

Consistency with the Comprehensive Plan and Southwest Neighborhood Plan

Map Designation	Application to the Project
<p>The NE Parcel is designated on the Generalized Policy Map as a “Land Use Change Area,” which areas are intended “to encourage and facilitate new development . . . to become mixed-use communities containing housing, retail shops, services, workplaces, parks and civic facilities, . . . [and] to create high quality environments that include exemplary site and architectural design and that are compatible with and do not negatively impact nearby neighborhoods.” 10-A DCMR §§ 223.11, 223.12.</p>	<p>The Project* is part of a new mixed-use community containing housing, retail, services, arts, educational, office uses, outdoor areas and other civic facilities. As part of the overall Waterfront Station PUD*, the Project contributes to a high quality environment with exemplary site and architectural design that is compatible with and does not negatively impact nearby neighborhoods, as demonstrated in the first-stage PUD and in this application.</p>
<p>The NE Parcel is shown on the Future Land Use Map as mixed-use “High Density Residential” and “High Density Commercial” allowing for high-rise apartment and/or commercial buildings in excess of 8 stories and expressly contemplating C-3-C zoning. <i>Id.</i> §§ 225.6, 225.11.</p>	<p>The Project is a high-rise, mixed-use building consistent with the Future Land Use Map designation applicable to the NE Parcel. The Zoning Map amendment approved as part of the Waterfront Station PUD is consistent with the zone designations contemplated in the high density zones.</p>

*Unless otherwise defined in this Exhibit, all capitalized terms used herein have the meaning first set forth in the Statement to which this Exhibit is attached.

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Framework Element: Guiding Principles	
<p>1. Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives such as poverty, crime, and homelessness. <i>Id.</i> § 217.1</p>	<p>The Project represents positive, desirable change, with new public benefits and amenities and improvement of a vacant lot.</p>
<p>2. A city must be diverse to thrive, and the District cannot sustain itself by only attracting small, affluent households. To retain residents and attract a diverse population, the city should provide services that support families. A priority must be placed on sustaining and promoting safe neighborhoods offering health care, quality education, transportation, child care, parks, libraries, arts and cultural facilities, and housing for families. <i>Id.</i> § 217.2 (emphasis added)</p>	<p>The Project adds new neighborhood-serving uses including educational and arts uses that add diversity to the existing uses in the town center. The Project’s contribution of uses include those that serve family needs.</p>
<p>3. Diversity also means maintaining and enhancing the District’s mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples. <i>Id.</i> § 217.3</p>	<p>The Project includes a substantial portion of affordable housing (137 new units) that adds economic diversity to the housing stock.</p>
<p>4. The District needs both residential and non-residential growth to survive. Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. <i>Id.</i> § 217.4</p>	<p>The Project adds both residential and non-residential uses in support of this principle.</p>
<p>5. Much of the growth that is forecast during the next 20 years is expected to occur on large sites that are currently isolated from the rest of the city. Rather than letting these sites develop as gated or self-contained communities, they should become part of the city’s urban fabric through the continuation of street patterns, open space corridors and compatible development patterns where they meet existing neighborhoods. Since the District is landlocked, its large sites must be viewed as extraordinarily valuable assets. Not all should be used right away-some should be “banked” for the future. <i>Id.</i> § 217.5</p>	<p>The Project is located on a large site that has developed in a manner that continues the surrounding street grid and is compatible with surrounding development. The District’s retention of the fee ownership interest in the NE Parcel allows it to be redeployed for public purposes again in the future.</p>
<p>6. 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 not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. <i>Id.</i> § 217.6</p>	<p>The Project is a redevelopment of an infill site near transit. The Project respects the surrounding community. An infrastructure impact analysis is included in Exhibit I.</p>
<p>7. Growth in the District benefits not only District residents, but the region as well. By accommodating a larger number of jobs and residents, we can create the critical mass needed to support new services, sustain public transit, and improve regional environmental quality. <i>Id.</i> § 217.7</p>	<p>The Project is part of a regionally-significant development that adds new residents, jobs, and retail and cultural opportunities.</p>

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<p>8. The residential character of neighborhoods must be protected, maintained and improved. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places in which to live. These qualities can lead to development and redevelopment pressures that threaten the very qualities that make the neighborhoods attractive. These pressures must be controlled through zoning and other means to ensure that neighborhood character is preserved and enhanced. <i>Id.</i> § 218.1</p>	<p>The Project is respectful of nearby residential neighborhoods and does not threaten any unique qualities of Southwest DC. Instead, the Project enhances the qualities of Southwest neighborhoods with neighborhood-serving ground floor uses as well as new residents to help support a revitalized “town center”.</p>
<p>9. Many neighborhoods include commercial and institutional uses that contribute to their character. Neighborhood businesses, retail districts, schools, park and recreational facilities, houses of worship and other public facilities all make our communities more livable. These uses provide strong centers that reinforce neighborhood identity and provide destinations and services for residents. They too must be protected and stabilized. <i>Id.</i> § 218.2</p>	<p>The Project adds to a town center neighborhood-serving uses that support and enhance the existing neighborhood commercial, religious, and service uses.</p>
<p>10. The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. <i>Id.</i> § 218.3</p>	<p>The Project advances this principle through the production of new affordable housing, with 30 percent of the units (a total of 137 units) in the Project set aside for very low-income and low-income residents.</p>
<p>11. The District of Columbia contains many buildings and sites that contribute to its identity. Protecting historic resources through preservation laws and other programs is essential to retain the heritage that defines and distinguishes the city. Special efforts should be made to conserve row houses as the defining element of many District neighborhoods, and to restore neighborhood “main streets” through sensitive renovation and updating. <i>Id.</i> § 218.4</p>	<p>The Project does not adversely affect any historic resources or neighborhoods and contributes to the strong character of mid-century Modernism and contemporary architecture in Southwest DC.</p>
<p>12. Each neighborhood is an integral part of a diverse larger community that contributes to the District’s identity. Growing an inclusive city means that all neighborhoods should share in the overall social responsibilities of the community, including housing the homeless, feeding the hungry, and accommodating the disabled. <i>Id.</i> § 218.5</p>	<p>The Project helps establish Waterfront Station as a town center for Southwest DC and adds a diversity of uses and housing that serve a wide range of the District’s population.</p>
<p>13. Enhanced public safety is one of the District’s highest priorities and is vital to the health of our neighborhoods. The District must continue to improve safety and security, and sustain a high level of emergency police, fire, and medical assistance. Moreover, the District must engage in appropriate planning and capital investments to reduce the likelihood and severity of future emergencies. <i>Id.</i> § 218.6</p>	<p>The Project’s development of a currently vacant lot improves security. The Project is also designed to promote and support public safety and health.</p>
<p>14. Confidence in government begins at the neighborhood level. It is built block-by-block, based on day-to-day relationships and experiences. Meaningful citizen participation and quality, responsive neighborhood services are essential to sustain successful neighborhoods. <i>Id.</i> § 218.7</p>	<p>The Project’s design and mix of uses are the result of several months of community engagement and public participation. The</p>

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15. Public input in decisions about land use and development is an essential part of creating successful neighborhoods, from development of the Comprehensive Plan to every facet of its implementation. <i>Id.</i> § 218.8	Applicant expects that such engagement and participation will continue through the PUD review process.
16. Increasing access to jobs and education by District residents is fundamental to improving the lives and economic well-being of District residents. Education must equip students with the skills and tools to succeed. <i>Id.</i> § 219.1	The Project provides space for an important early-childhood education use in Southwest and provides new transit-accessible jobs.
17. An economically strong and viable District of Columbia is essential to the economic health and well-being of the region. Thus, a broad spectrum of private and public growth (with an appropriate level of supporting infrastructure) should be encouraged. The District’s economic development strategies must capitalize on the city’s location at the center of the region’s transportation and communication systems. <i>Id.</i> § 219.2	The Project includes private growth that is tailored to the level of supporting infrastructure. The Project capitalizes on the District’s location and the presence of transit.
18. Increasing access to education and employment is linked to broader social goals such as strengthening families, creating a better future for the city’s youth, and reducing chronic and concentrated poverty. Therefore, physical plans for the city must be accompanied by plans and programs to improve our educational system, improve literacy and job training, and link residents to quality jobs. <i>Id.</i> § 219.3	The Project is mindful of District youth by providing an early-childhood educational use, an outdoor play area, and an opportunity for synergies with the nearby public library. The Project’s educational and arts resources and opportunity to engage with a newly-renovated library support these principles.
19. The overarching goals of the Comprehensive Plan cannot be achieved without sustained investment in public school and library facilities. The physical condition of these facilities must be improved before the vision of a more inclusive city can be truly achieved. <i>Id.</i> § 219.4	
21. Land development policies should be focused to create job opportunities for District residents. This means that sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. A mix of employment opportunities to meet the needs of residents with varied job skills should be provided. <i>Id.</i> § 219.6	The Project develops vacant land and adds new jobs in an area that from a jobs perspective is still growing. The Project’s new jobs are transit accessible and range from entry-level to management positions and will require a range of educational backgrounds.
22. Providing more efficient, convenient, and affordable transportation for residents to access jobs in the District and in the surrounding region is critical to achieve the goal of increasing District residents’ access to employment. <i>Id.</i> § 219.7	The Project enhances transit use and encourages walking and biking. It provides adequate parking for the proposed uses.
24. Despite the recent economic resurgence in the city, the District has yet to reach its full economic potential. 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 District’s economic development expenditures should help support local businesses and provide economic benefits to the community. <i>Id.</i> § 219.9	The Project’s theater use will bring visitors to a neighborhood beyond the traditional Downtown/National Mall area and will bring neighborhood-serving uses to an area that is intended to serve as a town center.
25. Increased mobility can no longer be achieved simply by building more roads. The priority must be on investment in other forms of transportation, particularly transit. Mobility can be enhanced further by improving the connections between different transportation modes, improving traveler safety and security, and increasing system efficiency. <i>Id.</i> § 220.1	The Project encourages multi-modal access given the location to the Metrorail, its prioritization of walking and bicycling, and its relative de-emphasis of vehicles.

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26. Transportation facilities, including streets, bridges, transit, sidewalks, and paths, provide access to land and they provide mobility for residents and others. Investments in the transportation network must be balanced to serve local access needs for pedestrians, bicyclists, transit users, autos and delivery trucks as well as the needs of residents and others to move around and through the city. <i>Id.</i> § 220.2	The Project supports and serves pedestrians and cyclists. Loading for the Project occurs entirely out of the public realm. A new private drive allows for off-street pick-up and drop-off.
27. Washington’s wide avenues are a lasting legacy of the 1791 L’Enfant Plan and are still one of the city’s most distinctive features. The “great streets” of the city should be reinforced as an element of Washington’s design through transportation, streetscape, and economic development programs. <i>Id.</i> § 220.3	The Project, as part of the overall Waterfront Station PUD, supports the reopening of 4 th Street, SW, a part of the L’Enfant Plan.
29. The District continues to grow in reputation as an international cultural center. To sustain this growth, it must continue to support a healthy arts and cultural community through its land use, housing, and economic development policies. The power of the arts to express the identity of each community while connecting neighborhoods and residents must be recognized. <i>Id.</i> § 220.5	The Project supports arts and cultural development through the addition of a new live theater use in a transit-accessible location.
30. Residents are connected by places of “common ground,” such as Union Station and Eastern Market. Such public gathering places should be protected, and should be created in all parts of the city as development and change occurs. <i>Id.</i> § 220.6	The Project enhances the existing publicly-accessible spaces in Waterfront Station and adds a new one with features for children.
31. The District’s communities are connected by a shared heritage of urban design, reflecting the legacy of the L’Enfant Plan, the McMillan Plan, the Height Act of 1910, and preservation of much of the historic urban fabric. After more than two centuries of building, the nation’s capital is still a remarkable place. Urban design and streetscape policies must retain the historic, majestic, and beautiful qualities that make Washington unique among American cities. <i>Id.</i> § 220.7	The Project features urban design principles that are compatible with the surrounding buildings and that reinforce contemporary best practices such as orientation to the street and a lack of surface parking.
32. The site selected for the national capital was characterized by a very special topography, including hills interlaced with broad rivers and streams. The topography allowed for the construction of a special collection of buildings that give the District a unique profile. This profile has been further protected by local and national ordinances and must continue to be protected in the future. This should include the protection of views and vistas and the enhancement of city gateways. <i>Id.</i> § 221.1	The Project enhances vistas into Waterfront Station and does not disrupt views north along 4 th Street, SW into the heart of the National Mall.
33. The earth, water, air, and biotic resources of the District must be protected. Furthermore, such resources should be restored and enhanced where they have been degraded by past human activities. In particular, reforestation of the District and maintenance of its tree cover should be emphasized to sustain the District’s reputation as one of America’s “greenest” cities. <i>Id.</i> § 221.2	The Project is constructed on an infill, unforested location and will result in the planting of additional trees. The Project is designed with environmentally-progressive principles and will be certified LEED Gold 2009. The Project adds rooftop solar and many other green features.
34. 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, and reduce harmful effects on the natural environment. <i>Id.</i> § 221.3	

