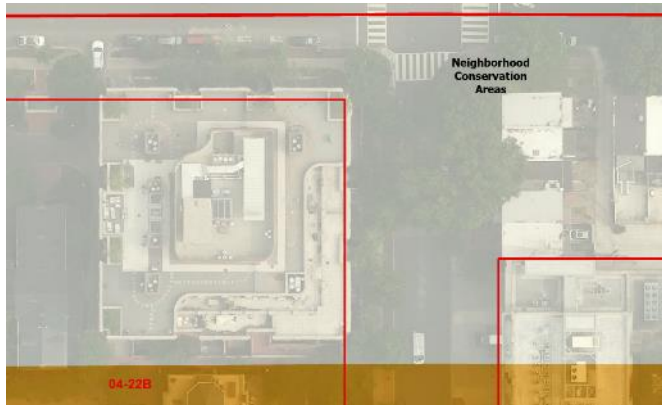


Comprehensive Plan Policy Guidance

Building Transitions Precedents



Monroe Street Market PUD (Z.C. Order No. 08-24)



Senate Square PUD (Z.C. Order No. 04-22)



Comprehensive Plan Policy Guidance

Relationship of Small Area Plans to Comprehensive Plan

Framework Element Guidance

- Unless a Small Area Plan has been made binding on the Zoning Commission through its enactment as part of a Comprehensive Plan amendment, a Small Area Plan provides only supplemental guidance to the Zoning Commission, **and it does so only to the extent it does not conflict with the Comprehensive Plan.**” 10-A DCMR 224.5.

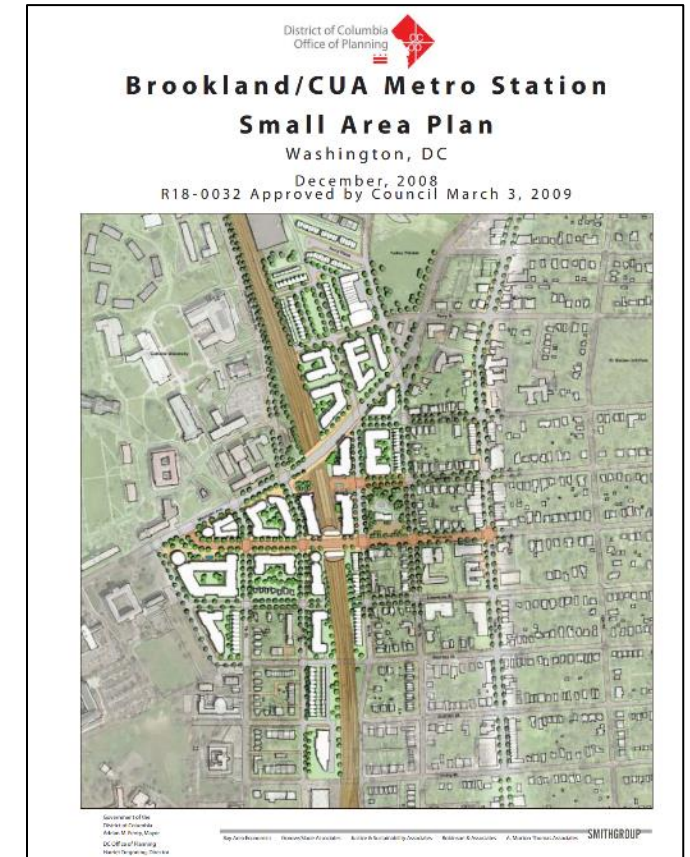
Implementation Element Guidance

- Policy IM-1.2.3: Protocol for Small Area Plans - Small Area Plans are typically approved by resolution of the D.C. Council, and information from these plans may be subsequently incorporated into the Comprehensive Plan Elements. If approved by D.C. Council resolution, the Small Area Plans should be used as supplemental guidance by the Zoning Commission **where not in conflict with the Comprehensive Plan**. A Small Area Plan can be incorporated into, and given the same force as, the Comprehensive Plan by D.C. Council act. 10-A DCMR 2503.6

Comprehensive Plan Policy Guidance

Brookland / CUA Metro Station Small Area Plan

- Adopted March 3, 2009 (Resolution #R18-0032) in response to the 2006 Comp Plan.
- The Comprehensive Plan was subsequently amended in 2011 and 2021, including amendments to the PUD Site's FLUM designation which supports greater height and density.
- The 2021 Comprehensive Plan FLUM and policy guidance reflect the District's current land use policy goals (affordable housing, transit-oriented development, and equitable access to transportation) for the PUD Site and surrounding area.



