

EVALUATION OF COMPREHENSIVE PLAN CONSISTENCY

INTRODUCTION AND OVERALL CONCLUSION

As set forth below, the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan (the “**Comp Plan**”).¹ The Comp Plan guides the District’s development, both broadly and in detail, through maps and policies that address the physical development of the District. 10-A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the city and the well-being of its citizens.

As part of its review, the Zoning Commission (“**Commission**”) must find the proposed Zoning Map amendment to be not inconsistent with the Comp Plan. *See* 11-X DCMR § 500.3. As stated in the Framework Element, in making decisions as to Comp Plan consistency, “the [Commission] must consider the many competing, and sometimes conflicting, policies of the [Comp Plan], along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the [Commission] to consider and balance those policies relevant and material to the individual case...and clearly explain its decision-making rationale.” 10-A DCMR § 224.8. To approve the proposed Zoning Map amendment, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination as to whether the map amendment is “not inconsistent” with the Comp Plan when read as a whole. As part of its Comp Plan evaluation, the Commission must also consider the recommendations of any adopted plans and active programs that are applicable to the subject site, including adopted Small Area Plans (“**SAPs**”), which are approved by resolution by the D.C. Council and provide more detailed planning guidance for a defined geographic area. Unless an SAP has been made binding on the Commission through its enactment as part of a Comp Plan amendment, an SAP provides only supplemental guidance to the Commission, but only to the extent that it does not conflict with the Comp Plan. *Id.* § 224.5. In this case, the Property is located within the Northwest One Redevelopment Plan (“**NW1 Plan**”).

The following sections of this exhibit contain the Applicant’s evaluation of the proposed Zoning Map amendment’s overall consistency with the Comp Plan. In conducting its Comp Plan evaluation, the Applicant has considered the goals and policies of the Comp Plan elements that are applicable to the proposal. In addition, the Applicant’s evaluation includes a specific assessment of potential Comp Plan inconsistencies. As detailed below, overall, the Applicant finds the proposal to rezone the Property from MU-4 to MU-9A to be not inconsistent with the Comp Plan when read as a whole through a racial equity lens. In particular, the Applicant finds that the proposed rezoning will facilitate redevelopment of the Property that is consistent with the high-density mixed-use development that is contemplated by the FLUM and the NW1 Plan, and that will advance several policies within the Central Washington, Land Use, and Housing Elements.

¹ D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the Generalized Policy Map (“**GPM**”) and Future Land Use Map (“**FLUM**”) (D.C. Resolution R24-0292).

GENERALIZED POLICY MAP EVALUATION

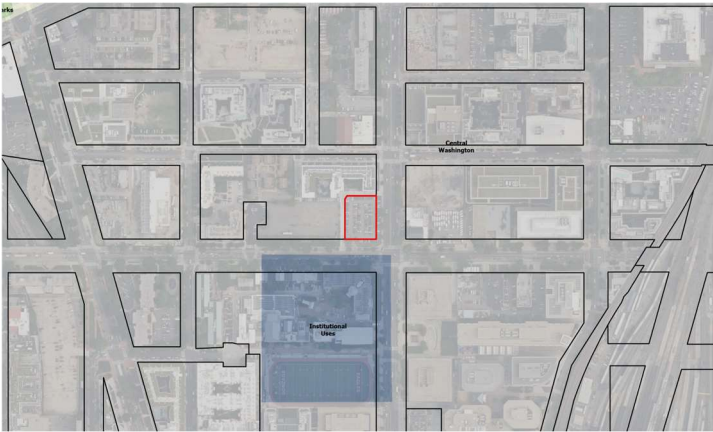


Figure 1: Excerpt of GPM showing Property located within the Central Washington area.

As shown in **Figure 1**, the Property is located within the area designated as “Central Washington” on the GPM. Central Washington is not a specific category on the GPM. This is due to the area’s unique and varied characteristics that cannot be defined by any one GPM category. Instead, the Comp Plan relies upon specific detailed policies within the Central Washington Area Element to define the long-term policy direction of Central Washington, both generally and for specified areas. The

consistency of the proposed Zoning Map amendment with applicable policies of the Central Washington Element is provided below. Generally, the proposed MU-9A zone will facilitate high-density mixed-use development on the Property that is consistent with the general type and scale of development that is characteristic of Central Washington.