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<p>35. Planning decisions should improve the health of District residents by reducing exposure to hazardous materials, improving the quality of surface and groundwater, and encouraging land use patterns and land uses that reduce air pollution and facilitate pedestrian and bicycle travel. <i>Id.</i> § 221.4</p>	<p>The Project’s transit-oriented location is considered to be environmentally preferable. The Project includes stormwater and landscaping elements that improve surface and ground water quality.</p>
<p>36. The District’s parks and open spaces provide health, recreational, psychological, aesthetic, and ecological benefits that contribute to the quality of life. Maintenance and improvement of existing parks, and increased access to open space and recreation across the city are basic elements of the city’s vision. The District’s public open spaces should be protected against exploitation, and their recreational and environmental values should be conserved. <i>Id.</i> § 221.5</p>	<p>The Project’s new private and public open spaces improve the quality of life of existing and new residents in support of the objectives of this Guiding Principle.</p>
<p>Land Use Element</p>	
<p>Policy LU-1.1.3: Central Employment Area--Continue the joint federal/District designation of the Central Employment Area [“CEA”] within the District of Columbia. The CEA shall include existing “core” federal facilities such as the US Capitol Building, the White House, and the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States Government. Additionally, the CEA shall include the greatest concentration of the city’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 city, 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 (for example, 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 to establish federal leases. The boundaries of the CEA are shown in Figure 3.2. <i>Id.</i> § 304.8</p>	<p>The Project is within the boundaries of the CEA. It includes a relatively high overall density of residential, commercial, and entertainment uses. The Project’s density supports economic growth and the Project’s design reinforces the urban character encouraged within the CEA.</p>
<p>Policy LU-1.1.4: Appropriate Uses in the CEA--Ensure that land within the [CEA] is used in a manner which reflects the area’s national importance, its historic and cultural significance, and its role as the center of the metropolitan region. Federal siting guidelines and District zoning regulations should promote the use of this area with high-value land uses that enhance its image as the seat of the national government and the center of the District of Columbia, and that make the most efficient possible use of its transportation facilities. <i>Id.</i> § 304.9</p>	<p>The Project represents the highest and best use of land within the CEA: it includes high-density residential uses with supporting ground floor retail. It makes efficient use of the nearby Metrorail station by developing density within one block of such station.</p>

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<p>Policy LU-1.1.5: Urban Mixed Use Neighborhoods--Encourage new central city mixed-use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas: 1. Mt. Vernon Triangle; 2. North of Massachusetts Avenue (NoMA); 3. Downtown East; 4. South Capitol Street corridor/Stadium area; 5. Near Southeast/Navy Yard; 6. Center Leg Freeway air rights; and 7. Union Station air rights. 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 ensure that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land-use mix <i>Id.</i> § 304.11</p>	<p>The Project is within the prioritized central city mixed-use neighborhoods identified in the Lower Anacostia Waterfront/Near Southwest Area Element. The Project is being developed as part of an attractive pedestrian-oriented neighborhood with high-quality architecture and interesting, high-quality urban spaces. The Project includes a high percentage mix of affordable housing.</p>
<p>Policy LU-1.1.6: Central Employment Area Historic Resources--Preserve the scale and character of the Central Employment Area’s historic resources, including the streets, vistas, and public spaces of the L’Enfant and McMillan Plans as well as individual historic structures and sites. Future development must be sensitive to the area’s historic character and should enhance important reminders of the city’s past. <i>Id.</i> § 304.12</p>	<p>The Project is part of the overall Waterfront Station effort to restore and enhance the original L’Enfant street plan for Southwest DC with the re-opening of 4th Street, SW.</p>
<p>Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites--Recognize the potential for large, government-owned properties to supply needed community services, create local housing and employment opportunities, remove barriers between neighborhoods, provide large and significant new parks, enhance waterfront access, and improve and stabilize the city’s neighborhoods. <i>Id.</i> § 305.5</p>	<p>The Project is part of a comprehensive redevelopment of a large, formerly government-owned site that now includes a mix of community uses, housing and employment opportunities. The Project continues with efforts to improve and stabilize Southwest DC neighborhoods.</p>
<p>Policy LU-1.2.2: Mix of Uses on Large Sites--Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses. <i>Id.</i> § 305.7</p>	<p>The Project’s mix of uses are compatible with adjacent uses and provide a benefit to surrounding existing neighborhoods. The Project’s mix of uses and Zoning Map amendment follows the Future Land Use Map and other Elements of the Plan.</p>
<p>Policy LU-1.2.3: Federal Sites--Work closely with the federal government on re-use planning for those federal lands where a change of use may take place in the future. Even where such properties will remain in federal use, the impacts of new activities on adjacent District neighborhoods should be acknowledged and proactively addressed by federal parties. <i>Id.</i> § 305.8</p>	<p>The Project is the result of re-use of a former federal office site and represents a mix of federal- and District-led community-focused planning.</p>
<p>Policy LU-1.2.5: Public Benefit Uses on Large Sites--Given the significant leverage the District has in redeveloping properties which it owns, include appropriate public benefit uses on such sites if and when they are reused. Examples of such uses are affordable housing, new parks and open spaces, health care and civic facilities, public educational facilities, and other public facilities. <i>Id.</i> § 305.1</p>	<p>The Project is on District-owned land. As a result, the Project includes public benefit uses, including a 30 percent mix of affordable housing, publicly-useable outdoor space, and the other Project Public Benefits.</p>

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<p>Policy LU-1.2.6: New Neighborhoods and the Urban Fabric--On those large sites that are redeveloped as new neighborhoods (such as Reservation 13), integrate new development into the fabric of the city to the greatest extent feasible. Incorporate extensions of the city street grid, public access and circulation improvements, new public open spaces, and building intensities and massing that complement adjacent developed areas. Such sites should not be developed as self-contained communities, isolated or gated from their surroundings. <i>Id.</i> § 305.11</p>	<p>The Project is part of a large site redevelopment that has been reintegrated into the fabric of Southwest DC street grid. The Project’s new circulation improvements, open spaces, and massing complements adjacent developed areas. It is not isolated or gated.</p>
<p>Policy LU-1.3.1: Station Areas as Neighborhood Centers--Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, 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 which the stations provide. This policy should not be interpreted to outweigh other land use policies which call for neighborhood conservation. Each Metro station area is unique and must be treated as such in planning and development decisions. 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. <i>Id.</i> § 306.1</p>	<p>The Project contributes to the emergence of the Waterfront Station town center as a Metro-anchored economic and civic development area. The Project advances the individual aspects of this policy objective (e.g., it increases jobs, provides a range of retail goods and services, and a stronger sense of place, among other items) and expresses the desires of the Small Area Plan, as summarized below as part of a custom development plan for the Metro station area.</p>
<p>Policy LU-1.3.2: Development Around Metrorail Stations--Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. <i>Id.</i> § 306.11</p>	<p>The Project represents concentrated development around a Metrorail station that, upon initial approval of the Waterfront Station PUD, had great opportunity for redevelopment given the large amount of previously-vacant land. The Project’s design minimizes auto usage and encourages transit ridership without overcrowding the station.</p>
<p>Policy LU-1.3.4: Design To Encourage Transit Use--Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots. <i>Id.</i> § 306.13</p>	<p>The Project features urban architecture and site planning aspects that, given the proximity of the Metrorail station, encourage pedestrian and bicycle access and safety to such station. Streetscaping and landscaping details serve pedestrians and enhance safety. The Project has no surface parking lots.</p>

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<p>Policy LU-1.3.5: Edge Conditions Around Transit Stations--Ensure that development adjacent to Metrorail stations is planned and designed to respect the character, scale, and integrity of adjacent neighborhoods. For stations that are located within or close to low density areas, building heights should “step down” as needed to avoid dramatic contrasts in height and scale between the station area and nearby residential streets and yards. <i>Id.</i> § 306.14</p>	<p>The Project respects the character, scale, and integrity of the Southwest neighborhood, which include apartment buildings of similar height and scale. The Project is not proximate to the lower-density portions of the neighborhood.</p>
<p>Policy LU-1.3.6: Parking Near Metro Stations--Encourage the creative management of parking around transit stations, ensuring that automobile needs are balanced with transit, pedestrian, and bicycle travel needs. New parking should generally be set behind or underneath buildings and geared toward short-term users rather than all day commuters. <i>Id.</i> § 306.15</p>	<p>All of the Project’s parking is located below-grade and does not encourage all-day commuters. The Project’s Private Drive moves Project users’ and visitors’ automobiles out of the public realm in favor of pedestrian, transit and cyclist needs.</p>
<p>Policy LU-1.3.7: TOD Boundaries--Tailor the reach of transit-oriented development (TOD) policies and associated development regulations to reflect the specific conditions at each Metrorail station and along each transit corridor. The presence of historic districts and conservation areas should be a significant consideration as these policies are applied. <i>Id.</i> § 306.16</p>	<p>The Project’s transit-oriented nature is expressly a part of its overall design. The absence of any historic or conservation areas immediately nearby supports the Project’s height/density.</p>
<p>Policy LU-1.4.1: Infill Development--Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. <i>Id.</i> § 307.5</p>	<p>The Project is on an infill site that is currently a gap in the urban fabric and that detracts from the pedestrianized and urban nature of 4th Street, SW. The Project complements the established urban character of 4th Street, SW.</p>
<p>Policy LU-1.4.3: Zoning of Infill Sites--Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development. <i>Id.</i> § 307.7</p>	<p>The Project’s zoning is compatible with the prevailing mid- and high-rise development pattern of Southwest and reflects an appropriate increase in density given the site’s adjacency to Metro. The Project is not adjacent to any single-family or rowhouse neighborhoods.</p>
<p>Policy LU-2.1.1: Variety of Neighborhood Types--Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. <i>Id.</i> § 309.5</p>	<p>The Project advances this objective of having a range of residential neighborhoods that includes high-density mixed-use types. The mixed-use character of the Project is a positive element that enhances the character of the surrounding area.</p>

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<p>Policy LU-2.1.2: Neighborhood Revitalization--Facilitate orderly neighborhood revitalization and stabilization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need. Use social, economic, and physical indicators such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate as key indicators of need. <i>Id.</i> § 309.7</p>	<p>The Project is a part of an orderly neighborhood revitalization effort in Southwest DC made possible through disposition of now and formerly government-owned land, a type of government action contemplated in this objective.</p>
<p>Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods--Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. <i>Id.</i> § 309.8</p>	<p>The Project increases housing supply and expands neighborhood-serving commerce to help create a town center that will not harm the character of other neighborhoods but will instead strengthen neighborhood character.</p>
<p>Policy LU-2.1.10: Multi-Family Neighborhoods--Maintain the multi-family residential character of the District’s Medium and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible. <i>Id.</i> § 309.15</p>	<p>The blocks surrounding the Project are generally multi-family in nature, and the Project maintains that character while adding neighborhood-serving ground floor uses.</p>
<p>Policy LU-2.1.11: Residential Parking Requirements--Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. <i>Id.</i> § 309.16</p>	<p>The Project’s parking is responsive to the expected demand generated by its users in light of the Project’s proximity to transit. The landscaped Private Drive minimizes disruptions to traffic resulting from the Project. The Project includes TDM measures.</p>
<p>Policy LU-2.2.4: Neighborhood Beautification--Encourage projects which improve the visual quality of the District’s neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. <i>Id.</i> § 310.5</p>	<p>The Project’s landscaping and streetscaping efforts advance this beautification objective.</p>
<p>Policy LU-2.3.2: Mitigation of Commercial Development Impacts--Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts on surrounding residential areas. Before commercial development is approved, establish requirements for traffic and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid such adverse effects. <i>Id.</i> § 311.4</p>	<p>The Project’s impacts from traffic, litter, shadows, and the like are all carefully managed and mitigated as part of its design and operational planning efforts.</p>
<p>Policy LU-2.3.3: Buffering Requirements--Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. <i>Id.</i> § 311.5</p>	<p>The Project’s commercial uses are not adjacent to lower density residential areas, but the Project nonetheless includes appropriate buffers.</p>

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Policy Objective	Application to the Project
<p>Policy LU-2.3.4: Transitional and Buffer Zone Districts--Maintain mixed use zone districts which serve as transitional or buffer areas between residential and commercial districts, and which also may contain institutional, non-profit, embassy/chancery, and office-type uses. Zoning regulations for these areas (which currently include the SP-1 and SP-2 zones) should ensure that development is harmonious with its surroundings, achieves appropriate height and density transitions, and protects neighborhood character. <i>Id.</i> § 311.6</p>	<p>The Project is part of a mixed-use zone that serves as a town center. The residential uses at the perimeter of the Waterfront Station area buffer the surrounding residential blocks while also allowing appropriate height and density near transit.</p>
<p>Policy LU-2.3.5: Institutional Uses--Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. Ensure that when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life. Encourage institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion. <i>Id.</i> § 311.7</p>	<p>The Project is designed to be respectful of the church that is immediately to the north of the Project. The Project is set back a considerable distance from the shared property line and includes landscaping that buffers the church grounds. The Applicant has met with leaders of the neighboring church to ensure the Project and the church can co-exist harmoniously.</p>
<p>Policy LU-2.3.6: Places of Worship and other Religious Facilities--Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city’s neighborhoods. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these facilities’ transportation needs, operations, and expansion, so that existing and new religious facilities may be sustained as neighborhood anchors and a source of spiritual guidance for District residents. <i>Id.</i> § 311.8</p>	
<p>Policy LU-2.4.1: Promotion of Commercial Centers--Promote the vitality of the District’s commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, and sustain the city’s role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and ease of access for nearby residents. <i>Id.</i> § 312.5</p>	<p>The Project promotes the vitality of the emerging Waterfront Station town center. The Project expands economic and job opportunities and invites social interaction.</p>
<p>Policy LU-2.4.2: Hierarchy of Commercial Centers--Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Activities in each type of center should reflect its intended role and market area, as defined in the Framework Element. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. <i>Id.</i> § 312.6</p>	<p>Waterfront Station exists within a spectrum of commercial centers based on its intended neighborhood-serving market area. The Project’s mix of residential and commercial uses reinforce the neighborhood-serving scale of Waterfront Station.</p>
<p>Policy LU-2.4.5: Encouraging Nodal Development--Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them. <i>Id.</i> § 312.9</p>	<p>The Project encourages the nodal nature of Waterfront Station around the Metrorail station. The Project’s height, mass, and scale do not unreasonably impact the immediate surrounding context, which is generally of comparable heights and scale.</p>

