



GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT



Office of the Director

OCT 19 2018

Zoning Commission
of the District of Columbia
441 4th Street, N.W. Suite 210
Washington, DC 20001

Re: **Request for Waiver of Zoning Commission Hearing Fee for the Flats at South Capitol project located at 3838-3848 South Capitol Street.**

Dear Members of the Commission:

Pursuant to 11-Z DCMR § 1602, the District of Columbia Department of Housing and Community Development (“DHCD”) requests that the Zoning Commission (“Commission”) waive the portion of the hearing fee for the above-referenced application attributable to the construction of residential units that will be reserved as affordable housing. Based on the project characteristics presented to DHCD, this development would be eligible to receive funding from a recognized District of Columbia or federal government housing subsidy program. This project has applied for financing through the Low Income Housing Tax Credit (“LIHTC”) and/or Housing Production Trust Fund (“HPTF”) prior to the approval of the Planned Unit Development (“PUD”).

The PUD application proposes 104,424 square feet of gross floor area of which 100% will be reserved as 106 units of affordable housing. All of the 106 affordable units will remain affordable for at least 60 years. Based on the attached assumptions and calculations, DHCD recommends a 100% hearing fee waiver reduction, totaling \$6,895.

Because there is not yet an affordability covenant or subsidy contract associate with this property, it is essential that the assumptions upon which this recommended reduction is based be incorporated into the Commission’s order as a requirement enforceable by DHCD and the Zoning Administrator, if approved.

Thank you for your considerate attention to this matter. Please do not hesitate contact me at 202-442-7210 with any questions or concerns.

Sincerely,

Allison Ladd, Deputy Director

ZONING COMMISSION

District of Columbia

D.C. Department of Housing and Community Development
Reduction Calculator for Zoning Commission Hearing Fee

Applicant:

Kaye Stern Properties LLC/The Flats at South Capitol

ZC Case No:

ZC Case 18-14

A	Total Hearing Fee	\$ 6,895
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Gross Square Footage for Affordable Housing	104,424
Total Gross Square Footage of Entire Project	104,424

B	Percent Affordable	100.0%
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<u>AMI Served</u>	<u>Weight</u>	<u>Units</u>	<u>Weighted Total</u>
30% AMI	1.2	22	26.4
40% AMI	1.1	0	0
50% AMI	1	72	72
60% AMI	0.9	12	10.8
80% AMI	0.7	0	0
Affordable Units		106	109.2

C	Weighted Total / Total	1.03
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Affordability Term (years)	60
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D	Affordability Term / 40	1.50
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Recommended Hearing Fee Reduction (A * B * C *D)	\$ 6,895
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Reduced Hearing Fee	\$ -
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**BEFORE THE ZONING COMMISSION
OF THE DISTRICT OF COLUMBIA**



FORM 116 – HEARING FEE CALCULATOR

Pursuant to Subtitle Z, Chapter 16, the following hearing fees shall be paid when the Zoning Commission schedules a public hearing on a petition or application. In the case of a petition or application combining two (2) or more actions on this form, the fee charged shall be the greatest of all the fees computed separately. Please show ALL computations.

A department, office, or agency of the Government of the District of Columbia is not required to pay a hearing fee where the property is owned by the agency and the property is to be occupied for a government building or use.

MAP AMENDMENT

Pursuant to Subtitle Z § 1601.1, if the Commission schedules a public hearing on a petition or application for an amendment to the Zoning Map, prior to advertisement of the hearing, the petitioner/applicant shall pay a hearing fee in accordance with the following schedule:

Petition or Application for Rezoning to any:	Unit	Fee	Quantity	Total
R-1 through R-3, R-6 through R-17, or R-19 through R-21 zone	43,560 sq. ft. or part of that area	\$ 650		
RF-1 through RF-3 zone and RA-1 or RA-6	43,560 sq. ft. or part of that area	\$1,625		
RA-2, RA-7, RA-8, or RC-1	43,560 sq. ft. or part of that area	\$3,250	1	\$3250
RA-3 through RA-5, RA-9, RA-10, D-1-R, SEFC-2, SEFC-3, or CG-1 zone	43,560 sq. ft. or part of that area	\$6,500		
MU-1, MU-2, MU-10 through MU-16, MU-22, MU-23, MU-29, D-2, SEFC-1, SEFC-4, CG-4 through CG-7, and ARTS-4 zone	10,000 sq. ft. or part of that area	\$2,600		
MU-3 through MU-6, MU-17 through MU-19, MU-24 through MU-27, NC-1 through NC-5, NC-7, NC-9 through NC-11, NC-14, NC-16, NC-17, D-4-R, CG-2, ARTS-1, ARTS-2, RC-2 and RC-3 zone	10,000 sq. ft. or part of that area	\$1,625		
MU-7 through MU-9, MU-20, MU-21, MU-28, NC-6, NC-8, NC-12, NC-13, NC-15, D-3 through D-5, D-5-R, D-6, D-6-R, D-7, D-8, CG-3, and ARTS-3 zone	10,000 sq. ft. or part of that area	\$3,250		
PDR-1 through PDR-7 zone	20,000 sq. ft. or part of that area	\$2,600		
TOTAL				\$3250

- Notes:
- The maximum hearing fee for rezoning to any Residence District (R, RF, RA, D-1-R, SEFC-2, SEFC-3 or CG-1) is \$65,000.
 - For an application that proposes rezoning to more than one (1) zone district or is in the alternative, the fee shall be the total of the amounts for the area devoted to each proposed district or alternative computed separately.
 - A "part of an acre" or "part of that area" should be rounded to the next whole number.

