

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Karen Thomas, Project Manager
JLS
Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: January 6, 2020

SUBJECT: Final Report for Zoning Commission Case No. 19-16, Consolidated Planned Unit Development for 1200 5th Street NW (Square 481, Lot 23)

I. RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the application by MCF WALP Phase 1, LLC for a consolidated PUD which would allow the construction of a 363-unit, residential building with 103 below-grade parking spaces subject to the following conditions:

Because there is no related map amendment with this case, there is only a single vote required for final approval. OP recommends the following information be provided prior to final action:

Extra FAR: The applicant has provided a solid argument how the extra density provides for the proposed design. However, addition information should be provided about how the requested FAR beyond the PUD density is “*essential to successful functioning of the project*” Pursuant to X§ 303.10 (b).

Monetary Contributions: The applicant should provide details to the record regarding the timing of the payments of the proffers and how they are consistent with Section X- 305.3 (d).

OP recommends the requested design flexibility be limited as follows:

Design Flexibility, page 12:

- (d) Number of Units: **flexibility be limited to studios and one bedrooms only;** and
- (e) Parking: **flexibility be limited to providing less parking only.**

OP also supports DHCD’s suggestion that the applicant increase the affordable housing proffer to 15% (page 17). While the application does not include a PUD-related map amendment it is asking the Commission to exercise its discretion and grant density that exceeds the PUD level.

With the above conditions and additional information, the proposal would be not inconsistent with the Comprehensive Plan and the Convention Center Area Strategic Development Plan. On balance, the benefits of the PUD would be commensurate with the flexibility requested.

II. RESPONSES TO OP AND ZONING COMMISSION COMMENTS FROM SETDOWN

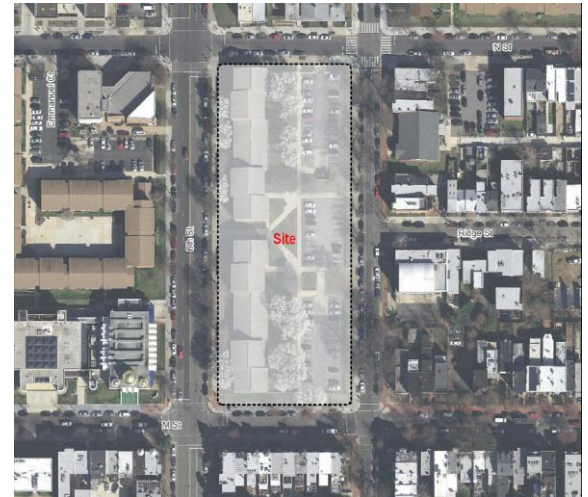
The following summarizes the Zoning Commission’s and OP’s comments from setdown and the project’s current status.

	<u>Comment</u>	<u>Applicant Response</u>	<u>OP Comments</u>
ZC 1	The Commission requested further refinement of the project’s courtyard design	Revised renderings show enhanced courtyard features at Exhibit 23A4, A5 Sheets, A11, A14, A16 & A18. Details of the internal courtyards are shown at Exhibit 23A8 Sheet L01-L04	OP is satisfied with the requested details to the record, including the perspectives of the court’s window features and materials proposed for the court’s interior. Further discussion is included on page 14 and 15 herein.
ZC 2	The Commission requested a showing of the project’s consistency with the SMA Design Guidelines – specifically the guidelines of the tripartite arrangement of and provision of a sense of privacy for ground level residents.	The responses are provided in Exhibit 13 (Tab D) specifically addressing: <ul style="list-style-type: none"> - the compatibility of mixed-income housing near metro stations with adjacent residential areas; - Provision of a prominent building entrance/lobby; - Street animation through design; - The tripartite arrangement of building elevation; - Quality of materials; - Privacy of ground level units; - The location of HVAC units; - Location of garage and service entrances. 	The applicant addressed the criteria of the Convention Area Strategic Development Plan as presented. OP’s report references these items under Item V(b) of this report.
OP 1	The applicant should detail the parameters of the affordable housing component, such as (but not limited to): <ol style="list-style-type: none"> a) The anticipated MFI level for apartment type. (e.g. X one-bedrooms at 60% MFI etc.) b) The bedroom count of apartments in the existing building compared to the proposed building. 	Page G10 of Exhibit A supplements the information in the record as Exhibit 13A regarding the Project’s affordable housing and includes the estimated number of affordable units, the affordable unit types by bedroom count, the affordability levels, and the proposed location of the affordable units.	A summary of information regarding the Project’s affordable housing is provided as requested by OP. The details of the affordable housing component are required to assess the level of affordability and proportion of unit sizes provided in the proposed development compared to the existing building and to assess the overall benefits of the project. The applicant has provided this information to the record shown in Exhibit 23C Pg. 1. The affordable housing component represents 12% of the residential GFA or 29,547 sf which is greater than 75% of the IZ bonus density of 24,946 sf. (4,601 sf in excess of bonus).

