

SUMMARY OF COMPLIANCE WITH THE COMPREHENSIVE PLAN

The Project advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use Map and Generalized Policy Map, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

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 Project significantly advances these purposes by promoting the social, physical, and economic development of the District through the provision of a high-quality residential Project with ground floor retail on the Site, without generating any adverse impacts.

B. Future Land Use Map

According to the District of Columbia Comprehensive Plan Future Land Use Map, the Site is designated mixed use Medium Density Residential and Moderate Density Commercial. The Medium Density Residential designation is used to define neighborhoods or areas where mid-rise (4-7 stories) apartment buildings are the predominant use. Pockets of low and moderate density housing may exist within these areas. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. The R-5-B and R-5-C Zone districts (the RA-2 and RA-3 Zone districts under the 2016 Zoning Regulations) are generally consistent with the Medium Density designation, although other zones may apply. 10A DCMR § 225.5.

The Moderate Density Commercial designation is used to define shopping and service areas that are somewhat more intense in scale and character than the low-density commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in low density commercial areas but generally do not exceed five stories in height. The corresponding Zone districts are generally C-2-A, C-2-B, and C-3-A (the MU-4, MU-5, and MU-7 Zone districts under the 2016 Zoning Regulations), although other districts may apply. 10A DCMR § 225.9.

The Framework Element of the Comprehensive Plan provides that the Land Use Map is not a zoning map. *See* 10A DCMR § 226.1(a); *see also* Z.C. Order No. 11-13; Z.C. Order No. 10-28. Whereas zoning maps are parcel-specific and establish detailed requirements for setback,

height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. *Id.* By definition, the Map is to be interpreted broadly. *Id.* Furthermore, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate. The granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited here. *Id.* at § 226.1(c). The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans. *Id.* at § 266.1(d).

Thus, in evaluating the proposed map amendment, the Site should be viewed in context and not as an isolated parcel. When taken in context with the surrounding neighborhood, the Applicant's proposal to rezone the Site from the MU-4 District to the MU-5-B District in order to construct the mixed-use Project with new housing, affordable housing, and neighborhood-serving retail use is consistent with the Comprehensive Plan's designation of the Site, particularly because the MU-5 District is specifically identified as a corresponding zone district in the Moderate Density Commercial category.

C. Generalized Policy Map

The District of Columbia Comprehensive Plan Generalized Policy Map designates the Site as a Main Street Mixed Use Corridor. Main Street Mixed Use Corridors are traditional commercial business corridors with a concentration of older storefronts along the street. The service area for Main Streets can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper story residential or office uses. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment. 10A DCMR § 223.14.

The proposed rezoning and PUD redevelopment of the Site is consistent with the policies indicated for Main Street Mixed Use Corridors because the Project will improve the traditional commercial corridor by providing a pedestrian-oriented streetscape with a traditional retail storefront with residential units in the upper stories. Doing so will foster economic development and create new housing opportunities within a dense urban neighborhood. The Site is also located in a transit-oriented location, such that redevelopment will support transit use.

D. Compliance with Guiding Principles of the Comprehensive Plan

The Project is consistent with the guiding principles in the Comprehensive Plan for managing growth and change, creating successful neighborhoods, and building green and healthy communities, as set-forth in the Comprehensive Plan.

1. Managing Growth and Change.

In order to manage growth and change in the District, the Comprehensive Plan encourages, among other goals, the growth of both residential and non-residential uses. The Comprehensive Plan also states that redevelopment and infill opportunities along corridors is an important part of reinvigorating and enhancing neighborhoods. The Project is fully-consistent with each of these goals. Redeveloping the Site as a vibrant mixed-use building with residential and retail/restaurant uses will further the revitalization of the surrounding neighborhood. The proposed retail/restaurant uses will create new jobs for District residents, further increase the city's tax base, and help to reinvigorate the existing neighborhood fabric.

2. Creating Successful Neighborhoods.

One of the guiding principles for creating successful neighborhoods is getting public input in decisions about land use and development; from development of the Comprehensive Plan to implementation of the plan's elements. The Project furthers this goal since, as part of the PUD process, the Applicant is working closely with ANC 3E to ensure that the Project provides a positive impact on the immediate neighborhood. The Applicant is presently in the process of working with ANC 3E and other stakeholders on the proposed public benefits package, and will continue to work to refine the details of the package prior to the public hearing.