Comprehensive Plan Policy Guidance

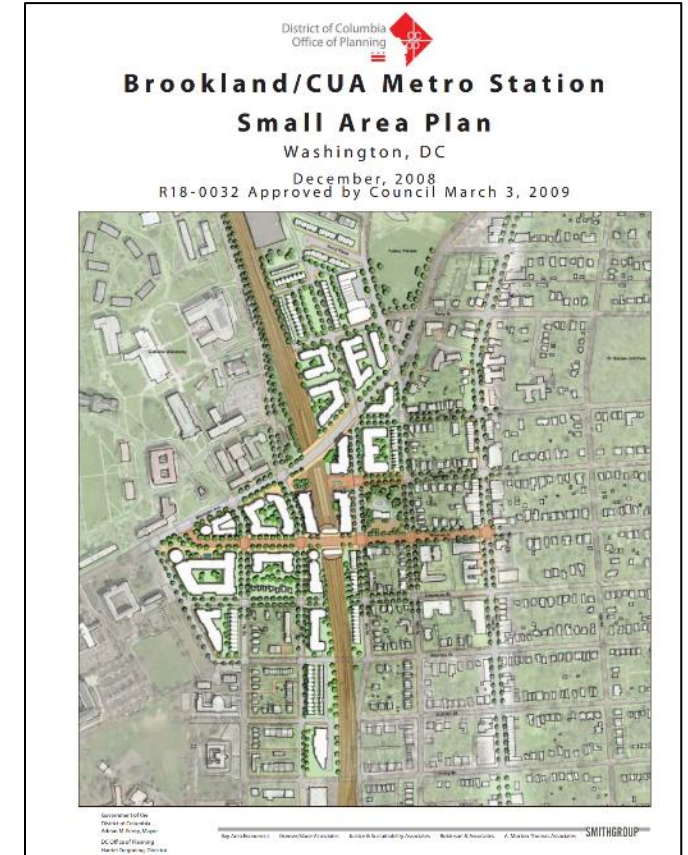
Brookland / CUA Metro Station Small Area Plan

Guiding Principles

- Land Use and Neighborhood Character
- Economic Development and Neighborhood Amenities
- Transportation, Walkability and Connectivity
- Open Space and Environment

Urban Design Concepts

- Support mixed-use, transit-oriented infill development near Metrorail and along Monroe Street.
- Provide residential uses south of the Metrorail.
- Strengthen Monroe Street as a primary east-west connector and gateway into the Brookland neighborhood.
- Improve pedestrian circulation.
- Support area businesses.
- Use green building techniques and site design.

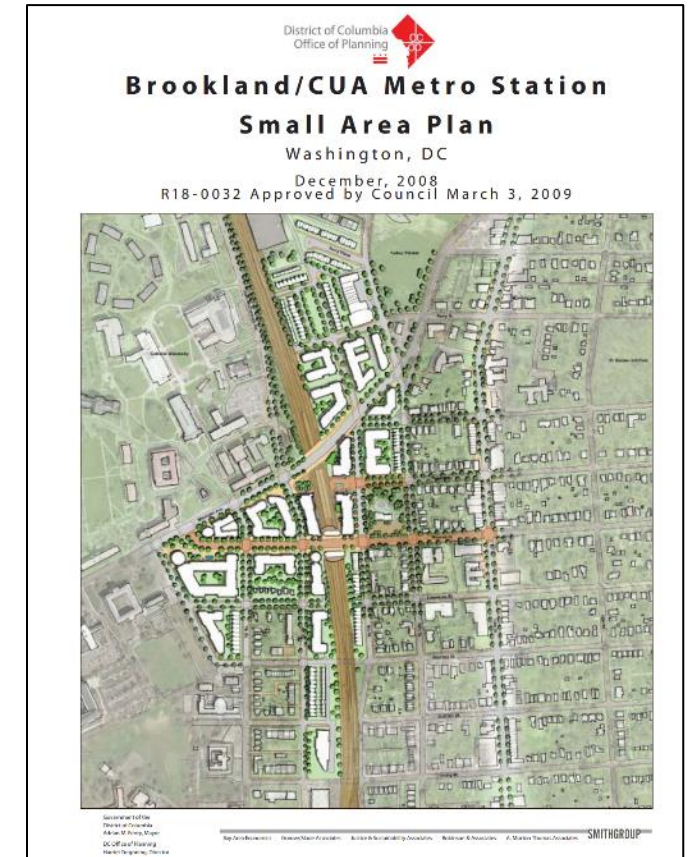


Comprehensive Plan Policy Guidance

Brookland / CUA Metro Station Small Area Plan

Sub-Area Recommendations

- Provide adequate parking but at low transit-oriented development parking ratios.
- Allow infill and redevelopment along Monroe Street east of the WMATA/CSX tracks.
- Development along Monroe Street east of the WMATA/CSX tracks may be allowed up [to] a maximum of 50 feet through a Planned Unit Development, a discretionary review by the District's Zoning Commission.
- Buildings in the subarea should step back in height at a ratio of one half (1/2) to one (1) above 50 feet.



