

MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: ^{JLS} Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation
DATE: October 12, 2021
SUBJECT: Supplemental Report for Zoning Commission Case No. 16-11, Consolidated Planned Unit Development and Related Map Amendment at 3000 Georgia Avenue N.W., between Irving Street, N.W. and Columbia Road, N.W.

I. BACKGROUND

At its July 26, 2021 public meeting, the Zoning Commission (the “Commission”) deliberated on the Court order that vacated and remanded Z.C. Order No. 16-11. The Commission asked the parties and the Office of Planning (“OP”) to file written statements analyzing the proposed Planned Unit Development (“PUD”) under the updated Comprehensive Plan. Since the order was remanded, changes were made to the Comprehensive Plan that directly impact the subject PUD site. Notably, the Future Land Use Map has been changed to mixed-use Medium Density Residential/Medium Density Commercial along the northern portion of the site, and to mixed-use Moderate Density Residential/Parks, Recreation and Open Space on the southern portion of the site.

II. REVISED RECOMMENDATION

The Office of Planning continues to **recommend the Commission approve** the application for a consolidated PUD and a related map amendment from the R-4 and C-2-A zones to the R-5-B and C-2-B zones for the construction of a mixed-use project at Square 289, Part of Lot 849, along Georgia Avenue N.W. between Irving Street, N.W. and Columbia Road, N.W.

On balance, the proposal would be not inconsistent with the 2020 Comprehensive Plan, including the updated Generalized Future Land Use Map.

III. PROJECT SUMMARY

The PUD is proposed for a new mixed-income development that includes an apartment house, a senior building, and eight townhomes (“Project”). Approximately 44,000 square feet will be developed by the District for permanent park and recreation uses. The Project will include a total of 273 residential units, with 189 units in the apartment house, 76 units in the senior building, and eight townhomes. Ninety units will be public housing replacement units, 109-113 units will be workforce affordable units, and 70-74 units will be market rate.

The principal public benefits would include the construction of mixed-income housing including 90 replacement units for previous Park Morton residents, work-force housing (no more than 80% MFI), the

senior housing and the provision of significant park and recreation space. For a full description of the proposal, refer to the applicant submissions at Exhibits 237 to 237M, and the OP report at Exhibit 43.

THE COMPREHENSIVE PLAN, RACIAL EQUITY, AND ZONING

Racial equity is an important consideration in the updated Comprehensive Plan. Racial equity is a broad and encompassing goal of the entire District government. As explained in the Framework Element of the Comprehensive Plan,

[t]he District seeks to create and support an equitable and inclusive city. Like resilience, equity is both an outcome and a process. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality. 213.6

At root, equity refers to fairness and justice and is distinguished from equality. Equity means recognizing that individuals start life with varied economic, racial and social backgrounds and will be confronted with and experience barriers and access to opportunities differently. It is important for public policy to acknowledge and recognize those differences and make adjustments to reduce and eliminate inequity. For example, due to the history of racism, including past and present discriminatory practices and the legacy of systemic racism, Black residents of the District, on average, have considerably less household wealth than white residents, face more negative health outcomes, and incur more challenges to accessing opportunity than white residents.¹

The Comprehensive Plan update further recognizes that advancing equity requires a multifaceted policy approach:

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

Particularly relevant is Section 2501.7 of the Implementation Element’s call for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.” 2501.7.

The direction to consider equity “as part of [the Zoning Commission’s] Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive

¹ Comprehensive Plan Housing Element 512.2

Plan and whether a proposed zoning action is “not inconsistent” with that Plan, rather than on a separate determination about a zoning action’s equitable impact. Whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action before the Commission and what aspects of the outcome the Zoning Commission can control.

Equity is discussed throughout the Comprehensive Plan. In the context of zoning certain priorities stand out. These include affordable housing, displacement, and access to opportunity. One of the key ways the Comprehensive Plan seeks to address equity is by supporting additional housing development. The Plan recognizes that without increased housing the imbalance between supply and demand will drive up housing prices in a way that will create challenges for many residents, particularly low-income residents. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels.

A planned unit development provides a detailed description of the final project in terms of size, bulk and design of the structure, the number of units, the uses within the structure, and the benefits provided including items such as affordable housing, possible work force development, or job opportunities. The Comp Plan consistency analysis of a PUD should look at how the elements of the PUD work together relative to Comprehensive Plan policies, including equity.

