

**APPLICATION OF THE DOUGLASS LLC FOR REVIEW OF BUILDINGS AND
STRUCTURES IN THE NHR ZONE**



LOT 97 IN SQUARE 5860

I. Introduction

This application is submitted on behalf of The Douglass LLC (the “**Applicant**”) for Zoning Commission review and approval of new construction at 632 Howard Road SE. The property is comprised of Lot 97 in Square 5860, as detailed in the Plat attached as Exhibit D (the “**Property**”). The Property is comprised of approximately 92,303 square feet of land area and is located in the Northern Howard Road (“**NHR**”) Zone District.

The Property currently contains a concrete pad but is otherwise unimproved. The Applicant intends to build a mixed-use building containing approximately 748 residential units and approximately 46,685 square feet of retail, grocery, and restaurant space (the “**Project**”). The Project will have a total gross floor area of approximately 739,261 square feet, equating to a total floor area ratio (“**FAR**”) of approximately 8.01. The Project will be built to a maximum height of 130 feet and a lot occupancy of approximately 90%. The Project will include approximately 355 parking spaces and residential and commercial loading, all of which will be accessed from the 45-foot wide public easement accessed from Howard Road SE.

The Property is located in Ward 8 along Howard Road SE between South Capitol Street SE and I-295. The Property is immediately south of Anacostia Park – Section C and two blocks from the Anacostia Metrorail station. The Property is designated for Mixed Use: High Density Residential/High Density Commercial/Institutional uses on the Future Land Use Map of the District of Columbia Comprehensive Plan.

The Project serves as the first step in developing the Bridge District, the un- and underdeveloped property between the new Frederick Douglass Memorial Bridge and the Anacostia Metrorail station. The Project would facilitate the beginning of this development with a mixed-use building providing ground-floor activation, community-serving retail, and ample housing opportunities, including significant affordable housing.

II. Jurisdiction of the Zoning Commission

The Zoning Commission has jurisdiction to grant approval of the proposed development pursuant to Subtitle K, Section 1005 and Subtitle X, Section 603 of the Zoning Regulations.

III. North Howard Road Zone

The Northern Howard Road zone was established in order to promote seven primary goals:

- a. Assure development of the area with a mixture of residential and commercial uses, and a suitable height, bulk, and design of buildings, as generally indicated in the Comprehensive Plan;
- b. Encourage a variety of visitor-related uses, such as retail, service, and entertainment;
- c. Provide for increased height and density associated with increased affordable housing;

- d. Encourage superior architecture and design in all buildings and publicly accessible outdoor spaces;
- e. Require preferred ground-level retail and service uses along Howard Road, S.E.;
- f. Provide for the development of Howard Road, S.E. as a pedestrian- and bicycle-friendly street, with street-activating uses, and connections to metro and the broader neighborhood; and; and
- g. Encourage the inclusion of a bicycle track along Howard Road.

11-K DCMR § 1000.2

IV. Description of Property

The Property is a corner lot fronting on Howard Road SE to the south, South Capitol Street SE to the west, the National Park Service’s Anacostia Park to the north, and other private property owned by Applicant affiliates to the east. The Property is located immediately west of the Anacostia Metrorail Station and within view of the Anacostia River. The Property contains approximately 92,303 square feet of land area and is located in the NHR Zone. The Property is currently unimproved except for a concrete pad. Pictures of the Property and the surrounding properties are included in the plans attached as Exhibit E (the “**Plans**”).

The Property is part of a larger area referred to as The Bridge District (formerly known as Columbian Quarter), which consists of much of the land on either side of Howard Road in between South Capitol Street to the west and I-295 to the east. The Bridge District is being developed by the Applicant and its affiliates. The Bridge District is in the NHR Zone.

V. Description of Project

The Project will be the first development in the Bridge District and in the overall NHR zone. As such, it serves as the cornerstone of the future community on this largely undeveloped land. The Project is located on the northwestern end of the Bridge District and will serve as the western bookend to the Bridge District, with the eastern bookend being the Anacostia Metrorail station. The Project provides the start needed in the Bridge District to create a thriving, high-density neighborhood with a mix of residential, including affordable residential, retail, including community-serving and local retail, entertainment, and office uses. The Project also presents the beginning of the public space improvements and surrounding community improvements that are being made as part of the development of the Bridge District.

The Applicant proposes to develop the Property with a mixed-use building with residential and retail uses (the “**Building**”). The Project will have an FAR of 8.01, a maximum building height of 130 feet, and will occupy approximately 90% of the Property. The Project will provide approximately 748 residential units, approximately 46,685 square feet of commercial space, dedicated to eating and drinking establishments and retail, including grocery use, 355 vehicular parking spaces, and approximately 255 long-term bicycle parking spaces. More detailed zoning tabulations are included in on A1.02 of the Plans.

The Building is designed to provide a key visual opening to the Bridge District and is complementary to the high-quality, high-density development on the opposite side of the Anacostia River. The Project is highly articulated as a series of three sections over an approximately 24-foot, pedestrian-scaled retail base. The Project breaks up the massing with five terraces beginning at the second level. Additionally, by varying the materials within each of the three sections, the Building provides an interesting visual experience breaking up the overall length and massing of the Building into three distinct experiences. The break between the eastern and central portions of the Building is 45 feet wide and provides a public access easement for pedestrian, vehicular, and bicycle access to the Project. Additionally, at the east end of the Property, the Applicant will be constructing an approximately 30 foot wide woonerf that will also provide an area focused on pedestrian and bicycle, access which will be an activated space and a de facto extension of the immediately adjacent retail. The woonerf area will include approximately 30 feet of the Property and will be expanded during the Applicant's future development of the parcel to the east.

The entire perimeter of the ground floor, with the exception of the residential entry, is devoted to retail and restaurant uses, activating Howard Road with these preferred uses and highly designed storefronts. This includes an approximately 15,000 - 25,000 square foot space on the west side of the Building anticipated for a grocery store which is a priority for the Project. The Project also contains retail use in the mezzanine space. The ground floor of the Project is bifurcated by a 45-foot public access easement that connects Howard Road SE to the northern Anacostia Park area. The 45-foot public access easement provides vehicle and pedestrian connection from Howard Road to the north side of the Property. It also serves as a future connection point to Anacostia Park and potential future development in that area. This public access easement also provides additional entrance points for the retail at the center of the Project.

