

EVALUATION OF COMPREHENSIVE PLAN CONSISTENCY

INTRODUCTION AND OVERALL CONCLUSION

As set forth below, the proposed Planned Unit Development and related Zoning Map amendment to RA-3 (collectively the “**Project**” or the “**PUD**”) 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 and with other adopted public policies and active programs related to the subject site. *See* 11-X DCMR § 304.4(a). 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 Project, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination as to whether the Project 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 Property, 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. 10-A DCMR § 224.5. In this case, the Property is not within the boundaries of any adopted SAPs. However, the Property is within the boundaries of the 2015 Adams Morgan Vision Framework (the “**AM Framework**”).

The following sections of this exhibit contain the Applicant’s thorough evaluation of the Project’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 PUD and related Zoning Map amendment to RA-3 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 proposal will advance several policies within the Mid-City, Land Use, and Housing Elements related to the production of housing, including affordable housing, to achieve District housing goals, and the preservation of affordable housing in accordance with anti-displacement strategies. The Applicant has identified a few Land Use (LU-

¹D.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).

2.1.4: Rehabilitation Before Demolition) and Urban Design Element (UD-2.2.4: Transitions in Building Intensity, UD-2.2.5: Infill Development) policies with which the proposed Project could potentially be considered inconsistent. As discussed in greater detail below, the Applicant has determined that full redevelopment of the Property is necessary given the condition of the existing structure, and to achieve the desired housing program. Additionally, although the Applicant proposes to rezone the Property to RA-3 through the PUD process, the rezoning is only necessary to achieve the Project's density, while the proposed height of the Project is still within the matter-of-right height permitted under the Property's existing RA-2 zone. Notwithstanding, even if the Commission were to find the Project to be inconsistent with these few policies, such inconsistencies would be outweighed by other competing Comp Plan policies and considerations such that overall, the proposal would remain not inconsistent with the Comp Plan when read as a whole.

GENERALIZED POLICY MAP EVALUATION

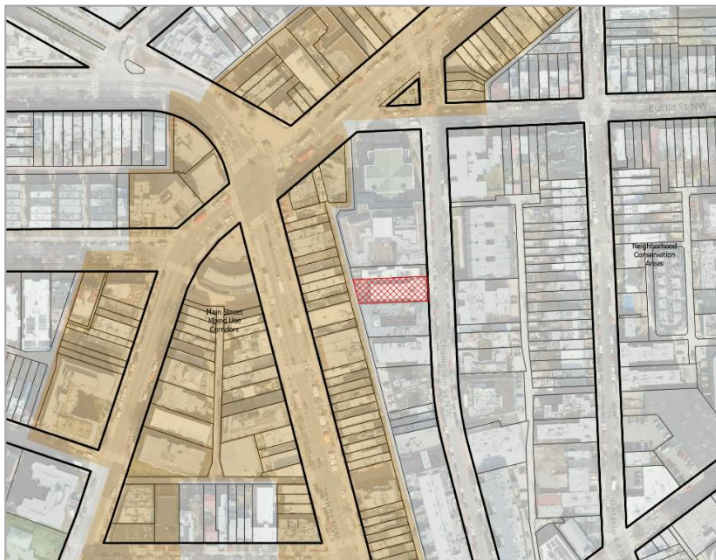


Figure 1: Excerpt of GPM showing Property within a designated Neighborhood Conservation Area.

As shown in **Figure 1**, the Property is located within a “Neighborhood Conservation Area” designation on the GPM, just east of the Adams Morgan 18th Street “Main Street Mixed Use” corridor. According to the Framework Element, Neighborhood Conservation Areas (“NCA”) “have little vacant or underutilized land and are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in

density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by [Comp Plan] policies and the [FLUM].” 10-A DCMR § 225.4. The guiding philosophy in NCAs is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. 10-A DCMR § 225.5. When sites are redeveloped, the diversity of land uses and building types within NCA’s should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities within NCAs are guided by the FLUM and relevant Comp Plan policies. “Approaches to managing context-sensitive growth in [NCAs] may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity and displacement should emphasize preserving affordable housing and enhancing services, amenities, and access to opportunities.” *Id.*

The Project is not inconsistent with the GPM. The Project will maintain the residential use of the Property by replacing an outdated multifamily building with a new, appropriately scaled and sustainably designed multifamily building that will preserve and expand the amount of affordable housing on the Property, thus helping to address the District’s housing needs without causing permanent displacement of existing residents, and without causing indirect displacement. The Project design is compatible with the scale and character of the surrounding area. Despite the proposed RA-3 zone allowing up to 75 feet under a PUD, the height of the proposed building will remain within the 50-foot height that permitted as a matter of right under the site’s existing RA-2 zone. The height and lot occupancy are also compatible with the scale, pattern, and character of the surrounding neighborhood. Notably, as shown in **Figures 2 and 3**, the 50-foot (5 stories) and approximate 80% lot occupancy of the Project falls within the ranges of heights and lot occupancies found along this block of Champlain Street.