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Policy Objective	Application to the Project
<p>Policy LU-2.4.6: Scale and Design of New Commercial Uses--Ensure that new uses within commercial districts are developed at a height, mass, scale and design that is appropriate and compatible with surrounding areas. <i>Id.</i> § 312.1</p>	<p>The Project’s single-level commercial uses are of an appropriate scale and design relative to the town center goals for Waterfront Station.</p>
<p>Policy LU-2.4.8: Addressing Commercial Parking Impacts--Ensure that the District’s zoning regulations consider the traffic and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery. <i>Id.</i> § 312.12</p>	<p>The Project includes transportation demand management measures and a loading plan that mitigates potential demand and congestion problems.</p>
<p>Policy LU-2.4.10: Use of Public Space within Commercial Centers--Carefully manage the use of sidewalks and other public spaces within commercial districts to avoid pedestrian obstructions and to provide an attractive and accessible environment for shoppers. Where feasible, the development of outdoor sidewalks cafes, flower stands, and similar uses which “animate” the street should be encouraged. Conversely, the enclosure of outdoor sidewalk space with permanent structures should generally be discouraged. <i>Id.</i> § 312.14</p>	<p>The Project’s proposed ground level uses enhance the pedestrian realm along 4th Street, SW and further animate that environment with sidewalk cafés and other similar uses. The Project does not permanently enclose outdoor public space. (Although the Project’s outdoor play area is enclosed, such enclosure is in private space not on a sidewalk, and such enclosure is necessary for safety and security.)</p>
<p>Transportation Element</p>	
<p>Policy T-1.1.2: Land Use Impact Assessment--Assess the transportation impacts of development projects using multi-modal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment to land use impacts. <i>Id.</i> § 403.8</p>	<p>This application will include a Comprehensive Transportation Review to assess the Project’s transportation impacts using multi-modal standards to allow for more accurate measurements and mitigation techniques. The Project will adhere to rigorous environmental standards established by the USGBC and will include multiple features that mitigate its environmental impacts, as outlined in the LEED scorecard and GAR checklist included in the Plans.</p>
<p>Policy T-1.1.3: Context-Sensitive Transportation--Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. <i>Id.</i> § 403.9</p>	<p>The Project’s Private Drive supports the Project’s mix of uses without adversely affecting goals for compact, transit-accessible development.</p>

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Policy Objective	Application to the Project
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. <i>Id.</i> § 403.1	The Project represents textbook transit-oriented development given its proximity to the Metrorail station.
Policy T-1.1.5: Joint Development --Attract new riders to the transit system by fostering transit-supportive commercial and residential joint development projects on Washington Metropolitan Area Transit Authority (WMATA) owned or controlled land and on private properties adjacent to Metrorail stations. <i>Id.</i> § 403.11	The Project has potential to attract new riders to the transit system through new development on property adjacent to Metro.
Policy T-1.2.3: Discouraging Auto-Oriented Uses --Discourage certain uses, like “drive-through” businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, 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. <i>Id.</i> § 404.8	The Project does not feature any auto-oriented uses. Its Private Drive is designed to alleviate pressure on 4 th Street, SW stemming from drop-off and pick-up activities at the on-site school and theater. The Project’s design minimizes curb cuts by using an existing private alley, located in the corner of the Property and away from pedestrian entrances, for parking and loading access.
Policy T-1.3.1: Transit-Accessible Employment --Work closely with the federal government and suburban jurisdictions to support transit-oriented and transit-accessible employment throughout the region. <i>Id.</i> § 405.11	The Project’s new ground floor uses add transit-accessible employment opportunities.
Policy T-2.3.3: Bicycle Safety --Increase bicycle safety through traffic calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improving bicycle access where barriers to bicycle travel now exist. <i>Id.</i> § 409.1	The Project provides both curbside bicycle parking for short-term visitors and long-term bicycle parking inside the building.
Policy T-2.4.1: Pedestrian Network --Develop, maintain, and improve pedestrian facilities. Improve the city’s sidewalk system to form a network that links residents across the city. <i>Id.</i> § 410.5	The Project improves sidewalk and pedestrian areas along 4 th Street, SW and Wesley Place, SW and adds an east-west connection through the Private Drive.
Policy T-2.4.4: Sidewalk Obstructions --Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage. Maintain sidewalk surfaces and elevations so that disabled or elderly pedestrians can safely use them. <i>Id.</i> § 410.8	The Project’s sidewalk areas are designed to create separation between walking and the café zones. These uses are not impediments to safe pedestrian access and are accessible to the disabled and elderly.
Policy T-3.1.1: Transportation Demand Management (TDM) Programs --Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. <i>Id.</i> § 414.8	The Project will include TDM measures to reduce automobile usage and increase transit usage.

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Policy Objective	Application to the Project
Policy T-3.2.1: Parking Duration in Commercial Areas --Encourage the supply and management of public parking in commercial areas to afford priority to customers and others on business errands, and discourage the use of these spaces by all-day parkers, including establishment employees. <i>Id.</i> § 415.3	The Project’s parking is not designed to serve all-day parkers, but includes parking intended to serve customers and patrons.
Policy T-3.3.1: Balancing Good Delivery Needs --Balance the need for goods delivery with concerns about roadway congestion, hazardous materials exposure, quality of life, and security. <i>Id.</i> § 416.8	By relocating all loading facilities to private space, the Project appropriately balances goods delivery and pedestrian quality.
Housing Element	
Policy H-1.1.1: Private Sector Support --Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. <i>Id.</i> § 503.2	The Project is a private-sector led initiative to provide new housing and affordable housing consistent with other District policies and objectives.
Policy H-1.1.2: Production Incentives --Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing. <i>Id.</i> § 503.3	The Project is the subject of a mix of regulatory (e.g., PUD) and other financial incentives (e.g., District ground lease) to achieve District housing production goals.
Policy H-1.1.3: Balanced Growth --Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure 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. <i>Id.</i> § 503.4	The Project is part of a development on vacant, underutilized land that is planned and zoned to meet the District’s long-term high-density housing needs. Because of the Project’s location at the Metro station, high-density housing is the most appropriate form of housing.
Policy H-1.1.4: Mixed Use Development --Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. <i>Id.</i> § 503.5	The Project exemplifies this objective because it is a mixed-use development with housing on commercially-zoned land around a Metrorail station that is at a center of commercial activity.
Policy H-1.1.5: Housing Quality --Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood. <i>Id.</i> § 503.6	The Project’s affordable housing is designed to the similar high architectural standards as its market-rate housing, and the two types of units are generally indistinguishable and have access to the same project amenities.

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Policy Objective	Application to the Project
<p>Policy H-1.1.6: Housing in the Central City--Absorb a substantial component of the demand for new high-density housing in Central Washington and along the Anacostia River. Absorbing the demand for higher density units within these areas is an effective way to meet housing demands, create mixed-use areas, and conserve single family residential neighborhoods throughout the city. Mixed income, higher density downtown housing also provides the opportunity to create vibrant street life, and to support the restaurants, retail, entertainment, and other amenities that are desired and needed in the heart of the city. <i>Id.</i> § 503.7</p>	<p>The Project satisfies this goal of absorbing new high-density housing along the Anacostia River in a mixed-income, mixed-use environment that conserve single-family housing elsewhere in the District. The Project supports a vibrant street life and the nearby retail and dining/entertainment uses.</p>
<p>Policy H-1.1.7: New Neighborhoods--Accommodate a significant share of the District's projected housing demand in "new neighborhoods" developed on large sites formerly used for government functions. In addition to housing, these neighborhoods must include well planned retail, public schools, attractive parks, open space and recreation, as well as needed supportive services. The new neighborhoods should include a variety of housing types, serving a variety of income levels. <i>Id.</i> § 503.8</p>	<p>The Project provides a large amount of new housing, at a mix of income levels, in a "new neighborhood" (i.e., new as of the adoption of the Comprehensive Plan) that was formerly a government office complex and that also now includes a mix of town center uses as well as supporting public plazas and transportation connections.</p>
<p>Policy H-1.2.1: Affordable Housing Production as a Civic Priority--Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. <i>Id.</i> § 504.6</p>	<p>The Project is the result of a District-led public land disposition program that sets aside 30 percent of its units for low and very low income households.</p>
<p>Policy H-1.2.2: Production Targets--Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the area wide median income (AMI). Newly produced affordable units should be targeted towards low-income households in proportions roughly equivalent to the proportions shown in Figure 5.2. <i>Id.</i> § 504.7</p>	<p>The Project does its part to satisfy this objective of maintaining one-third of new housing at affordable levels, as 30 percent of the Project is reserved for low-income (50% AMI) and very-low income (30% AMI) households.</p>
<p>Policy H-1.2.3: Mixed Income Housing--Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. <i>Id.</i> § 504.8</p>	<p>The Project adds new affordable housing in a mixed-income building in a portion of the District with a substantial mix of market and affordable housing options.</p>
<p>Policy H-1.2.4: Housing Affordability on Publicly Owned Sites--Require that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households. <i>Id.</i> § 504.11</p>	<p>The Project, built on a publicly-owned site, requires a substantial percent (30 percent) of the total units be reserved for low-income and very low-income residents.</p>

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Policy Objective	Application to the Project
<p>Policy H-1.2.7: Density Bonuses for Affordable Housing--Provide zoning incentives to developers proposing to build low- and moderate-income housing. Affordable housing shall be considered a public benefit for the purposes of granting density bonuses when new development is proposed. <i>Id.</i> § 504.14</p>	<p>The Project benefits from a zoning incentive in exchange for, in part, providing new low- and very low-income affordable housing.</p>
<p>Policy H-1.3.1: Housing for Families--Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. <i>Id.</i> § 505.6</p>	<p>Although the Project does not include three- or four-bedroom units, it does provide some family units (i.e., two-bedrooms) as well as other family amenities, such as a play area. The Project’s proposed bedroom counts reflect planning principles which suggest building smaller units nearer to transit and larger units further away. The Project’s transit-oriented and town center location and its Future Land Use Map designation make it an inappropriate location for single-family homes, duplexes or row houses. Because the Project’s affordability requirement is based on the number of units (rather than the residential GFA of the building), the smaller unit sizes support an absolutely larger number of affordable units, thereby having a comparatively greater housing benefit than a project with larger bedroom count units.</p>
<p>Policy H-1.3.2: Tenure Diversity--Encourage the production of both renter-occupied and owner-occupied housing. <i>Id.</i> § 505.7</p>	<p>The Project includes renter-occupied housing. Nearby buildings have owner-occupied units.</p>
<p>Policy H-1.4.6: Whole Neighborhood Approach--Ensure that the construction of housing is accompanied by concurrent programs to improve neighborhood services, schools, job training, child care, parks, health care facilities, police and fire facilities, transportation, and emergency response capacity. <i>Id.</i> § 506.12</p>	<p>The Project is part of a whole neighborhood development, with parks, transit access, jobs, and an early childhood education use.</p>
<p>Policy H-1.5.4: Financial Incentives--Consider tax incentives, reduced permitting and infrastructure fees, underwriting land costs, and other financial measures to reduce the cost of affordable housing construction. <i>Id.</i> § 507.5</p>	<p>The Project’s land disposition component is a public financing mechanism that encourages affordable housing construction.</p>

