trails, future streetcar stops, and other multimodal meeting points. Create strong nodes of character to effectively link retail and transit. <i>Id.</i> §708.11b	The Navy Yard/Ballpark Metrorail station is only a few blocks away. With the heavy foot traffic surrounding the Ballpark, the Project's proposed retail will serve pedestrians, bikers, and Metro riders.
Policy ED-3.1.1: Neighborhood Commercial VitalityPromote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing	The Project is an attractive addition to South Capitol Street and will help to

businesses, attracting new businesses, and improving the mix of goods and services available to residents. <i>Id.</i> §713.5	enliven the area by providing more housing, including affordable housing, and potentially smaller commercial space, providing a greater mix of goods and services to current and future residents in the neighborhood.
Parks, Recreation and Open Space Eleme	nt
Policy PROS-4.3.3: Common Open Space in New DevelopmentProvide incentives for new and rehabilitated buildings to include "green roofs", rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. Id. §819.5	The Project will include a green roof and the robust landscaping design proposes to plant new trees both on the street frontages and within the Property. The ground level and rooftop amenity space will provide visual relief and aesthetic balance for residents and visitors.
Policy PROS-4.3.4: Protection of Open Space in Multi-Family Development—Recognize the implicit value of the lawns, courtyards, gardens, and other open areas that surround many of the District's older high- and medium density residential buildings. Discourage the practice of building on these areas if the historic proportions and character of the original buildings would be compromised. Id. §819.6	The Project consists of multi-family units, including affordable multi-family units, and will incorporate various open spaces, including balconies, patios, front yards, and a rooftop for residents and visitors to enjoy.
Policy PROS-4.3.5: Residential Yards Recognize the value of residential yards as a component of the city's open space system and discourage increased coverage of such areas by buildings and impervious surfaces. <i>Id.</i> §819.7	The Project will include front yards along N Street SW and will also improve the public space along South Capitol Street with a wide sidewalk and landscaping.
Urban Design	

Policy UD-1.1.1: National ImageStrengthen and enhance the physical image, character and outstanding physical qualities of the District, its neighborhoods, and its open spaces, in a manner that reflects its role as the national capital. Id. §903.6	The Project's placement along South Capitol Street will contribute to the framing of the Capitol. The height and massing of the Project will help create a monumental streetscape leading up the viewshed of the Capitol, strengthening the image and identity of the District.
<i>Policy UD-1.1.4: Height Act of 1910</i> Protect the civic and historical character of the city, particularly the "horizontal" urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910. Basic principles of the Height Act are shown in Figure 9.4. <i>Id.</i> §903.10	The Project conforms to the limits of the Height Act.
Policy UD-1.2.4: View Protection Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods. <i>Id.</i> §904.6	The Project fits in within the context of South Capitol Street. With the Ballpark directly to the east and the Capitol to the north, the Project will contribute to a vital vantage point in the City.
Policy UD-1.4.1: Avenues/Boulevards and Urban FormUse Washington's major avenues/boulevards as a way to reinforce the form and identity of the city, connect its neighborhoods, and improve its aesthetic and visual character. Focus improvement efforts on avenues/ boulevards in emerging neighborhoods, particularly those that provide important gateways or view corridors within the city. Id. §906.6	The Project's massing and design will enhance the Capitol Gateway, contributing to a varied landscape leading to the Capitol. The façade is consciously designed to reflect the history of the surrounding neighborhood, with materiality intended to reflect the South Capitol rowhouses and the nearby historic Syphax School building. The Project will also incorporate commemorative components, including murals and signage, reflecting the history of the neighborhood.
<i>Policy UD-1.4.2: City Gateways</i> Create more distinctive and memorable gateways at points of entry to the city, and points of entry to individual neighborhoods and	The retention of several rowhouses and the setback of the building from N Street will