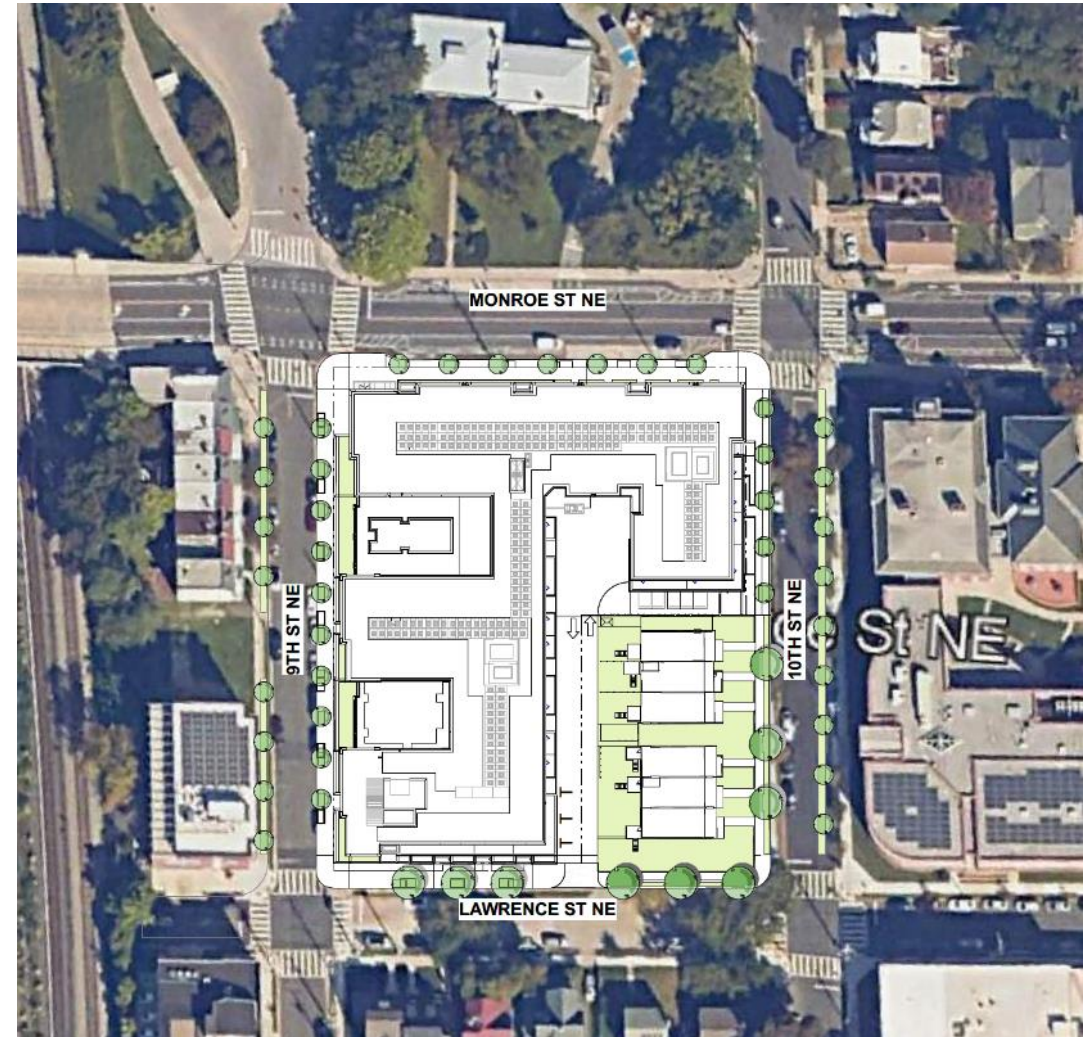
Evaluation of Potential Comp Plan Inconsistencies

UD-4.2.3: Continuity and Consistency of Building Frontages

“Maintain the established frontage lines of streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid placing new construction that extends beyond the existing facade line unless it significantly benefits the public life of the street. Where existing facades are characterized by an established pattern of windows and doors or other elements, new construction should complement the established rhythm.”