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Policy Objective	Application to the Project
<p>Policy H-2.1.1: Protecting Affordable Rental Housing--Recognize the importance of preserving rental housing affordability to the well-being of the District of Columbia and the diversity of its neighborhoods. Undertake programs to protect the supply of subsidized rental units and low-cost market rate units. <i>Id.</i> § 509.5</p>	<p>By virtue of being constructed as part of a PUD and a public disposition, the Project’s affordable rental housing is preserved at affordable rates for 99 years. The Project does not disrupt or displace any existing housing.</p>
<p>Policy H-2.1.3: Avoiding Displacement--Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units. Rental housing comprises almost 60 percent of the housing stock and is the main housing option for those just entering the workforce and those without the initial resources to purchase a home. <i>Id.</i> § 509.7</p>	<p>Because the Project is constructed on vacant land there is no loss of any existing housing and consequently no displacement of existing residents. All of the Project’s affordable housing is net new affordable housing.</p>
<p>Policy H-2.1.4: Conversion of At-Risk Rentals to Affordable Units--Support efforts to purchase affordable rental buildings that are at risk of being sold and converted to luxury apartments or condominiums, in order to retain the units as affordable. Consider a variety of programs to manage these units, such as land banks and sale to non-profit housing organizations. <i>Id.</i> § 509.8</p>	<p>Because the Project does not replace any existing housing there is no loss of affordable rental units. The Project’s affordable units must be maintained as rental units.</p>
<p>Policy H-2.1.5: Long-Term Affordability Restrictions--Ensure that affordable housing units that are created or preserved with public financing are protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by federal programs, affordable units should remain affordable for the life of the building, with equity and asset build up opportunities provided for ownership units. <i>Id.</i> § 509.9</p>	<p>The Project’s affordable units are reserved at affordable levels for 99 years.</p>
<p>Policy H-2.2.3: Tax Relief--Maintain tax relief measures for low income homeowners and low income senior homeowners faced with rising assessments and property taxes. These measures should reduce the pressure on low income owners to sell their homes and move out of the District. <i>Id.</i> § 510.5</p>	<p>The Project does not directly impact any existing low income households.</p>
<p>Policy H-4.2.4: Barrier-Free Housing for the Disabled--Work toward a target of designing eight (8) percent of the new housing units added to the city's stock over the next 20 years specifically to meet the accessibility needs of persons with physical disabilities. These units should be spread evenly across affordability brackets. <i>Id.</i> § 516.1</p>	<p>The Project is designed in accordance with applicable accessibility laws including the Americans with Disabilities Act (“ADA”). Fifteen percent (15%) of the Project’s units (or 68 total) are specifically designed to be accessible units in compliance with the ADA.</p>

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Policy Objective	Application to the Project
Environmental Protection Element	
<p>Policy E-1.1.1: Street Tree Planting and Maintenance--Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods. <i>Id.</i> § 603.4</p>	<p>The Project includes two new street trees and plantings as part of a comprehensive landscaping plan that beautifies and enhances the street network, provides stormwater retention benefits, and offers amenities for visitors and residents alike.</p>
<p>Policy E-1.1.3: Landscaping--Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. <i>Id.</i> § 603.6</p>	
<p>Policy E-1.2.1: River Conservation--Improve environmental conditions along the Anacostia River and other water bodies, including shorelines, wetlands, islands, tributaries, and the rivers themselves. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitat, creating new wetlands, and reducing litter. <i>Id.</i> § 604.3</p>	<p>The Project is within the boundaries of the Anacostia Waterfront Development zone, which imposes heightened stormwater retention requirements on publicly-financed projects, including the Project. The Project's enhanced stormwater retention program helps achieve this policy objective.</p>
<p>Policy E-1.2.2: Waterfront Habitat Restoration--Undertake a range of environmental initiatives along the Anacostia River to eliminate combined sewer overflows, reduce urban runoff, restore wetlands and tributary streams, increase oxygen levels in the water, remediate toxins in the riverbed, clean and redevelop contaminated brownfield sites, and enhance natural habitat. <i>Id.</i> § 604.4</p>	
<p>Policy E-1.3.1: Preventing Erosion--Ensure that public and private construction activities do not result in soil erosion or the creation of unstable soil conditions. Support the use of retaining walls and other "best management practices" that reduce erosion hazards. Erosion requirements should be implemented through building permit and plan reviews, and enforced through the permitting and regulatory processes. <i>Id.</i> § 605.2</p>	<p>The Project's redevelopment of a vacant lot is subject to erosion control best management practices. An erosion control plan is included in the Plans.</p>
<p>Policy E-2.1.1: Promoting Water Conservation--Promote the efficient use of existing water supplies through a variety of water conservation measures, including the use of plumbing fixtures designed for water efficiency, drought-tolerant landscaping, and irrigation systems designed to conserve water. <i>Id.</i> § 609.3</p>	<p>The Project's internal water efficient fixtures are part of the Project's overall effort to achieve a LEED Gold 2009 level of design.</p>
<p>Policy E-2.2.1: Energy Efficiency--Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees. <i>Id.</i> § 610.3</p>	<p>The Project's LEED Gold 2009 level of design includes a number of energy efficient features in furtherance of these policy objectives. In addition, the Project features rooftop solar panels as an alternative and clean energy source that provides a modest level of price control on energy expenses.</p>
<p>Policy E-2.2.2: Energy Availability--Improve energy availability and buffer District consumers from fluctuations in energy supply and prices. This should be achieved through the District's energy purchasing policies, financial assistance programs for lower income customers, incentives for "green" power, and regulatory changes that ensure that local energy markets are operating efficiently. <i>Id.</i> § 610.4</p>	
<p>Policy E-2.2.3: Reducing Home Heating and Cooling Costs--Encourage the use of energy-efficient systems and methods for home insulation, heating, and cooling, both to conserve natural resources and also to reduce energy costs for those members of the community who are least able to afford them. <i>Id.</i> § 610.5</p>	

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Policy Objective	Application to the Project
<p>Policy E-2.2.4: Alternative Energy Sources--Support the development and application of renewable energy technologies, such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. <i>Id.</i> § 610.6</p>	
<p>Policy E-2.2.5: 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. The planning and design of new development should contribute to energy efficiency goals. <i>Id.</i> § 610.7</p>	
<p>Policy E-2.2.7: Consumer Education on Energy--Promote citizen awareness concerning energy issues through educational and demonstration initiatives and other programs. <i>Id.</i> § 610.1</p>	
<p>Policy E-3.1.1: Maximizing Permeable Surfaces--Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. <i>Id.</i> § 613.2</p>	<p>The Project employs a variety of permeable surfaces, green roofs, and other landscaping to achieve these policy objectives. In addition, the Project does not include any parking lots.</p>
<p>Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff--Promote an increase in tree planting and landscaping to reduce stormwater runoff, 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. <i>Id.</i> § 613.3</p>	
<p>Policy E-3.2.1: Support for Green Building--Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. <i>Id.</i> § 614.2</p>	<p>The Project will be designed and constructed in “green” building practices to a LEED Gold 2009 level.</p>
<p>Policy E-3.2.2: Green Building Education and Awareness--Support programs that educate District employees, the building and real estate communities, and the public regarding the benefits and techniques of green building. <i>Id.</i> § 614.3</p>	<p>The Project will display its certification of its LEED Gold status as a means of raising public awareness of its green status.</p>
<p>Policy E-3.4.1: Mitigating Development Impacts--Take measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited. <i>Id.</i> § 616.3</p>	<p>The Project mitigates environmental impacts to the maximum extent feasible. Because the Project site is generally flat, there are no grade or slope challenges for the Project.</p>
<p>Policy E-3.4.2: Transparency of Environmental Decision-Making--Ensure that discussions and decisions regarding environmental impacts and mitigation measures occur through a transparent process in which the public is kept informed and given a meaningful opportunity to participate. <i>Id.</i> § 616.4</p>	<p>The Project’s environmental decision-making has been and will continue to be part of the discussion of the Project’s public and transparent review and impact evaluation.</p>

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<p>Policy E-3.4.3: Environmental Assessments--Ensure full and meaningful compliance with the District of Columbia Environmental Policy Act of 1989, effective October 18, 1989 (D.C. Law 8-36; D.C. Official Code § 8-109.01 et seq.) [“DC EPA”], including the use of procedures to assess the environmental impacts of major development projects comparable to the regulations developed by the Council on Environmental Quality for the National Environmental Policy Act of 1969, approved January 1, 1970 (83 Stat. 852; 42 U.S.C. 4321 et seq.). The environmental review should include all pertinent information about the effects of the project on the human environment, including information about existing conditions, projected impacts, and mitigation measures. Carbon dioxide and other greenhouse gas (GHG) emissions impacts should be included in the environmental impact assessments. The process should ensure that the information is available when a development is proposed and is available to the public and decision-makers before any decision is made. <i>Id.</i> § 616.5</p>	<p>The Project will comply with the DC EPA as part of its building permit review process.</p> <p>By virtue of the Project’s LEED Gold rating, inclusion of solar panels, and transit-oriented location, the Project generates far lower GHG emissions than a typical development of the same size. In addition, the DC EPA includes a process for evaluating air quality impacts pursuant to applicable law and regulation.</p>
<p>Policy E-4.1.3: Evaluating Development Impacts On Air Quality--Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. <i>Id.</i> § 618.8</p>	<p>The Project’s TDM measures mitigate any possible adverse impacts of air emissions from new development. The Project also includes construction and landscaping controls that provide air quality mitigation.</p>
<p>Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency--Promote strategies that reduce motor vehicle emissions in the District and surrounding region. As outlined in the Land Use and Transportation Elements of this Comprehensive Plan, this includes the development of a fully integrated regional system of buses, streetcars, rail transit, bicycles, taxis, and pedestrian facilities to make it easier and more convenient to travel without an automobile. It also includes the promotion of trip reduction measures such as videoconference facilities, telecommuting, flextime, and carpooling. Strategies to reduce congestion and idling time, such as improved signal timing and reversible commute lanes also should contribute to air quality improvement. <i>Id.</i> § 618.1</p>	<p>The Project reduces motor vehicle emissions by virtue of its proximity to transit, its Project-wide TDM, and its overall pedestrian-supportive design.</p>
<p>Policy E-4.1.6: Clean Fuels--Encourage the use of clean fuel vehicles and enhance efforts to place refueling and recharging equipment at facilities accessible for public use. Where feasible, provide financial incentives for District residents and business to use clean vehicles, such as reduced motor vehicle tax and license fees. <i>Id.</i> § 618.11</p>	<p>The Project advances this policy objective by including electric vehicle charging stations in prominent locations within its below-grade garage.</p>
<p>Policy E-4.2.3: Control of Urban Runoff--Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. <i>Id.</i> § 619.8</p>	<p>The Project controls stormwater runoff to an enhanced degree by virtue of its compliance with standards for development in the Anacostia Watershed Development zone.</p>

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Policy Objective	Application to the Project
<p>Policy E-4.2.5: Groundwater Protection--Protect Washington's groundwater from the adverse effects of urban uses. Contaminated groundwater should be investigated to determine whether long term monitoring or treatment is necessary or feasible. Future land uses and activities should be managed to minimize public exposure to groundwater hazards and reduce the likelihood of future contamination. <i>Id.</i> § 619.1</p>	<p>The Project is designed to avoid public exposure to any groundwater hazards and to reduce the risk of future contamination, all in compliance with applicable laws.</p>
<p>Policy E-4.7.4: Flood Plains--Restrict development within FEMA-designated flood plain areas. Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within these areas that could pose public health or safety hazards in the event of a flood. Regulation of land uses in flood plains, waterfronts, and other low-lying areas should consider the long-term effects of global warming and sea-level rise on flood hazards. <i>Id.</i> § 624.7</p>	<p>The Project is not located within the 100-year floodplain.</p>
<p>Policy E-4.8.2: Expanded Outreach to Disadvantaged Communities--Expand local efforts to involve economically disadvantaged communities, particularly those communities that historically have been impacted by power plants, trash transfer stations, and other municipal or industrial uses, in the planning and development processes. <i>Id.</i> § 625.4</p>	<p>The Project is the subject of an extensive public outreach and community participation process in which all community members, including historically disadvantaged communities, are encouraged to participate.</p>
<p>Policy E-5.1.1: Low Impact Development and Green Building Methods for the District--Strongly encourage the use of low impact development (LID) methods and green building design methods and materials in new construction and major rehabilitation projects undertaken by the District of Columbia government. <i>Id.</i> § 627.3</p>	<p>The Project's stormwater retention and green area features and other LID methods are all demonstrated by the Project's commitment to LEED Gold.</p>
<p>Policy E-5.1.4: Sustainable Landscaping--Encourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides. <i>Id.</i> § 627.6</p>	<p>The Project's landscaping is designed to employ best management practices with respect to low-impact watering and chemical usage.</p>
<p>Economic Development Element</p>	
<p>Policy ED-1.1.3: Diversification--Diversify the District's economy by targeting industries with the greatest potential for growth, particularly technology-based and creative industries, retail, international business, and the building trades. <i>Id.</i> § 703.11</p>	<p>The Project includes retail and other neighborhood-serving uses that will help diversify the Southwest DC economy.</p>
<p>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 underserved areas. <i>Id.</i> § 708.4</p>	<p>The Project's ground floor uses advance and enhance this expanded retail strategy by bringing retail uses to Southwest DC and stabilizing existing nearby retail uses. In addition, the Project's residents will help patronize and support other town center uses.</p>