TEXT AMENDMENT

Pursuant to § Subtitle Z § 1601.3, if the Commission schedules a public hearing on a petition for an amendment to the text of the Zoning Regulations, prior to the advertisement of the hearing, the petitioner shall pay a hearing fee in accordance with the following schedule:

Petition	Fee	Quantity	Total
Each section proposed to be added, deleted, or amended (Maximum of \$1,300)	\$325.00		
TOTAL			

FORM 116 – HEARING FEE CALCULATOR – Side 2

PLANNED UNIT DEVELOPMENT (PUD) OR AIR SPACE DEVELOPMENT

Pursuant to Subtitle Z § 1601.4 if the Commission schedules a public hearing on an application for approval of a planned unit development or air space development, prior to the advertisement of the hearing, the applicant shall pay a hearing fee in accordance with the following schedule:

Application	Fee	Quantity	Total
For each 100 sq. ft. of gross floor area (GFA), or part thereof, included in the application devoted to dwelling units, and the immediate area needed to serve that dwelling unit (Maximum of \$65,000.)	\$7.00	985	\$6895
For each 100 sq. ft. of GFA, or part thereof, included in the application devoted to any use other than a dwelling unit and the immediate area needed to serve that dwelling unit	\$13.00		
TOTAL			\$6895

- Notes:
- There is no charge for the hearing on the second-stage of a two-stage PUD application
 - A "part thereof" should be rounded to the next whole number.

MODIFICATION TO AN APPROVED PUD OR AIR SPACE DEVELOPMENT

Pursuant to Subtitle Z § 1601.6, if the Commission schedules a public hearing on an application for a modification to an approved planned unit development, air space development, or any other review of a specific site or building plan, prior to the advertisement of the hearing, the applicant shall pay a hearing fee in accordance with the following schedule:

Request for Modification	Fee	Total
Modification to a previously approved case	26% of original hearing fee or \$1,300, whichever is greater	
TOTAL		

APPLICATION/ FEE OF PETITION

Pursuant to Subtitle Z § 1601.5, in the case of a petition or application combining two (2) or more actions on this form, the fee charged shall be the greatest of all the fees computed separately. Below, please list the total fee for each action requested and enter the fee of the greatest fee calculated.

Type of Petition/Application	Total
Map Amendment	\$3250
Text Amendment	
PUD/Air Space Development	\$6895
Modification to an approved PUD or Air Space Development	
GREATEST OF CALCULATED FEES	\$6895

CERTIFICATION

I/We certify that the information on this form is true and correct to the best of my/our knowledge, information and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of not more than \$1,000 or 180 days imprisonment or both.
(D.C. Official Code § 22-2405)

Name: **Cary Kadlecek** Signature: **Cary Kadlecek** Date: **10/4/2018**

Digitally signed by Cary Kadlecek
DN: CN = Cary Kadlecek email =
ckadlecek@goulstonstorts.com C = US O =
Goulston and Storms PC
Date: 2018.10.04 16:23:00 -0400



If you need a reasonable accommodation for a disability under the Americans with Disabilities Act (ADA) or Fair Housing Act, please complete a Form 155 - Request for Reasonable Accommodation.

MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: Maxine Brown-Roberts, Project Manager
JL for Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation
DATE: October 12, 2018
SUBJECT: Preliminary Report for Zoning Commission Case No. 18-14, Consolidated Planned Unit Development and Related Map Amendment from RA-1 to RA-2 at 3836-3838 South Capitol Street, SE (Square 6129, Lots 77 and 819).

I. RECOMMENDATION

The Office of Planning (OP) recommends that the Zoning Commission **set down** the application by 3840 S Capitol Street LLC for a consolidated PUD and a related map amendment from the RA-1 to the RA-2 zone at 3836-3838 South Capitol Street, SE. The proposal is to redevelop the property with an all affordable, multi-family residential building with 106 units at 2.50 FAR. The proposal would be not inconsistent with the Comprehensive Plan or the Bellevue Small Area Plan, and the filing generally meets the requirements of 11 DCMR Subtitle X, Chapter 3.

II. SUMMARY OF OP COMMENTS

It is typical that some issues require additional resolution or detail at this stage of a PUD application – many applicants benefit from the additional direction provided by the Commission at set down before preparing final drawings and proposals. However, it is important that identified issues be sufficiently resolved by the applicant prior to the date being set for a public hearing, to ensure that District agencies, the ANC, and the public have a reasonable opportunity to review a complete and comprehensive submission as final recommendations and comments to the Commission are being formulated.

The following table summarizes OP comments regarding this proposal, including areas where resolution or additional information is required. OP will continue to work with the applicant to adequately address these issues, and other issues raised by the Commission at set down, prior to a public hearing.

OP Comment	Planning and / or Zoning Rationale
The development should provide outdoor play areas on-site.	There would be an increase in family size units on the site and therefore outdoor play areas should be identified to promote outdoor activities and exercise for children.

OP Comment	Planning and / or Zoning Rationale
Provide details of the relocation plan for existing residents.	The details of the relocation plan, including methods for consultation with residents as the plan is developed, are needed to assess potential impacts of the proposal on residents.
Provide a comprehensive transportation review (CTR) and transportation demand management (TDM) measures.	The Comprehensive Plan recommends minimizing the impact of traffic and vehicular circulation on the surrounding roadways and encouraging the use of alternate ways of transportation.
Participate in a First Source Employment Agreement with the Department of Employment Services or Certified Business Agreement with the Department of Small and Local Business Development or other employment related proposal to provide job opportunity for DC residents.	The Comprehensive Plan encourages the provision of employment and training opportunities for residents, especially in PUD projects and those which are using public financing.
Explore the use of more efficient heating/cooling systems which along with solar panels could make the building more energy efficient and less costly for the residents. Applicant should work with DDOE to address this issue.	The Comprehensive Plan recommends the use of efficient energy systems towards a sustainable building as well as the general environment.

III. AREA DESCRIPTION

The subject property is located within Ward 8/ANC-8C, the Bellevue neighborhood, on the northeast of the intersection of Martin Luther King, Jr. Avenue, South Capitol Street and Xenia Street, SE. Two lots would be combined to form the development site. The property currently houses two, three-story apartment buildings.