The upper floors of the Project provide approximately 748 residential units in three sections each connected by a narrower double-loaded corridor component. The Project's 748 units include a variety of unit types, from studios to three-bedroom units. Additionally, approximately 85% of the residential units have balconies. As has become especially apparent during the COVID-19 pandemic, the Applicant recognizes the vital importance of private, outdoor space for residents. Therefore, there is approximately 56,000 square feet private balcony space in the Project which ensures that residents will always be able to access outdoor space, with the vast majority of residents accessing outdoor space via their units.

The Project's residential use includes 12% of the residential floor area devoted to affordable housing, as required in the NHR zoning designation. In total, the Project provides over 58,000 square feet of affordable housing set aside at 50% and 60% of the Median Family Income ("MFI"). In total, the Project provides 77 affordable units, including 29 three-bedroom affordable units.

The eastern, central, and western wings are each articulated with distinct materials and architectural compositions that further break down the scale of the Building and create visual interest to the facades. The eastern wing features a shifting expression of horizontal balconies, the central wing features a grid composition, and the western wing features a distinct vertical

tower expression. While unique, each of these compositions share a common design language including natural-toned cementitious cladding, ample glazing, articulated floor lines, and a plethora of balconies that creates a unified composition and neighborhood identity. The base of the Building is extremely transparent, with a high percentage of glazing that provides views into the active ground floor uses. This glazing is broken up by a diverse mix of natural and biophilic materials including exposed architectural concrete, wood or wood-look paneling, green walls, and cementitious paneling.

The Project's circulation centers around the ground floor break bifurcating the Building into two components. The 45-foot access easement that provides this bifurcation is the sole vehicular access point for the Project. Off of this easement area, the Project provides access to below-grade parking and interior loading facilities to serve the Building.

Additionally, the Project includes significant bicycle infrastructure to support bicycle usage and circulation. The Project provides long-term storage for 250 bicycles (residential) and 5 bicycles (retail) and short-term storage for 38 bicycles (residential) and 15 bicycles (retail). Long-term residential bicycle storage exceeds the minimum zoning requirements to give ample access to residents. A ground level entry off of the future promenade and dedicated elevator provides quick and safe travel between the storage areas and the regional trail network. These facilities open the Building to the growing population of bicyclists in the District and encourages environmentally friendly travel, reinforcing the existing bicycle infrastructure and anticipating future development.

Finally, the Project is designed to provide essentially 360-degree pedestrian circulation. Howard Road serves as the primary pedestrian area with multiple retail access points activating the streetscape. The ground floor is designed with significant floor-to-ceiling clearance, large windows creating an open, active streetscape, and multiple retail and residential entrance points, creating an interactive environment for pedestrians. Additionally, the 45-foot easement area includes pedestrian dedicated space to access the park-facing side of the Property, which connects to a promenade providing access from the new oval park adjacent to the Frederick Douglass Memorial Bridge to the Anacostia Metrorail station. The overall Bridge District development will also include additional pedestrian pathways connecting to the Project's circulation plan.

As noted, the ground floor is separated by the 45-foot easement area dividing the Building into a western and eastern component. This easement area provides an open access point that provides vehicular, bicycle, and pedestrian access to the Project, its ground-floor retail, and to the north side of the Property. The easement has been negotiated with and approved by the District Department of Transportation ("DDOT"). The easement provides a clear 16 feet of clear space at all points and is open to the sky for the first 62 feet from Howard Road into the Property and for the back 28 feet of the Project. The covered area constitutes 128 feet of depth. Paving clearly delineates separate zones for pedestrians and vehicles to minimize conflicts. This area is designed to ensure there is sufficient light and air in the easement area to create a welcoming environment for both cars and pedestrians.

In addition to the public easement area, the Project includes a 30-foot wide woonerf area that will serve as the break between the Project and the Applicant's planned future development

on the site to the east. This area will be an access area intended for pedestrian and bicycle access with a focus on the pedestrian environment. The woonerf will have activated ground floor use adjacent to it. The area will be light and inviting, including street trees, and outdoor seating areas. The woonerf will serve both the Project and the public visiting the broader Bridge District.

The Project includes the creation of outdoor spaces integrated with the Building itself, and establishing a new public-realm vocabulary for additional development on Howard Road. The ground-level spaces immediately surrounding the Building are designed in coordination with future connections to Anacostia Park, local transit routes, and the larger recreational infrastructure of the Anacostia River corridor. The improved Howard Road edge will provide wider sidewalks activated by retail frontage and associated planting and seating opportunities. The new streetscape will employ Low-Impact-Development strategies, including planted stormwater infiltration beds and new street trees. New street lighting and bicycle parking will also be included along Howard Road. Additional areas for seating and circulation are provided on the north and east sides of the Project, with canopy trees and ground level plantings as appropriate to the urban context. Strategic areas of the Building façade have been identified for planted screens or vines, maximizing opportunities for vegetation within the confines of the immediate Building environs. The 45-foot wide easement area passes through the Building at ground-level, improving the Howard Road pedestrian experience by limiting truck loading, garage entries, and other sidewalk interruptions. The easement provides visual and public pedestrian connections from Howard Road north to Anacostia Park using materials and language common to the overall development. Landscape or public art features at the north and south ends provide interest and visual activation to the route. Five second floor terraces and a roof level pool deck overlook Howard Road and the surrounding Anacostia/Anacostia Park landscape, offering intensively planted recreational opportunities for Building occupants and enlivening the ground level spaces with views of greenery from above.

The Project is designed to meet a minimum LEED v.4.1 Gold certification level, providing excellent sustainability features. This rating system employs a holistic approach to sustainable design with credits addressing various aspects of the Project including site design, building energy, materials, and indoor air quality. The Building envelope is highly efficient and protective against the outdoor environment, reducing energy consumption for heating and cooling. Mechanical systems were chosen to drastically reduce the burning of fossil fuels at the Project site and to anticipate a future clean electrical grid. Solar analysis was done early on in the design and informed overall Building massing, allowing relief from harsh summer solar heat gain. Site design focused on connecting to public transportation and bicycle and pedestrian paths. A special attention to microclimate influenced the design, resulting in a targeted 40% of green roof cover of native plant species to reduce the heat-island effect on the site and mimic a natural landscape in a new development. Furthermore, embodied carbon and effect on human health and indoor air quality informs the selection of materials. In addition to these, the Project will include approximately 14,000 square feet of solar panels, designed to generate at least 1% of the Building's energy needs.

