

## **CONSISTENCY OF THE PROJECT WITH THE COMPREHENSIVE PLAN**

The proposed Modification to the First-Stage PUD and the Second-Stage PUD are not inconsistent with the guiding principles, policies, and goals of the Comprehensive Plan for the National Capital, including the land use designation assigned to the PUD Site on the Future Land Use Map (the “FLUM”), and general policy designation on the Generalized Policy Map (the “GPM”).

### **A. Purposes of the Comprehensive Plan**

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. (D.C. Code §1-245(b)).

The proposed Modification to the First-Stage PUD and the Second-Stage PUD significantly advance these purposes by promoting the social, physical and economic development of the District through the provision of high-quality, mixed-use buildings on the Properties without generating any adverse impacts. The modified East M and West M buildings will help to improve the surrounding neighborhood by provide housing, including affordable housing, jobs, and locally-serving retail and office opportunities. In addition, it will advance the “town center” concept envisioned for the PUD Site in the Comprehensive Plan, as supplemented by the SW Plan. Particularly, based upon the market research prepared by the District and included in the SW Plan,

the modified First-Stage PUD and the Second-Stage PUD will adapt the overall use and make-up of the town center to align with the area's current demand for additional housing, including larger-sized affordable housing units and a variety of market-rate unit sizes, and increased neighborhood serving retail, service, and office uses.

**B. Future Land Use Map**

The Future Land Use Map of the Comprehensive Plan (January 2013), adopted as part of the District Elements of the Comprehensive Plan for the National Capital, designates the PUD Site as mixed use High Density Residential / High Density Commercial. According to the Framework Element, the High Density Residential land use designation is used to define neighborhoods and corridors where high-rise (8 stories or more) apartment buildings are the predominant use. Pockets of less dense housing may exist within these areas. 10A DCMR § 225.6. The High Density Commercial land use category is used to define the central employment area of the city and other major office employment centers on the downtown perimeter. It is characterized by office and mixed office/retail buildings greater than eight stories in height, although many lower scale buildings (including historic buildings) are interspersed. 10A DCMR § 225.11.

Pursuant to Z.C. Order No. 02-38A, the Commission found that the PUD was consistent with the FLUM designation of the PUD Site. Similarly, the requested First-Stage PUD modification and Second-Stage PUD continue to be consistent with the Comprehensive Plan's FLUM. The East M and West M buildings will be comprised of high-density apartment buildings with mixed office/retail uses on the ground- and second-floor levels. The conversion of the buildings to primarily residential use, while maintaining a moderate amount of office use that is suitable for neighborhood services and small start-up companies, will directly address the high demand for residential use in this area of the city and further diversify the range of uses within the

overall PUD. Finally, notwithstanding the change in the primary use of the East M and West M buildings, the proposed height and density remain consistent with the FLUM, and that which was previously approved by the Commission.

### **C. Generalized Policy Map**

The PUD Site is located in a Land Use Change Area on the District of Columbia Comprehensive Plan Generalized Policy Map, and is also identified as an Enhanced/New Multi-Neighborhood Center. As described in the Framework Element, the guiding philosophy for Land Use Change Areas is to encourage and facilitate new development and promote the adaptive reuse of existing structures. Many of these areas have the capacity to become mixed-use communities containing housing, retail, services, workplaces, parks and civic facilities. The Comprehensive Plan's Area Elements provide additional policies to guide development and redevelopment within the Land Use Change Areas, including the desired mix of uses in each area. 10A DCMR § 223.11.

Multi-Neighborhood Centers contain many of the same activities as neighborhood centers but in greater depth and variety, and have a service area ranging from one to three miles. These centers are generally found at major intersections and along key transit routes, and might include supermarkets, general merchandise stores, drug stores, restaurants, specialty shops, apparel stores, and a variety of service-oriented businesses. These centers also may include office space for small businesses, although their primary function remains retail trade. 10A DCMR § 223.17.