To the north of the site are three-story apartment buildings in the RA-1 zone; to the east are single family detached and duplex dwellings in the R-3 zone; to the south is a small neighborhood commercial area with a mixture of office and retail uses, and a four-story building with three floors of residential use above ground floor retail in the MU-4 zone. To the west is the Covenant Baptist United Church of Christ, and a mixture of single family detached residences, a 4-story apartment and retail uses in the R-2 zone.



IV. SITE DESCRIPTION

The subject property is located at 3836-3838 South Capitol Street, SE (Square 6129, Lots 77 and 819), in the RA-1 zone. The property has a land area of 39,318 square feet, with a gentle rise from south to north along South Capitol Street and a more severe rise on the eastern portion of the site. The property is developed with two multifamily, apartment buildings surrounded by open space areas. The buildings combine for a total of 30 units, with twenty-one 2-bedroom units, eight, 3-bedroom units and one, five-bedroom unit. Both buildings have rental units affordable at 60% of MFI and are all currently occupied. The northernmost building has a curb-cut to parking along its side and rear. There is a 15-foot wide paper alley to the rear of the property.

As the site is less than an acre in size, flexibility from the PUD land area requirement is requested.

V. PROJECT DESCRIPTION

A part of the consolidated PUD, 3840 S Capitol Street LLC has requested a map amendment to rezone the property from the RA-1 to the RA-2 zone and would combine the lots to accommodate a single, multifamily building. The building would be four-stories and a partial basement with a maximum height of 50.58 feet. The building would have a total of 98,450 square feet of gross floor area and a 2.59 FAR. There would be 106 all affordable dwelling units, with 23 units at up to 30% of MFI, 71 units at up to 50% of MFI, and 12 units at up to 60% of MFI¹. The units would be a combination of studios, one-bedroom, two-bedroom and three-bedroom units. The building would include a ground level parking garage with 17 parking spaces, loading and delivery from South Capitol Street.

VI. PLANNING CONTEXT

As described in the Introduction (Chapter 1, Introduction, Section 103, Attachment I), the Comprehensive Plan is the centerpiece of a “Family of Plans” that guide public policy in the District. The Introduction goes on to note three “Tiers” of Planning (Chapter 1, Introduction, Section 104, Attachment II), including:

- a. Citywide policies

¹ Subsequent to the submission, the applicant revised the originally proposed affordability levels from up to 30% and 50% of MFI to 30%, 50% and 60% of MFI to comply with the requirements of Low Income Housing Tax Credit (LIHTC) financing.

- b. Ward-level policies
- c. Small area policies.

A. COMPREHENSIVE PLAN MAPS

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2, Framework Element, Section 226, Attachment III), 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 and map amendment would be not inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for moderate density residential, and for a small portion of the site a mix of moderate density residential/low density commercial uses.



Moderate Density Residential: This designation is used to define the District’s row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner-city 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). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 225.4

Moderate Density Commercial: This category is used to define shopping and service areas that are somewhat more intense in scale and character than the low-density commercial areas. Retail, office and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in low density commercial areas but generally do not exceed five stories in height.

Mixed Use Categories: The Future Land Use Map indicates areas where the mixing of two or more land uses is encouraged. The particular combination of uses desired in a given area is depicted in striped patterns, with stripe colors corresponding to the categories defined on the previous pages. The Mixed Use category generally applies in the following three circumstances:

- a. Established, pedestrian-oriented commercial areas which also include substantial amounts of housing, typically on the upper stories of buildings with ground floor retail or office uses;
- b. Commercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future. The pattern envisioned for such areas is typically one of pedestrian-oriented streets, with ground floor retail or office uses and upper story housing; and
- c. Large sites (generally greater than 10 acres in size), where opportunities for multiple uses exist but a plan dictating the precise location of these uses has yet to be prepared. 225.18

The general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other (for example, ground floor retail with three stories of housing above), the Future Land Use Map may note the dominant use by showing it at a slightly higher density than the other use in the mix ... 225.19

A variety of zoning designations are used in Mixed Use areas, depending on the combination of uses, densities, and intensities. 225.21

The requested map amendment to the RA-2 zone (formerly the R-5-B zone) would not be inconsistent with the FLUM. RA-2 would permit moderate-density residential development as proposed and is appropriate along this portion of South Capitol Street which is developed with multi-story apartments. The proposed 4-story residential building at a density of 2.59 FAR would be well within the general PUD parameters of the moderate density residential use, and meets the development standards for this zone.