The Applicant has been working with the community, including Advisory Neighborhood Commission (“ANC”) 8A, where the Property is located, and ANC 8C, across the street from the

Property, for many years.¹ As part of that coordination, the Applicant and the ANCs plan to enter into a community agreement regarding the Bridge District development, including the Project. As part of that agreement, the Applicant will be coordinating directly with the ANCs and broader community on ways to support the community, including through the training and apprenticeship program, reduced rent for local retailers, and funding for community non-profits.

VI. The Applicant Satisfies the Burden of Proof for Zoning Commission Review of Buildings, Structures, and Uses in the NHR Zone District

Pursuant to Subtitle K, Section 1005 of the Zoning Regulations, the Applicant must demonstrate that the application satisfies the specifically delineated requirements of the NHR Zone (11-K DCMR § 1005.2). The Applicant must also satisfy the Design Review requirements set forth in Subtitle X, Section 604.

A. The Applicant Satisfies the Standards with Regard to Zoning Commission Review Under the NHR Design Review

The Applicant satisfies the NHR Design Review standards as follows.

1. The proposed project will achieve the objectives of NHR Zone as defined in Subtitle K, §1000.1 (11-K DCMR § 1005.2(a))

The Project will achieve the objectives of the NHR zone that are set forth in Section III above. The Applicant is proposing a mixed-use development, providing primarily residential units with supporting retail and restaurants. The Project includes a variety of unit types, including many three-bedroom units reserved for families earning no more than 50% MFI. Additionally, the Project includes significant retail space, occupying almost all of the ground floor, which will serve both residents and visitors to the Bridge District. These uses include grocery and restaurant uses.

The height and density of the Building are appropriate for this area and are within the height and density permitted in the NHR Zone District. Further, the Building envelope is not inconsistent with its Mixed Use: High Density Residential/High Density Commercial designation on the District of Columbia Comprehensive Plan’s Future Land Use Map (“**FLUM**”).

The Project uses high-quality materials that set the standard for the Bridge District. The three façade types provide articulation and visual differentiation, creating an attractive Building. Additionally, the public space, terrace, and landscaping improvements associated with the Project will create accessible outdoor spaces for residents and visitors to the Project.

Finally, the Project creates a pedestrian and bicycle friendly street along Howard Road, minimizing curb cuts and vehicular conflicts. In addition to the street activating uses along Howard Road, the Project provides activated space along the 45-foot public access easement area

¹ The Applicant worked with both ANC 8A and 8C during a previous Planned Unit Development (“PUD”) application for the area including the Property, as well as on a text amendment to create the NHR Zone, a map amendment to rezone the Property and other nearby property to the NHR zone, and a recent map amendment for property immediately adjacent to the Anacostia Metrorail station to the NHR zone.

and the woonerf. In addition to Howard Road, the Project will connect to a future promenade at the northern side of the Property which will provide significant bicycle and pedestrian access between the south circle off of the new Frederick Douglass Memorial Bridge and the Anacostia Metrorail station. The relocation of bike traffic from Howard Road to a dedicated bike path along the future promenade provides for a more direct connection between the Frederick Douglass Bridge and Anacostia River trail to the west and the Anacostia Metro station to the east. In addition, it minimizes vehicle and bike conflicts along Howard Road and ultimately provides a safer and more pleasant experience for riders of all ages and abilities.

2. The proposed project will help achieve the desired use mix, with the identified preferred uses specifically being residential, office, entertainment, retail, or service uses. (11-K DCMR § 1005.2(b))

This development will provide significant residential uses, which is required by Section 1001.3. In addition to these residential uses, the Project will include other preferred uses. As noted above, the Project serves as the starting point of the Bridge District. By bringing a significant number of residents, including those earning 50% and 60% of the DC MFI, to a place with currently no residents, the Project will start the Bridge District neighborhood with approximately 748 new households. Additionally, the retail and restaurant use proposed include neighborhood-serving retail, like the grocery store, and will support the new residents, as well as existing residents in the broader area.

3. The proposed project will provide streetscape connections for future development and be in context with an urban street grid. (11-K DCMR § 1005.2(c))

The Project is centered around the 45-foot public access easement, as noted above. In the easement agreement the Applicant has entered into with DDOT for this space, the Applicant has guaranteed that it will allow access through the public access area for future development to the north. Additionally, the public access easement divides the Property into segments, with approximately 264 linear feet of building to the west and approximately 140 feet to the east, mimicking an urban street grid. It should be noted that the applicant is following DDOT guidance and proposing two curb cuts on the north side of Howard Road as the final development condition. One of the two curb cuts is included in the Project and one will be included in future development plans.

4. The proposed project will minimize conflict between vehicles, bicycles, and pedestrians. (11-K DCMR § 1002.5(d))

The proposed design promotes a safe and efficient pedestrian experience, particularly along Howard Road SE which is expected to be one of two east-west pedestrian corridors for the Bridge District, along with the proposed promenade to the north. All vehicular access to the Project will be through the public access easement noted above, minimizing conflicts at the Project by providing only one curb cut. Additionally, the streetscape improvements along Howard Road as well as the public access area will be designed to maximize pedestrian and bicycle access. The site design proposes a pedestrian bump-out and a crosswalk which will provide traffic calming measures and create a safer environment for bicycles, vehicles and

pedestrians. The Project provides long-term storage for 250 bikes (residential) and 5 bikes (retail) and short-term storage for 38 bikes (residential) and 15 bikes (retail). Long term storage areas are accessed via an at-grade entrance along the north edge of the site. Access to additional storage in the garage below is provided via the service elevators at the center of the Building.

In addition, the Project is planned to be developed in conjunction with a promenade at the north of the Property. This promenade will provide pedestrian and bicycle access between the Anacostia Metrorail station and the traffic circle at the south end of the new Frederick Douglass Memorial Bridge. The promenade, in addition to the features noted above, will allow pedestrians and cyclists to choose a route completely devoid of vehicular traffic, preventing conflicts and ultimately provides a safer and more pleasant experience for riders of all ages and abilities.