			The affordable component of this project is acceptable given a map amendment was not requested (Housing, Pg. 16 herein)
OP 2	Additional information should be provided regarding the benefits and amenities including a) Environmental and sustainable benefits b) Superior landscaping, or creation or preservation of open spaces.	The list of project benefits including environmental benefits are included in the record as Tab C in the prehearing Statement (Exhibit 23C)	In consultation with DOEE the project would provide a minimum of 1,400 sf of solar installation and charging stations for electric vehicles, with power outlets provided in the bike storage unit for e-bicycles. (Exhibit 23C, Pg. 2)
	A materials exhibit should be included with the plans.	A sample materials board would be provided at the hearing and a rendering is provided in the prehearing statement – (Exhibit 23A7 Sheet A26) The applicant replaced the lighter color panels on the upper levels with a darker grey. The window and door color have been adjusted to a dark grey to provide more contrast to the white metal panel and better relate to the darker panel colors at the top of the building.	External materials are included in the record as Exhibit 23A7 Sheet A26. The changes made reflect the Commission’s comments regarding the non-masonry materials and concerns regarding weathering. The materials proposed are consistent with contemporary housing materials and are located appropriately including the primary masonry brick facades, interspaced with off white metal panels and darker cementitious panels for the penthouse, and should mitigate concerns regarding durability, as desired.

III. AREA DESCRIPTION

The subject site is located at 1200 5th Street, N.W. It is approximately 92,394 square feet in area, on a single lot of record comprising the entire block of N Street to the north, 5th Street to the east, M Street to the south and 6th Street to the west. It is located one block east of the Mount Vernon Square Metro Station, and currently developed with a two-story garden apartment style residential building of 63 units and approximately 80 surface parking spaces, accessed at M and N Street N.W. The area is characterized by a mix of row dwellings to the east and north of the site and low to moderate density apartment buildings along 6th Street and 7th Street.



IV. PROJECT DESCRIPTION

The Applicant proposes to construct a multi-family residential building that includes 363 apartments in 246,222 square feet of gross floor area. The building will have a maximum height of 50 feet, plus a habitable penthouse, and a density of 2.67 floor area ratio (“FAR”). The project will devote 12% of the residential square footage to affordable housing and approximately 28% of the units will include two or three bedrooms. The project will provide 103 vehicle parking spaces and be designed to the LEED Silver v4. The property is zoned RA-2 and a map amendment is not proposed.

	Proposal <i>(Exhibit 23A1 Sheet G 05 Dec. 20, 2019)</i>
Building Height	50 ft.
FAR	2.66
GFA (residential)	246,222 sf
Lot Occupancy	81.7%
Residential Units	363 (approx..)
Parking	103 (approx..)

V. PLANNING CONTEXT

Title 11 Subtitle X § 304.4(a) requires that a PUD, inclusive of a map amendment, be not inconsistent with the Comprehensive Plan.

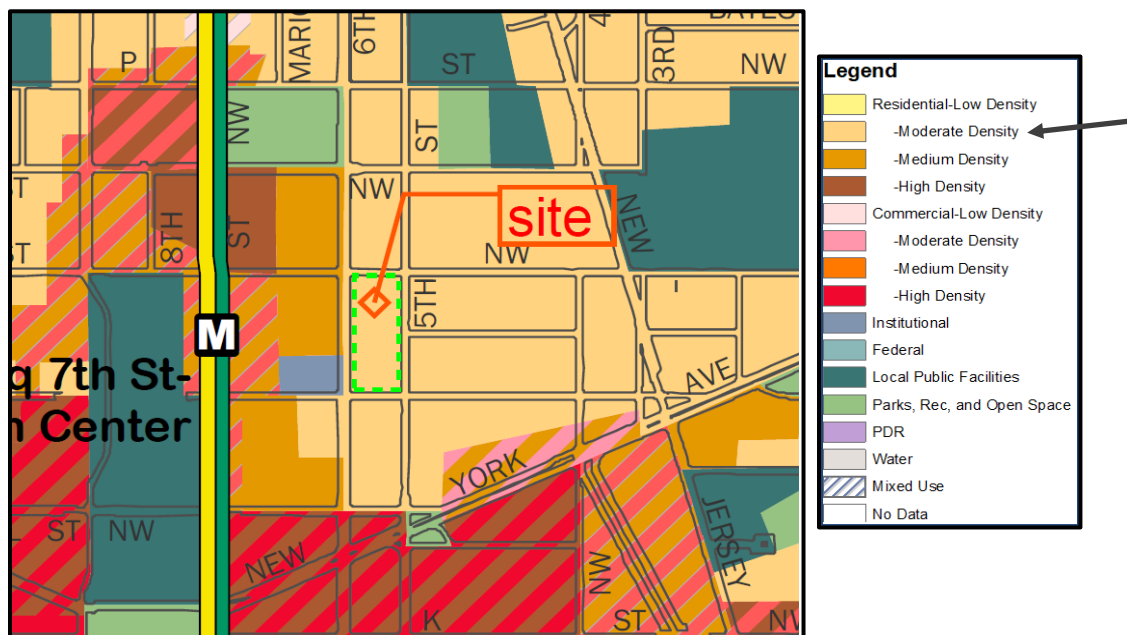
On balance, the proposal is not inconsistent with the Comprehensive Plan as a whole, including the maps and the policy statements. In particular, the proposal would further policy statements contained in the Land Use, Transportation, Housing, Urban Design, Environmental Protection, Parks and Recreation, Citywide Elements, the Near Northwest Area Element, and the Convention Center Area Strategic Development Plan.