Pursuant to Z.C. Order No. 02-38A, the Commission previously found the PUD to be consistent with the Enhanced/New Multi-Neighborhood Center GPM designation assigned to the PUD Site (*see* FF No. 102). The requested First-Stage PUD modification and Second-Stage PUD continue to be consistent with this designation. Specifically, development of the East M and West M buildings will help complete the new mixed-use, town center community that is envisioned for

the overall PUD Site, which contains housing, retail, services, employment, and outdoor public space. The buildings are located along M Street, SW, which is a major transportation corridor, and also along 4<sup>th</sup> Street, SW, which has been converted into a walkable, mixed-use commercial district. The East M and West M buildings will contain a variety of retail shops, service-oriented businesses, and smaller office uses such as neighborhood-serving doctors/dentist offices, accountants, co-working, child care, or even smaller locally-owned start-up businesses.

**D. Compliance with Guiding Principles of the Comprehensive Plan**

The Project is consistent with many of the guiding principles of the Comprehensive Plan for managing growth and change, creating successful neighborhoods, increasing access to education and employment, connecting the city, and building green and healthy communities.

1. Managing Growth and Change

The modified First-Stage PUD and the Second-Stage PUD are consistent with several of the principles contained within the Managing Growth and Change section, which focuses on overcoming physical, social, and economic obstacles to ensure that the benefits and opportunities available to District residents are equitably distributed. Specifically, in order to manage growth and change, the Comprehensive Plan encourages, among other factors, growth in both residential and non-residential sectors, with residential uses comprising a range of housing types to accommodate households of varying sizes and income levels, and nonresidential uses that include services that support residents. The Comprehensive Plan also states that redevelopment and infill opportunities along corridors and near transit stations are an important part of reinvigorating and enhancing District neighborhoods as well as the surrounding region.

The modified First-Stage PUD and the Second-Stage PUD are fully consistent with these goals. Redeveloping the PUD Site with mixed-use buildings comprised of residential units, ground

floor retail, and neighborhood-serving office uses will benefit the residents and employees who live and work in the neighborhood and will help contribute to the development of this area. The retail and office spaces will create new jobs for District residents and provide additional neighborhood-serving amenities to new and existing residents. In addition, the proposed buildings will grow the District's tax base, strengthen the M Street corridor, and help reinvigorate existing neighborhood fabric. The new residential units will greatly assist in addressing the continuing demand for additional housing in the District. In fact, according to a recent study conducted by the Capitol Riverfront BID entitled "GreenPrint of Growth 2.0," the Metrorail green line, which runs through the Waterfront Metrorail station, is the District's strongest growth corridor in both residential and retail growth. Thus, in addition to adding a substantial amount of new retail space, given the close proximity of the Waterfront Metrorail station to the PUD Site, converting the majority of the East M and West M buildings to residential use will greatly assist in meeting the continued demand for housing along the green line corridor.

## 2. Creating Successful Neighborhoods

One of the guiding principles for creating successful neighborhoods is to protect and stabilize neighborhood businesses, retail districts, parks, and other facilities, and to reinforce neighborhood identity and provide destinations and services for residents. In addition, noting the crisis of affordability that has resulted from the continued housing boom in the District, the guiding principles recognize the importance of preserving existing affordable housing and producing new affordable housing to avoid a deepening of racial and economic divides in the city. Citizen participation and responsive neighborhood services are also recognized as keys ingredients to creating successful neighborhoods. Such participation includes garnering public input in decisions

about land use and development, from development of the Comprehensive Plan to implementation of the plan's elements.

The modified First-Stage PUD and the Second-Stage PUD are consistent with each of these principles. The Applicant continues to work closely with ANC 6D and other neighborhood stakeholders and associations to ensure that the East M and West M buildings provide uses that respond to the neighborhood's current demands. In addition, the Applicant is working with these groups regarding the architectural design and public spaces and will continue to work with the public throughout the PUD process.

As thoroughly discussed in the Application Statement, the SW Plan indicates that the primary neighborhood demands call for increased residential use, including additional affordable housing, and greater neighborhood-serving retail and service uses. The modified First-Stage PUD and the Second-Stage PUD will respond to these demands by providing a substantial number of additional residential units within a walkable, town center environment that is within close proximity to several modes of public transportation. In addition, not only will the proposal result in a considerable amount of additional retail and service uses, the Applicant has committed to execute a retail marketing study during construction of the East M and West M buildings to determine the most suitable types of retail and service uses.