5. The proposed building will minimize unarticulated blank walls adjacent to public spaces through facade articulation. (11-K DCMR § 1005.2(e))

The elevations included at A6.01-A6.06 of the Plans and the renderings included at A4.01-A4.09 of the Plans depict the proposed Building facades. The proposed Building facades are highly articulated and differentiated on each elevation, thus eliminating unarticulated blank walls adjacent to public spaces. The façade articulation is accomplished through the use of high-quality building materials, articulation and terraces, and balconies. The three masses of the Building, each with a unique façade, creates highly articulated massing with no blank walls at the Project. Of particular note, the significant incorporation of balconies provides activation on every wall of the Project. Finally, because the Project is surrounded by either public space or viewsheds, the Building is highly designed on every side.

6. The proposed project will minimize impact on the environment, as demonstrated through the provision of an evaluation of the proposal against LEED certification standards. (11-K DCMR § 1005.2(f))

The Building has been designed to achieve LEED v.4.1 Gold certification standards for New Construction, as shown on Page A1.07 of the Plans. Some of the key “green” features include approximately 14,000 square feet of solar panels, an efficient Building envelope and mechanical design, green roof cover, stormwater collection and healthy, low-embodied carbon material selection.

7. The proposed project will promote safe and active streetscapes through building articulation, landscaping, and the provision of active ground level uses. (11-K DCMR § 1005.2(g))

As described above, the proposed Building is designed to activate Howard Road as well as the park-facing north side of the Building and the woonerf area. The ground floor is highly designed with a minimum clear height of 14 feet, with a significant portion of the ground floor having significantly higher ceilings. The majority of the ground floor façade is glass and there are multiple pedestrian entrances along Howard Road, all creating significant activity on the streetscape. Additionally, the Building provides high articulation, including through balconies

and bay windows and courtyards, creating visual activity along the streetscape. Finally, the Project includes significant landscaping along Howard Road.

- 8. This application includes information regarding coordination by the applicant with the Department of Employment Services (DOES) regarding apprenticeship and training opportunities during construction and operation at the subject site, and the provision of any internship or training opportunities during construction and operation at the subject site, either with the applicant or with contractors working on the project independent of DOES. (11-K DCMR § 1005.3(a))**

The Applicant has been operating its internal apprenticeship and training program for local high school and college students for over six years. Thus far, the Applicant has employed eight students, 3 college and 5 high school, in paid internships to learn the real estate development industry. Additionally, once construction on the Project begins, the Applicant will also have internship opportunities specific to construction for students as well.

- 9. This application includes information regarding efforts by the applicant to include local businesses, especially Wards 7 and 8 businesses, in contracts for the construction or operation of the proposed project. (11-K DCMR § 1005.3(b))**

The Applicant has already undertaken efforts to attract local businesses to the Project. The Applicant has signed a lease with Sandlot for temporary retail space at the Property prior to the Project's commencement. Additionally, the Applicant has been working with F&L Construction, a local Ward 8 construction business, on site construction thus far, and intends to continue working with F&L Construction on the Project. The Applicant has also been working with the Anacostia BID to contract with a local cleaning, landscaping, and trash removal organization for site cleanup moving forward.

- 10. The project will provide retail or commercial leasing opportunities to small and local businesses, especially Ward 8 businesses, and efforts to otherwise encourage local entrepreneurship and innovation. (11-K DCMR § 1005.3(c))**

As part of coordination with the community, the Applicant will provide a 10% discount on rent for local retailers to lease at The Bridge District, including at the Project.

- 11. The project will provide information regarding coordination by the applicant with the State Archaeologist and any plans to study potential archeological resources at the subject site, and otherwise recognize local Anacostia history. (11-K DCMR § 1005.3(d))**

The Applicant has continued to study potential archeological resources at the Property and will do so throughout the development of the Project. To date, the Applicant has completed a Phase I and Phase I-B study. The Phase I-B study was completed earlier this year, and based on that study the Applicant will release the archeology team to conduct a Phase I-B/II study. The

Applicant has been coordinating with the State Historic Preservation Officer, as appropriate, throughout these studies and will continue to do so.

B. The Applicant Satisfies the Standards with Regard to Zoning Commission Design Review Under the Design Review Regulations

The Applicant satisfies the general Design Review standards as follows.

1. The Proposed Project Will Not Be Inconsistent with the Comprehensive Plan.² (11-X DCMR § 604.5)

The purposes of the Comprehensive Plan are to a) define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; b) guide executive and legislative decisions and matters affecting the District and its citizens; c) promote economic growth in jobs for District residents; d) guide private and public development in order to achieve District and community goals; e) maintain and enhance the natural and architectural assets of the District; and f) assist in conservation, stabilization and improvement of each neighborhood and community in the District (DC Code Section 1-245(b)).

The Project advances these purposes by furthering the social, economic, and physical development of the District through the construction of new residential units and retail uses on vacant and underutilized land along Howard Road, proximate to the Anacostia Metrorail Station and next to Anacostia Park. The Project furthers racial equity goals in the updated Comprehensive Plan. In particular, the Project also assists to achieve the District's goals to increase housing supply, including affordable housing supply. Also, the Project is in accordance with the Mayor's Housing Equity Report of 2019 which puts an onus on the production of new housing, particularly affordable housing, in the District of Columbia. Additionally, by requiring affordable housing in excess of typical Inclusionary Zoning requirements and at deeper levels of affordability, the Project specifically will provide many family-sized, affordable units at deeper levels of affordability. As noted in the Comprehensive Plan, because "the MFI for Black households in the District [is] less than the MFI for White households." 10-A DCMR § 500.7c. The Project will assist DC in reaching the Housing Equity Report's goal of 36,000 units of housing, including 12,000 units of affordable housing, by 2025.

a. Framework Element

The Project is consistent with the following policies of the Framework Element of the Comprehensive Plan:

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

² This section analyzes the Project's consistency with the updated Comprehensive Plan passed by the DC Council in May of 2021 that will become law in September 2021. While the new Comprehensive Plan is not effective as of the date of this filing, it will be effective by the time the Project is set for a public hearing.

Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must be designed to respect the integrity of stable neighborhoods and the broader community context, and encourage housing and amenities for low-income households, who rely more on transit. Adequate infrastructure capacity should be ensured as growth occurs. § 219.7

As the nation's capital, the District should be a role model for environmental sustainability. Building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, encourage the use of distributed energy resources like rooftop solar, and reduce harmful effects on the natural environment. § 223.4

High Density Residential: This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. § 227.8

High Density Commercial: This designation is used to define the central employment district, other major office centers, and other commercial areas with the greatest scale and intensity of use in the District. Office and mixed office/retail buildings with densities greater than a FAR of 6.0 are the predominant use, although high-rise residential and many lower scale buildings (including historic buildings) are interspersed. The MU-9, D-3, and D-6 Zone Districts are consistent with the High Density Commercial category, and other zones may also apply. § 227.13

The Future Land Use Map designates the Property as appropriate for Mixed Use: High Density Residential, High Density Commercial, and Institutional use. The Project, with its height of 130 feet and FAR of 8.01, with a mix of residential and retail uses, is consistent with this designation.

The Generalized Policy Map designates the Property as a "Land Use Change Area" where "change to a different land use from what exists today is anticipated." §225.9. The Framework Element specifically notes that the Lower Anacostia/Near Southwest Area is predicted to house 16.5% of the District's household growth. §215.19. The Project will effectuate this change anticipated by the Comprehensive Plan.

b. Land Use Element

Broadly, the Land Use Element cites the importance of transit-oriented developments and the importance of residential units above ground-floor retail. The Project is consistent with the following policies from the Land Use Element:

Policy LU-1.2.2.: CEA Continue the joint federal/District designation of a CEA within Washington, DC. The CEA shall include existing core federal facilities, such as the U.S. Capitol Building, the White House, and the Supreme Court, as well as most of the legislative, judicial, and executive administrative headquarters of the U.S. government. Additionally, the CEA shall include the greatest concentration of the District’s private office development, and higher-density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses. Given federally imposed height limits, the scarcity of vacant land in the core of the District, and the importance of protecting historic resources, the CEA may include additional land necessary to support economic growth and federal expansion. The CEA may be used to guide the District’s economic development initiatives and may be incorporated in its planning and building standards (e.g., parking requirements) to reinforce urban character. The CEA is also important because it is part of the point system used by the General Services Administration (GSA) to establish federal leases. The boundaries of the CEA are shown in Map 3.4. § 305.7

Policy LU-1.2.4: Urban Mixed-Use Neighborhoods Encourage new mixed-use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas: . . . Near Southeast/Navy Yard; . . . The location of these areas is shown in the Central Washington, and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should require that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, especially affordable and deeply affordable housing, is particularly encouraged and must be a vital component of the future land use mix. As areas continue to redevelop, community engagement and actions shall be undertaken to retain existing residents, particularly communities of color and vulnerable populations, and enable them to share in the benefits of area redevelopment while addressing adverse short and long-term impacts. § 305.11

Policy LU-1.4.1: Station Areas as Neighborhood Centers Encourage the development of Metro stations as anchors for residential, economic, and civic development and to accommodate population growth with new nodes of residential development, especially affordable housing, in all areas of the District in order to create great new walkable places and enhance access and opportunities for all District residents. The establishment and growth of mixed-use centers at Metrorail stations should be supported as a way to provide access to housing opportunities at all income levels and emphasizing affordable housing, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense

of place, provide civic gathering places, and capitalize on the development and public transportation opportunities that the stations provide. Station area development should have population and employment densities guided, but not dictated, by desired levels of transit service. This policy should be balanced with other land use policies, which include conserving neighborhoods. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. § 307.9.

Policy LU-1.4.2: Development Around Metrorail Stations In developments above and around Metrorail stations emphasize land uses and building forms that minimize the need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. § 307.10.

Policy LU-1.4.3: Housing Around Metrorail Stations Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. § 307.11.

Policy LU-1.4.3: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations Explore and implement as appropriate mechanisms, which could include community land trusts, public housing, and shared appreciation models, to encourage permanent affordable rental and for-sale multi-family housing, adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. § 307.12

The Project will begin the development of the Bridge District, a mostly vacant and underutilized Metro-adjacent large site. The Project provides significant housing and retail use in an area designated for high-density use in a highly designed building. Additionally, as part of the NHR Zone, the Project provides high levels of affordable housing at deeper levels of affordability than typically required in the District.

c. Transportation Element

Similar to the Land Use Element above, the Transportation Element cites the importance of transit-oriented development, while it also focuses on the importance of integrating pedestrian resources and safety into residential development. The proposed development is consistent with several policies in the Transportation Element:

Policy T-1.1.4: Transit-Oriented Development Support transit-oriented development by investing in pedestrian-oriented transportation

improvements at or around transit stations, major bus corridors, and transfer points. Encourage development projects to build or upgrade the pedestrian and bicycle infrastructure leading to the nearest transit stop to create last-mile connections. Pedestrian movements and safety should be prioritized around transit stations. § 403.10

Policy T-1.2.3: Discouraging Auto-Oriented Uses Discourage certain uses, like drive-through businesses or stores with large surface parking lots and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. § 404.6.

Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks such that residents of each of the District's wards have access to high-quality bicycling and pedestrian facilities. § 410.9

Policy T-2.3.2: Bicycle Network Provide and maintain a safe, direct, and comprehensive bicycle network connecting neighborhoods, employment locations, public facilities, transit stations, parks, and other key destinations. Eliminate system gaps to provide continuous bicycle facilities. Increase the amount of protected bike lanes, wayfinding signage, and Capital Bikeshare stations. § 410.10

Action T-2.3.B: Bicycle Facilities Wherever feasible, require large, new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. Residential buildings with eight or more units shall comply with regulations that require secure bicycle parking spaces. § 409.16

Policy T-2.4.1: Pedestrian Network Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. § 411.5

Policy T-2.4.2: Pedestrian Safety Improve safety and security at key pedestrian nodes throughout the District. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, high-intensity activated crosswalk pedestrian signals, rectangular rapid flashing beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, and pedestrian countdown signals. § 411.6.