FUTURE LAND USE MAP EVALUATION

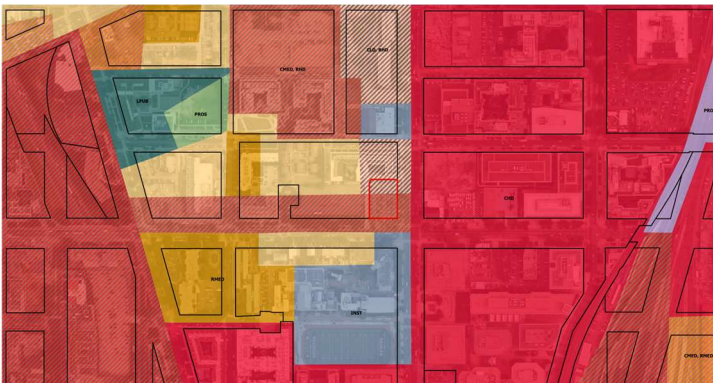


Figure 2: Excerpt of FLUM showing Property located within two high-density Mixed Use areas on the FLUM.

The FLUM shows the general character and distribution of recommended and planned uses across the city. 10-A DCMR § 200.5. Per the guidelines for using the FLUM set forth in the Framework Element, the FLUM is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements and development standards for setbacks, height, use, parking, and other attributes, the FLUM is intended to be “soft-edged” and does not follow parcel boundaries,

and its categories do not specific allowable uses or development standards. By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *Id.* § 228.1(a). Densities within any given area on the FLUM reflect all contiguous properties on a block. *Id.* § 228.1(c). Similarly, the land-use category definitions describe the general character of development in each area. *Id.* The zoning of any given area is guided by the FLUM, interpreted in conjunction with the Comp Plan text. *Id.*

As shown in **Figure 2**, the Property is split between two Mixed Use areas on the FLUM. The southern two-thirds of the Property is located within an area designated for Mixed Use (Medium Density Commercial / High Density Residential) development that extends westward along K Street to New Jersey Avenue. The remaining northern one-third of the Property is located within an area designated for Mixed Use (Low Density Commercial / High Density Residential) development that extends northward along North Capitol Street to New York Avenue, excluding the Mt. Airy Baptist Church site, which is designated Institutional.

A “Mixed Use” designation is a specific land use category and is assigned to areas where the mixing of two or more land uses is encouraged, but not mandatory. The Mixed-Use FLUM designation is intended primarily for larger areas where no single use predominates today, or areas where multiple uses are encouraged in the future. 10-A DCMR § 227.3. One of the areas specified by the Framework Element where the Mixed Use designation is typically found includes, but is not limited to, commercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future. *Id.* § 227.20(a). The combination of uses and the general density of development in any given Mixed Use area are not intended to be strictly interpreted by the stripe patterns on the FLUM, but rather the stripe patterns are intended to provide guidance in combination with applicable Comp Plan policy guidance. If the desired outcome is to emphasize one use over another, the FLUM may note the dominant use by assigning it a higher density. *Id.* § 227.1. The Area Elements and applicable small area plans, if any, may also provide detail on the mix of uses envisioned for an area.

In this case, both Mixed Use areas within which the Property is located contemplate high-density mixed-use development with an expressed preference for residential use. Policy guidance in the Central Washington Area Element and recommendations within the Northwest One Redevelopment Plan also encourage the development of higher density residential use on the Property. Regarding commercial uses, while the FLUM contemplates commercial uses along both the North Capitol Street and K Street frontages of the Property, there is greater emphasis on commercial uses along K Street.