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, policies and 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) indicates that the site is appropriate for Moderate Density Residential.

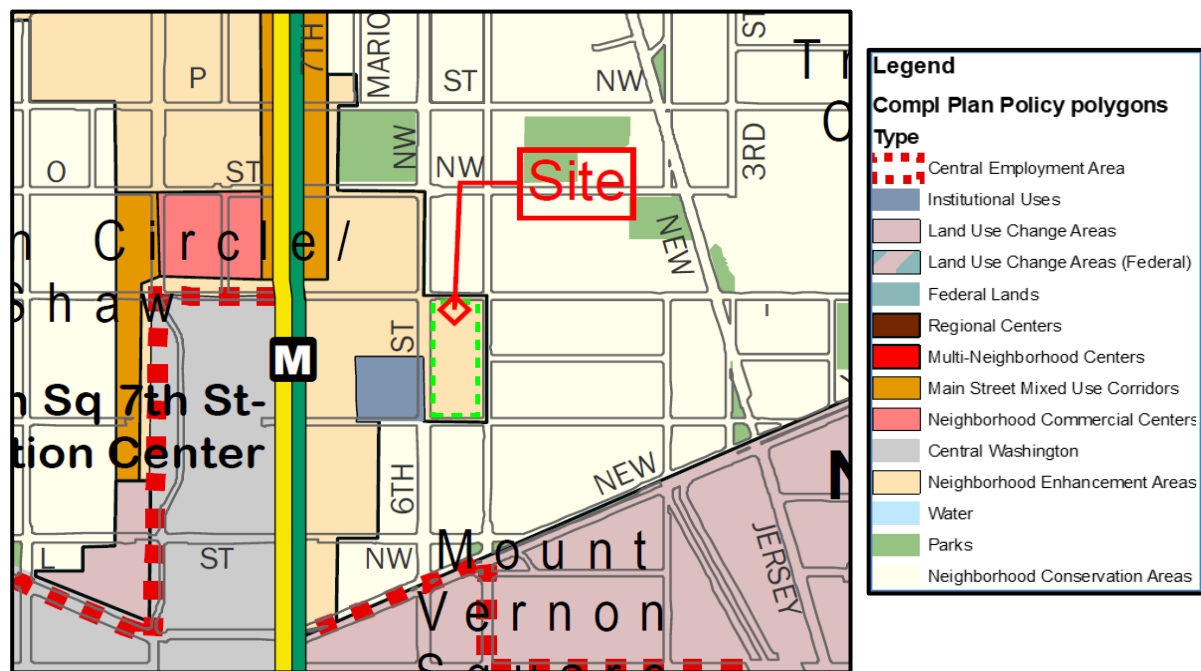


Moderate Density Residential: This designation is used to define the District’s row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, 2-4-unit buildings, row houses, and low-rise apartment buildings. 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, nd RA-1 Zone districts are generally consistent with the Moderate Density Residential category; the RA-2 district and other zones may also apply in some locations (10A DCMR § 225.4).

The proposed development would not be inconsistent with the Comprehensive Plan's FLUM. The RA-2 zone permits moderate-density residential development and would be appropriate as the site is bounded by 6th Street, a wide public street, which provides an appropriate buffer between the medium-density residential uses west of 6th Street and the moderate-density residential uses to the east. The proposed five-story building with a floor area ratio (FAR) of 2.66 would be within the permitted PUD density flexibility and would conform to the RA-2's development standards, except where flexibility is requested for 81.7% lot occupancy (60% maximum permitted).

Generalized Policy Map

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



Neighborhood Enhancement Areas are neighborhoods 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. (10 A DCMR § 223.6) The guiding philosophy in Neighborhood Enhancement Areas is to ensure that new development “fits-in” and responds to the existing character, natural features, and existing/planned infrastructure capacity. New housing should be encouraged to improve the neighborhood and must be consistent with the land use designation on the Future Land Use Map. The unique and special qualities of each area should be maintained and conserved, and overall neighborhood character should be protected as development takes place. Publicly-owned open space within these areas should be reserved and enhanced to make these communities more attractive and desirable. (10 A DCMR § 223.7)

The Consolidated PUD development would not be inconsistent with the Generalized Policy Map, which anticipates compatible small-scale infill development, and which encourages new housing to improve the neighborhood consistent with the FLUM's land use designation. The project would help revitalize the site by replacing dated development constructed in the early 1970's with contemporary units. New housing would also increase the supply of affordable housing in the neighborhood, in keeping with the District's goals of increasing affordable housing around metro-accessible locations.

b. SMALL AREA PLAN

The Convention Center Area Strategic Development Plan (*Approved June 20, 2006, Resolution 16-0687*)

This plan covers the area between New York Avenue, Massachusetts Avenue, 12th Street, Vermont Avenue, U Street, Florida Avenue, and New Jersey Avenue.