The Transportation Element promotes strengthening the link between land use and transportation as new development occurs and that is precisely what this Project does. The Property is adjacent to the Anacostia Metrorail Station. The Project design also encourages bicycling and walking, as it includes streetscape improvements and bicycle infrastructure. Altogether, the Project encourages the employment of diverse modes of transportation by providing the infrastructure for, or being designed for, the use of walking, biking and using public transportation.

d. Housing Element

The Project provides significant new housing and affordable housing and is consistent with the Housing Element. Specifically, the Project is consistent with the following policies within the Housing Element:

Policy H-1.1.1: Private Sector Support Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. § 503.3

Policy H-1.1.4: Mixed-Use Development Promote moderate to high-density, mixed-use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed-use corridors and high-capacity surface transit corridors, and around Metrorail stations. § 503.6

Policy H-1.1.7: Large Sites Accommodate a significant share of the District's projected housing demand in new neighborhoods developed on large sites. Prioritize housing, particularly affordable housing preserved for long-term affordability. These neighborhoods should include or have access to well-planned retail, public schools, attractive parks, open space and recreation, as well as needed supportive services for older adults and persons with disabilities and enable resilient, innovative neighborhood-level energy systems. The new neighborhoods should include a variety of housing types, including housing for families, older adults, and other needed types, serving a diverse population and a variety of income levels. § 503.9.

Policy H-1.2.3: Affordable and Mixed-Income Housing Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. § 504.9

Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods Support mixed-income housing by encouraging affordable housing in high-cost areas and market rate housing in low-income areas. Identify and implement measures that build in long-term affordability, preferably permanent or for the life of the project, to minimize displacement and achieve a balance of housing opportunities across the District. § 504.18

Policy H-1.3.1: Housing for Larger Households Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail. § 505.8

The Project is providing approximately 459,388 net square feet of housing on a site that currently provides no housing. The Project also includes approximately 58,165 net square feet of affordable housing. The provision of residential units at this site is significant given its history and the District's objective of creating significant new housing and affordable housing units. This location, immediately adjacent to a Metrorail station, is well suited to accommodate the degree of housing proposed by the Project. In fact, this location is ideally suited to deliver a meaningful piece of the significant additional housing supply, including affordable housing supply, that the District needs.

Further, the Applicant will include a component of family-sized units in the Project. Specifically, the Project will include 29 three-bedroom units, half of which will be available to households earning up to 50% MFI and half will be available to households earning up to 60% MFI.

e. Environmental Protection Element

The Project promotes the following policies of the Environmental Protection Element:

Policy E-1.1.5: Resilient Infrastructure Design infrastructure, such as roads and parks, to withstand future climate impacts, and increase Washington, DC's' resilience by having roads and parks serve multiple purposes where possible, including flood risk reduction, urban heat island mitigation, and stormwater management. See the Infrastructure Element for more information on resilient infrastructure. § 603.9.

Policy E-1.1.6: Floodplains, Waterfronts, and Other Low-Lying Areas Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within floodplains, waterfronts, and other low-lying areas that could pose public health or safety hazards in the event of a flood. Regulation of land uses in floodplains, waterfronts, and other low-lying areas should consider the long-term effects of climate change—including

sea level rise, increasingly heavy rain events, and more severe coastal storms—on flood hazards. § 603.10

Policy E-2.1.2: Tree Requirements in New Development Use planning, zoning, and building regulations to promote tree retention and planting, as well as the removal and replacement of dying trees when new development occurs. a Tree planting and landscaping required as a condition of permit approval should include provisions for ongoing maintenance. § 605.6.

Policy E-3.2.7: Energy-Efficient Building and Site Planning Include provisions for energy efficiency and for the use of alternative energy sources in the District’s planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals. § 612.9

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. § 615.4

The Project is designed to achieve LEED v. 4 Gold certification for new construction, incorporating several sustainable measures, including significant solar panels. Additionally, the Project incorporates trees, landscaping, and other green space as part of the Project. Finally, the Building is being designed as elevated out of the 500-year flood plain to increase the resiliency of the Project.

f. Economic Development Element

The Economic Development Element addresses the priorities around commercial development in the District. The Project furthers the following Economic Development policies:

Policy ED-2.2.1: Expanding the Retail Sector Pursue a retail strategy that will allow the District to fully capitalize on the spending power of residents, workers, and visitors, and that will meet the retail needs of communities across the District and particularly in underserved communities. § 708.6

Policy ED-2.2.4: Support Local Entrepreneurs Support the efforts of local entrepreneurs who enhance the District’s economy by manufacturing and retailing goods within Washington, DC, which increases the local employment and tax revenue generated by consumer retail spending. § 708.9

Policy ED-2.2.6: Grocery Stores and Supermarkets Support and incentivize the development of new grocery stores and supermarkets, and prioritize stores in neighborhoods with existing food deserts, where residents currently travel long distances for food and other shopping services, and neighborhoods most affected by hunger and poverty to improve access to healthy, affordable food. Because such uses inherently require greater depth and lot area than is present in many commercial districts, consider adjustments to current zoning standards to depth and lot area to accommodate these uses, and explore new models like co-ops. § 708.11.

Policy ED-2.2.9: Clustered Retail at Transit Cluster retail around areas of high foot traffic, including Metrorail stations, bicycle facilities, high-capacity transit stops, and other multimodal meeting points. Create strong, vibrant retail nodes of to effectively link retail and transit. § 708.14

The Project provides approximately 46,685 square feet of retail and restaurant use, including space for a grocery store. This provision of retail creates Howard Road as a retail corridor coming from the Metrorail station. Additionally, the Applicant will provide incentives for small, local business to occupy space at the Project by offering local retailers a 10% discount on retail space in The Bridge District, including at the Project.

g. Urban Design Element

The Urban Design Element describes the essential relationship between a property's location within the urban fabric including along certain boulevards and vistas and a building's design. The Project furthers several of the Urban Design Element policies including:

Policy UD-1.3.3: Innovative and Resilient Waterfront Development The design of new waterfront development projects should respond to the unique opportunities and challenges of being on the water. Incorporate nature-based design and flood-resilient building and site design methods. New buildings should be carefully designed to consider their appearance from multiple public vantage points along the Anacostia and Potomac shorelines, including from the shoreline and from the water. § 905.7.