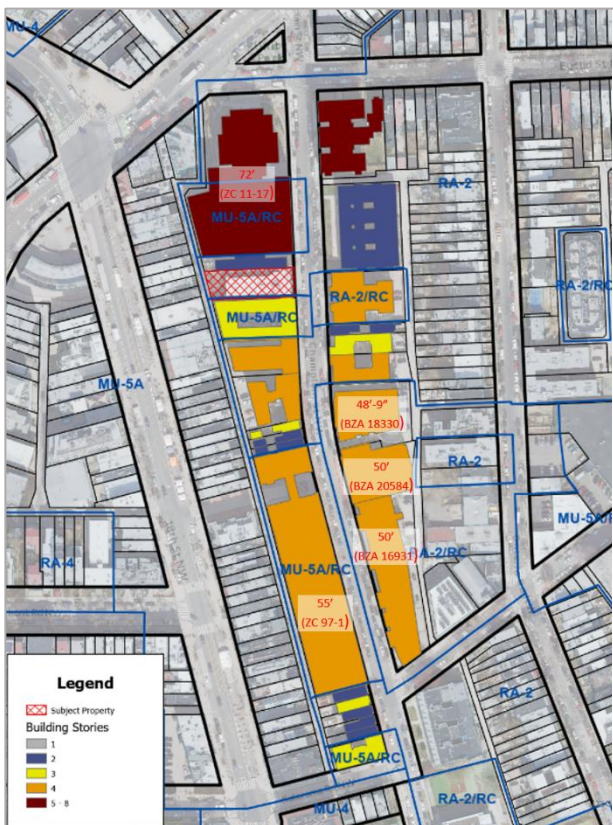


Figure 2: Analysis of approximate heights of existing buildings along 2300 block of Champlain Street NW.²

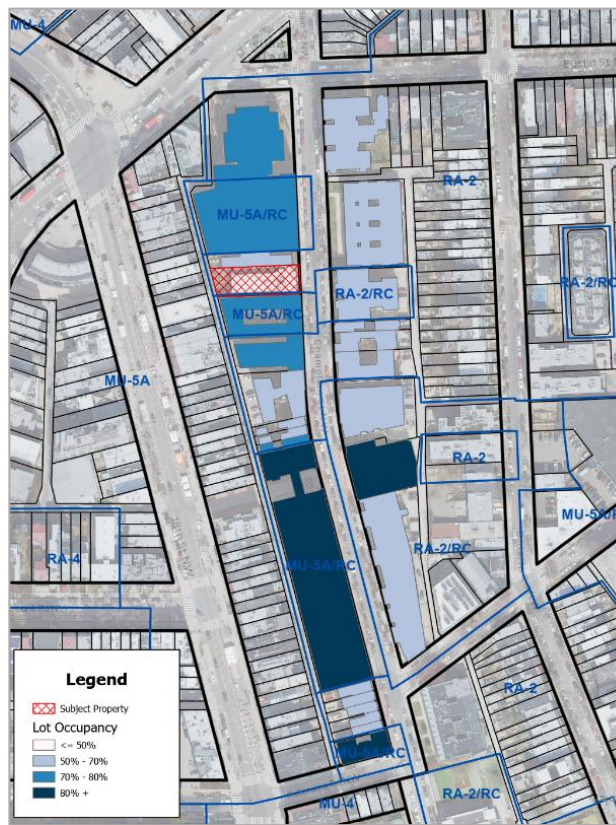


Figure 3: Analysis of approximate lot occupancies of existing buildings along 2300 block of Champlain Street NW.

² Number of stories is estimated based upon Google Streetview (multiple properties have partial below grade levels that contribute to measured height but not number of stories)

FUTURE LAND USE MAP EVALUATION



Figure 4: Excerpt of FLUM showing Property designated Moderate Density Residential

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. 10-A DCMR § 228.1(a). Densities within any given area on the FLUM reflect all contiguous properties on a block, there may be individual buildings that are larger or smaller than these ranges within each area. 10-A DCMR § 228.1(c). Similarly, the land-use category definitions describe the general character of development in each area, citing typical (matter-of-right) FARs as appropriate. The granting of density bonuses (such as through a PUD) may result in density that exceeds the typical ranges cited. *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 4**, the Property is located within an area designated as Moderate Density Residential on the FLUM. The area to the north and immediately west is designated for moderate density mixed-use development. The Framework Element describes the Moderate Density Residential land use category as defining “neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings...Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning [(“IZ”)] or when approved through a [PUD].” Emphasis added. 10-A DCMR § 227.6.

The proposed PUD, including related Zoning Map amendment to RA-3, is not inconsistent with the FLUM. As noted above, the FLUM is not a zoning map and does not prescribe specific development standards for a specific property. Rather, the FLUM is intended to be read and applied broadly by area rather than on a property-by-property basis, particularly when considering a Zoning Map amendment proposed as part of a PUD. While the proposed RA-3 zone is not one of the zones expressly referenced by the Framework Element as being consistent with the Moderate Density Residential FLUM designation, it also states that “other zones may also apply.” The

Framework Element also specifically states that “even if a zone is not identified in a category, it can be permitted as described in Section 227.2.” 10-A DCMR § 228.1(e). That section of the Framework Element describes how the Commission goes about evaluating a proposed zone district, stating that when evaluating a selected zone district, the Commission considers and balances the competing and sometimes conflicting aspects of the Comp Plan, including the policies and text; the intent of the FLUM and GPM, and the FLUM and GPM themselves. 10A DCMR § 227.2.