The area is generally referred to as Shaw but includes a number of neighborhoods identified by area residents. These include Logan Circle, French Street, Westminster Street, Blagden Alley, O Street Market, East Central, and Mount Vernon Square.

Specifically, the Plan references the subject site in Sub Area VII – Transit Oriented Housing - This area is defined by the common design of apartment developments guided by the Shaw Urban Renewal Plan¹ and their proximity to metro stations. They provide a variety of unit types and include a substantial number of affordable housing units, but their unadorned facades and surface parking lots are distinctive characteristics that make them stand out from the surrounding historic row-houses, apartment buildings, and commercial blocks. The Plan's development guide recommends the following:

- *Encourage mixed-income residential development with underground parking on surface parking lots adjacent to Metro stations.*
- *Encourage renewal of Project-based Section 8 contracts; alternatively, redevelop with equivalent/increased number of affordable residential units.*
- *Encourage infill developments built to property line on street frontage with open space oriented to the interior of the block.*

According to the applicant, "there is no Section 8 contract in effect for the property and there has not been since 2002" (Exhibit 2, Line 1, page 17). The redevelopment would include affordable units up to 50% and 60% AMI, for up to 12% of residential GFA, in addition to market-rate units. At the requested 2.66 FAR, the project would provide increased density proximate to a metro station. This supports the District's goal of creating 36,000 new residential units by 2025, including affordable units for low-income residents to ensure all residents can live in the city without being burdened by housing costs. This project would provide 18 three-bedroom units where only 8 previously existed. The proposed provisions of below-grade parking and a long-term bicycle storage facility are consistent with the neighborhood character where surface lots are not typical near the metro station, as is currently the site's condition. The design is built to

¹ The Shaw Urban Renewal Plan is proposed to be terminated and will be considered by the Council in early 2020.

the property line on all street frontages and ample open space is oriented to the interior of the block providing a visual linkage from 5th to 6th Street.

The project would satisfy the specific directives identified for this site. The design guidelines follow the goal to:

- *Encourage additional new construction of mixed-income housing at and near Metro stations that are compatible with adjacent residential areas;*
- *Provide prominent building entrances and lobbies*
- *Provide design that animates street through projections or openings;*
- *Tripartite arrangement of building elevation encouraged;*
- *Material shall be of high quality, providing a sense of detail, scale and visual interest;*
- *Provide a sense of privacy for ground level residential units;*
- *Through-wall HVAC units are not allowed on public elevations;*
- *Garage and service entrances should be from alleys, not on front elevations;*

As noted in this report ([see page 16](#)), the mixed-income project would include proportionate ratios of affordable units in the range of 50% and 60% AMI, within a block of the Mt. Vernon Metro Station and the multi-route 7th Street metrobus corridor. The five-story structure would not be incompatible with the surrounding row-house neighborhood character of the Mount Vernon Square Historic District which abuts the site to the east and south.

The applicant addressed the above design guidelines, including the provision of landscaped entrances on both 5th and 6th Street leading to a spacious two-story common amenity core, linking the north and south wings of the building. Exhibit 23A4, Sheet A13, A14. In addition, bay projections and decks provide articulation of the building frontages on four sides and would provide eyes on and animation of the large block (Sheet A15). The projections and recessed two-story link break up the massing on both 6th and 5th Streets, which would be a significant improvement over the existing building, particularly as viewed from 6th Street, where extensive courtyard landscaping would be provided for both 5th Street and 6th Street entrances. Some ground level residential units would have private stair entrances, accessible from the street, similar to existing row-homes on M Street and on 5th Street, south of M Street (Exhibit 23A4 Sheet A 10a).

Presently, the 5th Street frontage is lined by the 80-space asphalt surface parking for the former residences. The large block provides no alley access, therefore private vehicle access, as well as loading for the north wing is proposed from N Street. Loading for the south wing would be via 5th Street. The applicant filed for concept approval from the Public Space Committee in December 2019 for the new and relocated curb cuts.

All HVAC units are shown on the building's penthouse roof. (Exhibit 23A4 Sheet A11).

c. SUMMARY OF PLANNING CONTEXT ANALYSIS

On balance, the proposed PUD is the appropriate vehicle for realizing the Comprehensive Plan's anticipated site designation of moderate density residential and for achieving the goals for the subject property noted in the Convention Center Area Small Area Plan. The project would complement and support the redevelopment of an underutilized site with a new apartment

building, including architectural design, sustainability, and open green space. The proposed mixed-income redevelopment would increase density at the metro-accessible site, providing more housing within the scale, density and design context of the existing neighborhood.