Policy UD-2.1.1: Streetscapes That Prioritize the Human Experience Commercial streetscapes should be designed to be comfortable, safe, and interesting to pedestrians. At a minimum, commercial corridor sidewalks should be designed with clear, direct, accessible walking paths that accommodate a range of pedestrian users and facilitate a sense of connection to adjacent uses. Where width allows, corridors should have a generous presence of shade trees and café seating areas, as well as bicycle facilities. In areas with large pedestrian volumes, streetscapes should provide seating, drinking fountains, publicly accessible restrooms, and

other infrastructure that supports increased frequency and duration of walking. § 908.3.

Policy UD-2.1.7: Streetscapes That Encourage Activation Design new streetscape projects with public spaces that can be flexibly programmed to enhance public life with short- or long-term uses throughout the year to meet the needs of a wide variety of community members. Such spaces can be sites for creative placemaking efforts, block parties, festivals, markets, pop-up retail, or food trucks. § 908.9.

Policy UD-4.2.1: Scale and Massing of Large Buildings Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest. § 920.3.

Policy UD-4.2.2: Engaging Ground Floors Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. § 920.4

The Project is highly designed and the Building has been raised out of the 500-year floodplain. Additionally, the Building's design creates an activated ground floor with an enhanced pedestrian experience, as detailed above. Finally, the Building includes façade variations, courtyards, and balconies to provide significant articulation and avoid repetitiveness in the design. The Building's mass is articulated as a series of wings radiating from a central circulation spine. These wings shelter five distinct courtyards that provide a variety of outdoor gathering areas, break down the massing, and provide daylight and views to the interior of the block. The eastern, central, and western wings are each articulated with distinct materials and architectural compositions that further break down the scale and create visual interest. The eastern wing features a shifting expression of horizontal balconies, the central wing features a grid composition, and the western wing features a distinct vertical tower expression. While unique, each of these compositions share a common design language including natural toned cementitious cladding, floor to ceiling glazing, articulated floor lines, and a plethora of balconies that creates a unified composition and neighborhood identity.

h. Area Element

The Property is located within the “Lower Anacostia Waterfront and Near Southwest” Area Element, one of the ten area elements contained in the Comprehensive Plan. The Project is consistent with the following policies of the Area Element:

Policy AW-1.1.2: New Waterfront Neighborhoods Create new mixed-use, mixed-income neighborhoods on vacant or underused waterfront lands, particularly on large contiguous publicly owned waterfront sites. Within the Lower Anacostia Waterfront/Near Southwest Planning Area, new neighborhoods should continue to be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, and Navy Yard/Capitol Riverfront. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside via trails, additional water recreation opportunities, and improved park access points along the Anacostia shoreline. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Opportunities for grid interconnected neighborhood-scale energy utilities systems as part of the development of these areas should be evaluated, using renewable energy sources to provide greater environmental benefits for the community. The new waterfront neighborhoods should integrate new parks and amenities, enhance public access to the waterfront, and incorporate resilient design to mitigate flooding. § 1907.3.

Policy AW- 1.1.3: Lower Anacostia Waterfront Infrastructure for Flood Mitigation Identify locations of future development that are at risk of flooding to help prioritize infrastructure improvements to mitigate flooding. Encourage the inclusion of parks, open space, and other improvements around denser development that preserve or enhance the natural function of floodplains. § 1907.4

Policy AW-2.4.3: Poplar Point Mixed-Use Neighborhood Create a new transit-oriented mixed-use neighborhood oriented around the Poplar Point Park and linked to the Anacostia and Congress Heights Metro stations. The neighborhood should include a significant component of affordable housing, as well as retail and civic uses that benefit the adjacent communities east of I-295. To minimize the loss of useable open space, development should use the land recovered after the realignment and reconstruction of the Frederick Douglass Bridge. § 1913.9.

Policy AW-2.4.5: Scale of Development at Poplar Point Provide a scale and pattern of development at Poplar Point that recognizes the area’s proximity to a Metro station and other major surface arterials. The area is physically separated from surrounding neighborhoods and, therefore, may accommodate buildings and site plans that are unlike but compatible with the fine-grained pattern found in nearby Historic Anacostia. Development

should be pedestrian-oriented and include active ground floor uses. The massing, height, and bulk of buildings and related features, such as parking, also should respect adjacent park uses and environmentally sensitive areas. § 1913.11

The Project is precisely the development anticipated and encouraged by the Area Element. It provides a high-quality building on a vacant property with significant housing, including family-sized units and affordable housing, all outside of the 500-year floodplain. Additionally, the Project emphasizes pedestrian interactivity with ground-floor retail and restaurant use, all proximate to the Anacostia waterfront.

- 2. Street frontages are designed to be safe, comfortable, and encourage pedestrian activity, including: (1) Multiple pedestrian entrances for large developments; (2) Direct driveway or garage access to the street is discouraged; (3) Commercial ground floors contain active uses with clear, inviting windows; (4) Blank facades are prevented or minimized; and (5) Wide sidewalks are provided. (11-X DCMR § 604.7(a))**

The Property fronts on Howard Road and provides multiple pedestrian entrances along this frontage. The final pedestrian entrance locations will be coordinated with retail plans and users. Additionally, as detailed above, the ground floor is almost entirely devoted to active retail and restaurant use and provides floor-to-ceiling heights in excess of 14 feet and majority glass walls to create an interactive pedestrian environment. The Project also provides no direct access off of Howard Road to parking or loading, instead only providing access through the public access easement area.

There are no blank walls created by the Project. In fact, the Building has been carefully crafted in order to ensure that all sides are highly articulated and provide highly-designed facades from every viewpoint. As shown on the landscape sections in the Plans, the Project provides ample sidewalk width along both Howard Road and the woonerf area.

- 3. Public gathering spaces and open spaces are encouraged, especially in the following situations: (1) Where neighborhood open space is lacking; (2) Near transit stations or hubs; and (3) When they can enhance existing parks and the waterfront. (11-X DCMR § 604.7(b))**

The Project includes public open space through the public access easement area and the planned promenade connecting to the Property on the north side. Additionally, the Project includes significant open space through the terraces in the Building, providing gathering spaces for the new residents. Additionally, the Project provides significant private open space through the ample provision of balconies for almost every residential unit. Finally, the Project includes a 30 foot pedestrian woonerf which includes a public gathering space.