neighborhood centers. Gateways should provide a sense of transition and arrival, and should be designed to make a strong and positive visual impact. <i>Id.</i> §906.8	establish a nuanced transition from the neighborhood to the monumental Capitol Gateway.
<i>Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors</i> Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place. (see Figure 9.7). <i>Id.</i> §906.9	The Project's massing and design reinforce the framing of the distant Capitol. The landscaping and architectural quality enhance the vista along the Capitol Gateway.
Policy UD-1.4.4: Multi-Modal Avenue/Boulevard DesignDiscourage the use of the city's major avenues and boulevards as "auto-only" roadways. Instead, encourage their use as multi-modal corridors, supporting transit lanes, bicycle lanes, and wide sidewalks, as well as conventional vehicle lanes. Id. §906.10	The Project will improve and widen the sidewalks along the perimeter of the Property. There are bicycle lanes along N Street SW and signed routes along South Capitol Street. The Project will facilitate usage of these bike lanes by providing the both short- and long-term bicycle parking spaces.
Policy UD-1.4.5: Priority Avenues/BoulevardsFocus the city's avenue/boulevard design improvements on historically important or symbolic streets that suffer from poor aesthetic conditions. Examples include North and South Capitol Streets, Pennsylvania Avenue SE, and Georgia Avenue and the avenues designated by the "Great Streets" program. Id. §906.11	The Project's placement on South Capitol Street will offer an attractive design on a symbolic street that has previously suffered aesthetically. The Project fills a gap in the streetscape, replacing a surface parking lot with a building and restoring several rowhouses. The Project will also bring much needed improvements to the surrounding sidewalks, bringing them up to ADA compliance, and will beautify the space with a robust landscaping plan. The Project's location across from the Ballpark and with a view of the Capitol cannot be understated. South Capitol Street will be

	well served by these significant design improvements.
Policy UD-2.1.1: Design Character Create a more coherent design character for Central Washington by improving the physical linkages between the monumental core, the business sub-districts on the perimeter of the National Mall, and the expanding mixed use areas to the east and southeast of Downtown. Urban design strategies should focus on making the entire area more walkable, discouraging monolithic architecture, improving signage and streetscape features, and adding new land uses which make the area more lively, interesting, and dynamic. <i>Id.</i> §909.7	The Project will help make the area surrounding the Ballpark more walkable and attractive for current and future residents as well as Ballpark attendees.
Policy UD-2.1.4: Architectural Excellence Promote excellence in the design of Downtown buildings and landscapes. Particular attention should be focused on ground floor (street) levels, with greater architectural details used to improve visual image. <i>Id.</i> §909.12	The Project will consist of high-quality architectural design. The façades are highly articulated on each elevation with brick pattering, glass accents, and balconies, and the rear façade is designed with similar attention to the street facing façades.
Policy UD-2.2.1: Neighborhood Character and IdentityStrengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. Id. §910.6	The Project retains several existing rowhouses and will incorporate elements of the surrounding neighborhood into the new building's design. The Project also includes commemorative references in signs and murals to honor the history and identity of the community.
Policy UD-2.2.4: Transitions in Building IntensityEstablish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. Id. §910.11	The Project smooths the transition between the existing rowhouses, surface parking lot, and adjacent Camden South Capitol building by uniting the streetscape with a new building and enhancing several rowhouses. The building will be set back from both South Capitol Street and N Street SW to establish a more visually

	appropriate connection between the various building heights in the immediate vicinity.
Policy UD-2.2.5: Creating Attractive FacadesCreate visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street. (see Figure 9.12) Id. §910.12	As mentioned above, the proposed building façades will be highly articulated, avoiding any blank walls. Masonry has been employed throughout the building to enhance its appearance and complement the surrounding neighborhood. Glass accents, balconies, and brick pattering will create a visually interesting and attractive addition to the Capitol Gateway. The rear façade, in particular, has been modified based on community input and will incorporate brick detailing and elements drawn from the historic Syphax School building, establishing an intentional visual connection between the Project and the community in which it is situated.
Policy UD-2.2.6: Maintaining Facade LinesGenerally maintain the established facade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic facade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing facades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm. Id. §910.14	The Project's façades incorporate coloration seen throughout the surrounding neighborhood, including the historic Syphax School building, the adjacent rowhouses, and the James Creek community.
Policy UD-2.2.7: Infill Development Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. <i>Id.</i> §910.15	The Project improves the existing contrasts of scale between the rowhouses located along N Street SW and South Capitol Street, the nearby Ballpark, and the adjacent Camden South Capitol building,