VI. ZONING ANALYSIS

The site is currently zoned RA-2; the applicant is not requesting a PUD-related zoning map amendment but is applying the RA-2 PUD development standards, which is not inconsistent with the Comprehensive Plan. The table compares the existing (MoR) and PUD RA-2 zone to the proposal:

	Existing Zone RA-2 MoR	RA-2 PUD	Proposal (RA-2 PUD)	Flexibility
Minimum Land Area X § 301.1	Not Applicable	15,000 sf minimum	92,394 sf.	-
Height (ft.) F § 303.1/ X § 303.7	50 ft.	60 ft.	50 ft.; 5 stories	-
Penthouse F § 303.2	12 ft. max; 1 story 15 ft. mechanical	12 ft./1 story max. (habitable space) 15 ft./2 nd -story permitted for penthouse mechanical space	Conforms	-
FAR F § 302.1/ X §§ 303.3; 303.4	1.8	MOR: 1.8 = 166,309 GFA PUD 20% Bonus: 2.59 = 239,485 GFA ZC 5% increase: 2.72 = 251,460 GFA	2.66 246,222 GFA	Requested
Residential GFA	27,000 sf. max.	239,485 sf max.	246,792 sf	
			5% flexibility = 11,974 s sf.	7,307 sf (delta)
Lot Occupancy F § 304	60% max: 55,436 GFA	60 % max.	81.7 % 75,497 sf	Requested
Rear Yard F § 305.1	20 ft. min.	4 in. per 1 ft. of building height but not less than 15 ft. (20 ft. min.)	22 ft. 11 ins	-
Side Yard F § 306.2	None required; if side yard is provided than no less than 6 ft.	None required; if side yard is provided than no less than 6 ft.	None Provided	-
Parking C §§ 701.5; 702.1	1 per 3 dwelling units in excess of 4 and 50% reduction in spaces because site is located within 0.5 mi. of Metrorail station	60 spaces required: • 1 per 3 dwelling units in excess of 4 and • 50% reduction in spaces because site is located within 0.5 mi. of Metrorail station	Approx. 103 spaces	-

	Existing Zone RA-2 MoR	RA-2 PUD	Proposal (RA-2 PUD)	Flexibility
Bicycle Parking C § 802	Long Term: 1 space per 3 dwelling units min.	Long Term: 1 space per 3 dwelling units min. (121 spaces req.)	121 spaces	-
	Short Term: 1 space per 20 dwelling units min.	Short Term: 1 space per 20 dwelling units min. (18 spaces req.)	18	-
Loading C § 901	1 min. for a building with more than 50 dwelling units	1 min. for a building with more than 50 dwelling units min. (1 loading berth required)	2 loading berths	-
Green Area Ratio F § 307.1	0.4 min.	0.4 min.	0.448	-

The applicant requests the following flexibility through this PUD:

1. FAR: 2.66 **Proposed**; 2.59 maximum permitted; 2.72 - ZC 5% max. allowable increase:

The project seeks a FAR beyond the maximum density but within the 5% increase, which can be granted by the ZC upon the Commission’s determination that the extra FAR is “*essential to the successful functioning of the project and is consistent with the purpose and evaluation standards*” of a PUD (X§ 303.10 (b)).

Sheet G06 of the plans provides the GFA diagrams and the Building Area Table providing the total GFA for each level. The table shows that loading on the first floor adds 4,541 sf to the total GFA in FAR and covered balconies add 5,459 sf to the GFA for a total of 10,000 sf to the GFA. The Commission’s 5% flexibility is equivalent to 11,974 s sf.

Balconies and Design

The loading areas on the first level and the provision of covered balconies on the first through third level are essential to the successful design elements of the project. The balconies do not project into public space but align with the property line as part of the design, which includes the bay and balcony features as one projection. Uncovered balconies, which are not included in the FAR GFA, link individual smaller bay projections compared to the covered balconies which are part of the larger projections including two units in one projection. The projections with the balconies are design elements, which break up the façade primarily along the 6th Street frontage.

The applicant states that the additional density is requested to balance the reduced height, without loss of minimum-sized efficient, livable areas, and the provision of a double-loaded corridor with interior courts. Increased density also allows for a project, which is

anchored at the corners rather than recessed from the street, which is not typical of the row character of the adjacent homes or a downtown location.

Loading

If loading were not provided at the first level, then it would be located below-grade requiring excavation or the loss of parking areas, adding to project costs, and less on-site parking, which the applicant states the community would not support. The request would offset a design change to provide a lower density through larger court areas, which may result in loss of residential units in the vicinity of the courts at all levels.