3. Building Green and Healthy Communities.

A major objective for building green and healthy communities is that building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. As discussed in more detail in the Application Statement, the Project will include a substantial number of sustainable design features and will achieve LEED-Gold certification.

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. The Land 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. 10A DCMR § 300.1. Because the Land Use Element integrates the policies and objectives of all the other District Elements, "it should be given greater weight than the other elements as competing policies in different elements are balanced." 10A DCMR § 300.3.

The District's underlying goal of the Land Use Element is to:

[e]nsure the efficient use of land resources to meet the long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and

to effectively balance the competing demands for land to support the many activities that take place within District boundaries. 10A DCMR § 302.1.

The proposed Zoning Map amendment will advance this important goal by complying with the policies listed below and set forth in the Land Use Element of the Comprehensive Plan.

- *Policy LU-1.3.2: Development Around Metrorail Stations* –
The Project will provide new residential and retail development approximately 1.5 blocks north of the Tenleytown Metrorail station in an infill site that has great growth potential. This type of development at the Site will minimize the necessity of automobile use and maximize transit ridership.
- *Policy LU-1.3.3: Housing Around Metrorail Stations* –
Similar to above, the Project will allow for new residential density at the Site that will be developed with new housing, including 12% affordable housing at 60% and 50% of the Median Family Income (“MFI”), in close proximity to the Tenleytown Metrorail station. New development in this location will reduce the need to own a private vehicle and thus decrease overall household expenses for residents who are impacted the most.
- *Policy LU-1.4.1: Infill Development* –
Redevelopment of the Site will allow for infill development on land that is presently underutilized. The Project will complement the established character of the area, particular other recently-developed mixed-use projects in the immediate vicinity, and will not create any sharp changes in the surrounding physical development patterns.
- *Policy LU-2.1.1: Variety of Neighborhood Types* –
The Project will help create a varied neighborhood with higher density development at the Site incorporated into the existing context. Redevelopment will not negative impact the existing identity and character of the neighborhood because it will replace an underutilized building, activate the Site with new ground floor and penthouse retail/restaurant space, provide much-needed new housing and affordable housing, and generally be a positive attribute that helps to improve the area.
- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods* –
The Project will allow for increased housing supply, including affordable housing, while utilizing sustainable design and building elements to help restore the environment. The Project will achieve LEED Gold certification and will comply with the District of Columbia’s Green Building Act of 2006 (D.C. Official Code §6-1451.01 *et seq.* (2012)) and the District’s stormwater management regulations (Title 21 DCMR, Chapter 5 and Title 20 DCMR, Chapter 31). Doing so will help to improve the surrounding community and help to create a successful and revitalized neighborhood.
- *Policy LU-2.2.4: Neighborhood Beautification* –
The Project will improve the visual quality of the neighborhood by providing an upgraded streetscape that includes new landscaping, paving, lighting, and other pedestrian-oriented

amenities. The building will also incorporate visually appealing façade treatments and high quality materials that will all together help to beautify the neighborhood.

F. Housing Element

The District’s overarching goal for housing 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.” 10A DCMR § 501.1. The proposed Zoning Map amendment will advance this goal and several policies within the Housing Element of the Comprehensive Plan as follows:

- *Policy H-1.1.1: Private Sector Support -*
The Project is privately funded and accordingly will help meet the needs of present and future District residents at locations consistent with District land use policies and objectives by providing new housing and affordable housing at the Site. A minimum of 12% of the residential gross floor area will be devoted to affordable housing at 60% of the MFI, and a minimum of 12% of the penthouse habitable space will be devoted to affordable housing in the building at 50% of the MFI. Moreover, the housing will be provided in a mixed-use neighborhood adjacent to numerous Metrobus routes and the Tenleytown Metrorail station, which is consistent with District land use policies.
- *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 need for low and moderate density single family homes as well as the need for higher-density housing. The Project supports this policy goal by developing new, medium density residential and moderate density commercial development on underutilized land in a rapidly growing and changing mixed-use neighborhood. The Project will help the District meet its long-term housing and affordable housing needs.
- *Policy H-1.1.5: Housing Quality -*
Consistent with this policy, the design of the affordable housing will meet the same high quality architectural standards of the market-rate housing. In fact, the affordable units will be larger in size than the market-rate units, which is consistent with the District’s goal of prioritizing affordable family-sized units.
- *Policy H-1.2.1: Affordable Housing Production as a Civic Priority*
- *Policy H-1.2.3: Mixed Income Housing*
- *Policy H-1.3.1: Housing for Families*
As stated above, the Project will provide new affordable housing reserved for households earning up to 50% and 60% of the MFI. The affordable units will be distributed throughout the building, will be indistinguishable from the market-rate units, and will not be concentrated in an area of the city that advances the further concentration of poverty.