	creating a more nuanced visual transition between the scale of the surrounding structures.
Policy UD-2.2.11: Parking Structures Encourage creative solutions for designing structured parking to minimize its visual prominence. Where feasible, the street side of parking structures should be lined with active and visually attractive uses to lessen their impact on the streetscape (see Fig 9.15). <i>Id.</i> §910.21	The Project will relocate parking on the Property from the existing surface parking lot to a below grade parking garage.
Policy UD-2.2.12: Strip Shopping Centers Ensure that zoning and parking standards discourage strip commercial shopping centers and auto-oriented building designs within designated neighborhood centers. <i>Id.</i> §910.23	The Project's potential commercial uses are minimal and pedestrian-focused rather than vehicle-oriented.
Policy UD-3.1.1: Improving Streetscape Design Improve the appearance and identity of the District's streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street "furniture", and adjacent building facades. <i>Id.</i> §913.8	The Project incorporates landscaping and hardscaping, including two rows of trees along South Capitol Street. The hardscaping street "furniture" as well as
Policy UD-3.1.2: Management of Sidewalk Space Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic. <i>Id.</i> §913.9	the ADA compliant ramps will enhance the pedestrian experience along the perimeter of the Project. The Project will also install new sidewalks that meet or exceed the width requirements.
Policy UD-3.1.13: Signage Encourage high standards of signage throughout the District, particularly for signs that designate landmarks, historic districts, and other areas of civic importance. <i>Id.</i> §913.20	The Project will incorporate commemorative signage, murals, and other components throughout the Project that will reference the neighborhood's history.
Policy UD-3.1.4: Street Lighting Provide street lighting that improves public safety while also contributing to neighborhood character and image. <i>Id.</i> §913.11	The Project will employ street lighting on both South Capitol Street and N Street SW.
<i>Policy UD-3.2.4: Security Through Streetscape Design</i> Develop and apply attractive, context-sensitive security measures in the design of streets, plazas, and public spaces.	The Project's streetscape design will incorporate bollards at the plaza/alley

These measures should use an appropriate mix of bollards, planters, landscaped walls, vegetation, and street furniture rather than barriers and other approaches that detract from aesthetic quality. <i>Id.</i> §914.9	transition, hardscaping, including specialty concrete paving and cobblestones, and a mix of evergreen shrubs, perennials, and trees.	
Policy UD-4.1.2: Design Review Support expanded design review programs in the District, with a priority on areas not currently protected by historic district designation. <i>Id.</i> §916.7	The Project is currently undergoing design review and the Property is not currently protected by historic district designation.	
Lower Anacostia Waterfront/Near Southwest Area Element		
Policy AW-1.1.1: Conservation of Established Waterfront Neighborhoods—Revitalize and preserve established neighborhoods in the Waterfront Planning Area. Continued investment in the existing housing stock and in established local commercial areas should be strongly encouraged. Id. § 1908.2	The Project is within the Southwest Waterfront Planning Area and continues the revitalization of that neighborhood with additional private investment in housing.	
Policy AW-1.1.2: New Waterfront NeighborhoodsCreate new mixed use neighborhoods on vacant or underutilized waterfront lands, particularly on large contiguous publicly-owned waterfront sites. Within the Lower Anacostia Waterfront/ Near Southwest Planning Area, new neighborhoods should be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, Southeast Federal Center and Carrollsburg areas. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Id. § 1908.3	The Project protects the residential character of the areas to the west of the Property and transitions from the mixeduse, high density uses along South Capitol Street into the adjacent residential neighborhood.	

Policy AW-1.1.3: Waterfront Area Commercial DevelopmentEncourage commercial development in the Waterfront Area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia Waterfront as well as space for government and private sector activities, such as offices and hotels. Commercial development should be focused along key corridors, particularly along Maine Avenue and M Street Southeast, along South Canoeing on the Anacostia Capitol Street; and near the Waterfront/SEU and Navy Yard metrorail stations. Maritime activities such as cruise ship operations should be maintained and supported as the waterfront redevelops. Id. § 1908.4	The Project is consistent with the Future Land Use Map as discussed above. The Project is also transit-accessible as encouraged by this objective.
Policy AW-1.1.4: Waterfront Development AmenitiesLeverage new development in the Waterfront Planning area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements. Id. § 1908.5	The Project leverages its location to create additional housing and public space infrastructure improvements.
Policy AW-1.2.2: Waterfront Cultural and Commemorative SitesEncourage the siting of new museums, memorials, civic gathering places, and cultural attractions on or near the Anacostia River as a way to catalyze revitalization and meet the demand for additional commemorative works without further crowding the National Mall and monumental core of the city. Such facilities should make the most of their waterfront locations and create an integrated system of gracious, beautiful, and vibrant places. Id. § 1909.2	The Project's inclusion of memorial plaques and public art spaces furthers the cultural goals of the Area Element.
<i>Policy AW-2.2.1: South Capitol Street Urban Boulevard</i> Transform South Capitol Street into a great urban boulevard and "walking" street, befitting its role as a gateway to the U.S. Capitol and a major Anacostia River crossing. Development along the street should include a mix of federal, District, and private uses. <i>Id.</i> § 1912.7	The Project provides public space improvements along the South Capitol boulevard to improve the pedestrian experience.