The applicant has established how the additional FAR results in the proposed design and OP has no objection to the requested flexibility to permit 2.66 FAR. However, additional evidence should be provided prior to final action establishing how the additional density is essential to the successful functioning of the project and is consistent with the purpose and evaluation standards”.

The arguments presented in the application seem to have the effect of prioritizing above-grade loading and below-grade parking as project givens. Only sixty (60) parking spaces are required but 103 are proposed.

2. Lot Occupancy: **81.7% Proposed:** 60% maximum permitted;

The applicant requested an increase of 17,013 square feet beyond the maximum permitted footprint in order to balance the necessity between the efficiency of the floor plate in the provision of balconies, larger family-sized units and the community’s desire for the project to not exceed the 50-foot height for matter-of-right development. The increase in lot occupancy would also provide for an increased density to accommodate additional affordable units beyond the required at a downtown location in proximity to metro and employment locations throughout the city. The applicant expressed that this flexibility would minimize the need to increase the height to 60 feet, which the neighborhood has stated it would not support.

OP supports the increased lot occupancy in proximity to metro as consistent with the District’s goals for equitable housing affordability in proximity to desirable transportation options and services.

3. Design Flexibility, including:

- a. Interior Components: To vary interior configuration of the proposed building including but not limited to partitions, structural slabs, doors, hallways, columns, stairways, and mechanical rooms, provided that the variations do not change the exterior configuration of the Project as shown on the final plans;
- b. Exterior Materials: To vary the final selection of the colors of the exterior materials based on availability at the time of construction, provided such colors are within the color ranges shown on the final plans; and to make minor refinements to exterior details, dimensions and locations, including curtainwall mullions and spandrels, window frames and mullions, glass types, belt courses, sills, bases, cornices, balconies, railings and trim, or any other changes to comply

with the District of Columbia Building Code or that are otherwise necessary to obtain a final building permit or to address the structural, mechanical, design, or operational needs of the building uses or systems;

- c. Exterior Details: To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior configuration of the building or design shown on the plans approved by the order. Examples of exterior details would include, but are not limited to, doorways, canopies, railings, and skylights;
- d. Number of Units: To provide a range in the approved number of residential dwelling units of plus or minus ten percent (10%) relative to the number depicted on the final plans;
OP recommends this flexibility be limited to studios and one-bedrooms only.
- e. Parking: To make refinements to the approved parking configuration, including layout and number of parking space plus or minus ten percent (10%), provided the number of parking spaces is at least the minimum number of spaces required by the Zoning Regulations.
OP recommends limiting this flexibility to less parking only.
- f. Ceiling Height: To make minor refinements to the floor-to-floor heights, so long as the maximum height and total number of stories as shown on the Plans do not change.
- g. Streetscape Design: To vary the design of the public space surrounding the Property and/or the selection of plantings in the landscape plan depending on seasonal availability within the range and quality as proposed in the [Final Plans] or otherwise in order to satisfy any permitting requirements of DC Water, DDOT, DOEE, DCRA, or other applicable regulatory bodies and/or service to the Property from utilities;
- h. Stormwater and Sustainability: To vary the amount, location and type of green roof, solar panels, and paver areas to meet stormwater requirements and sustainability goals or otherwise satisfy permitting requirements as long as the project achieves a minimum GAR required by the Zoning regulations and provides a minimum of approximately 1,400 square feet of roof area for solar panels and related equipment.
- i. LEED: To vary the approved sustainable features of the Project, provided the total number of LEED points achievable for the Project does not decrease below the minimum required for the LEED standard specified by the order;
- j. Mechanical Penthouse: To vary the final design and layout of the mechanical penthouse to accommodate changes to comply with Construction Codes or address the structural, mechanical, or operational needs of the building uses or systems, so long as such changes do not substantially alter the exterior dimensions shown on the [Final Plans] and remain compliant with all applicable penthouse dimensional requirements of the Zoning Regulations; and
- k. Plaza Spaces: To vary the final design and layout of the indoor and outdoor amenity and plaza spaces to reflect their final design and programming and to accommodate special events and programming needs of those areas from time to time.

The requested design flexibility was refined since setdown, and OP is satisfied that parameters were provided whereby the design changes may be permitted (Exhibit 23C, Pg. 5) subject to the following conditions:

- (d) Number of Units: **flexibility be limited to studios and one bedroom's only**; and
- (e) Parking: **flexibility be limited to providing to less parking only**.

VII. 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.*” “*A project amenity is one (1) type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors*” (§ 305.10). Section 305.5 lists several potential categories of benefit proffers, and states that “*(a) project may qualify for approval by being particularly strong in only one (1) or a few of the categories in [that] section but must be acceptable in all proffered categories and superior in many*” (§ 305.12). The Commission “*shall deny a PUD application if the proffered benefits do not justify the degree of development incentives requested (including any requested map amendment)*” (§ 305.11).

