

## **EXHIBIT H-1**

### **EVALUATION OF COMPREHENSIVE PLAN CONSISTENCY**

This Exhibit H describes how the proposed PUD modification is consistent with the Comprehensive Plan (“**Comp Plan**”) and advances a number of Comp Plan policies, particularly when viewed through a racial equity lens. The Project particularly furthers the Comp Plan’s goals to prioritize mixed income housing and home ownership opportunities in low-income areas where such housing will improve opportunities for upward mobility. The Comp Plan addresses the critical imbalance in the District between the overconcentration of affordable housing in low-cost areas and market rate housing in high-cost areas. For example, since 2015, only 330 affordable units were delivered in Ward 3, compared to 3,668 affordable units in Ward 7 and 6,183 affordable units in Ward 8.<sup>1</sup> Policies outlined in the Housing Element remedy this imbalance by encouraging affordable housing in high-cost areas and market rate housing in low-income areas. 10-A DCMR § 504.19. The Plan emphasizes the importance of “distribut[ing] mixed-income housing more equitably across the District” to “avoid further concentration of affordable housing.” § 504.10. The Project furthers this Comp Plan goal by rounding out the mixed income community of Skyland with 21 market rate units and 3 affordable units. The condominiums will diversify the unit type and affordability levels provided at Skyland. Between the 263 rentals at the Crest multifamily building, which includes 79 affordable units, the 126 townhomes, 7 of which will be affordable, and the 24 condominium units, 3 of which will be affordable, Skyland features a broad range of housing affordability. In the aggregate, over 21% of the units at Skyland will be affordable.

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<sup>1</sup> Affordable Housing, OPEN DATA DC (last updated May 19, 2025), <https://opendata.dc.gov/datasets/affordable-housing/explore?filters=eyJNQVJfV0FSRCI6WyJXYXJkIDgiXSwiU1RBVFVTX1BVQkxJQyI6WyJDb21wbGV0ZWQgMjAxNSB0byBEYXRlI19&showTable=true>

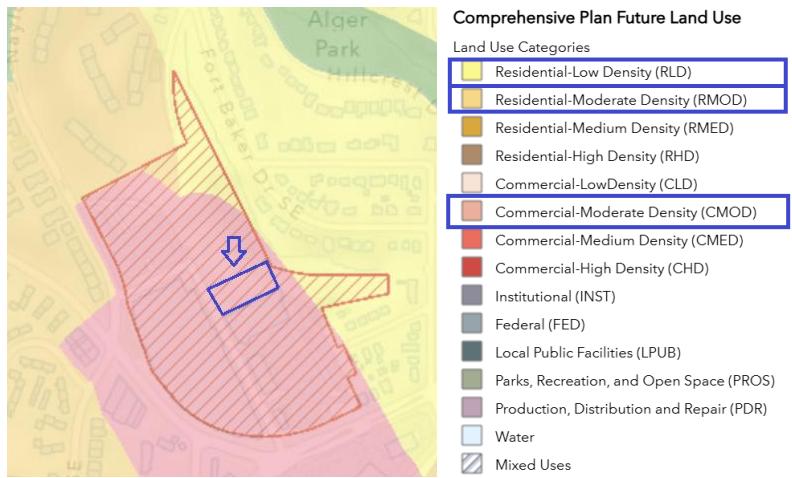
The Commission has already determined that the Approved PUD is not inconsistent with the Comp Plan and this analysis therefore is limited to the consistency of the proposed modification.

**Table 1** below identifies specific Comp Plan policies advanced by the proposed PUD modification, including specific policies identified in the Office of Planning’s Equity Crosswalk. The table is followed by a brief narrative addressing each applicable Comp Plan element. Directly below, and as shown on *Figure 1* and *Figure 2*, the Applicant explains the consistency of the proposed PUD modification with the Property’s Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”) designations.

#### Future Land Use Map

As shown on *Figure 1*, the Project will be constructed on a portion of the Property designated Moderate Density Commercial. The Moderate Density Commercial category is intended to encompass shopping and service areas greater in scale and intensity than the lower density designation. Density typically ranges between 2.5 and 4.0 FAR with greater density possible with IZ. The Framework Element explicitly calls out the MU-7 zone as appropriate for this category. § 227.11.