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<p>Policy ED-2.2.3: Neighborhood Shopping--Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences. <i>Id.</i> § 708.7</p>	<p>The Project is a key component in making 4th Street, SW a neighborhood shopping center. The Project's ground floor uses support other neighborhood uses along that corridor. The applicant has committed to having a non-national chain restaurant and anticipates that no more than a minority of the ground floor area will be national chains.</p>
<p>Policy ED-2.2.5: Business Mix--Reinforce existing and encourage new retail districts by attracting a mix of nationally-recognized chains as well as locally-based chains and smaller specialty stores to the city's shopping districts. <i>Id.</i> § 708.9</p>	<p>The Project reinforces a newly emerging neighborhood retail district that features a mix of locally-owned businesses and chains.</p>
<p>Policy ED-2.2.7: Planning For Retail--Coordinate neighborhood planning efforts with the District's economic development planning and implementation programs to improve retail offerings in local commercial centers. Consolidate retail according to existing and forecasted demand and consider converting retail to other uses where an increased consumer base is required. <i>Id.</i> § 708.11</p>	<p>The Project is part of a coordinated effort to establish Waterfront Station as a neighborhood-serving commercial center and economic development driver.</p>
<p>Policy ED-2.2.9: Clustered Retail at Transit--Cluster retail around areas of high-foot traffic, including Metrorail exits, bike trails, future streetcar stops, and other multi-modal meeting points. Create strong nodes of character to effectively link retail and transit. <i>Id.</i> § 708.11b</p>	<p>The Project's ground floor uses support and augment the existing retail uses along 4th Street, SW in the vicinity of the Metrorail station. The 4th Street, SW retail has strong pedestrian connections to transit.</p>
<p>Policy ED-2.3.3: Amenities Beyond the Mall--Promote the development of cultural amenities beyond the Mall in an effort to more fully capitalize on the economic benefits of tourism. <i>Id.</i> § 709.7</p>	<p>The Project's theater advances this objective of locating cultural amenities beyond the Mall.</p>
<p>Policy ED-3.1.1: Neighborhood Commercial Vitality--Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents. <i>Id.</i> § 713.5</p>	<p>The Project promotes a vital and diverse neighborhood center and attracts new business and services to improve access for Southwest DC residents.</p>
<p>Policy ED-3.1.5: Public-Private Partnerships--Leverage the expenditure of public funds to produce private sector investments, including joint development on publicly-owned land and redevelopment in areas considered to be high risks by investors. Support the involvement of local community development corporations in commercial development and revitalization efforts within these areas. <i>Id.</i> § 713.9</p>	<p>The Project is a collaborative effort of public and private resources that leverages a public resource (the property) using private investment and development expertise.</p>
<p>Policy ED-3.2.1: Small Business Retention and Growth--Encourage the retention, development, and growth of small and minority businesses through a range of District-sponsored technical and financial assistance programs. <i>Id.</i> § 714.6</p>	<p>The Project uses Certified Business Enterprises for various contract requirements.</p>

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<p>Policy ED-3.2.6: Commercial Displacement--Avoid the displacement of small and local businesses due to rising real estate costs. Programs should be developed to offset the impacts of rising operating expenses on small businesses in areas of rapidly rising rents and prices. <i>Id.</i> § 714.11</p>	<p>The Project does not displace any small and local businesses, and it anticipates having local businesses—the pre-kindergarten and the theater—operate on the ground floor. In addition, the Project provides additional residents to support other small and local businesses in the Waterfront Station PUD, which is under a PUD-wide obligation with respect to 12,500 square feet of retail space for small and local businesses.</p>
<p>Policy ED-3.2.7: Assistance to Displaced Businesses--Assist small businesses that are displaced as a result of rising land costs and rents, government action, or new development. Efforts should be made to find locations for such businesses within redeveloping areas, or on other suitable sites within the city. <i>Id.</i> § 714.12</p>	
<p>Policy ED-4.2.4: Neighborhood-Level Service Delivery--Emphasize the delivery of workforce development programs at the neighborhood level. Continue neighborhood faith-based and community-based initiatives which deliver job training and placement services to unemployed and underemployed residents. <i>Id.</i> § 717.12</p> <p>Policy ED-4.2.7: Living Wage Jobs--Promote the attraction and retention of living wage jobs that provide employment opportunities for unskilled and semi-skilled workers. Use marketing strategies and incentives to encourage the relocation of firms with such positions to the District. <i>Id.</i> § 717.15</p> <p>Policy ED-4.2.12: Local Hiring Incentives--Maintain requirements for resident job training and placement for projects built and/or operated with any form of public subsidy/loan, grant or other incentives. Promote incentives for similar training and hiring programs by the private sector. <i>Id.</i> § 717.2</p>	
<p>Parks, Recreation, and Open Space Element</p>	
<p>Policy PROS-1.2.2: Improving Access--Improve access to the major park and open space areas within the city through pedestrian safety and street crossing improvements, bike lanes and storage areas, and adjustments to bus routes. <i>Id.</i> § 805.6</p>	<p>The Project improves access to parks and public spaces in and adjacent to Waterfront Station and provides bicycle storage.</p>
<p>Policy PROS-1.2.3: Responding To Community Change--Update and improve existing parks in response to changing demographics, cultural norms, and community needs and preferences. Parks should reflect the identity and needs of the communities they serve. <i>Id.</i> § 805.7</p>	<p>The Project includes an outdoor tot lot that reflects a community need for an enclosed space for small children to play safely.</p>
<p>Policy PROS-1.3.6: Compatibility with Adjacent Development--Design and manage park activities and facilities including recreation centers in a way that is compatible with nearby residential and commercial uses. <i>Id.</i> § 806.8</p>	<p>The Project’s play area and plaza are compatible with the nearby town center and with the nearby library’s complementary playground uses, which serve a slightly older children than those who will likely enjoy the play area at the Project.</p>

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Policy Objective	Application to the Project
<p>Policy PROS-1.4.6: Parks in Employment Growth Areas--Provide new parks and open spaces in areas of expected employment growth. Small pocket parks, plazas, and other open spaces should be created in the vicinity of the New York Avenue Metro Station, the Southeast Federal Center, the east end of Downtown, and the South Capitol Street Corridor to provide visual relief and space for outdoor seating and passive recreation. <i>Id.</i> § 807.9</p>	<p>The Project’s plaza provides a northern bookend to the 4th Street, SW town center core and provides opportunity for an outdoor café and gathering area with room for outdoor seating and passive recreation.</p>
<p>Policy PROS-2.1.1: Recreational Facility Development--Improve the physical and psychological health of District residents by providing a variety of recreational and athletic facilities, including playing fields, tennis courts, swimming pools, basketball courts, trails and paths, and open areas for other sports activities. <i>Id.</i> § 809.5</p>	<p>The Project’s play area provides an opportunity to improve the physical and psychological health of the District’s youngest residents. The Project also provides for Project residents private amenity spaces that advance this objective.</p>
<p>Policy PROS-2.1.3: Quality and Compatible Design--Require all park improvements to be of high design and construction quality, sensitive to the natural environment, and compatible with surrounding land uses. <i>Id.</i> § 809.8</p>	<p>The Project’s play area and publicly-accessible outdoor gathering spaces are of a high-quality of landscape design and materiality.</p>
<p>Policy PROS-2.1.4: Responding to Local Preferences--Provide amenities and facilities in District parks that are responsive to the preferences and needs of the neighborhoods around the parks. Park planning should recognize that there are different leisure time interests in different parts of the city. To better understand these differences, the community must be involved in key planning and design decisions. <i>Id.</i> § 809.9</p>	<p>The Project’s play area is responsive to needs in the area for a place for small children to play. Other nearby play areas are designed to serve older children. The community has participated and will continue to participate in discussion on design of such area.</p>
<p>Policy PROS-2.1.5: Adapting to Changing Needs--Allow the development of facilities which respond to changing preferences and community needs in appropriate District parks, including fenced dog exercise areas (dog parks), skate parks, tot lots, and water spray parks. <i>Id.</i> § 809.1</p>	<p>The Project’s play area recognizes that the neighborhood is changing and now includes many families with small children.</p>
<p>Policy PROS-2.2.1: Maintenance and Renovation--Provide for the continuing maintenance, renovation, and upgrading of the District's parks and recreational facilities to prevent their deterioration and ensure that they continue to meet community needs. <i>Id.</i> § 810.5</p>	<p>Because the Project’s outdoor spaces and play area are part of a privately-owned development, they will be privately maintained and operated.</p>
<p>Policy PROS-2.2.2: Park Safety and Security--Design parks, trails, and recreational facilities to improve public safety. Avoid creating hidden and difficult to access areas where security problems or vandalism could result. Lighting, fencing, building materials, and other design components should be selected to enhance the safety of park users. Park lighting shall be compatible with adjacent residential neighborhoods. <i>Id.</i> § 810.6</p>	<p>The Project’s publicly-accessible outdoor areas and play area are designed with public safety and security in mind and feature numerous safety elements, including fencing and lighting.</p>

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<p>Policy PROS-2.2.3: Program Diversity--Provide diverse recreational activities for persons of all ages and cultural backgrounds, distributed equitably in all parts of the city. Coordinate with other service providers, including DC Public Schools, to maximize the effectiveness of service delivery and minimize redundancy. <i>Id.</i> § 810.7</p>	<p>The Project's tot lot provides a diverse recreation option and is coordinated with the play area on the library property which serves older children.</p>
<p>Policy PROS-2.2.5: Special Needs--Increase efforts to meet the needs of special population groups, particularly persons with disabilities. Provide "barrier free" access by modifying existing facilities to accommodate the needs of the disabled. A steady, reliable stream of funds will be essential to keep our parks safe and attractive, and to respond to future needs. <i>Id.</i> § 810.9</p>	<p>The Project's play area is ADA compliant and accessible.</p>
<p>Policy PROS-4.3.2: Plazas in Commercial Districts--Encourage the development of outdoor plazas around Metro station entrances, in neighborhood business districts, around civic buildings, and in other areas with high volumes of pedestrian activity. Use the planned unit development process to promote such spaces for public benefit and to encourage tree planting, public art, sculpture, seating areas, and other amenities within such spaces. <i>Id.</i> § 819.4</p>	<p>The Project's outdoor area along its private drive fulfills a need for an outdoor plaza in an area of high pedestrian activity and is part of a public benefit proffered through the PUD process.</p>
<p>Policy PROS-4.3.3: Common Open Space in New Development--Provide incentives for new and rehabilitated buildings to include "green roofs", rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. <i>Id.</i> § 819.5</p>	<p>The Project includes green roofs and private outdoor amenity spaces that provide visual relief and balance for residents and visitors.</p>
<p>Urban Design Element</p>	
<p>Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans--Respect and reinforce the L'Enfant and McMillan Plans to maintain the District's unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L'Enfant Plan reservations (green spaces), limits on street and alley closings (see Figure 9.3), and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds. <i>Id.</i> § 903.7</p>	<p>The Project respects and reinforces the L'Enfant Plan in Southwest DC through its orientation and view corridor protection and its part of the larger Waterfront Station PUD, which reopened the previously-closed 4th Street, SW, a part of the original grid.</p>
<p>Policy UD-1.2.4: View Protection--Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods. <i>Id.</i> § 904.6</p>	<p>The Project does not interfere with planned views along 4th Street, SW into the heart of the National Mall.</p>
<p>Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors--Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place. <i>Id.</i> § 906.9</p>	<p>The Project's height and bulk, combined with that of the mirror image building opposite 4th Street, SW help to accentuate the 4th Street, SW view corridor by creating a framing element and a defined street wall.</p>
<p>Policy UD-2.2. 1: Neighborhood Character and Identity--Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. <i>Id.</i> § 910.6</p>	<p>As an infill project, the Project relates rationally to the adjacent development and the overall context.</p>

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<p>Policy UD-2.2.2: Areas of Strong Architectural Character--Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development within such areas does not need to replicate prevailing architectural styles exactly but should be complementary in form, height, and bulk. <i>Id.</i> § 910.7</p>	<p>The Project is complementary in form, height, bulk, and elements (e.g., balconies) to other buildings in Southwest DC as well as the surrounding contemporary buildings.</p>
<p>Policy UD-2.2.3: Neighborhood Centers--Undertake strategic and coordinated efforts to create neighborhood centers, civic buildings, and shopping places that reinforce community identity (see Figure 9.11). <i>Id.</i> § 910.9</p>	<p>The Project is part of a coordinated effort to create a neighborhood town center and furthers that plan through the provision of residential, retail, and other supportive uses.</p>
<p>Policy UD-2.2.4: Transitions in Building Intensity--Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. <i>Id.</i> § 910.11</p>	<p>The Project avoids any stark transitions in building intensity through façade articulation and other appropriately scaled setbacks and yards in relationship to the lower buildings to the north. The Project steps down in height from the 130-foot building to the southeast.</p>
<p>Policy UD-2.2.5: Creating Attractive Facades--Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street. <i>Id.</i> § 910.12</p>	<p>The Project's pedestrian-scale façades are highly-designed and articulated, and they avoid the monolithic elements that are discouraged.</p>
<p>Policy UD-2.2.6: Maintaining Facade Lines--Generally maintain the established facade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic facade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing facades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm. <i>Id.</i> § 910.14</p>	<p>The Project's facades generally align with the prevailing façade line along 4th Street, SW but responsive to the unique angle of 4th Street, SW itself. The Project's ground floor design continues the existing rhythm of other commercial uses on the street.</p>
<p>Policy UD-2.2.7: Infill Development--Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. <i>Id.</i> § 910.15</p>	<p>The Project avoids any overpowering contrasts of scale, height, or density.</p>
<p>Policy UD-2.2.8: Large Site Development--Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. <i>Id.</i> § 910.16</p>	<p>The Waterfront Station PUD breaks down the larger site into parcels that conform to the prevailing scale of those elsewhere in Southwest (which also includes larger, block-long development).</p>
<p>Policy UD-2.2.9: Protection of Neighborhood Open Space--Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. <i>Id.</i> § 910.18</p>	<p>The Project is setback to the south to minimize the effects of shadows on the tree-lined allée immediately to the north.</p>