The applicant’s recent summary of project benefits and amenities provides additional information requested at setdown (Exhibit 23B). Entitlements gained through the proposed PUD

are summarized as shown:

	MoR Allowed	PUD Proposed	DIFFERENCE
Height:	50 ft.	50 ft.	0 ft.
Floor Area Ratio	1.8	2.59 allowed 2.66 requested	2.8% increase at ZC discretion
Gross Floor Area:	166,309 sf.	246,222 sf.	79,913 sf.
Lot Occupancy:	60 %	81.7 %	21.7%

OP's analysis of the proffers is summarized in the following table and detailed below.

ITEM	MITIGATION	PUBLIC BENEFIT	PROJECT AMENITY	REQUIRED	PROFFER
Urban Design, Architecture <i>X § 305.5(a)</i>					
Height and mass designed to relate to the surrounding context through height reduction (PUD height not applied), courtyards, façade articulation, and high-quality, context-sensitive materials		X	X	X	X
Landscaping Open Space, Streetscape <i>X §§ 305.5(b) and (l)</i>					
Improved landscaping onsite and within public space, including 5 new canopy trees and tree preservation	X	X	X		X
Site Planning, Efficient Land Utilization <i>X § 305.5 (c)</i>					
Replacement of underutilized development with additional housing including affordable rental units and environmentally sustainable design features	X	X	X		X
Housing and Affordable Housing <i>X §§ 305.5 (f) and (g)</i>					
6,535 sf in excess of the M-O-R required to satisfy the min. set aside based on the 75% IZ bonus density.		X	X	X	X
Affordable rental units up to 50% AMI in a metro accessible location		X	X		

ITEM	MITIGATION	PUBLIC BENEFIT	PROJECT AMENITY	REQUIRED	PROFFER
Increased number of family-sized units	X ²	X	X		X
Environmental and sustainable benefits <i>X § 305.5 (k)</i>					
Solar roof and green roof design (1,400 sf) (42,020 sf)	X	X	X	X	
3 electric car charging stations		X	X		
Power outlets in the long-term bicycle storage		X	X		
Bioretention – where none previously existed. The stormwater retention would exceed the required for the project		X	X	X	X
Five new canopy trees – with up to 35 feet canopy at maturity	X	X	X		X
Uses of Special Value to the Neighborhood <i>X § 305.5 (q)</i>					
See Exhibit 23B: Lists proffers agreed to among the applicant, ANC and 7 community organizations (Total: \$205,000)		X			X

(a) Superior urban design and architecture

(Exhibit 2G1- Sheets A01-A25)

The project occupies an entire block facing 4 streets. The applicant has proposed a design to address each street frontage by reducing the building’s mass on the main 6th Street frontages and 5th Street, through landscaped open courts to the main lobby and providing individual entrances at the lower level on 6th, M and 5th Streets to activate those frontages. Both north and south wings of the building would be bridged by an amenity core. The amenity core includes a spacious lobby at the ground level, residential amenities on the second floor and pool with roof terrace on the roof of the second floor. Interior courts, each over 5,000 square feet would be provided for passive recreation and would provide light and air to units facing the court areas. The design and architecture would be considered a benefit to future residents and to the neighborhood’s character. (Exhibit 23A4)

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

Two at-grade open courts facing 5th Street and 6th Street would have a combined 8,554 square feet (Sheet G07), which would accommodate landscaping to complement the

² OP considers this an “equity mitigation” in furtherance of providing affordable housing near desirable transportation options, where family-sized housing costs are typically higher.

streetscape. Five new trees, each with a 35 ft. mature spread would be planted. Interior courtyards (10,488 sf) would provide passive recreation areas for residents, as well as light and air to interior units, which would also have balconies facing the courtyards. Private entrances would also benefit from ornamental plantings, creating a defensible area for individual residential entries. This is a project benefit. (Exhibit 23A8 Sheet L 06 -L09; Sheet A10a).

(c) Site planning and efficient and economical land utilization

The proposed plan replaces an older underutilized building of 63 units and a one-acre surface parking area with a 363 unit, mixed-income building, where parking and loading facilities would not be visible to the street. In addition, important sustainable features, where none currently existed would be included to the neighborhood's and District's benefit as discussed herein.

(d) Housing and Affordable Housing

The project would increase the existing number of dwelling units from 63 to 363. The proposed PUD application would permit an additional 79,913 sf GFA of additional density beyond the matter-of-right and 29,547 sf of affordable housing. The applicant states that approximately 23% of additional density obtained through the PUD process would be assigned to affordable housing, where previously no permanently affordable units were provided (See Exhibit 2, Footnote Page 13). The project would increase the number of three-bedroom units from 8 to 18.

DHCD requested the applicant increase the number of dedicated IZ units from the proposed 12% to 15%. The applicant acknowledges the desire for affordability but stated that the requested flexibility was not commensurate with requested relief and a map amendment was not requested. Further, the applicant has proffered community benefits up to \$205,000 to seven (7) community organizations, as provided in Exhibit 23B of the record. **OP supports DHCD's request for 15 % affordable units.**

The figures in the following table are based on information supplied in the prehearing statement.