The proposed Zoning Map amendment to MU-9A is not inconsistent with the FLUM. The Framework Element does not provide guidance on typical densities or specific zones that are considered consistent with the Mixed Use land use category. Rather, the Framework Element states that “a variety of zoning designations are used in Mixed Use areas, depending on the combination of uses, densities, and intensities. All zone districts formerly identified as commercial, SP, CR and Waterfront were renamed as MU zone districts in 2016, and are considered to be mixed use.” 10-A DCMR § 227.23. In this case, the Applicant believes the proposed MU-9A is the most appropriate zone to achieve the type of development on the Property that is contemplated by the FLUM, as supported by Comp Plan policy guidance and the recommendations of the NW1 Plan. The following table of MU zones under the 2016 Zoning Regulations (“ZR16”) allow for high-density mixed-use development:

As clearly demonstrated in Table 1, the MU-9A zone is the ideal zone to implement the Property’s FLUM designation for residentially oriented high-density mixed-use development. While all of the zones allow for high-density mixed-use development, the proposed MU-9A zone is specifically intended for areas in or near the CEA and along arterial streets, and the one that

most favors residential use by limiting non-residential density to 1.0 FAR. As expressly described in ZR16, all of the other high-density mixed-use zones listed in the table are designed for other locations in the city (such as in the vicinity of the waterfront (MU-14) or the downtown core (MU-15), and/or allow much greater (and even favor) non-residential development.

Table 1: Mixed Use (MU) Zones That Permit High-Density Mixed-Use Development			
Zone	ZR16 Description	Height (ft)	Density (FAR)
MU-9A	Permits high-density mixed-use development including office, retail, and housing, with a focus on employment <u>and residential use in or near the CEA</u> , on arterial streets, in uptown and regional centers, and at rapid transit stops.	90 ft. (100 ft. w/ IZ)	6.5 (7.8 w/ IZ) <u>1.0 non-res. max.</u>
MU-9B			6.5 (7.8 w/ IZ) 6.5 non-res. max.
MU-10	Permits medium- to high-density mixed-use development with a balance of uses conducive to a higher quality of life and environment for residents, businesses, employees, and institutions in areas where a mixture of uses and building densities is intended to carry out elements of the Comprehensive Plan, small area plans, or framework plans.	90 ft. (100 ft. w/ IZ)	6.0 (7.2 w/ IZ) 3.0 non-res. max.
MU-14	Permits high-density mixed-use development <u>generally in the vicinity of the waterfront</u>	90 ft. (100 ft. w/ IZ)	6.0 (7.2 w/ IZ) 5.0 non-res. max.
MU-15	Permit high-density mixed-use development including office, retail, and housing, <u>with a focus on employment in or near the downtown core</u> that comprises the retail and office centers for both the District of Columbia and the metropolitan area.	110 ft	8.5 (10.2 w/ IZ) 8.5 non-res. max.
		130 ft. (on streets w/ min. 110 ft. width)	10.0

CENTRAL WASHINGTON AREA ELEMENT EVALUATION

The Zoning Map amendment is not inconsistent with the policies set forth in the Central Washington (“CW”) Area Element. The proposed Zoning Map amendment to MU-9A will facilitate the District’s long planned redevelopment of the Property as a vibrant mixed-use

neighborhood in accordance with the vision and principles of the New Communities Initiative (“NCI”) (CW-1.1.1). Consistent with the FLUM, the proposed MU-9A zone will promote high-density residential use on the Property while also allowing an appropriate amount of non-residential use (CW-1.1.4). The Applicant’s planned redevelopment of the Property will be carried out in accordance with a multi-phased land development disposition agreement (“LDDA”) with the District, which requires the Applicant to devote at least two-thirds (2/3) of all residential units as affordable housing to households earning no more than 30% and 60% Median Family Income (“MFI”) (CW-1.1.5, CW-2.8.B). This also requires the Applicant to, among other things, include one-for-one replacement of the public housing units that used to be located on the Property and to provide prior tenants a right to return to the Property upon completion of construct to a similarly-sized unit and comparable rental rates. The redevelopment of the Property with high-density development, including potential ground-floor retail use, will also reinforce the physical qualities of the North Capitol Street corridor by strengthening the street wall along the corridor and the viewshed toward the U.S. Capitol (CW-1.1.11).