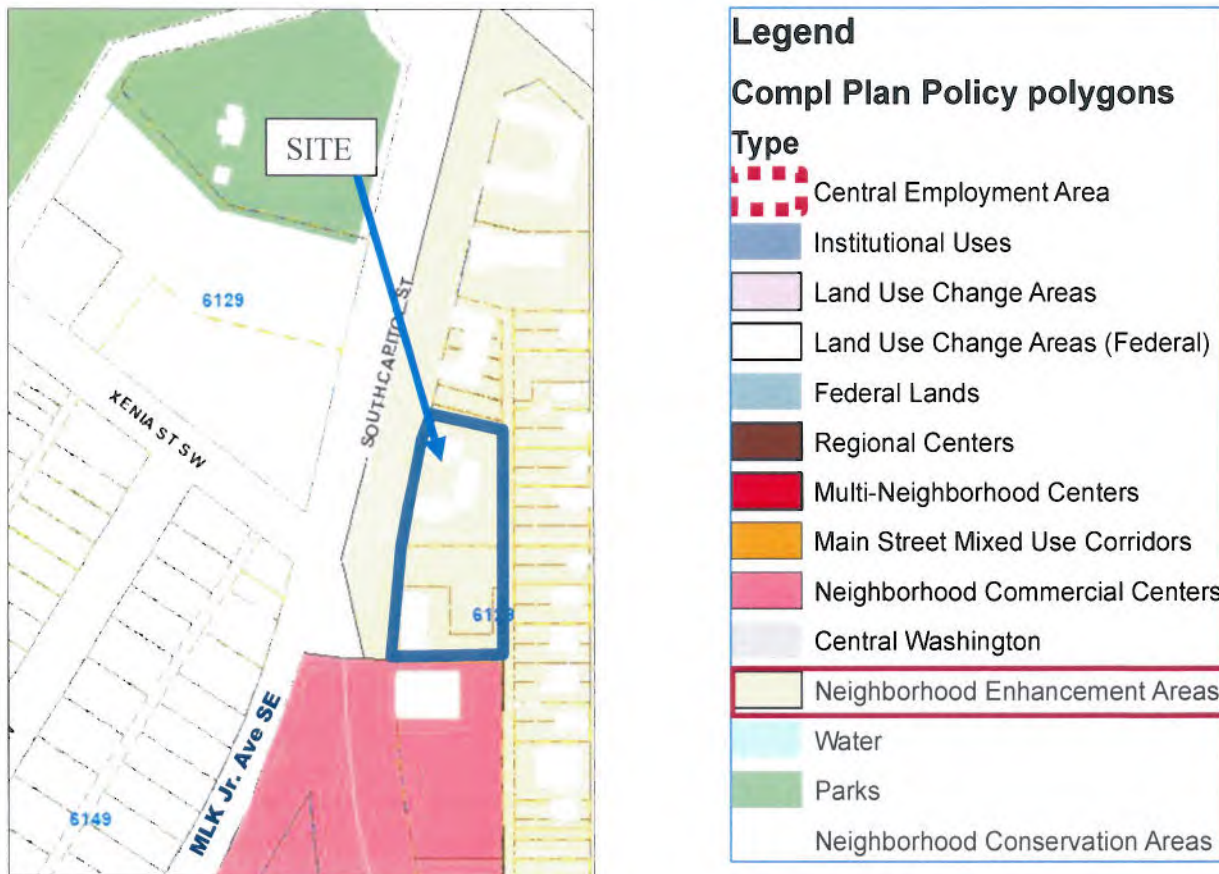
Generalized Policy Map

The Generalized Policy Map indicates that the site is in a Neighborhood Enhancement Area.

Neighborhood Enhancement Areas: Neighborhood Enhancement Areas are neighborhoods with substantial amounts of vacant residentially zoned land. They are primarily residential in character. Many of these areas are characterized by a patchwork of existing homes and individual vacant lots, some privately owned and others owned by the public sector or non-profit developers. These areas

present opportunities for compatible small-scale infill development, including new single-family homes, townhomes, and other density housing types. Land uses that reflect the historical mixture and diversity of each community should be encouraged. 223.6

The proposed development would enhance the area by replacing two outdated multifamily buildings with a single building along South Capitol Street, SE at a scale compatible with the streetscape. The project would enhance the pedestrian and streetscape environment by repairing the sidewalk, adding street trees, adding bicycle, parking, loading and trash collection in secure areas that are not readily visible from the street.



B. COMPREHENSIVE PLAN WRITTEN ELEMENTS

Citywide Elements of the Comprehensive Plan

Chapter 3 Land Use

The Land Use Chapter provides the general policy guidance on land use issues across the District.

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. 309.8

Policy LU-2.1.4: Rehabilitation Before Demolition

In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition. 309.9

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. 309.16

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. 310.5

The neighborhood consists of a mixture of single-family detached, duplexes, multifamily units, neighborhood commercial and institutional uses. The proposed redevelopment would be compatible with the current mix of uses. The existing buildings would be demolished and not rehabilitated due to age, lack of amenities and the underutilization of the land. The proposed development would improve this area of South Capitol Street with a modern building, improved pedestrian ways, improved landscaping, secured loading, parking and trash storage areas and an increase in the number of deeply affordable residences.

Chapter 4 Transportation

The Transportation Element provides policies and actions to maintain and improve the District's transportation system and enhance the travel choices of current and future residents, visitors and workers.

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

Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks. 409.8

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. 410.5

The proposed PUD is located on South Capitol Street along which a number of Metrobuses travel and which is a designated a Priority Business Corridor. The project also provides bicycle spaces, adequate parking, and sidewalk and streetscape improvements.

Chapter 5 Housing

The Housing Element describes the importance of housing to neighborhood quality in the District of Columbia and the importance of providing housing opportunities for all segments of our population.

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. 503.2

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. 503.4

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. 503.6

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 throughout the city. 504.6

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. 504.8

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. 505.6

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. 509.5

The proposed housing development would be by a private developer and would provide 106 new rental units which would be 76 additional units more than the 30 which currently exist. All the units would be affordable at up to 30%, 50% and 60% of MFI including one-, two-, and three-bedroom units, thus serving a variety of family

sizes. The development would respect the design of other buildings in the neighborhood and would have improved amenities, pedestrian ways, landscaping, stormwater management and energy efficiency.

Chapter 6 Environmental Protection

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources.

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. 603.4

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. 603.6

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. 609.3

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. 610.6

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. 610.7*

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. 613..*

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. 613.3*

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. 614.2*

The proposed development would be designed to achieve Enterprise Green Communities Gold certification standards through new landscaping, stormwater management methods, solar panels and other energy and water efficient systems (Exhibit 2I2, page G16). The project would comply with the Green Building Act, the District's stormwater management regulations, and with the Sustainable DC Plan. The proposal would be referred to DOEE for review.

Chapter 8 Parks Recreation and Open Space

The Parks, Recreation and Open Space Element addresses the future of parks, recreation, and open space in the District of Columbia. It recognizes the important role parks play in recreation, aesthetics, neighborhood character, and environmental quality.

The project would provide passive open space but no recreational space is provided on-site and has not indicated any nearby recreational area. The applicant should address this issue; OP has recommended the addition of a tot lot or other outdoor play area.

Chapter 9 Urban Design

The Urban Design Element addresses the District's physical design and visual qualities.