G. Transportation Element

The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.” 10A DCMR § 401.1. The proposed Zoning Map amendment advances this goal by allowing for new mixed-use development on property located one block away from a major District corridor and in close proximity to a Metrorail station and multiple Metrobus routes. The Zoning Map amendment also advances the specific policies listed below:

- *Policy T-1.1.4: Transit-Oriented Development* –
As described above, the Project is an excellent example of transit-oriented development since it is located in close walking distance to a Metrorail station, multiple Metrobus routes, and several Capital Bikeshare locations. The Project also includes various transportation improvements, including the construction of a new mix of uses in a commercial neighborhood, on-site parking spaces including EV parking spaces and car share spaces, secure on-site bicycle storage, and public space improvements, including new lighting, trees, planting beds, bicycle racks, and new sidewalk paving. The Applicant will also work with DDOT to develop an appropriate transportation demand management (“TDM”) plan for the Project that is based on the Site’s transit-oriented, infill location
- *Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning*
The Project carefully considers and integrates bicycle and pedestrian safety considerations by incorporating secure, indoor bicycle parking, short-term bicycle racks in public space, and providing enhanced, pedestrian-friendly streetscape amenities including landscaping, new paving, and lighting. Together, these physical enhancements to the streetscape will encourage bicycle and pedestrian activity and will bring additional revitalization to the area.
- *Action T-2.3-A: Bicycle Facilities*
This element encourages new developments to include bicycle facilities. As stated above, the Project will include secure indoor bicycle parking and exterior bicycle racks that will accommodate and encourage bicycle use.
- *Policy T-2.4.1: Pedestrian Network* –
The project will improve the pedestrian network by upgrading the streetscape in front of the Site to ensure that pedestrians have safe and convenient pathways to access nearby public transportation options and other uses and designations in the neighborhood.

H. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District’s land, air, water, energy, and biologic resources. 10A DCMR § 600.1. The overarching goal for environmental protection is to “[p]rotect, restore, and enhance the natural and man-made environment in the District of Columbia, taking steps to improve environmental

quality, prevent and reduce pollution, and conserve the values and functions of the District's natural resources and ecosystems." 10A DCMR § 601.1. The proposed Project is consistent with this goal and with the following specific policies:

- *Policy E-1.1.1: Street Tree Planting and Maintenance*
- *Policy E-1.1.3: Landscaping*
- *Policy E-2.2.1: Energy Efficiency*
- *Policy E-2.2.4: Alternative Energy Sources*
- *Policy E-2.2.5: Energy Efficient Building and Site Planning*
- *Policy E-3.1.1: Maximizing Permeable Surfaces*
- *Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff*
- *Policy E-3.1.3: Green Engineering*
- *Policy E-3.2.1: Support for Green Building*

In accordance with the Policies listed above, the Project includes new landscaping, energy and water efficient systems, construction waste management techniques, methods to reduce stormwater runoff, and bicycle parking. Moreover, the Project will be located in a walkable, transit-oriented, infill location, thus minimizing the need for residents, visitors, retail patrons, and employees to use a car to access the Site. Moreover, the Project will be designed to achieve LEED-Gold certification, and will incorporate energy-efficient systems to reduce energy use and provide alternative energy sources to contribute to the District's energy efficiency goals. The Project will comply with the Green Building Act and the District's stormwater management regulations, will meet the GAR requirements of the Zoning Regulations, and will be consistent with the Sustainable DC Plan.