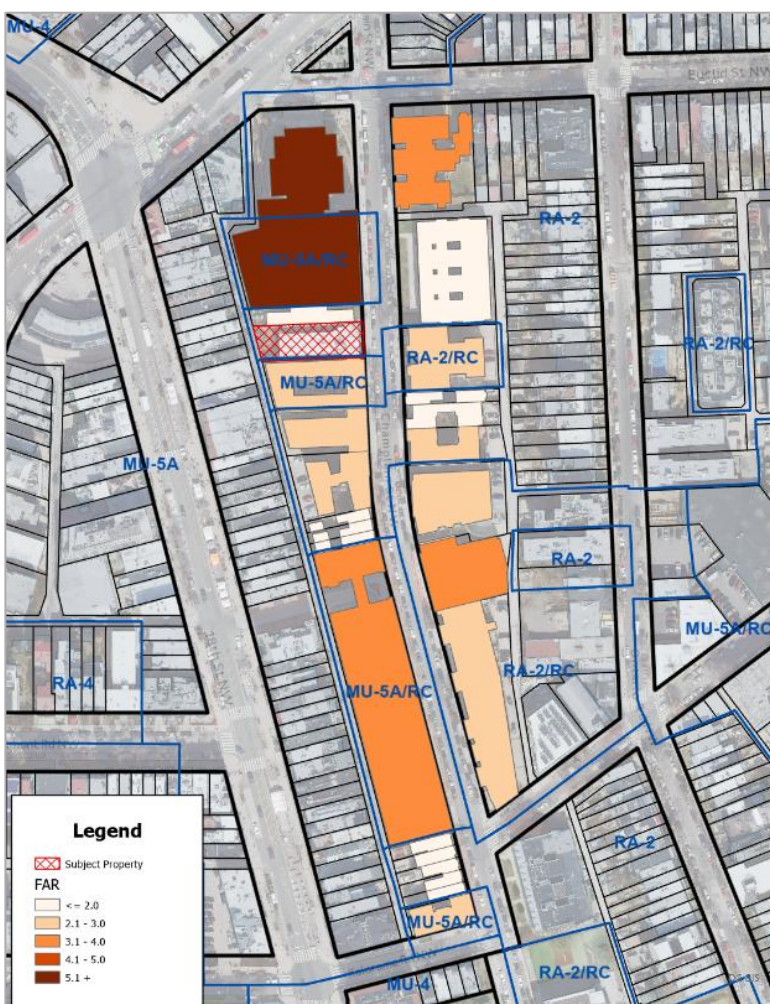


Figure 5: Evaluation of approximate density along the 2300 block of Champlain Street, NW

The Comp Plan specifically acknowledges that PUDs allow greater height and density and do not prescribe limits on height and density for PUDs. The Framework Element states “the goal of a PUD is to permit development flexibility greater than specified by matter-of-right zoning, such as increased building height or density...the Zoning Commission may include a zoning map amendment for the purpose of the PUD, which is applicable only for the duration of the PUD, and subject to PUD condition.” 10-A DCMR § 224.7.³ The reason for this wide range of flexibility for height, density, and the specific zone that can be approved is because the PUD process affords the Commission the ability to evaluate a specific project design and program to ensure that it does not result in unacceptable impacts on the surrounding area. 10-A DCMR § 227.2.

Based on the Framework Element’s guidance on PUDs, the Project is not inconsistent with the FLUM. When read together with Mid-City Area Element policy guidance, the height, density,

³ The Commission’s ability to approve a PUD-related map amendment that it might not otherwise approve as a standalone map amendment is well established. In Z.C. Order No. 05-42, the Commission stated, in relevant part, “[a] PUD map amendment is thus a temporary change to existing zoning, that does not begin until a PUD covenant is recorded, ceases if the PUD is not built, and ends once the PUD use terminates. This being the case, the Commission may grant PUD-related map amendment in circumstances where it might reject permanent rezoning.... A PUD applicant seeking a related map amendment must still demonstrate that public health, safety, and general welfare goals of the zoning regulations would be served by the amendment.”