Figure 1



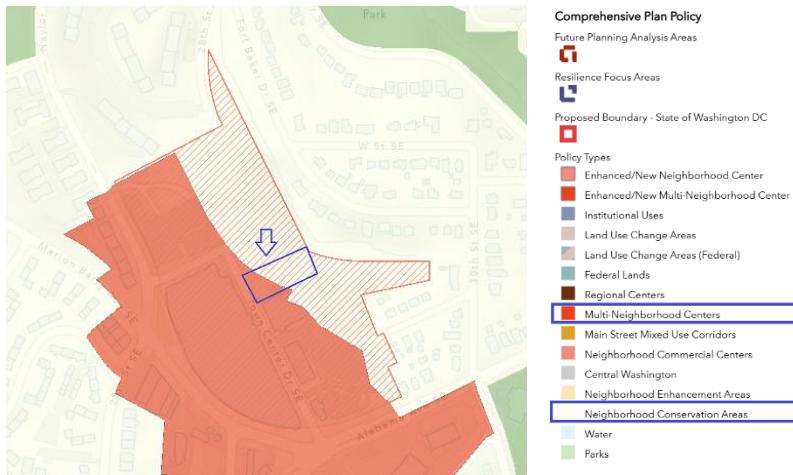
The size and scale of the Project is consistent with the Moderate Density Commercial category. One potential inconsistency with this FLUM designation is that the Project will remove the approved ground floor retail. The existing

retail space at the Skyland Town Center is only approximately 50% occupied. The Applicant desires to focus the retail uses in the portions of the Approved PUD that already include retail uses. The creation of new condominium units will provide clientele to support the existing businesses and help them thrive. Therefore, the Project continues to further the goals of the Moderate Density Commercial category by supporting the existing surrounding retail.

### Generalized Policy Map

The Property is designated as a Multi-Neighborhood Center and Neighborhood Conservation Area on the Generalized Policy Map, as shown on *Figure 2* below. The Project will cover both areas. Multi-Neighborhood Centers are found at major intersections with Skyland Town Center specifically listed as an example. *Id.* §§ 225.17 and 225.18. Neighborhood Conservation Areas are generally residential in character and the Comp Plan encourages conserving and enhancing established neighborhoods while not precluding development to address city-wide housing needs. § 225.5.

*Figure 2*



address city-wide housing needs, particularly with respect to the need for more home ownership options in Ward 7 at differing price points. The Project will improve the mix of affordability levels offered at Skyland Town Center and further racial equity goals by avoiding displacement and increasing access to opportunity.

Accordingly, the Project advances the goals of Multi-Neighborhood Centers and Neighborhood Conservation Areas by enhancing the residential character of the neighborhood with new mixed-income for-sale housing on an otherwise vacant lot.

| <b>Table 1: Summary of Comp Plan Policies Advanced by the Proposed PUD Modification</b>   |  |
|---|--|
| <b>Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.</b> |  |
| <b>Far Northeast and Southeast Area Element</b>   |  |
| FNS-1.1.2, FNS-1.1.3, FNS-2.7   |  |
| <b>Housing</b>  |  |
| H-1.1.1, H-1.1.3, H-1.1.5, H-1.1.9, H-1.2.1, <b><u>H-1.2.2, H-1.2.3</u></b> , H-1.2.5, H-1.2.11, H-1.3.2, H-1.4.2, <b><u>H-2.1.4</u></b> , H-3.1.1, H-3.1.3                 |  |
| <b>Land Use Element</b>   |  |
| <b><u>LU-1.3.6, LU-1.4.6, LU-1.5.1, LU-1.5.2, LU-2.1.2, LU-2.1.3, LU-2.1.11</u></b>   |  |
| <b>Economic Development Element</b>   |  |
| ED-3.1.1, ED-4.3.1  |  |
| <b>Urban Design Element</b>   |  |
| UD-2.1.2, UD-2.2.1, UD-2.2.5, UD-3.2.1  |  |

The Project offers infill housing that will enhance both the established and forthcoming Skyland neighborhood as well as the existing surrounding neighborhoods. The Project is purely residential and will help

### Far Northeast and Southeast Area Element

The Project develops a currently vacant lot with mixed-income housing, situated at a major intersection, fulfilling several major goals of the Far Northeast and Southeast Area (“FNS”) Area Element. The FNS Element specifically calls out Skyland as a space in which growth should be concentrated. Development at Skyland “is an important part of the District’s efforts to provide better shopping options for underserved communities, reduce the loss of retail dollars to the suburbs, and make Wards 7 and 8 more attractive to existing and future residents.” § 1717.2. A key driver behind the proposed modification is that the condominiums can deliver quickly and complete the Skyland Town Center. The Project offers new mixed-income homeownership opportunities that will support the nearby retail and on an accelerated timeline. Immediately adjacent to the town center park and nestled within the mixed-use Skyland community, the Project provides exactly the type of “safe, inviting, pedestrian-oriented place” that the FNS Area Element promotes. The Project will close out the decades-long Skyland Town Center development, completing the vision of a mixed-income, mixed-use center with a wide range of housing options and retail. (FNS-1.1.2, FNS-1.1.3, FNS-2.7).

### Housing Element

The Project greatly advances the Housing Element goals of the Comp Plan by providing new mixed-income homeownership opportunities where they are much needed in Ward 7. The Housing Element “encourag[es] affordable housing in high-cost areas and market rate housing in low-income areas.” § 504.19. The Element repeatedly emphasizes the importance of supporting paths to homeownership to enhance community stability. §§ 513.5, 513.7. Homeownership provides opportunities for upward mobility. § 506.7.