Policy AW-2.2.3: South Capitol Commemorative and Civic UsesIncorporate ceremonial uses such as memorials, plazas, monuments, museums and other commemorative works, along the South Capitol Street Corridor. The revitalized street provides a significant opportunity to expand civic and cultural facilities beyond the confines of the monumental core. Id. § 1912.9	The Project's inclusion of memorial plaques and public art spaces furthers the cultural goals of the Area Element.	
Policy AW-2.2.6: South Capitol Neighborhood BuffersEnsure that the established communities adjacent to the South Capitol Street corridor, including the James Creek and Greenleaf Gardens housing projects and adjacent residential areas, are buffered from adverse impacts associated with increased density and traffic relating to stadium area development. Conserve these communities as important parts of the city fabric, and as affordable housing resources for the Southwest community. Id. § 1912.12	The Project provides a buffer to the adjacent residential communities with setbacks, articulation, coloration, and materials that minimize the building's mass. Additionally, the Project incorporates materials, coloration, and patterning consistent with the surrounding properties.	
Implementation Element		
Policy IM-1.1.1: Mitigation of Development Impacts —To the greatest extent feasible, use the development review process to ensure that impacts on neighborhood stability, traffic, parking and environmental quality are assessed and adequately mitigated. <i>Id.</i> § 2502.5	The Project has undergone a comprehensive public review by the Zoning Commission and the ANC and other community groups and neighbors to ensure that its impacts are assessed and adequately mitigated.	
Policy IM-1.1.3: Relating Development to Infrastructure CapacityEnsure that development does not exceed the capacity of infrastructure. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit and other travel modes as well as streets and highways, and the availability of water, sewer, drainage, solid waste, and other public services. Id. § 2502.7	The Project's materials provide the analysis showing that the Project does not exceed infrastructure capacity. The Project appropriately balances the need for new housing (and the affordable housing it provides) with mobility capacity and utility infrastructure availability.	

Policy IM-1.1.5: Development Approvals and the Comprehensive PlanTo the extent they are relevant, consider the goals and policies of the District Elements in the approval of planned unit developments, variances, campus plans, special exceptions, large tract reviews, and other projects requiring review. Id. § 2502.9	This analysis identifies the relevant goals and policies of the District Elements of the Comprehensive Plan for the Zoning Commission's consideration in the instant Design Review application.
Policy IM-1.1.6: Studies Preceding Zoning Case Approvals Ensure that zoning case approvals such as Planned Unit Developments (PUDs) utilize: (1) transportation and infrastructure studies and recommended conditions of approval to mitigate potential impacts; (2) agreements for financing any necessary improvements, including public and private responsibilities; (3) agreements to comply with "first source employment" requirements and other regulations that ensure public benefits to District residents. <i>Id.</i> § 2502.1	The instant Design Review application includes a transportation review and an agreement to provide public space improvements to District residents.
Policy IM-1.2.1: Small Area PlansPrepare Small Area Plans and other planning studies for parts of the city where detailed direction or standards are needed to guide land use, transportation, urban design, and other future physical planning decisions. The focus should be on areas that offer opportunities for new residential, commercial, and mixed use development, or areas with problems or characteristics requiring place-specific planning actions. Use the Comprehensive Plan Area Elements, the Generalized Policies Map, and land use monitoring activities to identify areas in the city where such plans are needed. Citizens shall have the right to petition or suggest small area plans to be proposed by the Mayor. Id. § 2503.2	As set forth below, the Project is within an area that is the subject of a properly-prepared and duly-adopted Small Area Plan, and the Project is constructed in accordance with such plan.
Policy IM-1.2.2: Protocol for Small Area PlansEnsure that Small Area Plans take a form appropriate to the needs of the community and reflect citywide needs, District and neighborhood economic development policies and priorities, market conditions, implementation requirements, competing demands, available staffing resources and time, and available funding. Such plans should address such topics as neighborhood revitalization and conservation needs and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives. Small area plans should be adopted by the Council and used to	