Central Washington Area Element Policies Advanced by the Application²

CW-1.1: Guiding Growth and Neighborhood Conservation

- CW-1.1.1: Promote Mixed-Use Development
- CW-1.1.4: New Housing Development in Central Washington
- CW-1.1.5: Central Washington Housing Diversity
- CW-1.1.11: Reinforcing Central Washington’s Characteristic Design Features

CW-2.8: NoMa and Northwest One

- CW-2.8.B: Northwest One New Community

LAND USE ELEMENT EVALUATION

Overall, the Applicant has determined that the proposed Zoning Map Amendment is not inconsistent with the Land Use Element. The proposed rezoning will facilitate the Applicant’s redevelopment of the Property, a site that is along the North Capitol Street corridor and within walking distance to Metrorail (NoMa/Gallaudet Station and Union Station) (LU-1.4.6). Redevelopment of the Property with high-density mixed-use development with a significant amount of affordable housing and potential ground-floor retail use will not only help address the District’s citywide housing needs, it will also help strengthen the urban fabric, street wall, and character of the North Capitol Street corridor and help connect North Capitol Street to the Mount Vernon Triangle area along K Street (LU-1.5.1). Given its proximity to Metrorail, priority bus lines (X2, X9, 80, 96), and several neighborhood amenities and attractions, the Property is an ideal location for increased residential density, which not only will help achieve the 1:1 public housing replacement units from the prior public housing on the site, it will also bring additional market rate and affordable housing to the site (LU-2.1.1).

² Policies in **bold underline** denote policies that explicitly address racial equity as identified in the D.C. Office of Planning’s (“OP”) Equity Crosswalk (effective August 21, 2021).

Land Use Element Policies Advanced by the Application

LU-1.4: Transit-Oriented and Corridor Development

- LU-1.4.6: Development Along Corridors

LU-5: Neighborhood Infill Development

- LU-1.5.1: Infill Development

LU-2.1: A District of Neighborhoods

- **LU-2.1.1: Variety of Neighborhood Types**

HOUSING ELEMENT EVALUATION

The proposed Zoning Map Amendment to rezone the Property to MU-9A is not inconsistent with the policies of the Housing Element. The rezoning will facilitate the Applicant's continued redevelopment efforts in the Northwest One neighborhood, which it is carrying out in accordance with the terms of an LDDA with the District. The overall Northwest One redevelopment will provide a total of approximately 665 units of mixed-income housing, of which two-thirds of the units must be devoted to households earning no more than 30% and 60% MFI (H-1.1.1, H-1.1.3, H-1.1.4, H-1.1.8, H-1.2.1, H-1.2.2, H-1.2.4, H-1.4.4). The Applicant has already completed construction of a Phase 1 of Northwest One, a 220-unit building directly north of the Property, known as The Rise at Temple Court, which includes 65 units set aside as public housing replacement units. The Applicant is currently constructing Phase 2 on the property that is immediately west of the Property at 33 K Street, NW, which will deliver approximately 212 affordable rental units, including 72 replacement units, and is expected to be completed in Q1 of 2025. The final Phase 3 of Northwest One, which will be located on the Property and enabled by this Map Amendment, will consist of approximately 180-233 residential units, including Temple Courts replacement units, as well as potential retail use located on the ground floor. Together with other nearby high-density mixed-use and residential developments, including the nearby Sursum Corda redevelopment project (Z.C. Case No. 15-20), the substantial influx of market rate and affordable housing into this portion of Central Washington will help meet housing needs in a high-cost area where additional density is appropriate, maximize infrastructure, create new mixed-use areas, and minimize pressure on existing residential neighborhoods (H-1.1.6, H-1.2.3, H-1.2.11). Over the past two decades, the area around the Northwest One area has changed dramatically, with several commercial and market rate residential developments constructed in the east end of downtown, including in the Mount Vernon Triangle and NoMa areas. As this area continues to grow, it is critical that existing affordable housing and public housing be preserved for the long-term (LU-2.1.2, LU-2.1.6). The proposed Zoning Map Amendment will allow the Applicant to further advance its efforts to transform the Northwest One area into an equitable, mixed-income neighborhood that adheres to the District's original NCI principles to the maximum extent possible. This includes providing an opportunity for former Temple Court residents to return under similar tenancy qualifications, implementing one-for-one replacement of public housing units at comparable affordability levels and unit sizes, and continued acceptance of tenant-based vouchers (LU-1.4.4, LU-2.1.1, LU-2.1.9).