The site currently has no housing. It was previously improved with the Bruce Monroe elementary school and has been used as a temporary park for the last decade in anticipation of this development proposal. The requested PUD and related map amendment would enable the provision of more residential units on the site than would the existing RF-1/MU-4 zoning, the 90 replacement units for previous Park Morton residents would clearly be affordable, and at the macro level, the production of more housing decreases the upward pressure on overall housing prices.

The PUD proposed in this case, ZC 16-11, would deliver several benefits that would promote racial equity:

- The Project will establish a mixed-income community with new and diverse housing options.
- The Project will include a total of 273 residential units, with 189 units in the apartment house, 76 units in the senior building, and eight townhomes; 90 units will be public housing replacement units, 109-113 units will be workforce affordable units, and 70-74 units will be market rate.
- The Applicant for the PUD is required to comply with the relocation and reentry requirements for public housing replacement units of Resolution No. 16-06 “To Adopt and Re-entry Policies for New Communities Initiative Developments.”
- The PUD will provide 90 new replacement units for the Park Morton public housing site, which is part of the District’s New Community’s Initiative. The New Communities Initiative is a District government program designed to revitalize severely distressed subsidized housing and redevelop neighborhoods into vibrant mixed-income communities.
- The PUD site would include almost an acre of space to be dedicated only for park and recreation for the benefit of the residents of the neighborhood.

- The First Source Employment Agreement (Exhibit 237 H) will require that 51% of all new job hires and 31% of apprenticeship hours be for District residents.
- The Small Business Enterprises requirement (Exhibit 237 I) states that all construction and non-construction Government-assisted projects over \$250,000, shall require 35% subcontracting to Small Business Enterprises certified by the Department of Small and Local Business Development (DSLBD).

Due to the socio-economic composition of the District in general, and the residents of the New Communities in particular, the 90 units of affordable replacement housing would help provide access to residential units for residents of color while the requirement to comply with the Reentry policies for returning residents will ensure that existing Park Morton residents who wish to return may do so.

The applicant's commitment to providing economic opportunity as shown by the Certified Business Enterprise Agreement with the District Department of Small and Local Business Development and the First Source Employment Agreement with the District Department of Employment Services, consistent with the First Source Employment Agreement Act of 1984; and the commitment to meet the U.S. Department of Housing and Urban Development's Section 3 requirements will result in the provision of job training, employment, and contract opportunities for low- or very-low income residents in connection with development of the Project.

These efforts and elements of the PUD provide for “. . . *workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts.*”

IV. RELATIONSHIP OF THE APPLICATION TO THE COMPREHENSIVE PLAN MAPS AND WRITTEN ELEMENTS

The proposed project would, on balance, be not inconsistent with the maps and written elements of the 2020 Comprehensive Plan.

A. COMPREHENSIVE PLAN MAPS

Generalized Future Land Use Map (FLUM)

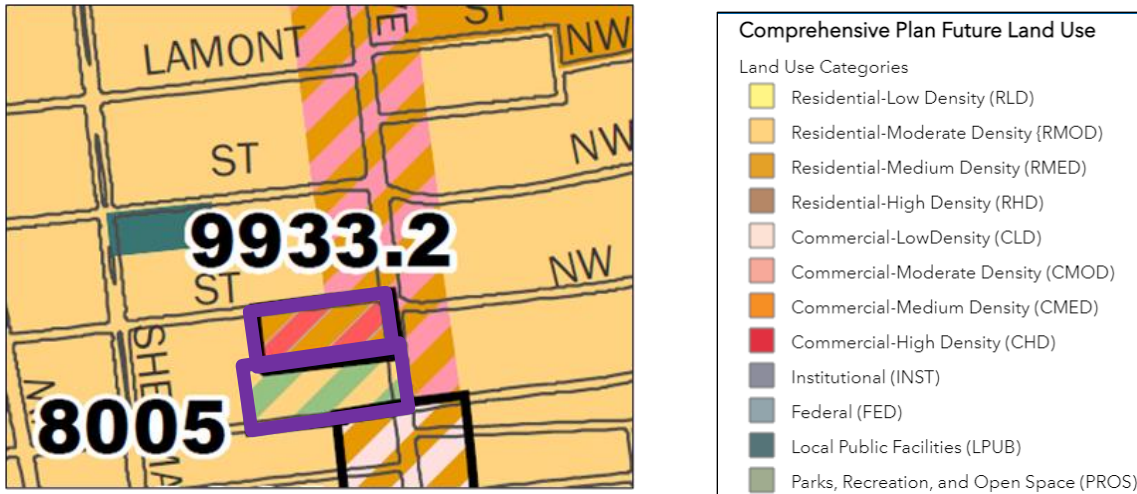
As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 228), the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development's physical characteristics including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

As described below, the proposed PUD would be not inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) was amended in April 2021 to designate the northern portion of the site (labeled 9933.2) for Mixed-use Medium Density Residential and Medium Density Commercial, and the southern portion of the site (labeled 8005) for Mixed-use Moderate Density Residential/ Parks, Recreation and Open Space.