Outweighing Policies or Other Considerations

- UNE-1.1.3: Metro Station Development
- UNE-2.6.1: Brookland/CUA Metro Station Area
- LU-1.4.1: Station Areas as Neighborhood Centers
- LU-1.4.2: Development Around Metrorail Stations
- H-1.1.3: Housing Growth
- H-1.1.8: Production of Housing in High-Cost Areas



Evaluation of Potential Comp Plan Inconsistencies

Brookland SAP Sub-Area Recommendation Regarding Building Height

“Development along Monroe Street east of the WMATA/CSX tracks may be allowed up [to] a maximum of 50 feet through a Planned Unit Development, a discretionary review by the District’s Zoning Commission.”

Outweighing Policies or Other Considerations

- Framework Element and Implementation Element guidance on relationship of small area plans and the Comp Plan. (10-A DCMR §§ 224.5 and 2503.1).
- FLUM: Mixed Use (Moderate Density Commercial, Medium Density Residential)
- LU-1.4.2: Development Around Metrorail Stations
- LU-1.4.3: Housing Around Metrorail Stations
- LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations
- H-1.1.2: Production Incentives
- H-1.1.4: Mixed-Use Development

Comparison of Zones Referenced in Framework Element in 2012 versus 2021 Comp Plan			
2012 Comp Plan			
FLUM Category	Compatible Zones Per Framework Element	Height (MOR)	Height (PUD)
Mixed Use (Low Density Commercial / Low Density Residential) Mixed Use (Moderate Density Commercial / Moderate Density Residential) Low Density Residential	C-2-B (MU-5B)	70 ft. (75 ft. w/ IZ)	90 ft.
	C-3-A (MU-7)	65 ft.	90 ft.
	C-2-A (MU-4)	50 ft.	65 ft.
	R-5-A (RA-1)	40 ft.	60 ft.
	R-4	35 ft./40 ft.	60 ft.
	C-1 (MU-3) R-3 R-2 R-1-B R-1-A	40 ft.	40 ft.
2021 Comp Plan			
FLUM Category	Compatible Zones Per Framework Element	Height (MOR)	Height (PUD)
Mixed Use (Moderate Density Commercial / Medium Density Residential)	MU-5B	75 ft.	90 ft.
	MU-5A	65 ft. (70 ft. w/ IZ)	90 ft.
	MU-7A	65 ft.	90 ft.
	MU-7B		
	RA-3	65 ft.	90 ft.

Evaluation of Potential Comp Plan Inconsistencies

“The Commission acknowledges that the Project is significantly taller and denser than the townhouse and garden style apartment development envisioned in the Takoma SAP. However, the Commission believes that this guidance has been superseded by changes to the Comprehensive Plan in the 20+ years since the Takoma SAP was adopted, and that **this newer guidance outweighs the inconsistency.**”

“The Framework Element states, “...a **Small Area Plan provides only supplemental guidance to the Zoning Commission and it does so only to the extent it does not conflict with the Comprehensive Plan.**” (See 10A DCMR § 224.5.)...The Commission concludes that this guidance is important in the context of the Takoma SAP and the Project, where Takoma SAP recommendations to moderate development on the PUD Site conflict with the Site’s current FLUM designation and recommendations to increase density around Metrorail stations to accommodate the critical, high priority need for new housing in the District. **The Commission believes that the additional density called for in the FLUM, and other more recently adopted policies supersede the guidance of the Takoma SAP that call for lower intensity development of the Site.**”

Z.C. Order No. 22-36 (TM Associates, LLC & WMATA)