Policy UD-2.2 Designing for Successful Neighborhoods 910:

Not all neighborhoods have a strong sense of identity, however. Some are negatively affected by dilapidated buildings, poorly maintained properties, vacant storefronts, and worse. These problems may be exacerbated by the absence of landscaping and street trees. Infill development and the adaptive reuse of historic buildings in such areas create a real opportunity to establish a stronger identity, and to create neighborhood centers where they are lacking today. 910.2

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. 910.6

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. 910.12

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. 914.10

The proposed development, a four-story building, would have a visually interesting architecture that would contribute to the Bellevue neighborhood and the South Capitol Street streetscape. However, unlike the existing buildings and those in the immediate neighborhood which are brick, the proposal would be fiber cement. The building would be designed to be in scale within the existing neighborhood context. The building and streetscape design should contribute to making the environment safer as the proposal would include lighting improvements, clear lines of sight, visual access. The additional

residents would add more “eyes and ears” on the street. OP will continue to work with the applicant to address any design or material related concerns.

Area Elements of the Comprehensive Plan

The proposed development is located within the Far Southeast Southwest Area Element of the Comprehensive Plan, and specifically within the Bellevue/Washington Highlands Policy Focus Area. The proposal would particularly further the following Area Element statements and policy objectives:

Policy FSS-2.6.3: Bellevue-Washington Highlands Infill

Encourage refurbishment and/or replacement of deteriorating apartment complexes within Bellevue and Washington Highlands. Where buildings are removed, encourage their replacement with mixed income housing, including owner-occupied single family homes and townhomes as well as new apartments. Every effort shall be made to avoid resident displacement when such actions are taken, and to provide existing residents with opportunities to purchase their units or find suitable housing in the community. 1816.6

Action FSS-2.6.A: Great Street Improvements

Implement the Great Street Plan to beautify South Capitol Street, maintaining the width of the street and landscaping it from Martin Luther King Jr Avenue to the Maryland border. 1816.7

The proposed development meets these recommendations as it would replace deteriorating buildings and would be a mixed income, all affordable housing. The applicant states that the existing residents would be relocated and offered the opportunity to return to the new development. OP has requested that the applicant provide a more detailed relocation and return plan.

C. SMALL AREA PLANS

The Small Area Plan, *Bellevue, Embracing the Revitalization*, was approved by the City Council on March 6, 2009. The vision for the future of Bellevue outlined in the Plan is to:

“Provide Bellevue residents with a picturesque, safe, and walkable neighborhood comprised of quality housing for everyone, expanded retail choices, and resources that meet existing and future community needs. The planning and implementation process should foster a sense of community ownership and accountability among residents.”

The plan identified four topic areas (goals) by which to achieve the vision:

Housing; Commercial and Retail Development; Community Resources and Land Use/Urban Design and Public Space. The goals relevant to the proposed development are for Housing and Land Use Urban Design and Public Space. (*Plan Foundation, Goals*, page 9)

Housing *Place priority on affordable rental and homeownership housing development.*

Land Use/Urban Design and Public Space *(A) Encourage a mix of land uses at each redevelopment site; (B) Establish visual consistency and compatible development along the South Capitol Street Corridor that builds on neighborhood assets through design guidelines.*

To achieve the stated goals, associated recommendations were outlined:

Housing:

2. Develop mixed-income housing at development opportunity and infill sites and ensure appropriately scaled development through design review.

The growing housing demand in Bellevue should accommodate both existing residents and help direct future District residents to Bellevue. Affordable rental and homeownership opportunities should be a priority, but market rate housing should also be encouraged. Any new infill development in existing residential areas should be scaled similar to the existing height of other residential buildings and should not disrupt/disorient the comfortable pedestrian experience. New housing on development opportunity sites along the South Capitol corridor should be a priority. Developers should continue to rely on OP guidance for both by-right and planned unit developments for conformance with neighborhood character.

The development would provide a mix of incomes within the development at, 30%, 50%, and 60% of MFI. The proposal would increase the number of affordable rental opportunities. The new building would have a height that is of a similar scale to other multifamily residential buildings in the area and along with the improved streetscape would improve the pedestrian experience along South Capitol Street.

The Plan at pages 30 and 31 outlines recommendations for *Land Use Designations and Urban Design Guidelines*. The subject property was not listed as an area for land use change. However, the Urban Design Guidelines recommends creating “*unified and enhanced development projects within Bellevue*” for identified and unidentified projects within Bellevue.

Urban Design Guidelines:

1. Building Orientation and Lot Access

- *Development should be brought to the sidewalk edge, unless creating a setback for publicly accessible open spaces, courtyards, or sidewalk cafes.*
- *Orient primary building entrances to the street; single building entries are discouraged in favor of individual entrances to ground floor units.*

The building is placed on the property line but is separated from the sidewalk by a landscaped public space. Two open courts also front on the street with one pedestrian and one vehicular entrance from South Capitol Street.

2. Architecture and Building Design

- *New architecture should blend innovative design with stylistic elements from the surrounding area.*
- *Materials should blend in with existing neighborhood architectural character and employ innovative use of materials and color, where appropriate.*
- *Buildings should step down in height in order to transition to lower scale residential areas that may be adjacent to new development.*

- *Facades should be articulated with a judicious use of architectural elements, such as balconies, to create variety, visual appeal, and activity along the street.*
- *Design elements such as awnings, transparent glass, and signage should differentiate individual storefronts within larger developments along major corridors. Signage should be made of high quality materials.*
- *Ground floor windows should be visually transparent with a minimum of 75% glazing along street frontage.*
- *Ground floor ceiling heights should be at least 14 feet tall from floor to ceiling to attract quality retail.*
- *Avoid external security features, such as roll down gates and bars, wherever possible.*
- *Incorporate placemaking elements into new development projects such as public plazas, water features, public art, sidewalk activities, etc.*

The proposed residential building would address the relevant architectural and through articulation that divides the building into three distinct masses and the use of balconies, and detailing that gives a residential feel. The massing and colors would fit within the characteristic of buildings in the neighborhood although the fiber cement materials on the façade is not a typical material. The public space would allow for a generous setback from the sidewalk. To the rear of the building there would be a setback from the rear property line ranging from 37 feet to nine feet. Additionally, the single-family residences to the rear of the property are at a higher elevation and therefore the apartment building would not cast significant shadows or affect light and air.