massing, and scale of the Project are compatible with adjacent uses and are appropriate given the heights and densities of the surrounding context. As noted above, although the proposed RA-3 zone permits a maximum height of 75 feet under a PUD, the proposed Project has a maximum height of 50 feet, which is consistent with the matter-of-right height permitted under the site's existing RA-2 zoning (a zone that is specifically referenced in the Framework Element as being consistent with the Moderate Density FLUM category). Indeed, the Applicant only needs the proposed RA-3 zone to accommodate the Project's density (3.91 FAR) on its own site, which by itself could be described as a medium density building. However, as stated in the Framework Element, when evaluating a proposed zone the Commission considers, in part, the intent of the FLUM, which reflects typical densities of all contiguous properties on a block that may contain buildings with higher or lower individual densities. In accordance with this guidance the Applicant evaluated the approximate overall density currently along the 2300 block of Champlain Street, which despite being predominately designated as Moderate Density Residential on the FLUM has a variety of zones including: RA-2, RA-2/RC, and MU-5A/RC. As shown in the Applicant's evaluation in **Figure 5**, along the 2300 block of Champlain Street approximate densities range from less than 2.0 FAR to greater than 5.0 FAR. Overall, the existing average density of all contiguous properties along the block – not including the proposed Project - is approximately 2.24 FAR, which is well within the 2.592 FAR that is permitted under a PUD in the moderate-density RA-2 zone, and just above the 2.16 FAR that is permitted as a matter-of-right. Inclusive of the Project, which has a density of approximately 3.91 FAR, the average density of all contiguous properties along the block increases to approximately 2.31 FAR. As such, the proposed Project is not inconsistent with the FLUM since the overall density along the 2300 block of Champlain Street will remain well within the density that is contemplated for an area designated for moderate density residential use.

MID-CITY AREA ELEMENT EVALUATION



Figure 6: Rendering showing height and massing of the proposed Project in relation to the existing scale and pattern of development of the surrounding context

The proposed PUD is not inconsistent with the policies set forth in the Mid-City (“MC”) Area Element. Generally, the surrounding area is a densely developed mixed use neighborhood characterized by commercial uses concentrated along 18th Street and Columbia Road surrounded by residential areas that have moderately scaled building heights with some larger buildings that either pre-date zoning or were constructed through the PUD process. As shown in **Figure 6**, the proposed

PUD will retain the multi-family residential use on the Property and its design, height, and density are compatible with the scale and character of the surrounding neighborhood. (MC-1.1.1, MC-2.4.1, MC-2.4.3, MC-2.4.5.) Further, the Project will preserve the existing 32 units of housing on the Property that are subject to an affordable housing covenant that is nearing expiration and add

an additional fourteen (14) units of new affordable housing, all of which will be provided for the life of the Project. (MC-1.1.7, MC-1.2.1.) While maintaining compatibility with the surrounding neighborhood, the Project design will also improve the environmental sustainability of the Property and the neighborhood, including improvements to surface water runoff, by maximizing use of green roofs and pervious surfaces on the site. (MC-1.1.12.)

Mid-City Area Element Policies Advanced by the Application⁴

MC-1.1: Guiding Growth and Neighborhood Conservation

- MC-1.1.1: Neighborhood Conservation
- MC-1.1.7: Preservation of Affordable Housing
- MC-1.1.12: Green Development Practices

MC-1.2: Conserving and Enhancing Community Resources

- MC-1.2.1: Cultural Diversity

MC-2.4: Adams Morgan

- MC-2.4.1: Creating an Inclusive Adams Morgan
- **MC-2.4.3: Mixed-Use Character**
- MC-2.4.5: Reed-Cooke Area

LAND USE ELEMENT EVALUATION

Overall, the proposed PUD is not inconsistent with the policies of the Land Use Element. The proposal will help the District maintain a variety of neighborhood types throughout the city by providing an appropriate amount of additional height and density for redevelopment of the Property with a new multi-family building on a site that is already zoned for multi-family development. (LU-2.1.1, LU-2.1.8.) Using District affordable housing funds and subsidies, the Project will utilize an appropriate amount of additional density to allow the Applicant to preserve all the existing affordable housing on the Property and add another twelve (12) units of affordable housing, which, at minimum, all will be devoted to households earning 80% MFI or below. (LU-2.1.2.) Not only will the Project preserve and expand affordable housing on the Property, but, as shown in the table below, it will also increase the average size of each unit type on the site.

Unit Type	Existing			Proposed		
	Count	% Total	Avg. SF	Count	% Total	Avg. SF
Studio / Efficiency	16	50%	327	19	43%	448
1 Bedroom	14	44%	515	24	55%	567
2 Bedroom	2	6%	652	1	2%	1,187
Totals	32	100%	13,742	44	100%	23,330

⁴ 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).

Through a thoughtfully conceived design that considers the scale and materiality of the surrounding context, as well as the existing building, the Project successfully balances Comp Plan goals to increase housing supply, and particularly affordable housing (in the Mid-City area), with parallel goals to further Fair Housing, protect neighborhood character, and advance sustainability and climate resilience. (LU-2.1.3).

Land Use Element Policies Advanced by the Application

LU-2.1: A District of Neighborhoods

- **LU-2.1.1: Variety of Neighborhood Types**
- **LU-2.1.2: Neighborhood Revitalization**
- LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- LU-2.1.8: Explore Approaches to Additional Density in Low- and Moderate-Density Neighborhoods

TRANSPORTATION ELEMENT EVALUATION

The Applicant has determined that the proposed PUD is not inconsistent with the Transportation Element. The Applicant, in coordination with DDOT, will prepare an analysis of the potential transportation impacts of the Project that utilizes multimodal standards rather than traditional vehicle standards to measure and mitigate potential impacts more accurately. (T-1.1.2.) The analysis will include a proposed transportation demand management (“TDM”) Plan that will be implemented by the Applicant to minimize and mitigate potential transportation impacts. (T-3.1.1.) Among other measures, the TDM Plan may include unbundling the cost of parking from the cost of renting a unit within the Project and traveler information systems that provide real-time transit arrival information. (T-3.2.D, T-3.4.1.) Given the Property’s location in proximity to a priority bus corridor running along 18th Street, NW, the preservation and increase of affordable housing on the Property will advance equitable access to transportation. (T-1.1.7.) In addition to promoting transit use, the Project will support bicycle travel by providing a minimum of sixteen (16) secure on-site bicycle parking spaces where none currently exist.