supplement the Comprehensive Plan. If necessary, Comprehensive Plan amendments should be introduced to ensure internal consistency for the areas involved. <i>Id.</i> § 2503.3	
Policy IM-1.3.2: Zone Map ConsistencyConsistent with the Home Rule Charter, ensure that the Zone Map is not inconsistent with the Comprehensive Plan Future Land Use Map. Make appropriate revisions to the Zone Map to improve its alignment with the Future Land Use Map and to eliminate clear inconsistencies. Id. § 2504.4	As detailed above, the property's existing zoning is consistent with the Future Land Use Map.
Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning DecisionsRequire the Board of Zoning Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. Decisions on requests for rezoning shall be guided by the Future Land Use Map read in conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. Id. § 2504.5	The instant Design Review application requires the Zoning Commission to consider and evaluate the Project's consistency with the District Elements (including the attendant Maps), the applicable Area Element, and Small Area Plan, and this analysis is intended to guide the Commission's evaluation.
Policy IM-1.3.4: Interpretation of the District Elements —Recognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements. As noted at Section 300.2, since the Land Use Element integrates the policies of all other District elements, it should be given greater weight than the other elements. <i>Id.</i> § 2504.6	This analysis identifies the overlapping and occasionally competing nature of the objectives of the Comprehensive Plan. Particular focus is given to the Land Use Element given its weighted status.
Policy IM-1.5.1: Involvement of Advisory Neighborhood CommissionInclude the Advisory Neighborhood Commissions and area residents in the review of development to assist the District in responding to resident concerns. Consistent with the statutory requirements of the DC Code, feedback from the ANCs should be given "great weight" as land use recommendations and decisions are made. Id. § 2507.3	The applicant has met with and will continue to seek the input of the ANC, and the ANC is in support of the Project.

Policy IM-1.5.2: Promoting Community Involvement Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation. A variety of means should be used to secure community input, including advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication. <i>Id.</i> § 2507.4	In addition to meeting with the ANC, the applicant has met or discussed the Project with neighbors and other community stakeholders. The Zoning Commission's review procedures also invited and accommodated public comment and
<i>Policy IM-1.5.4: Transparency in Decision-Making</i> Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents and maintaining open lines of communication with the public as plans are developed. <i>Id.</i> § 2507.6	participation in support of this objective. The Zoning Commission's review procedures are public and transparent with all information on which the Commission makes its decisions available to the general public.
Southwest Neighborhood Plan – Guiding Prince	ciples
Foster an environment that encourages and embraces cultural and economic diversity.	The Project encourages economic diversity through its provision of several family-sized units, 25 affordable housing units, live/work-designed units, and potential other commercial offerings.
Preserve the varied scale and green character of the neighborhood.	The Project is located in an appropriate location for its proposed height and scale and contributes positively to the green character of Southwest DC through public space improvements.
Design buildings, connections and sidewalks to improve safety, security and pedestrian circulation.	The Project's building orientation and streetscaping improve safety and security and promote pedestrian circulation.

Enhance, connect and better utilize parks both active and passive as open space.	The Project's public spaces connect and enhance Southwest DC's public open space.	
Invest in community, arts and education uses that serve resident needs.	The Project's inclusion of commemorative plaques and public art invests in community linkages and involvement.	
Preserve and develop a range of housing for a mix of income, age and family size, and encourage quality design and architecture.	The Project includes 25 units that are affordable. The Project also provides a variety of unit sizes, including significant family-sized units. Finally, the Project includes high quality design and architecture, as shown in the plans.	
Strengthen multimodal transportation and improve street connections, parking and safety.	The Project improves the pedestrian condition along South Capitol Street and N Street and adds riders for the nearby Metrorail station and bus routes.	
Develop a strategy for height, density and open space that enhances, acknowledges and complements the character of the neighborhood.	The Project's height is appropriate given its location along South Capitol Street SW and incorporates appropriate design elements to integrate into the residential character of the neighborhood.	
Incorporate goals and targets from the Sustainable DC Plan to protect our environment and conserve resources to foster a vibrant, healthy neighborhood.	The Project is constructed with a high level of environmental sustainability, including solar panels, LEED Gold, and car-charging stations.	
Southwest Neighborhood Small Area Plan – Concept Visions and Actions		