The amendment affirms the Council's intention that the site be redeveloped at medium density mixed use



The Northern Portion (9933.2):

The Future Land Use Map (FLUM) was amended to designate that the northern portion of the site for Mixed-use Medium Density Residential and Medium Density Commercial.

Medium Density Residential: This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings.

- The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space.
- Pockets of low and moderate density housing may exist within these areas, Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development.
- The RA-3 Zone District is consistent with the Medium Density Residential category, and other zones may also apply, 227.7

Medium Density Commercial: This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Moderate Density Commercial areas.

- Retail, office, and service businesses are the predominant uses, although residential uses are common. Areas with this designation generally draw from a citywide market area.
- Buildings are larger and/or taller than those in Moderate Density Commercial areas.
- Density typically ranges between a FAR of 4.0 and 6.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development.

The MU-8 and MU-10 Zone Districts are consistent with the Medium Density category, and other zones may also apply. 227.12

The Southern Portion (8005):

The Future Land Use Map (FLUM) was amended to designate the southern portion of the site for Mixed-use Moderate Density Residential/ Parks, Recreation and Open Space.

Moderate Density Residential: This designation is used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes.

- The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings.
- In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all).
- Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development.
- The R-3, RF, and **RA-2 Zone Districts are consistent** with the Moderate Density Residential category, and other zones may also apply. 227.6

Parks, Recreation, and Open Space: This designation includes the federal and District park systems, including the National Parks, such as the National Mall; the circles and squares of the L’Enfant city and District neighborhoods; . . . This category includes a mix of passive open space (for resource conservation and habitat protection) and active open space (for recreation). . . Zoning designations for these areas vary. The federal parklands are generally unzoned, and District parklands tend to be zoned the same as surrounding land uses. 227.19

The development of row houses with a maximum height of 40 feet, and the Bruce Monroe park and recreation space are consistent with these designations. The PUD related zone of R-5-B (now RA-2) is specifically identified in the Framework element as a zone consistent with the Moderate Density Residential category.

The Planned Unit Development

The PUD was approved under the 1958 regulations C-2-B zone (now the MU-5 zone) and the R-5-B zone (now the RA-2). The PUD is not inconsistent with the FLUM designation and is consistent with the FAR ranges represented in the Framework element. The zones identified as consistent with the Medium Density Commercial category are “MU-8 and MU-10, and other zones may also apply” . The following table compares the densities and heights of the MU-8, MU-10, C-2-B (MU-5) zones and the PUD.

Zone	Matter-of-Right FAR		Inclusionary Zoning		Planned Unit Development	
	FAR	HEIGHT	FAR	HEIGHT	FAR	HEIGHT
MU-10	6.0	90’	7.2	100’	8.64	110’
MU-8	5.0	70’	6.0	70’	7.2	90’
C-2-B	3.5	65’	4.2	70’	5.04	90’

(MU-5)						
Proposed PUD					3.6 (total aggregated)	90' Tallest of the buildings

The project’s aggregated 3.6 FAR is well within the density ranges the Framework element uses to illustrate the site’s FLUM categories; greater density is permitted *when complying with Inclusionary Zoning or when approved through a Planned Unit Development*. Non-residential uses would not exceed 0.5 FAR, which would not be inconsistent with the Medium Density Commercial category. The proposed 90 foot height of the apartment building is also consistent with the allowable height when approved as part of a PUD.

OP recommends the 90 feet as an appropriate height for the apartment building to accommodate the necessary mixed-income housing units and provide for the permanent, large park and recreation space of approximately one acre. If the building were to be lower, it would also be more squat with a larger footprint which would impinge on the size of the park. It is not uncommon for there to be taller buildings along the corridors and the applicant provided an image that shows building of 70 feet or more within a half mile of the proposed PUD (Exhibit 237A1). Although there is only one other building at 90 feet it was also approved as part of a PUD. On balance with the goal to provide permanent green recreation space, housing and affordable housing OP finds the height to be appropriate for the site.