3. Parking & Loading

- *Any new parking should be located below grade wherever possible, and to the rear of the site if below grade parking is not feasible.*
- *If structured parking is used, it should be wrapped or screened with appropriate design features or uses (such as retail).*
- *Provide vehicle access, loading and service from an alley or rear of a lot.*

Due to the grade on the site and no alley access, the below grade parking and loading areas would be accessed from South Capitol Street.

D. SUMMARY OF PLANNING CONTEXT ANALYSIS

On balance, the proposal would not be inconsistent with the recommendations of the Comprehensive Plan and the Small Area Plan. The proposal would serve the residents of the neighborhood by expanding affordable housing in a building that would be at a density and scale that is reflective of the neighborhood, be more energy efficient, and provide landscaping and an improved streetscape. To improve the building façade and be reflective of the materials on buildings in the neighborhood, the applicant should consider the incorporation of brick into the façade. The development would serve families with children, so the applicant should address outdoor recreation.

VII. ZONING ANALYSIS

The site is currently zoned RA-1 and the applicant has requested a PUD-related map amendment to the RA-2 zone, which is not inconsistent with the Comprehensive Plan. Below is a table comparing the existing (MoR) and proposed PUD zone to the proposal:

	Existing Zone RA-1 MoR	Proposed Zone RA-2 PUD:	Proposal	Flexibility
Lot Area X § 301.1	39,318 sq. ft.	0.9 acre (39,318 sq. ft.) Minimum of 1 acre for a PUD	0.9 acs. (39,318 sq. ft.)	Yes
Height (ft.) F § 303.1	40 ft./3 stories	60 ft.	50.58 ft.	No
Penthouse C § 1502.1	1 enclosure of equal height; Setback 1:1	1 enclosure of equal height; Setback 1:1	1 enclosure of equal height; Setback 1:1	No
FAR, F § 301.1	0.9	1.8 20% IZ bonus = 0.36 20% PUD bonus = 0.431 ² TOTAL – 2.59	2.59	No
Lot Occupancy, F § 304.1	40% max.	60% max.	59%	No
Rear Yard, F § 305.1	20 ft.	4 in./ft. of building height or 15 ft. minimum = 17 ft.	30.58 ft.	No
Side Yard F § 306.2(b)	3 ft./ height of building with a minimum 8 ft.	None required. If provided, no less than 4 ft.	10.08 ft.	No
Parking C § 701.5	1/3 du. in excess of 4 units and 50% reduction due to within ¼ mile of the property corridor network Metrobus routes.	1/3 du. in excess of 4 units and 50% reduction due to within ¼ mile of the property corridor network Metrobus routes. = 17 spaces	17	No
Bicycle Parking C § 802	Long Term: 1/3 units Short Term: 1/20 units	Long Term: 1/3 units Short Term: 1/20 units	Long Term: 36 Short Term: 5	No

² Pursuant to X § 303.4, the 20% PUD bonus may include the IZ bonus density when the PUD includes a full allocation of IZ units.

	Existing Zone RA-1 MoR	Proposed Zone RA-2 PUD:	Proposal	Flexibility
Loading C § 901	1, 30 ft. berth 1, 200 ft. platform 1, 20 ft. deep service/ delivery space	1, 30 ft. berth 1, 200 ft. platform 1, 20 ft. deep service/ delivery space	1, 30 ft. berth 1, 200 ft. platform 1, 20 ft. deep service/ delivery space	No
Green Area Ratio F § 307.1	0.4	0.4	0.402	No

VIII. REQUESTED ZONING FLEXIBILITY

The applicant requests the following flexibility through this PUD:

1. PUD-related map amendment from RA-1 to RA-2.
2. PUD lot size - 1-acre (43,560 square feet) minimum required, to 0.9 acre (39,318 square feet) proposed; the Zoning Commission may grant flexibility from the lot area requirement pursuant to X § 301.2.

OP will provide detailed analysis of requested flexibility prior to a public hearing.

IX. PUD EVALUATION STANDARDS

The Zoning Regulations define a Planned Unit Development (PUD) as “*A plan for the development of residential, institutional, and commercial developments, industrial parks, urban renewal projects, or a combination of these, on land of a minimum area in one (1) or more zones irrespective of restrictions imposed by the general provisions of the Zoning Regulations, as more specifically set forth in Subtitle X, Chapter 3.*” (Subtitle B-28). The purpose and general standards for a Planned Unit Development are established in Subtitle X 300:

- 300.1 *The purpose of the planned unit development (PUD) process is to provide for higher quality development through flexibility in building controls, including building height and density, provided that the PUD:*
 - (a) *Results in a project superior to what would result from the matter-of-right standards;*
 - (b) *Offers a commendable number or quality of meaningful public benefits; and*
 - (c) *Protects and advances the public health, safety, welfare, and convenience, and is not inconsistent with the Comprehensive Plan.*
- 300.2 *While providing for greater flexibility in planning and design than may be possible under conventional zoning procedures, the PUD process shall not be used to circumvent the intent and purposes of the Zoning Regulations, or to result in action that is inconsistent with the Comprehensive Plan.*

Public Benefits and Amenities:

Chapter X Section 305.2 states that “Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title.”

Subtitle X § 305.5 provides a summary of categories for PUD benefits and amenities. While the final benefits amenities proffer is typically refined and resolved later in the PUD process, at this point, the applicant has proffered the following (refer to Exhibit 2, pages 9-14) for the proposed PUD:

(a) Superior urban design and architecture

The applicant states that the project demonstrated superior urban design as it includes a variety of public spaces, activation of the streetscape, sidewalks with street trees along South Capitol Street and a massing that is consistent with the density on properties along South Capitol Street.

(b) Superior landscaping, or creation or preservation of open spaces

Street trees along South Capitol Street would be preserved and additional trees added. In addition, the public space between sidewalk and the property line would be landscaped and planted with a variety of vegetation to enhance the streetscape as well as the building. The applicant has proposed to retain the existing six-foot sidewalk and make repairs where needed. (Exhibit 2I2, pages L01 – L01-L03)

(c) Site planning and efficient and economical land utilization

The two existing buildings currently underutilize the lots and do not capitalize on the prominent South Capitol location. The consolidation of the lots allows for a larger building with a better street presence, and a larger number of affordable housing along with amenities for the residents.