In conducting its evaluation of the proposed Zoning Map Amendment against Housing Element policies, the Applicant identified a potential partial policy inconsistency that is addressed in detail below. This potential inconsistency pertains to the portion of Policy H-1.4.4 (Public Housing Renovation) that requires renovation of public housing to achieve all of the anti-displacement strategies set forth in Section 510.4a of the Housing Element, including the strategy to “build replacement affordable units first prior to any off-site physical relocation from existing affordable units, or provide appropriate offsite affordable units as new permanent housing within the project neighborhood, if necessary due to site constraints.”

Housing Element Policies Advanced by the Application

H-1.1: Expanding Housing Supply

- H-1.1.1: Private Sector Support
- H-1.1.3: Balanced Growth
- H-1.1.4: Mixed-Use Development
- H-1.1.6: Housing in Central Washington
- H-1.1.8: Production of Housing in High-Cost Areas

H-1.2: Ensuring Housing Affordability

- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- **H-1.2.2: Production Target**
- **H-1.2.3: Affordable and Mixed Income Housing**
- H-1.2.4: Housing Affordability on Publicly Owned Sites
- H-1.2.11: Inclusive Mixed-Income Neighborhoods

H-1.4: Housing and Neighborhood Revitalization

- H-1.4.4: Public Housing Renovation

H-2.1: Preservation of Affordable Housing

- **H-2.1.1: Redeveloping Existing Income-restricted Affordable Housing**
- **H-2.1.2: Preserving Affordable Rental Housing**
- **H-2.1.6: Long-Term Affordability Restrictions**
- **H-2.1.9: Redevelopment of Affordable Housing**

ENVIRONMENTAL PROTECTION ELEMENT EVALUATION

The Applicant has determined that the proposed Zoning Map Amendment is not inconsistent with the policies of the Environmental Protection Element. The proposal is necessary for the Applicant to advance redevelopment of the Property with new housing in accordance with the LDDA with the District, including a substantial amount of affordable housing and replacement housing. The redevelopment that is facilitated by the proposal will help reduce urban heat island effect by replacing the existing surface parking lots on the Property with a new, sustainably designed building that employs many sustainable design strategies, including green roofs and sustainable stormwater management (E-1.1.2, E-4.2.1).

Environmental Protection Element Policies Advanced by the Application

E-1.1: Preparing for and Responding to Natural Hazards

- **E-1.1.2: Urban Heat Island Mitigation**

E-4.2: Promoting Green Building

- E-4.2.1: Support for Green Buildings

URBAN DESIGN ELEMENT EVALUATION

The Applicant finds the proposed Zoning Map Amendment to be not inconsistent with the policies of the Urban Design Element. Currently, the Property is improved with surface parking which is not suitable or appropriate considering the site's Central Washington location, and position along the prominent North Capitol Street corridor. The development that will be facilitated by the proposed rezoning will replace the existing surface parking with a new, high-rise residential development, with potential ground-floor retail space, that will reinforce the historic Plan of the City of Washington by activating the Property and adjacent public realm and strengthening the street wall along the North Capitol Street and K Street corridors (UD-1.1.2, UD-1.4.1). Not only will future redevelopment significantly improve these corridors physically and programmatically, it will also improve the visual quality along these corridors, and in particular the viewshed toward the U.S. Capitol along North Capitol Street (UD-1.1.3, UD-1.4.3).

Urban Design Element Policies Advanced by the Application

UD-1.1: Building on Washington, DC's Historic Plan

- UD-1.1.2: Reinforcing L'Enfant's 1791 Plan for the City of Washington and Olmsted Highway Plans
- UD-1.1.3: Preeminent View Corridors

UD-1.4: Enhancing Thoroughfares and Gateways

- UD-1.4.1: Thoroughfares and Urban Form
- UD-1.4.3: Thoroughfare Vistas and View Corridors

NORTHWEST ONE REDEVELOPMENT PLAN

The Property is within the boundary of the NW1 Plan, which was approved by the D.C. Council in November 2006 pursuant to the Northwest One / Sursum Corda Affordable Housing Protection, Preservation and Production Act of 2006 (D.C. Law 16-0188). The NW1 Plan is comprised of three critical components: a physical Master Plan, a Human Capital Plan, and a Development and Finance Strategy.