Generalized Policy Map

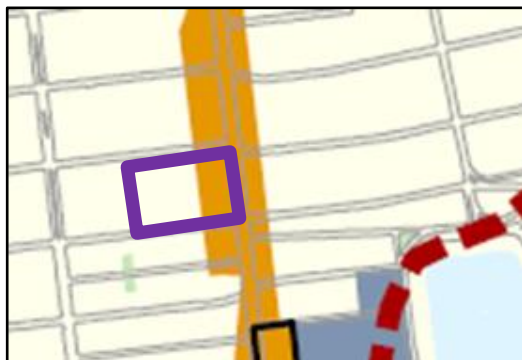


Figure 1. 2020 Generalized Policy Map with Site Approximated in Purple

The Generalized Policy Map identifies the part of the site fronting on Georgia Avenue as part of the Main Street Mixed-Use Corridor. The remaining portion of the site is identified Neighborhood Conservation Area,

Main Street Mixed-Use Corridors are traditional commercial business corridors with a concentration of older storefronts along the street. Their common feature is that they have a pedestrian-oriented environment with traditional storefronts, many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve

neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment, 225.14

The PUD will provide housing opportunities as a mixed use, mixed income project and will contain approximately 4,545 square feet of ground floor community service/retail space with frontage along Georgia Avenue.

Neighborhood Conservation Areas: *The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to*

address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. (10-A DCMR § 225.5)

The PUD Site is located adjacent to the rapidly changing Georgia Avenue corridor. Within one-half mile of the site there are “*opportunities, services and amenities*” such as three full service grocery stores, the Washington Hospital Center, Children’s Hospital, the Columbia Heights Metro station and several high-capacity bus lines, Columbia Height retail center, and many local restaurants, schools and shopping. But the area still includes significant pockets of concentrated poverty where residents lack quality housing, supportive services, and access to quality open space, healthcare, and recreation. (See Park Morton Plan, p. 6.)

The PUD will enhance the established neighborhood through the development of new housing, affordable housing and a permanent park. The architecture does not replicate the early 20th century style of much of the rowhouse neighborhood, but it clearly reads as residential in character. Windows, corner entrances, varied materials, and balcony and bay elements will create a residential, human-scaled design and enhance the pedestrian experience.

The density is “*guided by the Future Land Use Map and Comprehensive Plan policies*” especially those relative to housing and parks and open space. The scale of the PUD transitions down from the 90 foot tall apartment building on Georgia Avenue to the 60 foot tall senior building. The new development is then separated from the existing rowhouse neighborhood to the west by a new private street that runs between Irving Street and Columbia Road and new rowhouses on the south portion of the site.

The PUD is not inconsistent with the Generalized Policy Map designation of a Neighborhood Conservation Area. In summary:

- The guiding philosophy is to conserve and enhance established neighborhoods, **but not preclude development, particularly to address city-wide housing needs.**
- New development should be compatible with the existing scale, natural features, and character of each area, but **is not required to be at the existing scale**
- Densities in Neighborhood Conservation Areas are **guided by the Future Land Use Map** and Comprehensive Plan policies.
- Approaches to growth in Neighborhood Conservation Areas may **vary based on neighborhood socio-economic and development characteristics.**
- **More levels of housing affordability should be accommodated** in areas with access to opportunities, services, and amenities.

The PUD would provide housing and open space at a density consistent with the FLUM and the high priority policy of housing and affordable housing. The residents of the New Communities in particular are predominately African-American or Black, the 90 units of affordable replacement housing would

almost certainly provide access to residential units for residents of color while the requirement to comply with the reentry policies for returning residents will ensure that existing Park Morton residents who wish to return may do so.

B. WRITTEN ELEMENTS

The proposed project would, on balance, also be not inconsistent with written elements of the updated Comprehensive Plan including the Land Use, Transportation, Housing, and Urban Design elements and it contributes to the implementation of the Park Morton Redevelopment Initiative Plan, approved by the District Council in February 2008.

The PUD would also, on balance, be not consistent with policies within the Mid-City Area element. It would:

- Provide new housing where now there is none.
- Provide 90 replacement units for Park Morton.
- Provide a senior housing building.
- Employ architectural and urban design generally using high-quality materials, varied massing and fenestration and attention to ground floor details and public benefits affecting pedestrians. and
- Enhance environmental and sustainability objectives through the various green elements that would be built into the project.