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Policy UD-2.2.10: Surface Parking --Encourage the use of shade trees and landscaping or screening of surface parking areas. Parking should be designed so that it is not the dominant element of the street, and should be located behind development rather than in front of it. <i>Id.</i> § 910.19	The Project has no surface parking and its drop off zone is located to the side of the building rather than along 4 th Street SW.
Policy UD-2.2.11: Parking Structures --Encourage creative solutions for designing structured parking to minimize its visual prominence. Where feasible, the street side of parking structures should be lined with active and visually attractive uses to lessen their impact on the streetscape. <i>Id.</i> § 910.21	The Project employs below-grade structured parking.
Policy UD-2.2.12: Strip Shopping Centers --Ensure that zoning and parking standards discourage strip commercial shopping centers and auto-oriented building designs within designated neighborhood centers. <i>Id.</i> § 910.23	The Project’s commercial uses are pedestrian—rather than automobile—oriented.
Policy UD-2.3.1: Reintegrating Large Sites --Reintegrate large self-contained sites back into the city pattern. Plans for each site should establish urban design goals and principles which guide their subsequent redevelopment. <i>Id.</i> § 911.2	The Project is part of a large formerly self-contained site that has been reintegrated back into the L’Enfant grid.
Policy UD-2.3.2: Large Site Scale and Block Patterns --Establish a development scale on large sites that is in keeping with surrounding areas. "Superblocks" (e.g., oversized tracts of land with no through-streets) should generally be avoided in favor of a finer-grained street grid that is more compatible with the texture of Washington's neighborhoods. This also allows for more appropriately scaled development and avoids large internalized complexes or oversized structures. <i>Id.</i> § 911.4	The former superblock of the Waterfront Station PUD has been broken down into contextually-appropriately scaled parcels including the Project site and the creation of a fine-grained street grid.
Policy UD-2.3.3: Design Context for Planning Large Sites --Ensure that urban design plans for large sites consider not only the site itself, but the broader context presented by surrounding neighborhoods. Recognize that the development of large sites has ripple effects that extend beyond their borders, including effects on the design of transportation systems and public facilities nearby. <i>Id.</i> § 911.6	The master plan for Waterfront Station considered effects on surrounding areas, and the Project is designed in accordance with that master plan.
Policy UD-2.3.4: Design Trade-offs on Large Sites --Balance economic development and urban design goals on large sites. In some cases, it may be appropriate to develop a site in a manner that does not capitalize on its full economic value in order to achieve an important urban design objective, such as creation of new waterfront open space or preservation of a historic landmark. <i>Id.</i> § 911.7	The Project strikes an appropriate balance between revitalization and preservation of Southwest neighborhoods and provides generally neighborhood-serving uses. Among other priorities, the Waterfront Station PUD includes new streets and public spaces that reduce the full development potential.
Policy UD-3.1.1: Improving Streetscape Design --Improve the appearance and identity of the District’s streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street "furniture", and adjacent building facades. <i>Id.</i> § 913.8	The Project includes high-quality and contextually-appropriate streetscaping and landscaping.

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<p>Policy UD-3.1.2: Management of Sidewalk Space--Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic. <i>Id.</i> § 913.9</p>	<p>The Project preserves and enhances the width of sidewalks along 4th Street, SW and promotes additional pedestrian activity on the Project site to the north of the new building.</p>
<p>Policy UD-3.1.3: Streetscape Design and Street Function--Use variations in lighting and landscaping to highlight and clarify the function of different streets. The design features of streets should make the city's circulation system easier to navigate and understand for residents and visitors. <i>Id.</i> § 913.1</p>	<p>The Project employs variation in pavers and other materials and furniture to separate pedestrians and vehicles along the private drive and distinguishing the Private Drive from the surrounding network.</p>
<p>Policy UD-3.1.4: Street Lighting--Provide street lighting that improves public safety while also contributing to neighborhood character and image. <i>Id.</i> § 913.11</p>	<p>The Project employs street lighting on both public and private streets.</p>
<p>Policy UD-3.1.5: Streetscape and Mobility--Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Transit shelters, benches, bicycle parking, safe-pedestrian connections, and clear way-finding signage should be provided to facilitate multi-modal travel. <i>Id.</i> § 913.12</p>	<p>The Project's 4th Street, SW and private drive foster pedestrian and cycling connections.</p>
<p>Policy UD-3.1.6: Enhanced Streetwalls--Promote a higher standard of storefront design and architectural detail along the District's commercial streets. Along walkable shopping streets, create street walls with relatively continuous facades built to the front lot line in order to provide a sense of enclosure and improve pedestrian comfort. <i>Id.</i> § 913.13</p>	<p>The Project's streetwalls are highly designed and articulated to create a comfortable and inviting pedestrian experience.</p>
<p>Policy UD-3.1.7: Improving the Street Environment--Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall. <i>Id.</i> § 913.14</p>	<p>The Project's 4th Street, SW streetscaping and private drive and plaza areas promote the ground level uses in the town center, enhance walking, and promote an enjoyable pedestrian experience.</p>
<p>Policy UD-3.1.8: Neighborhood Public Space--Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the "activation" of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas. <i>Id.</i> § 913.15</p>	<p>The Project's private drive, northern plaza, and play area together activate 4th Street, SW. Outdoor dining areas and multiple shop entrances are included in such plaza.</p>
<p>Policy UD-3.1.10: Sidewalk Cafes--Discourage the enclosure of sidewalk cafes in a manner that effectively transforms them into indoor floor space. The design of sidewalk cafes should be compatible with the architectural qualities of the adjoining buildings, should complement the street environment, and should not impede pedestrian movement. <i>Id.</i> § 913.17</p>	<p>The Project's sidewalk café(s) do not impede pedestrian activity in the public realm. Rather they invite public activity onto the otherwise private area north of the Project.</p>

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Policy Objective	Application to the Project
Policy UD-3.1.11: Private Sector Streetscape Improvements --As appropriate and necessary, require streetscape improvements by the private sector in conjunction with development or renovation of adjacent properties. <i>Id.</i> § 913.18	The Project includes private sector-financed streetscape improvements in conjunction with the Project.
Policy UD-3.1.12: Programming of Outdoor Space --Encourage the programming of outdoor space with events and activities (such as performances, arts, and farmers markets) that stimulate streetlife and active use. <i>Id.</i> § 913.19	The Project's publicly-accessible outdoor areas and even the private drive are capable of being reserved for temporary outdoor neighborhood events, such as festivals.
Policy UD-3.1.13: Signage --Encourage high standards of signage throughout the District, particularly for signs that designate landmarks, historic districts, and other areas of civic importance. <i>Id.</i> § 913.2	The Project will include high quality signage that will be reviewed as part of this application.
Policy UD-3.2.3: Site Planning and Design Measures to Increase Security --Encourage architectural design and site planning methods that minimize perimeter security requirements and have a reduced impact on the public realm. Such measures include separating entryways, controlling access, "hardening" of shared walls, and the selection of more resilient building materials. <i>Id.</i> § 914.8	The Project employs design elements and an overall design strategy that minimizes the intrusiveness of security elements while still protecting pedestrians and the Project's play area. The Project's security elements are architectural and ornamental in addition to having functional value.
Policy UD-3.2.4: Security Through Streetscape Design --Develop and apply attractive, context-sensitive security measures in the design of streets, plazas, and public spaces. These measures should use an appropriate mix of bollards, planters, landscaped walls, vegetation, and street furniture rather than barriers and other approaches that detract from aesthetic quality. <i>Id.</i> § 914.9	
Policy UD-3.2.5: Reducing Crime Through Design --Ensure that the design of the built environment minimizes the potential for criminal activity. Examples of preventive measures include adequate lighting, maintaining clear lines of sight and visual access, and avoiding dead-end streets. A more attractive solution has been implemented at the Museum of the American Indian, where security and aesthetic needs are successfully balanced. Makeshift security measures such as jersey barriers adversely affect District streets and sidewalks. <i>Id.</i> § 914.1	The Project includes appropriate levels of lighting and monitoring to provide for a comfortable and safe pedestrian and resident experience and to minimize opportunities for criminal or other undesirable activities.
Policy UD-4.1.5: Small Area Plans --Integrate urban design considerations into small area plans. Consider the use of illustrative design guidelines and place-specific urban design standards as part of these plans. <i>Id.</i> § 916.1	The Project is consistent with the Southwest Neighborhood Small Area Plan, as set forth below.
Historic Preservation Element	
Policy HP-2.1.2: Disposition of District-Owned Properties —Evaluate District-owned properties for historic potential before acting on disposition. When disposal of historic properties is appropriate, ensure their continued preservation through transfer to a suitable new steward under conditions that ensure their protection and reuse. <i>Id.</i> § 1008.3	The Project site is not within any historic district and does not contain any existing structures, so this objective does not limit development of the Project.

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Policy Objective	Application to the Project
<p>Policy HP-2.3.1: The Plan of the City of Washington--Preserve the defining features of the L'Enfant and McMillan plans for Washington. Work jointly with federal agencies to maintain the public squares, circles, and major reservations as landscaped open spaces that provide a means to experience the legacy of the city plan. Preserve the historic pattern of streets and associated minor reservations, and protect these historic rights-of-way from incompatible incursions and intrusions. <i>Id.</i> § 1010.3</p>	<p>The Project respects and reinforces the L'Enfant Plan in Southwest DC through the building's orientation and view corridor protection and is part of the larger Waterfront Station PUD, which reopened the previously-closed 4th Street, SW, a part of the original grid. The Project—together with the building opposite it on 4th Street, SW—create a frame of 4th Street that respects the form and integrity of the L'Enfant Plan. The Project includes appropriate massing, signage, and streetscaping that respects and reinforces the form and importance of the L'Enfant Plan.</p>
<p>Policy HP-2.3.3: Spatial Character of L'Enfant Plan Streets--Protect the generous open space and reciprocal views of the L'Enfant Plan streets, avenues, and reservations. Protect the integrity and form of the L'Enfant system of streets and reservations from inappropriate new buildings and physical incursions. Support public and private efforts to provide and maintain street trees to help frame axial views and reinforce the city's historic landscape character. <i>Id.</i> § 1010.5</p>	
<p>Policy HP-2.3.4: Public Space Design in the L'Enfant Plan--Reinforce the historic importance and continuity of the streets as public thoroughfares through sensitive design of sidewalks and roadways. Avoid inappropriate traffic channelization, obtrusive signage and security features, and other physical intrusions that obscure the character of the historic street network. Work jointly with federal agencies to preserve the historic statuary and other civic embellishments of the L'Enfant Plan parks, and where appropriate extend this tradition with new civic art and landscape enhancements of the public reservations. <i>Id.</i> § 1010.6</p>	
<p>Policy HP-2.3.5: Enhancing Washington's Urban Design Legacy--Adhere to the design principles of the L'Enfant and McMillan Plans in any improvements or alterations to the city street plan. Where the character of the historic plan has been damaged by intrusions and disruptions, promote restoration of the plan through coordinated redevelopment and improvement of the transportation network and public space. <i>Id.</i> § 1010.7</p>	
<p>Community Service and Facilities Element</p>	
<p>Policy CSF-1.1.1: Adequate Facilities--Construct, rehabilitate, and maintain the facilities necessary for the efficient delivery of public services to current and future District residents. <i>Id.</i> § 1103.6</p>	<p>The Project's environmental impact analysis confirms that adequate utility services exist to support the Project and that the Project will not adversely affect efficient delivery of services in the future. The Project will be referred to DCPS, DPR and other District agencies for review of impacts on other public facilities.</p>
<p>Policy CSF-1.1.2: Adequate Land--Ensure that the District government owns a sufficient amount of land in appropriately distributed locations to accommodate needed public facilities and meet the long-term operational needs of the government. <i>Id.</i> § 1103.7</p>	<p>The District is retaining the fee ownership of the Project site so it will be able to reevaluate the use of the site in the future.</p>