The NW1 Plan established steps to manage redevelopment and growth for the Northwest One neighborhood, with the primary goal of ensuring that low-income families are equipped to live and prosper in their changing neighborhood. Developed in close coordination with residents and other stakeholders, the NW 1 Plan was intended to be the roadmap for the creation and

expansion of a new socially and economically integrated neighborhood, new housing, roads, public facilities, and community amenities. In alignment with the key principles of the District's NCI, the key guiding principles of the NW 1 Plan include:

- **Development of a mixed-income community** to ensure long-term viability of the neighborhood and its current families, and provide a range of housing and amenity options for a range of incomes whereby one-third of units are deeply subsidized (30% MFI), one-third of units are affordable (30% - 80% MFI), and one-third of units are market rate (80%+ MFI);
- **One for one replacement of deeply subsidized units** to ensure that there is no net loss of the existing deeply subsidized units in the neighborhood;
- **Right of return / right to stay** to ensure that current families will be able to afford to remain in their neighborhood if they choose and will not be excluded based on economic factors; and
- **Build first** to construct new housing on publicly controlled lands prior to the demolition of existing housing to minimize displacement and disruption.

While laudable for its overall intent, goals, and guiding principles, unfortunately the NCI program has been plagued by lengthy delays and development setbacks due to a wide range of issues. This can be said for nearly every identified NCI community, including Northwest One, which, among other things, has resulted in many former residents being displaced from the NW One neighborhood for nearly 20 years. A specific discussion of the potential causes leading to the NCI program's delays and displacement in the Northwest One community, is not germane to the proposed Zoning Map amendment or this Comp Plan evaluation. The causes and resulting delays and displacement far predate the Applicant's involvement in the redevelopment of the NW One neighborhood. However, while the NW1 Plan has not been implemented along the timeline that was originally intended, a discussion of the proposed Zoning Map amendment's consistency with certain recommendations of the NW1 Plan's physical Master Plan is appropriate.

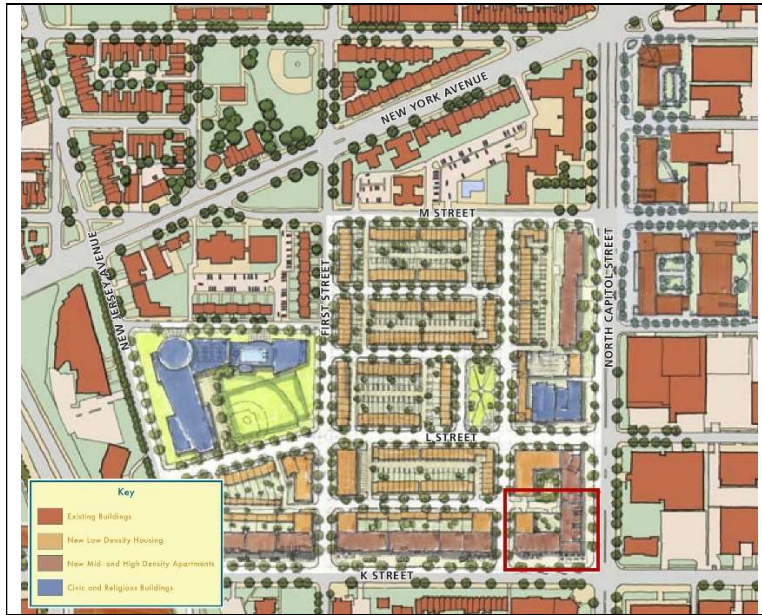


Figure 3: NW1 Plan Physical Master Plan

The NW1 Plan’s physical plan contains recommendations on housing, community assets, transportation, and urban design. As related to the proposed Zoning Map amendment, the NW1 Plan sets a program for approximately 1,560 housing units, with units divided equally in thirds to deeply subsidized, affordable, and market rate housing. In addition, the NW1 Plan recommends a series of mixed-income apartment building along K Street and North Capitol Street; the creation of new neighborhood retail, and specifically an active mix of neighborhood retail and special

uses in the ground floor along K Street; and improving the urban design along prominent streets (including K Street and North Capitol Street). With regard to new buildings, the NW1 Plan recommends tailoring height to existing right-of-ways and context, with 90 feet deemed appropriate along the west side of North Capitol Street at K Street. **Figure 3** below shows the NW1 Plan’s physical Master Plan, which recommends new mid- and high-density apartments on the Property.