Currently, home purchases by Black households in Ward 7 are in decline. Recent analysis of the Home Mortgage Disclosure Act data shows that east of the Anacostia River, 75% of home purchase mortgages went to Black households in 2021, down from 92% in 2007.<sup>2</sup> The Southeast quadrant has the lowest homeownership rate in general with renters occupying 82% of the housing units. Owner-occupied housing is largely concentrated in northwest, central and east DC.<sup>3</sup> Homeownership provides an avenue for wealth creation, a priority of the Comp Plan, and the Project will provide important homeownership opportunities in Southeast.

The Project offers these much-needed home ownership opportunities that will support financial asset generation, particularly for low- and moderate-income households. The condominiums will be offered at a lower price point than the townhomes, diversifying the mix of affordability levels in the neighborhood. Between the existing multifamily apartment building, the under-development for-sale townhomes, and these 24 for-sale condominium units, the Project will complete a truly mixed-income community at Skyland Town Center and contribute to a more even distribution of affordability levels across the District.

The proposed modification to the GAR calculation likewise furthers these homeownership objectives by providing the new homeowners of the townhomes the freedom to care for their own properties. Although the HOA documents will govern certain design and maintenance standards, a hallmark of homeownership is independence. The requested

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<sup>2</sup> Brad Theodos and Ilina Mitra, *Homeownership and Race in DC Communities East of the Anacostia River*, URBAN INSTITUTE (February 9, 2023), <https://www.urban.org/research/publication/homeownership-and-race-dc-communities-east-anacostia-river>.

<sup>3</sup> Yesim Sayin, *Taking Stock of the District's Housing Stock: Capacity, Affordability, and Pressures on Family Housing*, D.C. POLICY CENTER (March 27, 2018), <https://www.dcpolicycenter.org/publications/taking-stock/>.

modification is a recognition of this power in homeownership and the attendant flexibility to maintain one's own lot as he or she sees fit.

In addition to the homeownership opportunities, the mix of market-rate and affordable units advance the goals of the Comp Plan. Very few market rate units were constructed in the District last year. Between 2014 to 2023, there was an average of over 5,000 market rate housing starts per year. In 2024, as of November, there were only 44 market rate housing starts according to a study done by CoStar.<sup>4</sup> As described above, affordable housing is overconcentrated in Wards 7 and 8. The Project contributes both market rate and affordable home ownership in a part of the District where such opportunities are scarce. 10-A DCMR § 504.19. (H-1.1.1, H-1.1.3, H-1.1.5, H-1.1.9, H-1.2.1, H-1.2.2, H-1.2.3, H-1.2.5, H-1.2.11, H-1.3.2, H-1.4.2, H-2.1.4, H-3.1.1, H-3.1.3).

### Land Use Element

The Land Use Element emphasizes the importance of infill development on vacant lots with a priority for development along multimodal corridors. §§ 307.14, 308.2, 308.6. The Project continues to further the Land Use Element goals by redeveloping a currently vacant lot with new housing. As described in the statement, without subsidies, the initially approved senior multifamily building cannot move forward. The Project offers a program that does not require any subsidies and can deliver quickly, avoiding years of a vacant lot and ongoing construction site. The Project will provide new homeownership opportunities along a major corridor, supporting the neighborhood retail and completing the vision of the Skyland Town Center. The Project includes at least 1:1 per unit parking spaces, offering new residents ease of

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<sup>4</sup> DCBIA Annual Meeting 2024 (November 21, 2024), at 16, available at: <https://dcbia.org/wp-content/uploads/2024/11/DCBIA-Annual-Meeting-Slides.pdf>.

transportation, improving access to opportunity. (LU-1.3.6, LU-1.4.6, LU-1.5.1, LU-1.5.2, LU-2.1.2, LU-2.1.3, LU-2.1.11).

### Economic Development Element

The Project will support the commercial vitality of the Skyland Town Center by providing new residents to support the existing businesses. With retail at the Property just over 50% occupied, the new condominiums will increase a residential base to support the retail. In addition, the new residential units will improve access to jobs by providing new residential units immediately adjacent to retail opportunities and to a major corridor. (ED-3.1.1, ED-4.3.1).

### Urban Design Element

The design of the Project will improve the neighborhood character of this infill development. The condominium units will contribute to the diversity in housing types at Skyland Town Center which also features a multifamily apartment building and townhomes. The scale of the Project will also complement the smaller scale of the nearby townhomes in comparison to the adjacent Crest multifamily building. The color scheme of the façade is intended to mimic the colors of the nearby townhomes. The Project is surrounded by thoughtfully designed landscaping that will visually connect with the Town Center Park across the street. The Project features balconies and a shared private lobby, enabling social interaction. (UD-2.1.2, UD-2.2.1, UD-2.2.5, UD-3.2.1).