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Policy Objective	Application to the Project
<p>Policy CSF-1.1.3 Retention of Publicly-Owned Land--Retain District-owned property for community facility uses. Wherever feasible, the District should use short- or long-term leases for lands not currently needed so as to preserve the District's long-term supply of land for public use. <i>Id.</i> § 1103.9</p>	<p>The District is using a ground lease for the Project so as to preserve its long-term supply of land for future public use, if necessary.</p>
<p>Policy CSF-1.2.2: Linking the Comp Plan and Capital Improvement Program--Use the District's Comprehensive Plan, particularly its analysis of growth needs and service adequacy, to establish priorities for the funding of capital improvement projects. Public facility planning should be done systematically and comprehensively and should be based on analytical data about community needs, service levels, and projections-in addition to facility condition assessments. <i>Id.</i> § 1104.4</p>	<p>The Project is being developed within a designated growth area and in accordance with impact studies on area infrastructure.</p>
<p>Policy CSF-1.2.6: Impact Fees--Ensure that new development pays its "fair share" of the capital costs needed to build or expand public facilities to serve that development. Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large. <i>Id.</i> § 1104.8</p>	<p>The Project will pay into the DC Water System "System Availability Fee," which is assessed based on the size of the Project. The applicant is not aware of any other relevant mandatory impact fees but notes that it will pay rents on the ground lease which provide the District with revenue for the items identified in this policy objective. The Council analyzed the proposed disposition of the NE Parcel via a long-term ground lease and determined that such disposition was appropriate.</p>
<p>Policy CSF-2.2.3: Child Development Centers--Recognize the importance of early childhood education and related programs to the well-being of the District's youth, and support the development of appropriate facilities for these programs. <i>Id.</i> § 1107.4</p>	<p>The Project provides an early childhood education use in support of this objective.</p>
<p>Policy CSF-3.2.1: Location of Branch Libraries--Locate branch libraries in a systematic way to maximize access for the greatest number of District residents, including future residents who will reside in planned new neighborhoods. This approach may result in the development of new libraries in growing population centers within the city and the replacement of the substandard "kiosk" type libraries with larger, more appropriately designed facilities. <i>Id.</i> § 1111.2</p>	<p>The Project's location across the street from an existing library branch provides additional residents to patronize such branch and provides improved pedestrian access to help maximize usage of that branch.</p>
<p>Policy CSF-4.2.3: Responsiveness to Demographic Change--Ensure that fire and emergency medical services and facility assessments are responsive to the changing social and economic composition of the population, including workers and visitors as well as residents. <i>Id.</i> § 1114.1</p>	<p>The Project's mix of uses are unlikely to present a significant shift in the demographics of the population that existing fire and emergency medical services personnel are accustomed to treating.</p>

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Policy Objective	Application to the Project
Educational Facilities Element	
<p>Policy EDU-2.1.1: Collaborative Arrangements with Community Service Providers--Create partnerships between DCPS, District government, non-profits, and other institutions to promote schools as the central focus of community activities. <i>Id.</i> § 1209.5</p>	<p>The Project’s educational use adds educational programming as an important component of the overall mix of neighborhood-serving uses within Waterfront Station.</p>
Infrastructure Element	
<p>Policy IN-1.2.1: Modernizing and Rehabilitating Water Infrastructure--Work proactively with WASA [now DC Water] to repair and replace aging infrastructure, and to upgrade the water distribution system to meet current and future demand. The District will support water system improvement programs that rehabilitate or replace undersized, defective, or deteriorating mains. The District will also support concurrent programs that ensure that lines are flushed in order to eliminate the potential for stagnant water to accumulate at the ends of water mains. ANCs and community organizations should be consulted in the siting of any new facilities to ensure that the potential for adverse impacts are appropriately addressed. <i>Id.</i> § 1304.3</p>	<p>The Project will work with DC Water to determine infrastructure needs for the Project and will pay and required system fees.</p>
<p>Policy IN-1.2.2: Ensuring Adequate Water Pressure--Work proactively with WASA to provide land for new storage tanks and other necessary operations so that adequate water supply and pressure can be provided to all areas of the District. The siting and design of water storage tanks and similar facilities should be consistent with the policies of the Urban Design and Environmental Protection Elements, and should minimize visual impacts and "skylining" effects on ridges or hills. <i>Id.</i> § 1304.4</p>	<p>The Project will not adversely affect water pressure in the surrounding area.</p>
<p>Policy IN-2.1.1: Improving Wastewater Collection--Provide for the safe and efficient collection of wastewater generated by the households and businesses of the District. Ensure that new development does not exacerbate wastewater system deficiencies, and instead supports improved system efficiency and reliability. <i>Id.</i> § 1306.7</p>	<p>The Project employs efficient wastewater fixtures and systems and is designed to maintain system reliability.</p>
<p>Policy IN-2.1.2: Investing In Our Wastewater Treatment Facilities--Provide sustained capital investment in the District's wastewater treatment system to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment. <i>Id.</i> § 1306.8</p>	<p>The Project will contribute additional funds to maintain infrastructure through user fees and charges.</p>
<p>Policy IN-2.2.1: Improving Stormwater Management--Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process with clear lines of responsibility with regard to oversight, guidelines, and resources. <i>Id.</i> § 1307.3</p>	<p>The Project employs a highly-efficient stormwater capture and retention system.</p>

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Policy Objective	Application to the Project
Policy IN-3.1.1: Solid Waste Collection --Ensure safe, reliable, adequate solid waste collection from residences, business establishments, institutions and other facilities. <i>Id.</i> § 1310.5	The Project’s solid waste collection occurs via a shared private alley at the rear of the Project in order to reduce any noise, odor, or traffic effects on surrounding residential areas. This application’s environmental analysis provides additional detail on waste collection.
Policy IN-3.1.3: Reducing Community Impacts --Reduce the adverse effects of solid waste facilities, including noise, odors, and truck traffic, on District neighborhoods. <i>Id.</i> § 1310.6	
Policy IN-5.1.1: Adequate Electricity --Ensure adequate electric supply to serve current and future District of Columbia needs. This will require collaboration with PEPCO and other service providers. <i>Id.</i> § 1314.6	The Project is supplied by an adequate source of electricity. In addition the Project contributes to the supply of electricity through the inclusion of solar panels.
Policy IN-5.1.2: Undergrounding Electric Distribution Lines --Plan for the undergrounding of electric distribution lines throughout the District to provide increased reliability of service and enhanced aesthetics and safety, and seek equitable means to cover the high costs associated with undergrounding. Use the opportunity for undergrounding to bury other above-ground communication lines, such as telephone lines, wherever feasible. <i>Id.</i> § 1314.7	The Project is served exclusively by underground electric power lines.
Policy IN-6.1.1: Coordination of Infrastructure Improvements --Ensure that infrastructure upgrades are carefully scheduled and coordinated with development and redevelopment plans in order to minimize traffic rerouting, pavement cuts for laying cable or placement of other infrastructure within the street right-of-way, street closings, disruptive subsurface excavation, and utility shut-offs. <i>Id.</i> § 1317.2	To the extent required for the Project, any infrastructure upgrades will be carefully scheduled and coordinated with the applicable District agencies in order to minimize any impacts on neighbors.
Policy IN-6.1.3: Developer Contributions --Require that private developers fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to water and wastewater infrastructure, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project. <i>Id.</i> § 1317.5	The Project will contribute a system accessibility fee to DC Water, which fee advances the objectives of this policy. The Project will also include additional transformer vaults.
Arts and Culture Element	
Policy AC-1.1.2: Development of New Cultural Facilities --Develop new neighborhood cultural facilities across the District, providing affordable space for grass roots and community arts organizations. Provide technical and financial assistance to organizations to help plan and build such facilities. <i>Id.</i> § 1403.3	The Project includes a new neighborhood-based theater.
Policy AC-1.1.4: Cultural and Artistic Diversity --Ensure that neighborhood cultural facilities accommodate a wide variety of arts disciplines, cultures, individuals and organizations. Facilities should also accommodate the special needs of seniors and persons with disabilities. <i>Id.</i> § 1403.5	The Project’s theater can accommodate a range of live performances and is designed to accommodate patrons with special needs.

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Policy Objective	Application to the Project
<p>Policy AC-1.1.5: Siting of Facilities--Support the siting of arts facilities in locations where impacts upon nearby uses can be most easily managed. Give preference to locations near public transit, or sites where shared parking facilities are available. Conversely, ensure that appropriate parking and transit access improvements are made when arts and cultural venues are developed. <i>Id.</i> § 1403.6</p>	<p>The Project’s theater is located near transit and in a facility with shared parking all in accordance with this policy objective. The theater has appropriate parking available.</p>
<p>Policy AC-1.1.6: Performance and Events in Non-Traditional Settings--Encourage the provision of spaces for performances and art events in neighborhood parks, community centers, schools, transit stations, residential developments and public areas in private development. This can help reach new audiences and increase access to the arts for people in all parts of the city. <i>Id.</i> § 1403.7</p>	<p>The Project’s inclusion of a theater use in a privately-constructed development and alongside neighborhood-serving retail uses advances this objective and increases the accessibility and availability of performing arts in Southwest DC.</p>
<p>Policy AC-3.2.1: Promoting Cultural Amenities--Promote the development of cultural amenities "beyond the Mall" in an effort to more fully capitalize on the economic benefits of tourism for District residents, businesses, and neighborhoods. <i>Id.</i> § 1410.4</p>	<p>The Project’s location is “beyond the Mall” so its inclusion of arts uses will draw to Southwest DC visitors from other neighborhoods and cities who will in turn also support other nearby businesses.</p>
<p>Lower Anacostia Waterfront/Near Southwest Area Element</p>	
<p>Policy AW-1.1.1: Conservation of Established Waterfront Neighborhoods--Revitalize and preserve established neighborhoods in the Waterfront Planning Area. Continued investment in the existing housing stock and in established local commercial areas should be strongly encouraged. <i>Id.</i> § 1908.2</p>	<p>The Project is within the Southwest Waterfront Planning Area and continues the revitalization of that neighborhood with additional private investment in housing and an established local-serving commercial area.</p>
<p>Policy AW-1.1.2: New Waterfront Neighborhoods--Create new mixed use neighborhoods on vacant or underutilized waterfront lands, particularly on large contiguous publicly-owned waterfront sites. Within the Lower Anacostia Waterfront/ Near Southwest Planning Area, new neighborhoods should be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, Southeast Federal Center and Carrollsburg areas. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. <i>Id.</i> § 1908.3</p>	<p>The Project is part of the Waterfront Station, a new mixed-use neighborhood identified in this policy objective at the time it was written. Waterfront Station is on a large contiguous underutilized property.</p>

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Policy Objective	Application to the Project
<p>Policy AW-1.1.3: Waterfront Area Commercial Development--Encourage commercial development in the Waterfront Area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia Waterfront as well as space for government and private sector activities, such as offices and hotels. Commercial development should be focused along key corridors, particularly along Maine Avenue and M Street Southeast, along South Canoeing on the Anacostia Capitol Street; and near the Waterfront/SEU and Navy Yard metroraill stations. Maritime activities such as cruise ship operations should be maintained and supported as the waterfront redevelops. <i>Id.</i> § 1908.4</p>	<p>The Project is consistent with the Future Land Use Map and brings additional retail services and choices to the Anacostia waterfront and supports the government and private sector activity already in the neighborhood. The Project is also transit-accessible as encouraged by this objective.</p>
<p>Policy AW-1.1.4: Waterfront Development Amenities--Leverage new development in the Waterfront Planning area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements. <i>Id.</i> § 1908.5</p>	<p>The Project leverages its location to create amenities and benefits that serve new and existing residents. The Project’s amenities include a public plaza area and playground, employment benefits, and educational and arts facilities.</p>
<p>Policy AW-1.2.2: Waterfront Cultural and Commemorative Sites--Encourage the siting of new museums, memorials, civic gathering places, and cultural attractions on or near the Anacostia River as a way to catalyze revitalization and meet the demand for additional commemorative works without further crowding the National Mall and monumental core of the city. Such facilities should make the most of their waterfront locations and create an integrated system of gracious, beautiful, and vibrant places. <i>Id.</i> § 1909.2</p>	<p>The Project’s inclusion of an arts use advances this objective.</p>
<p>Policy AW-1.2.3: Waterfront Sports and Recreation Destinations--Develop new destinations for sports, recreation, and celebration on or near the Anacostia waterfront. Ensure that these destinations are served by adequate and efficient transportation systems and infrastructure. <i>Id.</i> § 1909.3</p>	<p>The Project includes a new tot lot near the Anacostia waterfront and well-served by transit.</p>
<p>Policy AW-2.1.1: Mixed Use Development--Support the redevelopment of the Southwest Waterfront with medium to high-density housing, commercial and cultural uses, and improved open space and parking. The Future Land Use Map shows high density development and it is expected that the project will capitalize on height opportunities to provide public spaces and, where appropriate, a mix of medium development density in order to transition to the surrounding neighborhoods. The development should also be designed to make the most of the waterfront location, preserving views and enhancing access to and along the shoreline. <i>Id.</i> § 1911.7</p>	<p>The Project includes high-density housing, commercial, and cultural uses as well as improved open space and below-grade parking. (The Project is within the boundaries of the “Southwest Waterfront” as identified in the Area Element.)</p>
<p>Policy AW-2.1.2: New Public Spaces and Open Space--Create new public spaces and plazas at the Southwest Waterfront, including an expanded public promenade at the water's edge. Public piers should extend from each of the major terminating streets, providing views and public access to the water. <i>Id.</i> § 1911.8</p>	<p>The Project includes a new public plaza and play area.</p>
<p>Policy AW-2.1.6: Waterside Mall--Support the redevelopment of Waterside Mall with residential, office, and local-serving retail uses. The site should be strengthened as a retail anchor for the surrounding Southwest community. Its redesign should restore 4th Street SW as part of the city street grid, and improve aesthetics, circulation, and connectivity to surrounding uses. <i>Id.</i> § 1911.12</p>	<p>The Project is part of the overall redevelopment of the former Waterside Mall with the mix of uses prescribed in this objective.</p>