### 3. Increasing Access to Education and Employment

The guiding principles pertaining to increasing access to education and employment focus on growing economic activity in the District, as well as improving the lives and economic well-being of District residents. To do this from a policy and transportation perspective, the Comprehensive Plan recognizes the importance of improving access to education and jobs by capitalizing on the city's location at the center of the region's transportation systems. Providing

more efficient, convenient, and affordable transportation options for residents increases resident access to jobs within the District and the surrounding region. Moreover, expanding the economy means increasing shopping and services for many District neighborhoods, bringing tourists beyond the National Mall and into the city's business districts, and creating more opportunities for local entrepreneurs and small businesses.

The Project will advance the District's goals of improving access to jobs and education by redeveloping two vacant properties with two mixed-use new buildings that will provide a substantial amount of new housing and retail use directly adjacent to a Metrorail station and in close proximity to other modes of public transportation. The close proximity to transit will increase residents' ability to access educational opportunities and jobs without owning a vehicle and without the added expenses associated with vehicle ownership. This is especially relevant to those residents living in the affordable dwelling units that will be integrated into the project and made available to households earning no more than 60% of the MFI. In addition, the proposed retail and neighborhood-serving office uses will expand the District's retail and office economy in the Southwest Waterfront neighborhood, which will create more opportunities for small businesses to thrive and create new employment opportunities for residents.

#### 4. Connecting the City

The Project is consistent with the guiding principles that pertain to connecting the city. The project is located in a walkable, bike-friendly, and transit-rich location, which will allow residents of the East M and West M buildings to take advantage of multiple transportation modes. The project will also include several streetscape improvements that will improve mobility and circulation around the PUD Site and throughout the neighborhood. These improvements consist

of the reconstruction of the public space surrounding the buildings, several new street trees, and other landscape and lighting improvements which help create a safe and inviting public realm.

#### 5. Building Green and Healthy Communities

The project is fully consistent with the Comprehensive Plan's guiding principles pertaining to building green and healthy communities. A major component to successfully building green and healthy communities is the use of sustainable building construction and renovation techniques that minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. The East M and West M buildings will each be designed to include the minimum number of points necessary to meet LEED 4.0 Silver, which is equivalent to the sustainability level required for the U.S. Green Business Council LEED Gold under LEED 2009 for New Construction.

#### **E. Land Use Element**

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city and provides direction on a range of development, conservation, and land use compatibility issues. This element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District of Columbia. Because of the role it plays in integrating the policies and objectives of all the other elements of the Comprehensive Plan, the Land Use Element is given greater weight than the other elements as competing policies in different elements are identified and balanced. The overarching goal of the Land Use Element is to ensure that the District's limited land resources are efficiently utilized in a manner that meets a wide range of long-term needs and helps foster other District goals, protects the health, safety, and welfare of District residents, institutions, and businesses, maintains and improves the character and stability

of all neighborhoods, and balances competing land demands to support the many activities that take place within the District. For the reasons discussed below, the proposal is consistent with this overarching goal through its advancement of a number of Land Use Element policies:

1. Policy LU-1.1.4: Appropriate Uses in the CEA

This policy promotes the importance of utilizing the land within the Central Employment Area (“CEA”) in a manner that reflects the area’s national importance and makes the most of the area’s proximity to transportation facilities. The proposed East M and West M buildings will advance the town center concept envisioned for the PUD Site by introducing two high-density mixed use buildings immediately adjacent to Metrorail and the M Street corridor. The residential units proposed as part of the modified First-Stage PUD, which include affordable units where none would otherwise be constructed, will increase the number of residential units in close proximity to transit, and in particular along the burgeoning green line corridor.