(d) Housing

The project would increase the number of units from the current 30 to 106. The proposed map amendment would allow for an additional 52,307 square feet of residential space over what is allowed as a matter-of-right. The proposal also allows for a significant increase in larger family-size units (3+ bedrooms) from nine to 32.

(e) Affordable housing

The project would be entirely affordable at up to 30%, 50% and 60% of MFI for a period of 40 years following which the project would provide the Inclusionary Zoning requirement of units at 60% MFI.

Residential Unit Type	Percentage Total	Units	Income Type	Affordable Control Period	Affordable Unit Type
Total	100%	106			
Affordable Units	21%	23	Up to 30% MFI	40years	
Affordable Units	68%	71	Up to 50% MFI	40 years	Rental
Affordable Units	11%	12	Up to 60% MFI	40 years	Rental

(f) Environmental and sustainable benefits

The project would include 10,500 square feet of solar panels on the roof, permeable paving, energy efficiency and stormwater management retention on site and meet an overall Green Communities Certification. The total GAR required for the project is 0.4 while the project is providing 0.402 GAR. (Exhibit 212, page L05)

(g) Streetscape plans

The development would include upgrading of the sidewalk and the retention and addition of street trees. The public space area between the sidewalk and the building would be improved with a mixture of trees, shrubs, ground cover perennials and grasses. OP anticipates that the streetscape plans would be submitted to DDOT for public space review prior to the public hearing.

(h) Uses of special value to the neighborhood or the District of Columbia as a whole; and

During construction, the current residents would be relocated to other properties owned by the applicant. A relocation plan would include assistance with packing, moving services and uninterrupted social services. Current residents would be offered the opportunity to return to the new development. Additional details of the relocation and return plan is needed.

In general, OP finds that the benefits proffered and level of detail provided at this time are sufficient for set down, with the revisions or additional information noted in this report to be provided prior to a public hearing.

The PUD is, on balance, not inconsistent with the goals and policies of the Comprehensive Plan and Bellevue Small Area Plan. The proposed RA-2 zone would support the housing along the transit rich South Capitol Street. The proposed redevelopment would further help the rejuvenation of the neighborhood; provide an increased number of affordable housing for residents; and help support the neighborhood serving retail to the south of the property. Ultimately, the proposal would help achieve the applicable policies, including the Housing and Economic Development Elements through the provision of an all-affordable housing development targeted to households earning no more than 60% MFI. The proposed PUD and related map amendment would allow a development that is anticipated under the guidelines of the Comprehensive Plan when read in conjunction with the objectives for the neighborhood under the Bellevue Small Area Plan.

The applicant should continue to work closely with OP, other Agencies, the ANC and other community groups to develop a full proffer that is commensurate with the flexibility requested, for submission prior to a public hearing. OP will provide detailed analysis of the final benefits and amenities proffer prior to a public hearing.

X. AGENCY REFERRALS

If this application is set down for a public hearing, the Office of Planning will refer it to the following District agencies for review and comment:

- Department of Energy and the Environment (DOEE)
- Department of Housing & Community Development (DHCD)
- District Department of Transportation (DDOT)

- DC Public Schools (DCPS)
- Department of Public Works (DPW)
- Department of Employment Services (DOES);
- Fire and Emergency Medical Services Department (FEMS)
- Metropolitan Police Department (MPD)
- DC Water

XI. ATTACHMENTS

- I. Comprehensive Plan - The Family of Plans
- II. Comprehensive Plan - The Three “Tiers” of Planning
- III. Comprehensive Plan - Guidelines for Using the Maps

JLS/Maxine Brown-Roberts

Attachment I

Comprehensive Plan Chapter 1 - Introduction

The Family of Plans 103

The Comprehensive Plan can be thought of as the centerpiece of a “Family of Plans” that guide public policy in the District (See Figure 1.1). In the past, there has been a lack of clarity over the relationship between the Comprehensive Plan and the many other plans prepared by District agencies. This has reduced the Plan’s effectiveness and even resulted in internal inconsistencies between agency plans. 103.1

Under the DC Code, the Comprehensive Plan is the one plan that guides the District’s development, both broadly and in detail. Thus it carries special importance in that it provides overall direction and shapes all other physical plans that District government adopts. In fact, all plans relating to the city’s physical development should take their lead from the Comprehensive Plan, building on common goals and shared assumptions about the future. For example, the growth projections contained in the Comprehensive Plan should be incorporated by reference in other plans that rely on such forecasts. 103.2

As the guide for all District planning, the Comprehensive Plan establishes the priorities and key actions that other plans address in greater detail. The broad direction it provides may be implemented through agency strategic plans, operational plans, long-range plans on specific topics (such as parks or housing), and focused plans for small areas of the city. 103.3

The Comprehensive Plan is not intended to be a substitute for more detailed plans nor dictate precisely what other plans must cover. Rather it is the one document that bridges all topics and is Where appropriate, this Comprehensive Plan includes cross-references and text boxes to highlight other documents in the “Family of Plans.” Some examples include the federally-mandated State Transportation Plan (known as the “Transportation Vision Plan”), the Historic Preservation Plan, the Parks and Recreation Master Plan, and the Public Facilities Plan. Other agency plans may be guided by Comprehensive Plan policies but are outside of the city government’s direct control. These include the District of Columbia Public Schools Master Facilities Plan. 103.6

Attachment II

Comprehensive Plan Chapter 1 - Introduction

The Three “Tiers” of Planning 104

Since the late 1980s, the District has maintained a three-tiered system of city planning comprised of:

- a. Citywide policies*
- b. Ward-level policies*
- c. Small area policies. 104.1*