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Policy Objective	Application to the Project
Implementation Element	
<p>Policy IM-1.1.1: Mitigation of Development Impacts--To the greatest extent feasible, use the development review process to ensure that impacts on neighborhood stability, traffic, parking and environmental quality are assessed and adequately mitigated. <i>Id.</i> § 2502.5</p>	<p>The Project will undergo a comprehensive public review by the Zoning Commission to ensure that its impacts are assessed and adequately mitigated.</p>
<p>Policy IM-1.1.3: Relating Development to Infrastructure Capacity--Ensure that development does not exceed the capacity of infrastructure. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit and other travel modes as well as streets and highways, and the availability of water, sewer, drainage, solid waste, and other public services. <i>Id.</i> § 2502.7</p>	<p>The Project’s environmental and facilities impact assessment provides the analysis showing that the Project does not exceed infrastructure capacity. The Project appropriately balances the need for new housing (and the affordable housing it provides) with mobility capacity and utility infrastructure availability.</p>
<p>Policy IM-1.1.4: Incentives for Achieving Goals and Policies--Allow the use of zoning incentives such as increased height and density in appropriate locations as a tool for achieving Comprehensive Plan goals and policies. <i>Id.</i> § 2502.8</p>	<p>The Project utilizes the PUD process to obtain additional height and density in a designated redevelopment area near transit as a means to achieve the numerous other goals and policies described herein.</p>
<p>Policy IM-1.1.5: Development Approvals and the Comprehensive Plan--To the extent they are relevant, consider the goals and policies of the District Elements in the approval of planned unit developments, variances, campus plans, special exceptions, large tract reviews, and other projects requiring review. <i>Id.</i> § 2502.9</p>	<p>This analysis identifies the relevant goals and policies of the District Elements of the Comprehensive Plan for the Zoning Commission’s consideration in the instant PUD application.</p>
<p>Policy IM-1.1.6: Studies Preceding Zoning Case Approvals--Ensure that zoning case approvals such as Planned Unit Developments (PUDs) utilize: (1) transportation and infrastructure studies and recommended conditions of approval to mitigate potential impacts; (2) agreements for financing any necessary improvements, including public and private responsibilities; (3) agreements to comply with "first source employment" requirements and other regulations that ensure public benefits to District residents. <i>Id.</i> § 2502.1</p>	<p>The instant PUD application includes a transportation review and an infrastructure capacity and environmental impact analysis as well as a first source employment agreement to provide public benefits to District residents.</p>
<p>Policy IM-1.1.7: Housing as a PUD Amenity--Consider the provision of on-site housing for low and moderate income households, seniors, and persons with special needs as an important amenity in Planned Unit Developments. <i>Id.</i> § 2502.11</p>	<p>The Project provides on-site affordable housing for low- and very low-income residents as part of a PUD.</p>

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Policy Objective	Application to the Project
<p>Policy IM-1.1.8: Location of PUD Amenities--Require that a substantial part of the amenities proposed in Planned Unit Developments (PUDs) shall accrue to the community in which the PUD would have an impact. <i>Id.</i> § 2502.12</p>	<p>The Project’s public benefits and amenities accrue primarily to the geographic area of the ANC in which the Project is located.</p>
<p>Policy IM-1.2.1: Small Area Plans--Prepare Small Area Plans and other planning studies for parts of the city where detailed direction or standards are needed to guide land use, transportation, urban design, and other future physical planning decisions. The focus should be on areas that offer opportunities for new residential, commercial, and mixed use development, or areas with problems or characteristics requiring place-specific planning actions. Use the Comprehensive Plan Area Elements, the Generalized Policies Map, and land use monitoring activities to identify areas in the city where such plans are needed. Citizens shall have the right to petition or suggest small area plans to be proposed by the Mayor. <i>Id.</i> § 2503.2</p>	<p>As set forth below, the Project is within an area that is the subject of a properly-prepared and duly-adopted Small Area Plan, and the Project is constructed in accordance with such plan.</p>
<p>Policy IM-1.2.2: Protocol for Small Area Plans--Ensure that Small Area Plans take a form appropriate to the needs of the community and reflect citywide needs, District and neighborhood economic development policies and priorities, market conditions, implementation requirements, competing demands, available staffing resources and time, and available funding. Such plans should address such topics as neighborhood revitalization and conservation needs and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives. Small area plans should be adopted by the Council and used to supplement the Comprehensive Plan. If necessary, Comprehensive Plan amendments should be introduced to ensure internal consistency for the areas involved. <i>Id.</i> § 2503.3</p>	
<p>Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions--Require the Board of Zoning Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. Decisions on requests for rezoning shall be guided by the Future Land Use Map read in conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. <i>Id.</i> § 2504.5</p>	<p>The instant PUD application requires the Zoning Commission to consider and evaluate the Project’s consistency with the District Elements (including the attendant Maps), the applicable Area Element, and Small Area Plan, and this analysis is intended to guide the Commission’s evaluation.</p>
<p>Policy IM-1.3.4: Interpretation of the District Elements--Recognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements. As noted at Section 300.2, since the Land Use Element integrates the policies of all other District elements, it should be given greater weight than the other elements. <i>Id.</i> § 2504.6</p>	<p>This analysis identifies the overlapping and occasionally competing nature of the objectives of the Comprehensive Plan. Particular focus is given to the Land Use Element given its weighted status.</p>

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Policy Objective	Application to the Project
<p>Policy IM-1.5.1: Involvement of Advisory Neighborhood Commission--Include the Advisory Neighborhood Commissions and area residents in the review of development to assist the District in responding to resident concerns. Consistent with the statutory requirements of the DC Code, feedback from the ANCs should be given "great weight" as land use recommendations and decisions are made. <i>Id.</i> § 2507.3</p>	<p>The applicant has met with and will continue to seek the input of the ANC in which the Project is located. The Project has and will continue to evolve in response to ANC considerations and recommendations.</p>
<p>Policy IM-1.5.2: Promoting Community Involvement--Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation. A variety of means should be used to secure community input, including advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication. <i>Id.</i> § 2507.4</p>	<p>In addition to meeting with the ANC, the applicant has met or discussed the Project with neighbors and other community stakeholders. The Zoning Commission’s review procedures also invite and accommodate public comment and participation in support of this objective.</p>
<p>Policy IM-1.5.4: Transparency in Decision-Making--Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents and maintaining open lines of communication with the public as plans are developed. <i>Id.</i> § 2507.6</p>	<p>The Zoning Commission’s review procedures are public and transparent with all information on which the Commission makes its decisions available to the general public.</p>
<p>Southwest Neighborhood Small Area Plan – Guiding Principles</p>	
<p>Foster an environment that encourages and embraces cultural and economic diversity.</p>	<p>The Project encourages cultural diversity through its inclusion of arts and educational spaces and encourages economic diversity through its provision of 137 affordable residential units.</p>
<p>Preserve the varied scale and green character of the neighborhood.</p>	<p>The Project is located in an appropriate location for its proposed height and scale and contributes positively to the green character of Southwest DC.</p>
<p>Design buildings, connections and sidewalks to improve safety, security and pedestrian circulation.</p>	<p>The Project’s building orientation, private drive and streetscaping improve safety and security and promote pedestrian circulation.</p>
<p>Support, enhance and expand neighborhood retail amenities.</p>	<p>The Project’s addition of residents supports and enhances retail offerings and the Project’s ground floor uses enhance and expand existing retail amenities.</p>

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Policy Objective	Application to the Project
Enhance, connect and better utilize parks both active and passive as open space.	The Project’s public spaces connect and enhance Southwest DC’s collection of parks.
Invest in community, arts and education uses that serve resident needs.	The Project includes arts and education uses that serve Southwest DC residents.
Preserve and develop a range of housing for a mix of income, age and family size, and encourage quality design and architecture.	The Project includes units that are affordable to very low income households (30% MFI), low income households (50% MFI), and market-rate households. The Project’s two-bedroom units accommodate families with children.
Strengthen multimodal transportation and improve street connections, parking and safety.	The Project improves the pedestrian condition along 4 th Street, SW and adds riders for the nearby Metrorail station.
Remember the history and legacy of the Southwest neighborhood while planning for change in the future.	The Project’s architecture recalls and promotes the modernist character of Southwest DC.
Develop a strategy for height, density and open space that enhances, acknowledges and complements the character of the neighborhood.	The Project’s height is appropriate given its location near the Metrorail station.
Incorporate goals and targets from the Sustainable DC Plan to protect our environment and conserve resources to foster a vibrant, healthy neighborhood.	The Project is constructed with a high level of environmental sustainability. See the environmental impact analysis included in Exhibit I attached herewith.
Southwest Neighborhood Small Area Plan – Concept Actions	
Modernist Gem Recommendation 3 --Support infill development and adaptive reuse of existing buildings in Southwest to promote the preservation of the community’s architectural character.	The Project is an infill development project that respects and enhances the Modernist character of Southwest DC.
Modernist Gem Recommendation 6 --Ensure future development and improvements reinforce the L’Enfant Plan as an important historic feature tying Southwest to its greater urban context.	The Project’s massing and orientation reinforce the re-establishment of the L’Enfant Plan along 4 th Street, SW.

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Policy Objective	Application to the Project
<p>Modernist Gem Recommendation 7--Apply the Design Guidelines contained in the [Small Area Plan] to all new development achieved through the Planned Unit Development process. Matter of right development is also strongly encouraged to apply the Design Guidelines:</p> <ol style="list-style-type: none"> 1. Encourage a mix of building heights. 2. Achieve design excellence for high quality and timeless development. 3. Promote variation in building frontages along streets with continuous massing. 4. Enhance green space through landscaped perimeters and internal green or amenity spaces. 5. Incorporate sustainable building and site design. 6. Ensure parking is not a detractor. 7. Maximize transparency and viability of ground floor uses along key commercial corridors. 8. Encourage connectivity for pedestrians, bicycles, and vehicular access, including transit where feasible. 	<p>The Project’s design complies with the Design Guidelines in the Small Area Plan. The Waterfront Station PUD includes a mix of building heights, and the Project provides high quality materials and significant articulation on all three street-facing façades. The Project’s ground floor is pedestrian oriented with tall, appropriately transparent retail storefront spaces. The Project includes private green areas as well as a public plaza. The Project is designed to be LEED Gold 2009. All of the Project’s parking is below grade where it is not a detractor. The Project is designed to promote pedestrian, bicycle, and transit connectivity.</p>
<p>Green Oasis Recommendation 8--Increase the tree canopy in the Southwest Planning Area from 25 percent to 37 percent with the addition of trees in all new developments, streetscape improvements and potentially at existing parks, such as Lansburgh. The creation of larger setbacks for new developments may allow for more tree planting opportunities. Ensure that any diseased trees are removed and replaced at appropriate times.</p>	<p>The project adds additional street trees and tree cover in the private internal courtyard; the building setback along Wesley Place, SW helps facilitate street trees along that frontage.</p>
<p>Green Oasis Recommendation 11--Reduce stormwater runoff by transforming key areas of existing impervious surfaces to pervious materials and encouraging bioretention and landscaping.</p>	<p>The Project reduces stormwater runoff with green roofs and other bioretention areas.</p>
<p>Green Oasis Recommendation 12--New Private Development: Meet or exceed current flood-proofing requirements (requirements are currently set for 100-year floods). The Southwest neighborhood should consider negotiating with developers so that future PUDs meet floodproofing for 500-year floods given the rapidly increasing sea-level rise projections. Any setbacks for new developments should become an opportunity for stormwater and flood water retention rather than lawns.</p>	<p>The Project is located entirely outside of the 100-year floodplain. The Applicant will work to address resiliency concerns.</p>
<p>Green Oasis Recommendation 13--Maximize open spaces, vegetation and sustainable practices by discouraging surface parking in new developments achieved through Planned Unit Developments (PUDs).</p>	<p>The Project contains no surface parking.</p>
<p>Green Oasis Recommendation 14--Encourage the installation of electric vehicle-charging stations and set aside electric vehicle-only parking spaces in the garages of future buildings constructed under Planned Units Developments (PUDs) as a community amenity.</p>	<p>The Project includes electric vehicle-charging stations.</p>
<p>Arts and Culture Recommendation 1-- Foster the Southwest neighborhood arts hub by expanding events, such as Jazz Night at Westminster, Southwest Night at Arena Stage, activities with Blind Whino, and future events with the proposed Rubell Museum at the Randall School.</p>	<p>The Project’s inclusion of a new theater use adds to the range of Southwest DC neighborhood arts venues.</p>

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Policy Objective	Application to the Project
<p>Thriving Town Center Recommendation 2--Promote a cohesive and concentrated retail cluster along 4th Street through the development of retail-appropriate spaces, coherent storefront design, signage, streetscape and street furniture as well as thorough management of the retail mix and marketing.</p>	<p>The Project's ground floor retail, arts, and educational uses enhance and add to the existing retail cluster along 4th Street, SW.</p>
<p>Thriving Town Center Recommendation 3--Pursue a neighborhood-focused retail attraction and retention strategy that provides an array of locally-serving shopping, services and dining to residents and the daytime office worker population. In new retail development consider allowing for different formats and sizes of spaces so that a variety of retail tenants, including small businesses, may lease space.</p>	<p>The Project's ground floor uses are all neighborhood-serving and are capable of being demised in a variety of sizes and formats.</p>
<p>Thriving Town Center Recommendation 7--Encourage pop-up retail and temporary creative uses in vacant spaces and parcels as a means to enliven a space, maintain retail continuity along 4th Street, promote small and local retailers and activate the main street.</p>	<p>The applicant expects that the Project's ground floor uses will enliven 4th Street, SW and activate the pedestrian zone.</p>