I. 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.

10A DCMR § 901.1. In keeping with this objective, the Applicant has gone to great lengths to align the Project with the character of the surrounding neighborhood. Consistent with *Policy UD-2.2.1: Neighborhood Character and Identity*, and *Policy UD-2.2.7: Infill Development*, the Project will help strengthen the architectural quality of the immediate neighborhood by relating the Project's scale to the existing neighborhood context. The Project includes elegant, visually-interesting and well-designed building façades to create stunning visual interest and contribute to the architectural quality of the neighborhood and streetscape. See *Policy UD-2.2.5*. The Project is also consistent with the goals of *Policy UD-3.2.5: Reducing Crime Through Design*, since the Project 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 criminal activity in the immediate area.

J. Rock Creek West Area Element

The Site is located in the Rock Creek West Area of the Comprehensive Plan, which encompasses 13 square miles in the northwest quadrant of the District. The demand for housing has been consistently strong in Rock Creek West, with growth resulting from a combination of factors, including accessible neighborhood retail and convenient Metrorail access. *See* 10A DCMR § 2300.7. Although there are limited opportunities for new housing development in the area, there is a substantial unmet need for new affordable units. *See* 10A DCMR § 2300.8. Some of the District's most vibrant retail districts are located around the area's Metrorail stations and along its major corridors. *See* 10A DCMR § 2300.5. In accordance with these characteristics, the Project is consistent with the following specific policies set forth for the Rock Creek West Area:

- *Policy RCW-1.1.3: Conserving Neighborhood Commercial Centers*
The Project is consistent with this policy because it will support local retail use in the area's Tenleytown commercial area. The mixed-use residential and retail building is a compatible new use for the area, and supports the District's goals of providing affordable housing in commercial centers, sustaining new neighborhood-serving retail, and bringing families back to the District through development of larger sized affordable units.
- *Policy RCW-1.1.4: Infill Development*
The Project is an excellent example of infill development in an area designated for commercial land use on the Future Land Use Map. The Applicant will work with the ANC, residents, and community organizations to develop the mixed-use project that contains both housing and commercial uses, rather than just a single use. The Project's proposed height and density is appropriate to the scale and character of the surrounding community, and will be designed and located so as to protect existing residential uses from any adverse impacts.
- *Policy RCW-1.1.6: Metro Station Areas*
Consistent with this policy, the Project recognizes the importance of the Tenleytown Metrorail station by redeveloping the underutilized Site with new housing and retail uses in a manner that is consistent with the Future Land Use Map, the Generalized Policy Map, and the Generalized Policies of the Comprehensive Plan, as set forth herein.
- *Policy RCW-1.1.14: Bicycle Facilities*
The Project will improve facilities for bicyclists by providing long- and short-term on-site bicycle parking for the building's residents, visitors, retail patrons, and employees.
- *Policy RCW-1.1.15: Metro Access*
Redevelopment of the Site will improve pedestrian and bicycle access to the Tenleytown Metrorail station by improving the visual and urban design qualities on and in front of the Site. Consistent with this policy's recommendation, the Project will include car share spaces near the Metrorail station, which will reduce parking congestion and encourage car sharing as an alternative to vehicle ownership.

The Site is located within the Wisconsin Avenue Corridor Policy Focus Area within the Rock Creek West Area Element. Most of the planning focus along the corridor has been around the Metrorail stations at Tenleytown and Friendship Heights, which are considered “opportunity areas for new housing.” See 10A DCMR § 2312.4. The proposed Project is consistent with the specific policies of the Wisconsin Avenue Corridor Policy Focus Area as follows:

- *Policy RCW-2.2.1: Housing Opportunities*
The Project recognizes the opportunity for additional housing with retail space on an underutilized commercially zoned site adjacent to Wisconsin Avenue. In furtherance of this Policy, the Project will be compatible with the existing nearby residential neighborhoods.
- *Policy RCW-2.2.2: Tenleytown Metrorail Station Area*
Consistent with this policy, the Project will create new well-planned economic activity around the Tenleytown Metrorail station area. The Project will help to encourage use of public transportation infrastructure, maximize Metrorail access, attract new retail/restaurant customers and new business establishments, provide much-needed new services to neighborhood residents, provide for the development of new housing, all at a height and density that is appropriate for the Site’s location, consistent with surrounding development, and provides an architectural design that is sensitive to the area’s existing vernacular.