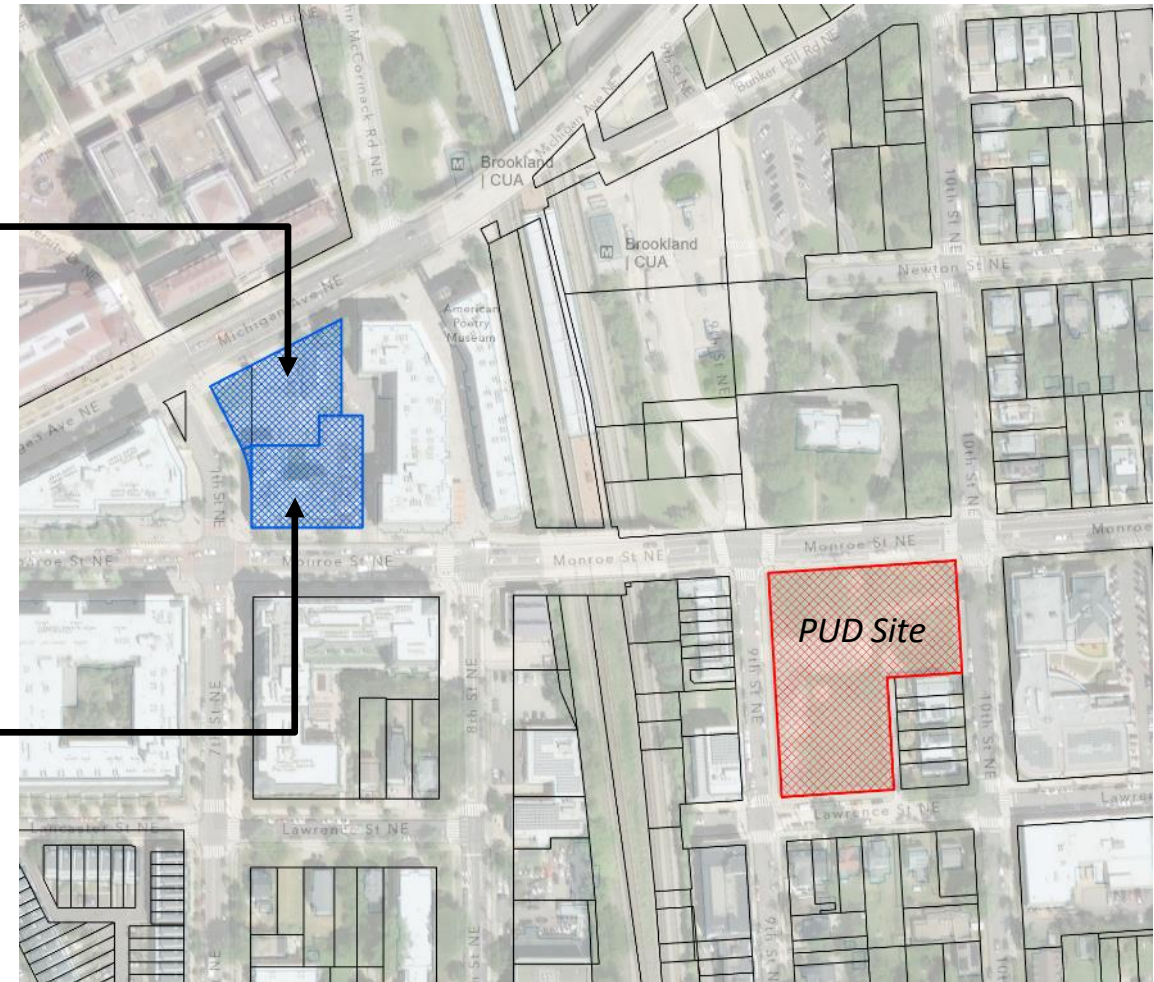
Evaluation of Potential Comp Plan Inconsistencies

“The Commission concludes that the Map Amendment will further policy objectives of the Brookland SAP; however, the Commission acknowledges the Applicant’s assertion that prior updates and the 2021 Comprehensive Plan update supersede the Brookland SAP.

*Z.C. Order No. 23-07 (701 Michigan, LLC)
Zoning Map Amendment from MU-3A to MU-2*

“The Commission concurs with the Applicant’s assertion that CP updates including the 2021 Comprehensive Plan update, which call for medium density and heights commensurate with the MU-2 Zone District, supersede the previous policy recommendations of the Brookland SAP that call for lower density and height”

*Z.C. Order No. 24-05 (The Bennett Corporation)
Zoning Map Amendment from MU-3A to MU-2*



Conclusion

- The proposed PUD and related map amendment is not inconsistent with the Comp Plan when read as a whole, including when viewed through a racial equity lens, and specifically:
 - The Project's density and mix of uses are not inconsistent with the FLUM as it proposes medium-density mixed-use development with an emphasis on residential use.
 - The Project is not inconsistent with the GPM Neighborhood Conservation Area as it will redevelop an underutilized site with a new multifamily development that addresses city-wide housing that is consistent with the FLUM, and is compatible with the land uses, building types, and character in the surrounding area.
- The proposal is consistent with the recommendations of the Brookland/CUA SAP that remain applicable to the PUD site.
- The proposal's consistency with the FLUM, GPM, and numerous policies related to land use, housing, and development around Metrorail far outweigh any potential Comp Plan and Brookland/CUA SAP inconsistencies.