Transportation Element Policies Advanced by the Application⁴

T-1.1: Land Use: Transportation Coordination

- T-1.1.2: Land Use Impact Assessment
- **T-1.1.7: Equitable Transportation Access**

T-2.3: Bicycle Access, Facilities, and Safety

- T-2.3.B: Bicycle Facilities

T-3.1: Transportation Demand Management

- T-3.1.1: TDM Programs

T-3.2: Curbside Management and Parking

- T-3.2.D: Unbundle Parking Cost

T-3.4: Traveler Information

- T-3.4.1: Traveler Information Systems

HOUSING ELEMENT EVALUATION

The proposed PUD is not inconsistent with the Housing Element. The existing building on the Property, which contains 32 dwelling units, was constructed in the 1940s and has reached the end of its useful life, and the Applicant has determined that redevelopment of the Property is the only financially feasible option to preserving and increasing affordable housing on the site. In so doing, the Applicant will increase the average size of each unit type within the Project and will significantly improve the sustainability and climate resilience of the Property through adherence to Enterprise Green Communities standards, and is striving to achieve Net Zero energy usage by maximizing use of rooftop solar (H-1.6.5).

Through the density gained under the proposed PUD and use of District affordable financing programs, the Project will advance housing goals related to the preservation of existing, and creation of new affordable housing. (H-1.1.2, H-1.2.7, H-1.2.8, H-2.1.5.) Specifically, through the preservation of 32 existing affordable units and creation of twelve (12) new affordable units the Project will help achieve the housing goals for low- and moderate-income households set forth in the Housing Element (15% of all housing units per Planning Area) and the 2019 Housing Equity report (12,000 new or newly covenanted affordable units by 2025). (H-1.2.1, H-1.2.2, H-1.2.5.) In particular, the preservation of the existing affordable housing on the Property, combined with the temporary relocation assistance and guaranteed right of return protections that will be put in place by the Applicant's tenant relocation plan, will help ensure the Mid-City Planning Area remains racially and economically diverse. (H-1.2.9, H-2.1.9.) This is particularly important in the Adams Morgan neighborhood considering the substantial demographic and socio-economic changes that have occurred in these areas over the past two decades. (H-1.2.11, H-2.1.2.) While the existing affordable housing on the Property is subject to a housing affordability covenant that is nearing expiration, the new and preserved affordable housing proposed by the Applicant will be set aside as affordable housing for the life of the Project. (H-2.1.6.) Given the small size of the Property, the Applicant is unable to employ a build first approach to the Project. As such, in partnership with existing tenants and Housing Help Plus, a non-profit organization that provides temporary tenant relocation services, the Applicant will execute a comprehensive temporary relocation plan that will provide existing tenants off-site housing that is comparable to their existing units and at the same rent levels. As will be set forth in the relocation plan, following construction existing tenants will have a guaranteed right to return to a comparable unit at the same rent level within the newly constructed Project. (H-1.2.10, H-2.1.1, H-2.1.4.)

Housing Element Policies Advanced by the Application

H-1.1: Expanding Housing Supply

- H-1.1.2: Production Incentives

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-1.2.5: Moderate-Income Housing
- H-1.2.7: Density Bonuses for Affordable Housing
- H-1.2.8: District Housing Finance Agency (DCHFA)
- **H-1.2.9: Advancing Diversity and Equity of Planning Areas**
- H-1.2.10: Redevelopment of Existing Subsidized and Naturally Occurring Affordable Housing
- H-1.2.11: Inclusive Mixed-Income Neighborhoods

H-1.6: Sustainability and Resilience

- H-1.6.5: Net-Zero, Energy Efficient Housing

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-2.1.4: Avoiding Displacement**
- **H-2.1.5: Conversion of At-Risk Rentals to Affordable Units**
- **H-2.1.6: Long-Term Affordability Restrictions**
- **H-2.1.9: Redevelopment of Affordable Housing**

ENVIRONMENTAL PROTECTION ELEMENT EVALUATION

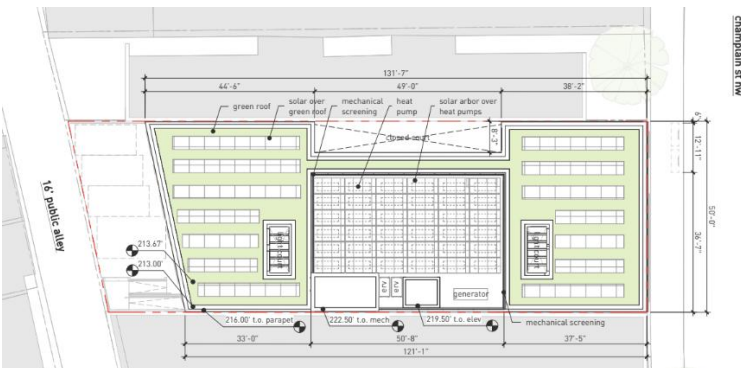


Figure 7: Proposed roof plan of the Project showing significant extent of green roof area and rooftop solar.