2. Policy LU-1.2.2: Mix of Uses on Large Sites

Development of the East M and West M buildings with new residential, retail, and office uses is consistent and compatible with adjacent uses and will provide a number of benefits to the immediate neighborhood and to the city as a whole. This proposed mix of residential and commercial uses is consistent with the FLUM designation of the Properties as High Density Residential and High Density Commercial, and the GPM designation as a Land Use Change area and Multi-Neighborhood Center. Furthermore, the range of uses proposed within the East M and West M buildings is responsive to the supplemental guidance provided by the SW Plan regarding current land use demands in the Southwest neighborhood.

3. Policy LU-1.3 Transit-Oriented and Corridor Development
4. Policy LU-1.3.1: Station Areas as Neighborhood Centers
5. Policy LU-1.3.2: Development Around Metrorail Stations

These policies recognize the importance of capitalizing on the investments made in Metrorail by maximizing the use of land around transit stations and along transit corridors. When addressing the management of land around Metrorail, the Comprehensive Plan encourages the application of principles that favor mixed use rather than single purpose buildings, and particularly a preference for providing a diverse range of housing types (market-rate and affordable) above ground floor uses. These policies also encourage well-designed, programmed, and maintained public spaces and convenient connections to transit. Beyond these core principles, the Comprehensive Plan also contains policies that treat Metrorail station areas as neighborhood centers that are tailored to the unique needs of each community and the surrounding neighborhood.

The East M and West M buildings exemplify the principals of transit-oriented development. The Properties are located directly adjacent to the Waterfront Metrorail station, which serves the rapidly expanding green line corridor, are served by several major bus routes, and are otherwise conveniently located near numerous other alternative forms of transportation. Development of the properties utilizes the Metrorail station as an anchor for economic and civic development, and are so located in order to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, enhance neighborhood stability, and create a stronger sense of place. The Waterfront Metrorail station in particular is an excellent location for new growth, particularly residential growth, and the Applicant will ensure that the East M and West M buildings respect the character of the surrounding area and maximize transit ridership. Most notably, as a result of the modified First Stage PUD, approximately 605 new residential dwelling units will be provided immediately adjacent to Metrorail, including several

affordable units that will be devoted to households earning up to 60% of the MFI, and would not otherwise be provided under the existing approved office use.

6. Policy LU-1.3.3: Housing Around Metrorail Stations

The modified First-Stage PUD and the Second-Stage PUD are consistent with Policy LU-1.3.3, which seeks to build housing adjacent to Metrorail stations, particularly given the reduced necessity of auto ownership in such locations. As noted above, the PUD Site is located directly adjacent to the Waterfront Metrorail station.

7. Policy LU-1.3.4: Design to Encourage Transit Use

The Second-Stage PUD has been designed to encourage transit use and helps to enhance the safety, comfort, and convenience of passengers walking to the Waterfront Metrorail station and to local Metrobus stops. The East M and West M buildings incorporate ground- and second-floor retail and office uses that will activate and animate the street frontages, providing lighting, signage, and landscaping, and generally increase safety by providing more eyes and ears on the street.

8. Policy LU-1.4.1: Infill Development

Currently, the East M and West M properties are vacant, which detracts from the character of the neighborhood and reduces the full potential of the town center concept envisioned for the PUD Site. The vacant sites also create a substantial gap in the urban fabric along 4<sup>th</sup> and M Streets. The proposed East M and West M buildings will remedy these issues. The design of the buildings complements the existing buildings within the PUD Site, and will strengthen the character of the adjacent mixed-use corridors. In addition, the massing of the buildings, and in particular the three-story podium and large open courtyards along M Street, successfully relate to the established

residential uses along the south side of M Street, while still leveraging the potential of this highly transit-accessible location.

9. Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Consistent with this policy, in designing the Second-Stage PUD, the Applicant sought to balance the housing supply in the area and expand neighborhood commerce, with the parallel goal of protecting the neighborhood character and restoring the environment.