As discussed below, the general furthering of policies relating to land use, senior and affordable housing, transportation and the retention of important neighborhood elements more than outweighs possible inconsistencies with aspects of housing policy relating to the uniform distribution of Inclusionary Zoning, and portions of the Comprehensive Plan design policies.

A. Framework Element

- The critical need for **new affordable housing** units is identified as *high-priority public benefits in the evaluation of residential PUDs (10-A DCMR Section 224.9)* and would be provided by the PUD through the addition of senior housing, market rate housing and replacement units for the Park Morton community.

B. Land Use Element

Growth can and must occur in a way that expands access to affordable housing, education, transportation, employment, and services for communities of color, low-income households, and vulnerable populations. Achieving equitable development requires attention to both the context and needs of different planning areas and to District-wide equity issues, described throughout the Comprehensive Plan. 304.4

- ***Development Along Corridors (Policy LU-1.4.5)***: Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and

integrity of adjacent neighborhoods, including appropriate transitions and buffers, while balancing against the District's broader need for housing. 307.14

- ***Planned Unit Developments in Neighborhood Commercial Corridors (Policy LU-2.1.13)*** : Planned unit developments (PUDs) in neighborhood commercial areas shall provide high-quality developments with active ground floor designs that provide for neighborhood commercial uses, vibrant pedestrian spaces and public benefits, such as housing, affordable housing, and affordable commercial space 310.20

The PUD is consistent with this policy.

- ***Buffering Requirements (Policy LU-2.3.3)***: Buffer new commercial development adjacent to residential areas to avoid adverse effects. Buffers may include setbacks, landscaping, fencing, screening, height step-downs, and other architectural and site-planning measures that avoid potential conflicts. 312.5

The PUD buffers the moderate residential neighborhood to the west through stepping down the multi-family and senior buildings , using a private drive to create space between the new building and the existing buildings building. On the southern portion of the site there are new rowhouses proposed at 40 feet tall that will buffer the existing buildings from the park and commercial corridor.

C. Housing Element

- ***Mixed-Use Development (Policy H-1.1.4)***: Promote moderate to high-density, mixed-use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed-use corridors and high-capacity surface transit corridors, and around Metrorail stations. 503.6
- ***Housing Quality (Policy H-1.1.5) and Production of Housing in High-Cost Areas (Policy H-1.1.9)***
- ***Density Bonuses for Affordable Housing (Policy H-1.2.7)*** The applicant has requested such bonuses through the PUD process, in an amount consistent with the PUD allowances and the Comprehensive Plan maps.
- ***Housing Choice for Seniors (Policy H-4.3.2) and Neighborhood-Based Housing for Older Adults (Policy H-4.3.3)*** These policies encourage the production of multi-unit buildings oriented to providing accessible dwelling units for seniors. While the PUD is more oriented to individual seniors than to couples and does not mix market rate and affordable units for seniors, it will increase the stock of senior affordable housing.
- ***Build Nonprofit Sector Capacity (Policy H-1.2.6)*** this policy calls for the active involvement and coordination with “. . .the nonprofit sector, including faith-based institutions, to meet affordable housing needs, including housing construction and housing service delivery.”

The Comprehensive Plan reports that “*Black and Hispanic households have the greatest rent burdens, at 35 and 39 percent*” and “*Of adults experiencing homelessness, 86 percent are Black, while only 47 percent of District residents are Black*” (Housing 500.5). The provision of public and workforce housing through this PUD should help address this inequity.

D. Transportation Element

The project would be located along Georgia Avenue, a high-capacity bus line. The location would make it feasible for many residents of the new buildings to access the site by transit rather than private vehicles. The applicant has proffered an extensive Transportation Management Plan (TMP) in coordination with the District Department of Transportation (DDOT). To further discourage automobile-oriented uses the project would meet vehicular parking requirements and would unbundle the cost of parking from unit rental or purchase agreements. The project would encourage the use of bicycles through the provision of more than the required number of bicycle parking spaces and the coordination of public space plans with DDOT’s future enhancements of bicycle lanes. Pedestrian / vehicular conflicts would be minimized by locating the loading facilities and the parking garage entrance on the private street. Together these provisions would support several policies in the Transportation Element, including:

- *Transit-Oriented Development (Policy T-1.1.4)*
- *Equitable Transportation Access (Policy T-1.1.7)*
- *Minimize Off-Street Parking (Policy T-1.1.8)*
- *Discouraging Auto-Oriented Uses (Policy T-1.2.3)*
- *Bicycle Facilities (Action T-2.1.B)*
- *Pedestrian Network (Policy T-2.4.1)*

E. Environmental Protection Element

While the project may not be in the forefront of sustainable development, its projected features and performance would not be inconsistent with the Environmental Element and was consistent with sustainability expectations for new developments at the time it was approved. The project would incorporate green roofs and employ trees, bioretention and other sustainable landscaping practices to reduce stormwater runoff and beautify the public realm. The new public park would provide green space for the neighborhood. The project would advance the following policies in the Environmental Protection Element:

- *Urban Heat Island Mitigation (Policy E-1.1.2)* would be assisted using green roofs and cool roofs throughout much of the project
- *Tree Requirements in New Development (Policy E- 2.1.2)* and *Sustainable Landscaping Practices (Policy E-2.1.3)* The applicant would be coordinating with DDOT’s public space committee and the Department of Parks on the planting of new street trees and the protection of existing trees lining the park to the south of the site.

- ***Energy Efficient Building and Site Planning (Policy E-3.2.7)*** While the overall performance of the building would meet required sustainability standards for new development, the transit-adjacent location and the site planning's proposed density and mix of uses would, in and of themselves, promote this policy.

F. Urban Design Element

OP had described the design as being not inconsistent with the 2012 Urban Design Element and that continues to be the case with respect to the 2020 Urban Design Element. This includes:

- ***Streetscapes That Prioritize the Human Experience (Policy UD-2.1.1), and Engaging Ground Floors (Policy US-2.4.1)*** The PUD would promote the policy with a strong pedestrian entrance to the apartment building and its associated community service/retail space visible from the street.
- ***Neighborhood Character and Identity (Policy UD-2.2.1)***: Strengthen the visual qualities of Washington, DC's neighborhoods as infill development and building renovations occur by encouraging the use of high quality and high-performance architectural designs and materials. In neighborhoods with diverse housing types, or when introducing more diverse infill housing types, use design measures to create visual and spatial compatibility. 909.6
- ***Transitions in Building Intensity (Policy UD-2.2.4)***: Design transitions between large- 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 and gradual through a variety of context-specific design strategies, such as a slender massing of taller elements, stepping back the building at floors above its neighbors' predominant roof line, stepping a building's massing down to meet the roof line of its neighbors, or strategic placement of taller elements to mark corners, vista terminations, or large open-space frontages. 909.10
- ***Preservation of Neighborhood Open Space (Policy UD-2.2.6)***: Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to minimize the loss of sunlight and maximize the usability of neighborhood parks and plazas. Buildings adjacent to parks or natural areas should orient their entrances or other community-serving functions toward these shared resources. 909.14
- ***Safe and Active Public Spaces and Streets (Policy UD-3.2.5)***: The design of the built environment should encourage public activity throughout the day and help minimize the potential for criminal activity. Design measures include active building frontages (such as windows, balconies, and frequently spaced entrances) adequate lighting that avoids glare and shadow, maintaining clear lines of sight and visual access, and avoiding dead-end streets. Where feasible consider closing streets to vehicular traffic to enhance pedestrian and cycling uses of streets.916.7

MID CITY

- ***Neighborhood Conservation (Policy MC-1.1.1)***: Retain and reinforce the historic character of Mid-City neighborhoods, particularly its mix of row houses, apartment houses, as well as historic districts, and walkable neighborhood shopping districts. The Planning Area's squares, alleyways, and historic alley lots offer opportunities for preservation and creative development. The area's rich architectural heritage and cultural history should be preserved and enhanced. 2008.2

- ***Preservation of Affordable Housing (Policy MC-1.1.7):*** Strive to retain the character of Mid-City as a mixed-income community by preserving the area's existing stock of affordable housing units and promoting the construction of new affordable units. Give attention to the most rapidly changing neighborhoods and encourage the use of historic preservation tax credits to

Overall and on balance, this project is not inconsistent with the Comprehensive Plan, its maps and elements. The project would further many important civic priorities by increasing the number of housing units, affordable housing units, and units for seniors; through the provision of new retail and employment opportunities; by providing new permanent park and recreation opportunities; and by supporting the New Communities Initiatives with the provision of 90 replacement units for Park Morton.