Model Community Vision : Southwest will remain an exemplary model of equity and inclusion - a welcoming and engaged community that celebrates and retains a mix of races, ages and income levels and enhances well-being for all amidst neighborhood growth and change.	The Project provides a significant degree of housing, including 25 affordable housing units and family-sized units.
Model Community Action 4: Retain the neighborhood's 19 percent of subsidized units by establishing targets that exceed current Inclusionary Zoning thresholds for future development on publicly owned land and in future Planned Unit Developments. Model Community Action 5: Future redevelopment of District-controlled sites should, at a minimum, require at least 20 percent of the units be affordable at varying levels of the area median income (AMI), preferably for longer than 20 years. Determine if a subject site meets the requirements for additional affordable units per the "Disposition of District Land Act of 2014". Model Community Action 6: As part of a community benefits package through the PUD process for new construction, prioritize affordable units above the Inclusionary Zoning requirement or fewer affordable units, but larger in size (e.g., three bedrooms) to better serve families.	The Project is not a PUD or a public disposition, and therefore this call for enhanced affordability does not apply. The Project complies with the IZ requirements which further the SAP's goals for additional affordable housing. Additionally, the Applicant has willingly agreed to work to have the IZ units concentrated in family-sized units (if permitted by District agencies).
Modernist Gem Action 1: Continue the community-led process of engagement to garner support for preserving Modernist properties in the Planning Area. The community, including property owners, neighborhood groups and the "Advisory Neighborhood Commission" should determine a preferred preservation strategy: Historic District, Conservation District (if approved by Council), or the continued designation of individual landmarks.	The Applicant has been engaged in community outreach for multiple years regarding the Project. Part of the outreach included an agreement with SWNA regarding the design of the building to be consistent with the architectural character of the neighborhood.
Modernist Gem Action 3 : Support infill development and adaptive reuse of existing buildings in Southwest to promote the preservation of the community's architectural character.	The Project is an ideal infill development on an underutilized site that is consistent with the community's architectural character.

Modernist Gem Action 5 : Retain existing streets and open spaces that contribute to the L'Enfant Plan.	The Project retains and respects the South Capitol streetscape and frames this great boulevard in a manner consistent with the improvements along this corridor.
Modernist Gem Action 6 : Ensure future development and improvements reinforce the L'Enfant Plan as an important historic feature tying Southwest to its greater urban context.	The Project retains and respects the South Capitol streetscape and frames this great boulevard with architectural embellishments consistent with the neighborhood.
Modernist Gem Action 7: Apply the Design Guidelines contained in the Plan (pages 81 -83) to all new development achieved through the Planned Unit Development process. Matter of right development is also strongly encouraged to apply the Design Guidelines.	The Applicant previously detailed the Project's compliance with the Design Guidelines at Exhibit 12.
<i>Green Oasis Action 8</i> : Increase the tree canopy in the Southwest Planning Area from 25 percent to 37 percent with the addition of trees in all new developments, streetscape improvements and potentially at existing parks, such as Lansburgh. The creation of larger setbacks for new developments may allow for more tree planting opportunities. Ensure that any diseased trees are removed and replaced at appropriate times.	The Project includes significant street tree plantings as part of the public space improvements.
<i>Green Oasis Action 13</i> : Maximize open spaces, vegetation and sustainable practices by discouraging surface parking in new developments achieved through Planned Unit Developments (PUDs). (Also see Design Guidelines on pages 81-83).	Even though the Project is not being developed through a PUD, it contains open spaces and significant landscaping. The Project also removes existing surface parking lots.
<i>Green Oasis Action 14</i> : Encourage the installation of electric vehicle-charging stations and set aside electric vehicle-only parking spaces in the garages of future buildings constructed under Planned Units Developments (PUDs) as a community amenity.	Even though the Project is not being developed as a PUD, the plans include electric-vehicle charging stations in the parking garage.

Vibrant Connections 11: Goal: Support the transformation of South Capitol Street into a high density, urban boulevard that establishes a robust pedestrian realm. Coordinate with the South Capitol Street Corridor Project to promote a high performance "green" streetscape, improve connections across South Capitol Street at 'I', M and P Streets, and reduce/limit commuter traffic through the Southwest neighborhood.	The Project provides high-density development along the urban boulevard of South Capitol Street while still preserving and incorporating existing rowhouses on the Property and designing the façade to fit within the neighborhood context. The Project also proposes improvements to the surrounding public space, as detailed in the Plans and in Comprehensive Transportation Report filed at Exhibit 11 in the case record.
<i>Vibrant Connections Action 2</i> : Enhance neighborhood edges and gateways by improving crosswalks, signage, lighting and/ or streetscapes at key gateways: South Capitol Street at 'I', L, M and N Streets.	The Project improves public space improvements along South Capitol and N Streets.