10. Policy LU-2.2.4: Neighborhood Beautification

This policy encourages projects to improve the visual quality of the District's neighborhoods. As shown on plans included with this application, the East M and West M buildings are designed to improve the visual aesthetic of the Properties and the neighborhood in general. Development of the Properties will be a major improvement over the currently vacant lots, which detract from the neighborhood aesthetic. The Second-Stage PUD also includes a significant amount of landscaping and open spaces, which will enhance the streetscape and improve the visual quality of the surrounding area.

11. Policy LU-2.4: Neighborhood Commercial Districts and Centers

12. Policy LU-2.4.2: Hierarchy of Commercial Centers

The Comprehensive Plan recognizes neighborhood centers as an essential part of the District's neighborhoods and as the "heart of a neighborhood." Comprehensive Plan policies relating to neighborhood commercial centers acknowledge the need to maintain and reinforce the hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District, with each type of center reflecting its intended role and market area. The policies also promote expansion and improvement of existing centers where the current range of goods and services is insufficient to meet community needs. Based upon the supplemental guidance and recommendations of the SW Plan, the modified First-Stage PUD and Second-Stage PUD will

strengthen the PUD Site's role as a multi-neighborhood commercial center and town center by increasing the number of residential units and expanding the range of neighborhood-serving retail, service, and office uses within and around the PUD Site.

#### **F. Transportation Element**

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District's transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comprehensive Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving mobility and accessibility. As discussed above, the modified First-Stage PUD and the Second-Stage PUD will increase the amount of housing available near Metrorail, thereby making it easier for District residents to access transit and decrease the need, and associated economic burden, of owning a vehicle. Thus, the PUD is well positioned to advance the policies and goals of the Transportation Element including the following:

1. Policy T-1.1.4: Transit-Oriented Development

As described above, the modified First-Stage PUD and Second-Stage PUD is a textbook example of transit-oriented development due to its location adjacent to the Waterfront Metrorail station and proximity to multiple other forms of public transportation. The project also includes various TOD-related improvements, including the construction of new mixed-uses along two major transportation corridors, bicycle storage areas, and public space improvements, including new lighting, trees, benches, bicycle racks, and paving.

2. Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

The Applicant carefully considered and integrated bicycle and pedestrian safety considerations in the design of the East M and West M buildings. The buildings incorporate secure indoor bicycle parking and exterior short-term bicycle parking to encourage residents, visitors, and employees of the buildings to travel by bike. The Applicant will also repave the streetscape surrounding the buildings according to DDOT's standards, and will otherwise improve the public realm by planting trees and making other landscape and lighting improvements to improve the pedestrian experience. Together, these physical improvements to the streetscape will encourage bicycle and pedestrian activity and will bring additional revitalization to the area.

3. Policy T-2.3.3: Bicycle Safety

This policy promotes increasing bicycle safety through various measures including traffic calming techniques, the provision of public bicycle parking, and enforcement of regulations requiring private bicycle parking. This policy is supported by a Comprehensive Plan action that requires new commercial and residential buildings to be designed with amenities that accommodate bicycle users. The project is consistent with this policy since it will provide secure indoor bicycle parking and bicycle racks in public space to accommodate and encourage bicycle use by all building users.

4. Policy T-2.4.1: Pedestrian Network

5. Policy T-2.4.2: Pedestrian Safety

The modified First-Stage PUD and the Second-Stage PUD incorporate significant improvements to the public space that will improve the city's sidewalk system to form a network that links residents across the city. Moreover, the proposed improvements will improve safety and security in the neighborhood and will incorporate new pedestrian amenities that will encourage residents, visitors, and employees to walk within and around the PUD Site.

6. Policy T-3.1.1: Transportation Demand Management (TDM) Programs

Consistent with this policy, the PUD has a strong TDM program that reduces the number of vehicle trips and miles traveled and increases the efficiency of the transportation system.

**G. Housing Element**

The overarching goal of the Housing Element is to “[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia.” 10 DCMR §501.1. The modified First-Stage PUD and the Second-Stage PUD will help achieve this goal by advancing the policies discussed below.

1. Policy H-1.1.1: Private Sector Support

The Project helps meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the approximately 605 new residential units proposed for the East M and West M buildings combined will be a substantial contribution to the supply of District housing that is in close proximity to Metrorail stations. Moreover, the provision of new housing at this particular location is fully consistent with the District's land use policies.