- 4. New development respects the historic character of Washington's neighborhoods, including: (1) Developments near the District's major boulevards and public spaces should reinforce the existing urban**

form; (2) Infill development should respect, though need not imitate, the continuity of neighborhood architectural character; and (3) Development should respect and protect key landscape vistas and axial views of landmarks and important places. (11-X DCMR § 604.7(c))

The Project does not affect the historic character of Washington's neighborhoods. As noted above, the Project is being developed in a largely undeveloped area. However, the Project is designed to respect the visual connection to the Anacostia River and the new Frederick Douglass Memorial Bridge. The Project does not intrude on any important views or vistas, and the overall massing of the Project is characteristic of a classic urban grid design.

5. Buildings strive for attractive and inspired façade design, including: (1) Reinforce the pedestrian realm with elevated detailing and design of first (1st) and second (2nd) stories; and (2) Incorporate contextual and quality building materials and fenestration. (11-X DCMR § 604.7(d))

As shown in Plans and detailed throughout the Statement, the Building provides pedestrian-oriented street-frontage designs, including high ceiling clearance and glass windows at the ground floor creating pedestrian interactivity. Additionally, the Project's woonerf, planned promenade and public access easement area focuses on pedestrians. The Project's materiality also focuses on the pedestrian experience through the use of a diverse mix of natural and biophilic materials, including exposed architectural concrete, wood or wood-look paneling, green walls, and cementitious paneling.

6. Sites are designed with sustainable landscaping. (11-X DCMR § 604.7(e))

The Project seeks to integrate vegetation into spaces throughout the site and Building, utilizing spaces at ground-level, green walls, multiple rooftop terraces, and greenroof plantings. Plantings, soil and drainage systems, and irrigation will be designed using current best practices to maximize successful plant growth and longevity to yield an attractive, mature landscape for years to come. Planting design seeks to provide vigorous, year-round appeal while minimizing the need for excessive water usage or high-intensity maintenance activities like frequent fertilization, spraying, or seasonal re-planting. Native species will be incorporated in the planting designs where possible.

7. Sites are developed to promote connectivity both internally and with surrounding neighborhoods, including: (1) Pedestrian pathways through developments increase mobility and link neighborhoods to transit; (2) The development incorporates transit and bicycle facilities and amenities; (3) Streets, easements, and open spaces are designed to be safe and pedestrian friendly; (4) Large sites are integrated into the surrounding community through street and pedestrian connections; and (5) Waterfront development contains high quality trail and

shoreline design as well as ensuring access and view corridors to the waterfront. (11-X DCMR § 604.7(f))

The Project open space design is coordinated with other current and proposed local improvements to both pedestrian and bicycle circulation. Future adjacent shared and dedicated bike/pedestrian facilities will enable linkages to the Anacostia Metro station, new circulation and access across the Frederick Douglass Memorial Bridge, and connections to existing recreational trails along the Anacostia River. Both short and long-term bicycle parking is provided on the site for various users and within the Building for tenants. The future bike path/Promenade is expected to draw the majority of bicycle traffic off of Howard Road, leaving room to maximize sidewalk width for pedestrians and limiting bicycle/vehicular conflicts. Both the Public Access Easement and the paved plaza area at the east edge of the Property will provide connection points for pedestrians and cyclists from Howard Road to the dedicated circulation routes planned immediately north of the Project.

The Project also incorporates the public access easement area into the design to create a safe vehicular access point that minimizes conflicts. The easement area has been designed to be pedestrian-oriented and the overall concept of the easement has been approved by DDOT. Additionally, the proposed promenade will provide dedicated bicycle and pedestrian pathways around the Project. Finally, the woonerf area on the east side of the Building provides an open, activated area centered around the pedestrian experience, including outdoor seating and a water feature.

C. The Applicant Satisfies the Special Exception Requirements with Regarding to Zoning Commission Review

Pursuant to 11-X DCMR Section 604.6, the Zoning Commission must find the Project meets the general special exception requirements of the Zoning Regulations. There is a two-pronged test to satisfy special exception review: (1) An applicant must demonstrate that the project is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and (2) it will not affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Map. The Applicant meets these requirements as follows.

1. The Proposed Design Is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps

As made clear in the above discussions, the Project is in harmony with the general purpose and intent of the Zoning Regulations and the Zoning Map applicable to the Property. Broadly, the NHR Zone District permits and encourages a broad mix of residential, commercial, and other uses, and the Project provides an appropriate mix of these uses, focusing on residential, including significant affordable units and family-sized units, with supporting retail use.

Additionally, the Project will meet all applicable NHR development standards. Most notably, the Project is within the 130-foot height limit, the 9.0 FAR limit, and meets all setback requirements, providing significant open space around the Building. The Building's proposed roof structure, including habitable space, is compliant with all zoning requirements relating to

roof structures, including setbacks, heights and enclosures such that it, too, will be in harmony with the purpose and intent of the Zoning Regulations.

2. The Proposed Building Will Not Affect Adversely the Use of Neighboring Property in Accordance with the Zoning Regulations and Zoning Map

The Property is surrounded by vacant land, including Anacostia Park to the north. Most other private property near the Project is also owned by the Applicant and its affiliates, and will be part of the overall Bridge District development. The overall area is undeveloped or significantly underdeveloped, and the proposed Building will help jump start the development of the area.

The Applicant has coordinated with the ANCs and surrounding community and will continue to do so, ultimately developing the Project and the overall Bridge District. The Project will provide significant benefits to the community, as detailed above. Therefore, the Project will not adversely affect the neighboring properties.

VII. Exhibits

The following exhibits are attached to this submission:

Exhibit A: Agent Authorization Letter

Exhibit B: Property Owner List

Exhibit C: Certificate of Notice

Exhibit D: Office of the Surveyor Plat

Exhibit E: Architectural Plans, Sections, Elevations, and Renderings/View Analyses; Photographs of the Property

VIII. Conclusion

For the foregoing reasons, the Applicant asks that the Commission approve this development per the NHR Zone District. We look forward to presenting this application to the Commission at the public hearing on this matter and appreciate your time reviewing this application.

Respectfully,

/s/
John T. Epting

/s/
Meghan Hottel-Cox