The Applicant has determined that the proposed PUD is not inconsistent with the policies and objectives of the Environmental Protection Element. The existing building on the Property was constructed in the 1940s and has reached the end of its useful life. Overall, its systems are outdated and not energy efficient and the site is nearly 100% impervious and

does not provide any sustainable stormwater management. The Project will replace the existing building with a new building that is designed to achieve a minimum Enterprise Green Communities certification that will maximize usage of green roof area for stormwater management and urban heat island mitigation, an important feature of the Project given the Adams Morgan neighborhood is in an area of the District that is most impacted by extreme heat and urban heat island effect.⁵ (E-1.1.2, E-4.1.2, E-4.2.1.) As shown in **Figure 7**, the Applicant is also endeavoring to reach net zero for energy usage by maximizing the amount of rooftop solar in accordance with DOEE guidelines on rooftop solar over green roofs. (E-3.2.3, E-3.2.6, E-3.2.7.) The Applicant is currently evaluating the availability of District programs that will allow existing and new tenants to directly benefit from the energy generated by the Project's rooftop solar. (E.3.2.8.) Overall, the

⁵ <https://www.dcpolicycenter.org/publications/heat-exposure-sensitivity/>,
<https://www.dcpolicycenter.org/publications/urban-heat-islands/>,

Project's numerous sustainable design features will positively contribute to the District's sustainability and climate resilience goals, which will result in environmental improvements that benefit existing and future tenants of the Project and the District as a whole. (E-4.4.1.)

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-3.2: Conserving Energy and Reducing GHG Emissions

- E-3.2.3: Renewable Energy
- E-3.2.6: Alternative Sustainable and Innovative Energy Sources
- E-3.2.7: Energy-Efficient Building and Site Planning
- E-3.2.8: Locally Generated Electricity

E-4.1: Green Infrastructure

- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

E-4.2: Promoting Green Building

- E-4.2.1: Support for Green Buildings

E-4.4: Reducing the Environmental Impacts of Development

- E-4.4.1: Mitigating Development Impacts

URBAN DESIGN ELEMENT EVALUATION



Figure 8: Images showing relationship of the Project's height, massing, and material palette to existing buildings along the block.

The proposed PUD is not inconsistent with the policies of the Urban Design Element. In designing the Project, the Applicant has taken into consideration the prevailing scale and pattern of development of the surrounding neighborhood, taking note that building height is a primary factor of compatibility rather than density given the small scale of Champlain Street. Thus, as shown in **Figure 8**, to maintain compatibility along the block and with the neighborhood the Applicant has deliberately kept the height of the Project to 50 feet, the matter-of-right right permitted under the site's existing RA-2 zoning, rather than take advantage of the additional height that is afforded under an RA-3 PUD (75 feet). (UD-2.2.1.) As shown in **Figure 6** and the elevation in **Figure 8**,

the height of the proposed building fits comfortably within the range of heights along the block and in the immediate surroundings. Additionally, the Applicant is proposing a warm material palette comprised of brick and bronze-colored “storefront,” window cladding, and trim, which give the Project an elevated design quality, relate to the materials that are common along the block, and reference the existing building on the Property. (UD-4.2.4.) Due to the narrowness of Champlain Street, the Applicant is unable to incorporate bay projections into the Project, which are often utilized to modulate façades and establish a residential character for a building. Absent bay projections, the Applicant has given the front façade visual depth by recessing the ground floor entrance and window system and using extended window frames and perforated metal screens on the upper floors. Together with the proposed material palette, these design tactics are effective at breaking up the front façade and relating the building to the rhythm and scale of this block of Champlain Street.

Urban Design Element Policies Advanced by the Application

UD-2.2: Designing for Vibrant Neighborhoods

- UD-2.2.1: Neighborhood Character and Identity

UD-4.2: Designing Architecture for People

- UD-4.2.4: Creating Engaging Facades

ADAMS MORGAN VISION FRAMEWORK

The Property is within the boundary of the AM Framework, which was prepared in 2015 by the DC Office of Planning (“OP”). The AM Framework “provides strategic planning direction that seeks to reinforce the long-standing character and identity of the neighborhood through a number of short- and long-term actions with the overarching goal of remaining a textured and vibrant neighborhood and outstanding place to live.” AM Framework at p.2. The goals and recommendations of the AM Framework were informed by community values (**Figure 9**) that were identified during OP’s engagement process which, as they relate to the Project, include promoting community diversity, protecting neighborhood character, advancing neighborhood sustainability, and protecting affordable housing. AM Framework at p.6.