2. Policy H-1.1.3: Balanced Growth

This policy strongly encourages the development of new housing on surplus, vacant, and underutilized land in all parts of the city, and recommends ensuring that a sufficient supply of land is planned and zoned to enable the city to meet its long term housing needs, including the needs for affordable housing and higher-density housing. The modified First-Stage PUD and Second-Stage PUD support these policy goals by developing new high-density housing on underutilized land in a rapidly growing and changing mixed-use neighborhood. Housing provided on the

properties will include market rate and affordable housing, to ensure that a sufficient housing supply is provided for District residents.

3. Policy H-1.1.4: Mixed Use Development

The modified First-Stage PUD and Second-Stage PUD are consistent with the goals of promoting mixed use development. The project incorporates residential, retail, and office uses on commercially zoned land, within a multi-neighborhood commercial center, and adjacent to a Metrorail station.

4. Policy H-1.1.5: Housing Quality

The Applicant will devote an amount equal to 8% of the project's residential gross floor area to affordable dwelling units, dedicated to households earning up to 60% of the MFI, which provides affordable housing that would otherwise not be provided if the buildings were constructed as office buildings as previously approved. Of the proposed affordable housing, the Applicant will dedicate two units in each building (four units total) as 3-bedroom units dedicated to households earning up to 60% of the MFI. The affordable housing will be designed and constructed according to the same high-quality architectural design standards used for the market-rate dwelling units, and will be indistinguishable from the market-rate dwelling units in their exterior appearance. Finally, the design of the project will address the need for open space and recreational amenities and will respect the design integrity of adjacent properties and the surrounding neighborhood.

5. Policy H-1.2.3: Mixed Income Housing

The residential component of the East M and West M buildings is mixed-income and includes both market-rate and affordable housing units. Thus, the modified First-Stage PUD and the Second-Stage PUD will advance the District's policy of distributing mixed-income housing

equitable across the city, rather than concentrating poverty within areas of the city that already have substantial affordable housing.

## **H. Economic Development Element**

By incorporating office and retail uses into the program of the East M and West M buildings, the modified First-Stage PUD and the Second-Stage PUD are consistent with several policies of the Economic Development Element as follows:

### **1. Policy ED-1.1.2: Economic Linkages**

The modified First-Stage PUD and the Second-Stage PUD are consistent with Policy ED-1.1.2 since they will enable new employment opportunities in the retail and office components, particularly the growth of businesses that supply essential goods and services to neighborhood residents.

### **2. Policy ED-1.1.5: Use of Large Sites**

Development of the Properties with mixed-use buildings composed of residential, retail, and office uses advances the goals of Policy ED-1.1.5 by advancing the multi-neighborhood commercial center / town center economic potential of the PUD Site. The Properties will be used to revitalize the neighborhood and diversify the District economy, particularly given their close proximity to Metrorail. Consistent with this policy, the properties will take advantage of creating opportunities for new jobs, in addition to new housing.

### **3. Policy ED-2.1.4: Diversified Office Options**

The modified First-Stage PUD and the Second-Stage PUD are consistent with this policy. As described in the Application Statement, there is no demand for significant new office development in the Southwest neighborhood, and as a result, the Applicant has been unable to secure financing for any future tenants for the East M and West M buildings. However, based on

the SW Plan and current market research, there is an unfulfilled demand for smaller office space that can accommodate mid- and low-range office space users, possibly locally-owned start-ups, and neighborhood-serving office uses such as medical/dental offices and accountants. Thus, the reduced amount of office space proposed by the Applicant will not only respond the current market demands of the Southwest neighborhood, it will also diversify the types of office spaces that are available in the town center established within the PUD Site.

#### 4. Policy ED-2.1.6: Local-Serving Office Space

By incorporating highly-trafficked office uses in the ground- and second-levels of the East M and West M buildings, the modified First Stage PUD and the Second-Stage PUD will successfully serve the neighborhood commercial district, residents, and employees within the area. Moreover, the types of office tenants envisioned as potentially occupying the proposed office space are consistent with the office uses that are specifically listed within this policy (“real estate and insurance offices, accountants, consultants, and medical offices”).