In the past, the Comprehensive Plan has been the repository for the citywide and ward-level policies. The small area policies, meanwhile, have appeared in separately bound “Small Area Plans” for particular neighborhoods and business districts. As specified in the city’s municipal code, Small Area Plans provide supplemental guidance to the Comprehensive Plan and are not part of the legislatively adopted document. 104.2

The 2006 Comprehensive Plan retains three geographic tiers but incorporates a number of changes to improve the plan’s effectiveness and readability. Probably the most important change is the replacement of “Ward Plans” with “Area Elements.” While Ward Plans were an effective way to express local priorities within the Comp Plan, the boundaries changed dramatically in 1990 and 2000 due to population shifts. Redistricting will occur again after the Censuses in 2010, 2020, and so on. Moreover, the city’s wards are drawn to ensure an equal number of residents in each Council district rather than to provide a coherent rationale for planning the city. Thus, places like Downtown Washington (divided by a ward boundary) and the Anacostia River (divided by four ward boundaries) have been covered in multiple places in past Comprehensive Plans. This has resulted in redundancy and fragmented policies for many of Washington’s most important places. The relationship between the Comprehensive Plan and the three tiers is described below. 104.3

Tier One: The Citywide Elements

The Comprehensive Plan includes 13 Citywide Elements, each addressing a topic that is citywide in scope, followed by an Implementation Element. 104.4

Tier Two: The Area Elements

The Comprehensive Plan includes 10 Area Elements, shown on Map 1.1. Taken together, these ten areas encompass the entire District of Columbia. ... 104.5

Although the Citywide and Area Elements are in separate sections of this document, they carry the same legal authority. The Area Elements focus on issues that are unique to particular parts of the District. Many of their policies are “place-based,” referencing specific neighborhoods, corridors, business districts, and local landmarks. However, the policies are still general in nature and do not prescribe specific uses or design details. Nor do the Area Elements repeat policies that already appear in the citywide elements. They are intended to provide a sense of local priorities and to recognize the different dynamics at work in each part of the city. 104.6

Tier Three: The Small Area Plans

As noted above, Small Area Plans are not part of the Comprehensive Plan. As specified in the DC Code, Small Area Plans supplement the Comprehensive Plan by providing detailed direction for areas ranging

in size from a few city blocks to entire neighborhoods or corridors. In the past, Small Area Plans have been prepared for places in the city where District action was necessary to manage growth, promote revitalization, or achieve other long-range planning goals. Examples include the H Street NE corridor, the Takoma Metro station area, and the Shaw/Convention Center area. Small Area Plans are adopted by the DC Council by resolution. The Comprehensive Plan is adopted in a different manner—by legislation—and becomes part of the DC Municipal Regulations. 104.8

In the future, additional Small Area Plans will be developed. The Implementation Element of this Comprehensive Plan outlines where and under what conditions such plans should be undertaken. Existing Small Area Plans are cross-referenced in the Comprehensive Plan Area Elements and should be consulted for further detail about the areas they cover. 104.9

Attachment III

Comprehensive Plan Chapter 2 – Framework Element

Guidelines for Using the Generalized Policy Map and the Future Land Use Map 226

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guides for development and conservation decisions. Several important parameters, defined below, apply to their use and interpretation.

- a. *The Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements for setbacks, height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. By definition, the Map is to be interpreted broadly.*
- b. *The Future Land Use Map is a generalized depiction of intended uses in the horizon year of the Comprehensive Plan, roughly 20 years in the future. It is not an “existing land use map,” although in many cases future uses in an area may be the same as those that exist today.*
- c. *The densities within any given area on the Future Land Use Map reflect all contiguous properties on a block—there may be individual buildings that are higher or lower than these ranges within each area. Similarly, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate. It should be noted that the granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited here.*
- d. *The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.*
- e. *The designation of an area with a particular land use category does not necessarily mean that the most intense zoning district described in the land use definitions is automatically permitted. A range of densities and intensities applies within each category, and the use of different zone districts within each category should reinforce this range. There are more than twice as many zone districts (about 30, plus more than a dozen overlay zones) as there are Comprehensive Plan land use categories. For example, there are at least three zone districts corresponding to “Low Density Residential” and three zone districts corresponding to “Moderate Density Residential.” Multiple zones should continue to be used to distinguish the different types of low- or moderate-density residential development which may occur within each area.*
- f. *Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the existing C-2-A zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area and the adjacent uses. A correspondence table indicating which zones are “clearly consistent”, “potentially consistent” and “inconsistent” with the Comprehensive Plan categories should be prepared to assist in Comprehensive Plan implementation and future zoning actions (see Action LU-4.3.B).*
- g. *The intent of the Future Land Use Map is to show use rather than ownership. However, in a number of cases, ownership is displayed to note the District’s limited jurisdiction. Specifically, non-park federal facilities are shown as “Federal” even though the actual uses include housing*

and industry (e.g., Bolling Air Force Base), offices (e.g., the Federal Triangle), hospitals (e.g., Walter Reed), and other activities. Similarly, the "Local Public" designation includes high-impact uses such as solid waste transfer stations and stadiums, as well as low-impact uses such as schools. Other maps in the Comprehensive Plan are used to show the specific types of public uses present in each area.

- h. The Map does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area Elements or an approved Campus Plan.*
- i. Streets and public rights-of-way are not an explicit land use category on the Future Land Use Map. Within any given area, the streets that pass through are assigned the same designation as the adjacent uses.*
- j. Urban renewal plans remain in effect for parts of the District of Columbia, including Shaw, Downtown, and Fort Lincoln. These plans remain in effect and their controlling provisions must be considered as land use and zoning decisions are made.*
- k. Finally, the Future Land Use Map and the Generalized Policy Map can be amended. They are not intended to freeze future development patterns for the next 20 years. The Comprehensive Plan is intended to be a dynamic document that is periodically updated in response to the changing needs of the city. Requests to amend the maps can be made by residents, property owners, developers, and the District itself. In all cases, such changes require formal public hearings before the DC Council, and ample opportunities for formal public input. The process for Comprehensive Plan amendments is described in the Implementation Element. 226.1*