The Project is consistent with many of the AM Framework recommendations, and particularly those relating to advancing neighborhood sustainability. Specifically, the AM Framework recommends achieving a 25% target for high performing roofs (e.g., solar, green, white roofs) for residential and commercial properties, and supports provisions in PUDs that encourage developers to go beyond Green Building Act requirements. The Project adheres to both recommendations. As stated above and shown in **Figure 7**, the Project is designed to Enterprise Green Communities Certification standards and includes a significant amount of green roof and rooftop solar which will provide habitat, help mitigate urban heat island effect, reduce energy consumption, and promote renewable energy production. The Applicant’s commitment to Enterprise Green Communities Certification standards exceeds Green Building Act requirements. Further, the Applicant is also striving to achieve Net Zero energy usage for the Project and is currently exploring available programs that will allow tenants of the Project to directly benefit from the proposed rooftop solar.

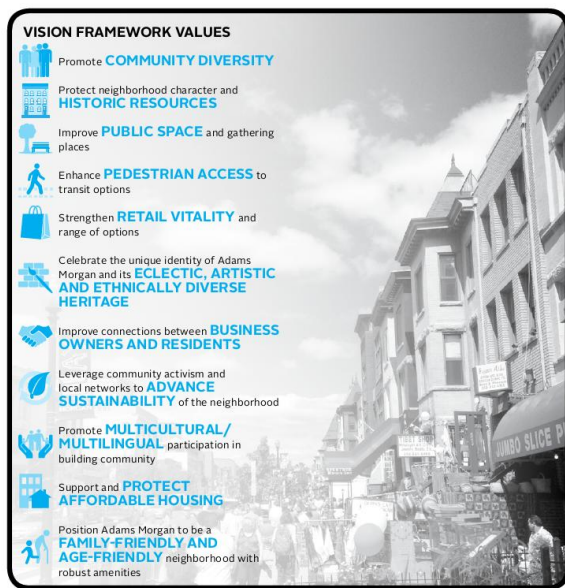


Figure 9: AM Framework values identified during OP's community engagement process.

The Project is also consistent with the AM Framework's recommendations for preserving and strengthening neighborhood character and identity. According to the AM Framework, "the area's apartment buildings similarly offer a range of forms and styles, from the smaller-scale, early 20th-century examples with projecting bays and bracketed cornices borrowed from the architectural vocabulary of the neighborhood's rowhouses to the larger-scale multi-story ones that offer new materials and treatments." AM Framework at p.18. To achieve the goal of preserving neighborhood character, the AM Framework recommends that new construction and additions should defer and reinforce the importance of historic character, pedestrian-friendly streets, housing affordability, aging in place, and preserving of housing stock. The AM Framework also calls for the preservation and

creation of affordable housing to preserve Adams Morgan's demographic and economic diversity. To do so, the AM Framework specifically recommends establishment of targets that exceed Inclusionary Zoning requirements in PUDs and seeking citywide subsidy sources for affordable housing. Consistent with these recommendations, the Project will utilize District affordable housing programs to preserve all 32 of the existing income restricted housing units on the Property and create twelve (12) new affordable units, all of which will remain dedicated affordable housing for the life of the Project.

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 explained in multiple 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 potential inconsistencies and explain why the 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 Project 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 inconsistent with certain Comp Plan policies.

Potential Comp Plan Inconsistencies Evaluation

The potential inconsistencies present in the proposed PUD relate to policies that call for rehabilitation of existing buildings before demolition, and avoidance of overwhelming contrasts in building intensity and scale during infill development or redevelopment of sites. As discussed below and shown in **Table 2**, the Applicant believes the potential inconsistencies with these policies are outweighed by the Project’s consistency with Mid-City Area Element policies supporting the preservation of affordable housing, increasing inclusivity, and sustainability, as well as other Housing and Environmental Protection Element policies that will be advanced by the Project.

Table 2: Comparison of Potential Comp Plan Inconsistencies and Competing Comp Plan Policies and Considerations	
Potential Inconsistency	Outweighing Policy / Consideration
<ul style="list-style-type: none"> · LU-2.1.4: Rehabilitation Before Demolition · UD-2.2.4: Transitions in Building Intensity · UD-2.2.5: Infill Development 	Consistency with Adams Morgan Vision Framework
	<u>Mid-City Planning Area Element</u>
	<ul style="list-style-type: none"> · MC-1.1.7: Preservation of Affordable Housing · MC-2.4.1: Creating an Inclusive Adams Morgan
	<u>Housing Element</u> <ul style="list-style-type: none"> · H-2.1.1: Redeveloping Existing Income-restricted Affordable Housing

	<ul style="list-style-type: none"> · H-2.1.2: Preserving Affordable Rental Housing · H-2.1.5: Conversion of At-Risk Rentals to Affordable Units · H-2.1.6: Long-Term Affordability Restrictions · H-2.1.9: Redevelopment of Affordable Housing <p><u>Environmental Protection Element</u></p> <ul style="list-style-type: none"> · <u>E-1.1.2: Urban Heat Island Mitigation</u> · E-3.2.3: Renewable Energy · E-3.2.6: Alternative Sustainable and Innovative Energy Sources · E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
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Policy Related to Rehabilitation of Existing Buildings Before Demolition



Figure 10: Photograph of front facade of existing building showing entrance raised above sidewalk level.