#### 5. Policy ED-2.2.1: Expanding the Retail Sector

Consistent with this policy, the modified First Stage PUD and the Second-Stage PUD incorporate significant new ground floor retail that will capitalize on the spending power of residents, workers, and visitors in the area and will meet the existing retail needs.

#### 6. Policy ED-2.2.3: Neighborhood Shopping

The modified First Stage PUD and the Second-Stage PUD will create new shopping opportunities within the Southwest neighborhood commercial center, which will better meet residents’ demand for basic goods and services. Consistent with this policy, the retail will be appropriately-scaled infill development and located on a vacant, underutilized site.

7. Policy ED-3.1.1: Neighborhood Commercial Vitality

By incorporating both retail and office uses within the primarily residential buildings, the Second-Stage PUD will strengthen the vitality and diversity of the Waterfront commercial center by attracting new businesses and improving the mix of goods and services available to residents, visitors, and employees in the area.

**I. Environmental Protection Element**

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biological resources. This element provides policies and actions on important issues such as restoring the city's tree canopy, energy conservation, and air quality. The modified First-Stage PUD and the Second-Stage PUD are fully consistent with the policies of the Environmental Protection Element because they incorporate street tree planting, landscaping, energy efficient systems and materials, alternative energy sources, and methods to reduce stormwater runoff. Additionally, the East M and West M buildings have been designed to meet LEED 4.0 Silver, which is equivalent to LEED Gold 2009 for New Construction.

1. Policy E-1.1.1: Street Tree Planting and Maintenance

As part of the modified First-Stage PUD and the Second-Stage PUD, the Applicant will reconstruct the streetscape adjacent to the Properties, which will include new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value.

2. Policy E-1.1.3: Landscaping

The project will incorporate significant landscaping within building courtyards, rooftop terraces, and green roofs, and will also include additional landscaping as part of the public space

improvements. These natural elements will enhance and beautify the streetscape, reduce storm water runoff, and strengthen the character of the public realm.

3. Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff

The design of the East M and West M buildings, and the public spaces surrounding the proposed buildings, include landscaping and green roofs, which will reduce stormwater runoff.

4. Policy E-3.2.1: Support for Green Building

This policy encourages the use of green building methods in new construction, as well as use of green building methods for operation and maintenance activities. The project is consistent with this policy. As stated above, the East M and West M buildings are designed to achieve LEED 4.0 Silver.

**J. Urban Design Element**

The goal of the Comprehensive Plan’s Urban Design Element is to “[e]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces” 10 DCMR §901.1. The modified First Stage PUD and the Second-Stage PUD will greatly assist in achieving this Comprehensive Plan goal. The height and massing of the East M and West M buildings is consistent with what has already been approved by the Commission, which relate to the other buildings within the PUD Site, and to the surrounding context.

1. Policy UD-2.2.1: Neighborhood Character and Identity

The modified First Stage PUD and the Second-Stage PUD will strengthen the defining visual qualities of the PUD Site and the Southwest neighborhood. Currently, the Properties create a significant gap in the streetscape along both 4<sup>th</sup> Street and M Street. Redevelopment of the

Properties with the East M and West M buildings will eliminate this gap and strengthen the character and identify of the town center that is envisioned within the PUD Site. The proposed development will also strengthen the definition of the 4<sup>th</sup> and M Street corridors and their unique corner intersection.

2. Policy UD-2.2.5: Creating Attractive Facades

The proposed buildings are designed in a manner that avoids large expanses of unarticulated facades through the use of projections, recesses, and a mixture of materials. Further, the large open courtyards facing M Street and upper levels setbacks establish an appropriate scale in relation to the existing residential uses across M Street. Overall, the proposed building design establishes an attractive building pattern at two prominent corner locations that complements the blocks and extends the pedestrian-scale quality of the streetscape along 4<sup>th</sup> and M Streets.