The proposed Zoning Map amendment to MU-9A is consistent with applicable recommendations contained within the NW1 Plan’s physical Master Plan. The rezoning will facilitate high-density mixed-use development on the Property that will heavily favor residential use, while at the same time allowing for the type of ground-floor commercial uses envisioned along North Capitol Street and K Street.

POTENTIAL COMP PLAN INCONSISTENCIES

The foregoing Comp Plan analysis thoroughly demonstrates the numerous ways in which the proposed Zoning Map amendment aligns with the policies and goals of the Comp Plan, including the FLUM and GPM. However, as set forth in decisions by the D.C. Court of Appeals (“**Court**”), it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because there is intentional overlap within and between the Comp Plan elements, a Comp Plan evaluation must recognize any potential inconsistencies and explain why said inconsistencies are outweighed by other Comp Plan policies and/or competing considerations. The Court has provided the following specific guidance:

“The Comp Plan is a broad framework intended to guide the future land use planning decisions for the District. Thus, even if a proposal conflicts with one

or more individual policies associated with the [Comp] Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the [Comp] Plan as a whole. The Comp Plan reflects numerous occasionally competing policies and goals, and, except where specifically provided, the [Comp] Plan is not binding. Thus, the Commission may balance competing priorities in determining whether a proposal would be inconsistent with the Comp Plan as a whole. If the Commission approves a [proposal] that is inconsistent with one or more policies reflected in the [Comp] Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016) (“*McMillan*”) (internal citations and quotations omitted).

The Implementation Element reflects similar guidance: “[r]ecognize the overlapping nature of the [Comp Plan] elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6.

Consistent with the guidance provided in the Implementation Element and by the Court, the Applicant conducted a thorough Comp Plan evaluation using a racial equity lens, and, as detailed throughout this statement, finds the proposed Zoning Map Amendment to be not inconsistent with the Comp Plan when read through such racial equity lens. In conducting its evaluation, the Applicant was careful to identify any instances where the proposal may be viewed as being potentially inconsistent with certain Comp Plan policies. Upon review, the Applicant did not identify any instances where the proposed Zoning Map amendment is categorically inconsistent with specific Comp Plan policies. As such, there is no need to balance any potential inconsistencies with other competing Comp Plan policies or considerations. That said, to the extent the Commission may find the proposed Zoning Map amendment to be inconsistent with one or more individual Comp Plan policies, the Applicant submits that the following list of outweighing policies and other considerations would outweigh any such inconsistency.

Table 2: Comparison of Potential Comp Plan Inconsistencies and Competing Comp Plan Policies and Considerations	
Potential Inconsistency	Outweighing Policy / Consideration
None identified	<ul style="list-style-type: none"> FLUM designation (Mixed Use (Low Density Commercial / High Density Residential) and Mixed Use (Moderate Density Commercial / High Density Residential)) <u>Central Washington Planning Area Element</u> <ul style="list-style-type: none"> <u>CW-1.1.4: New Housing Development in Central Washington</u> <u>CW-1.1.5: Central Washington Housing Diversity</u> <u>CW-2.8.B: Northwest One New Community</u> <u>Land Use Element</u> <ul style="list-style-type: none"> LU-1.4.6: Development Along Corridors

	<ul style="list-style-type: none"> · LU-1.5.1: Infill Development <p><u>Housing Element</u></p> <ul style="list-style-type: none"> · H-1.1.1: Private Sector Support · H-1.1.6: Housing in Central Washington · H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority · H-1.2.4: Housing Affordability on Publicly Owned Sites · H-1.2.11: Inclusive Mixed-Income Neighborhoods · H-2.1.2: Preserving Affordable Rental Housing · H-2.1.6: Long-Term Affordability Restrictions · H-2.1.9: Redevelopment of Affordable Housing
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