Land Use Element policy LU-2.1.4 encourages rehabilitation and adaptive reuse of architecturally or historically significant existing buildings rather than demolition. The existing building on the Property is a three (3)-story plus basement brick structure that was constructed in the 1940s. As noted earlier, it has reached the end of its useful life and has suffered from years of deferred maintenance. As shown in **Figure 10**, the current entrance to the building is also raised above the sidewalk which creates accessibility challenges. Finally, the building is setback from the sidewalk by approximately seven (7) feet, which

effectively would eliminate the front portion of the lot from any development if the Applicant opted to rehabilitate and expand the existing building. Instead, the Applicant would have to build fewer new dwelling units or a taller building to achieve the proposed development project, which is not an ideal solution considering the sensitivity expressed in the Comp Plan regarding building heights in the Adans Morgan / Reed-Cooke area. Based on the foregoing, the Applicant determined that redevelopment of the Property with a new building that preserved the 32 existing affordable units and added another twelve (12) new affordable units was the most appropriate development scenario for the Property. While this approach may be inconsistent LU-2.1.4, the Applicant believe this inconsistency is outweighed by the Project consistency with Mid-City Area Element and

Housing Element policies that support preservation and increase of affordable housing, redevelopment of existing income-restricted affordable housing, conversion of at-risk rentals to affordable units, and long-term affordability requirements. (MC-1.1.7, MC-2.4.1, H-2.1.1, H-2.1.2, H-2.1.5, H-2.1.6, H-2.1.9.)

Policies Related to Infill Development and Transitions in Building Height



Figure 11: Photographs showing existing range of building heights along the 2300 block of Champlain Street

Urban Design Element policy UD-2.2.4 calls for design of transitions between large- and small-scale developments, noting that “the relationship between taller, more visually prominent buildings and lower, small buildings (such as single-family or row houses) can be made more pleasing and gradual through a variety of context-specific design strategies,” such as a slender massing of taller elements, upper-level step backs, strategic placement of taller elements, or open-space frontages. 10-A DCMR § 909.9. In addition, policy UD-2.2.5 states that “new construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood,” and to avoid overpowering contrasts of scale and height as infill development occurs. 10-A DCMR § 909.10. As discussed above, the scale of the Project fits within the overall scale and development pattern of Champlain Street and the vicinity. As shown in **Figure 11**, the 2300 block of Champlain Street is characterized by a wide range of building heights. As shown in **Figure 2**, most buildings along the block contain four (4) stories with some two (2)- and three (3)-story buildings intermixed and a couple taller buildings at the north end of the block, namely the Line DC Hotel and the Cortland apartment building which contain seven (7) stories and six (6) stories, respectively. When considering the Project in relation to the overall



Figure 12: Rendering showing proposed building in relation to the existing apartment building to the immediate north of the Property.

one (1) story above the sidewalk. Due to the grade along Champlain Street, the difference in height between the existing building on the Property and North Apartment is only approximately 5–7 feet.

As shown in **Figure 12**, following construction of the Project the difference in height will increase to approximately 15–17 feet. The Applicant notes that height differences of this extent (approximately 1–1.5 stories) between abutting properties are common, and in fact exist on the same block. Furthermore, a far more extreme contrast in scale and height already exists between the North Apartment and the Line DC Hotel to the immediate north. The Line DC Hotel was constructed pursuant to a PUD that was approved by the Commission in 2013 (Z.C. Order No. 11-17), and the Comp Plan in effect at the time contained the same Urban Design Element policies that are being discussed herein. Based on the foregoing, while the Project will be taller than the North Apartment, and this difference in height will likely be perceptible at street level, the Applicant does not necessarily consider this height difference to be an “overpowering contrasts of scale and height.” Thus, the Applicant does not think the Project is inconsistent with UD-2.2.4 or UD-2.2.5. However, should the Commission conclude that the Project is inconsistent with these two policies, the Applicant submits that any such inconsistency would be greatly outweighed by the Project’s consistency with the Mid-City Area Element and Housing Element policies that were noted in the discussion regarding demolition of the existing building (MC-1.1.7, MC-2.4.1, H-2.1.1, H-2.1.2, H-2.1.5, H-2.1.6, H-2.1.9.) Further, the Project’s consistency with Environmental Protection Elements regarding mitigation of urban heat island effects, use green infrastructure, and renewable energy would also contribute to outweighing any potential inconsistency. (E-1.1.2, E-3.2.3, E-3.2.6, E-4.1.2.)

surrounding context of buildings, the Applicant believes a strong case can be made that the Project is not inconsistent with these two Urban Design Element policies. The mass and scale of the Project sit comfortably within the existing development pattern of the neighborhood and does not cause any incompatible contrasts in scale. The Project will, however, change the relationship between the improvements on the Property and the apartment building to the immediate north (“**North Apartment**”), which sits approximately