3. Policy UD-2.2.6: Maintaining Façade Lines

Currently, the existing use on the Properties creates substantial gaps in the street wall along 4<sup>th</sup> and M Streets. The project will rectify this problem since the proposed buildings will be constructed to create a strong urban street wall, generally in line with the existing buildings to the east and west along M Street, and to the north along 4<sup>th</sup> Street.

4. Policy UD-2.2.7: Infill Development

The East M and West M buildings will help strengthen the architectural quality of the immediate neighborhood by relating the architectural scale and massing of the buildings to the existing neighborhood, including the other buildings already constructed within the overall PUD Site.

5. Policy UD-2.3.1: Reintegrating Large Sites
6. Policy UD-3.1.6: Enhanced Street walls
7. Policy UD-3.1.7: Improving the Street Environment

These policies promote the reintegration of large, self-contained sites back into the city pattern. As noted in the Application Statement, the PUD Site was formerly improved with Waterside Mall, a “superblock” building that was constructed over the 4<sup>th</sup> Street right-of-way. Following the Commission’s approval of the PUD, Waterside Mall was demolished, 4<sup>th</sup> Street was reestablished, and the buildings constructed thus far on the PUD Site have facilitated the reintegration of the PUD Site into the urban fabric. The construction of the East M and West M buildings will further advance the reintegration of the PUD Site by eliminating substantial gaps in the street walls that exist along 4<sup>th</sup> and M Streets. The project will also aid in creating an attractive and interesting commercial streetscape through the proposed first- and second-level retail, service, and office uses which will make walking more comfortable and convenient.

8. Policy UD-3.1.11: Private Sector Streetscape Improvements

As part of the project, the Applicant will reconstruct the public spaces adjacent to the East M and West M buildings. Doing so will improve sidewalk conditions, incorporate landscaping and pedestrian-oriented street furniture, and provide new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value.

9. Policy UD-3.2.5: Reducing Crime Through Design

The redevelopment of the Properties with mixed-use buildings containing residential, office, and retail uses will bring additional "eyes and ears" to the street, as well as improved lighting, clear lines of sight, and visual access, all of which will help to minimize the potential for crime in the immediate area.

**K. Lower Anacostia Waterfront/Near Southwest Area Element**

The PUD Site is located within the boundaries of the Lower Anacostia Waterfront/Near Southwest Area Element. Section 1907 of the Comprehensive Plan sets forth the Lower Anacostia Waterfront/Near Southwest Area Element’s planning and development priorities. One stated priority is to revitalize and conserve existing neighborhoods and provide diverse housing choices so that a mix of household types and incomes are accommodated. Another priority is to reinforce existing neighborhood commercial centers and enhance the quality of life for existing residents, all while being responsive to local concerns about traffic, crowd-control, displacement, community service impacts, and changing neighborhood character. The modified First-Stage PUD and the Second-Stage PUD are consistent with these policies because the new mixed-use buildings will help revitalize the existing neighborhood with additional housing choices that will accommodate a range of household types and income levels. The project will also be responsive to local concerns by providing appropriate public benefits and project amenities and by working closely with ANC 6D and other community stakeholders and organizations to ensure that their concerns are adequately addressed.

The modified First-Stage PUD and the Second-Stage PUD are also consistent with the specific policies designed to guide development of the “Southwest Waterfront” neighborhood, within which the PUD Site is located. The project supports Policy AW-2.1.1 by developing the Properties with high-density housing, commercial uses, and improved open space and parking. The East M and West M buildings capitalize on height opportunities afforded by the PUD to provide public spaces adjacent to the buildings and large internal courtyards. The project is also consistent with Policy AW-2.1.2, which encourages the creation of new public spaces and plazas. Finally, the modified First-Stage PUD and Second-Stage PUD advances Policy AW-2.1.6, which

calls for the redevelopment of the former Waterside Mall (essentially the PUD Site) with residential, office, and local-serving retail uses in a manner that establishes a retail anchor for the surrounding community, restores 4th Street as part of the city grid, and improves aesthetics, circulation, and connectivity to surrounding uses.