Residential Unit Type	Floor Area (sf)	Percentage of Total	Units	Affordable Control Period	Affordable Unit Type
Total Res. Floor Area (Net SF)	342,943	100%	360		
Market Rate (Net SF)	301,790	88%	319		
IZ – 60% MFI (Net SF)	36,873	10.8%	38	Life of Project	Rental
IZ – 50% MFI (Net SF)	4,280	1.2%	3	Life of Project	Rental
Affordable / Non IZ	0	0	0	Life of Project	Rental
Large family sized units (3BR+)	22,820	4.2% 15/360 units	15	Life of Project	Rental
Affordable large family sized units (3BR+)	4,092	0.8% 3/360 units	3	Life of Project	Rental

The IZ unit mix is provided in the plans at Exhibit 23A Sheet G10 (Dec 20, 2019) and included here as reference:

Unit Type	Total		Market Rate		IZ Required	
	# of units	% of unit mix	# of units	% of unit mix	# of units	% of unit mix
Studio	135	37.5%	122	38.2%	13	31.7%
1BR	124	34.4%	110	34.5%	14	34.1%
2BR	83	23.1%	72	22.6%	11	26.8%
3BR	18	5.0%	15	4.7%	3	7.3%

(e) Environmental and sustainable benefits

The project’s sustainability would be measured by the provision of LEED Silver v4.0.

Approximately 42,020 sf of green roof would be provided primarily at the penthouse level. Green space would be included through internal courtyards, one in each wing, and with open courtyards on both 5th and 6th Street frontage. Up to 1,400 sf of solar installation would also be included with the green roof.

Bioretention systems would be placed in the north and south courtyards and middle plaza area covering a total surface area of 7,079 sf, which is anticipated to provide a stormwater capture volume of approximately 5,136 cf. (Exhibit 23A9 Sheet C-082).

Overall, on-site stormwater management where none currently exists, would exceed the required 8,778 cf. of stormwater retention, with up to 10,841 cf. to be retained, as shown on the plans (Exhibit 23A9 Sheet C-802).

These features would align with the goal established in Sustainable DC 2.0 plan to make new buildings more sustainable and would be considered a benefit and proffer of the project.

(f) Streetscape plans

Exhibit 2G9 of the record provided the initial overall concept streetscape plan. The streetscape plan was reviewed by OP and DDOT’s Public Space staff prior to the public hearing. DDOT staff expressed satisfaction with the public space’s tree planning schedule and streetscape at the interagency meeting held by OP on December 10, 2019. Refinement to the planting design and final section would be developed during the design phase and would reflect the main elements of the latest submission shown in Exhibit 23A8.

The proposed landscaping within and outside of public space would be considered a public benefit.

(g) Other public benefits and project amenities

The applicant collaborated with the ANC and community to develop an agreed upon benefits/amenities package (Exhibit 23B), included for reference:

Organization	Proffer	Amount (\$)
Greater Washington Community Foundation	Provides support for nonprofit providers in DC to help people obtain and maintain permanent housing and reduce the amount of time spent in the homeless services system.	75,000
New Endeavors by Women	To purchase computer lab equipment and support programs providing women and families with supportive services and transitional housing at 611 N Street, N.W.	20,000
Shaw Main Street	To support the Shaw Main Street's Clean & Safe Team.	30,000
Kennedy Rec. Center	Equipment, supplies and general operational support	15,000
Boolean Girl	Sponsorship of one year of the nonprofit organization Boolean Girl to operate in the updated computer lab at the Kennedy Recreation Center	15,000
DC Public Library (Shaw)	To support improvements to the children's section and related programming at the Shaw Library	20,000
Mt. Vernon Tri. Community Improvement District	To support the Mount Vernon Triangle Clean Team.	30,000

Section 305.3 (d) states:

Monetary contributions shall only be permitted if made to a District of Columbia government program or if the applicant agrees that no certificate of occupancy for the PUD may be issued unless the applicant provides proof to the Zoning Administrator that the items or services funded have been or are being provided

Prior to the order, details should be provided to the record regarding the timing of the payment of the proffers.

In summary, OP finds that the benefits, amenities and proffers **appear to be** commensurate with the requested flexibility through the PUD and would be enhanced if the affordable housing proffer were to be increased to 15% as suggested by DHCD.

VIII. AGENCY COMMENTS

OP circulated project information to District agencies and had discussions with the District Department of Energy and Environment (DOEE), DDOT and DCWater. In addition, OP arranged an interagency meeting, inviting representatives of all notified agencies to participate. These discussions are reflected as follows (See Exhibit 23C):

DC WATER COMMENTS

AGENCY COMMENT	APPLICANT RESPONSE
1. Will the existing water lines in either 5 th Street, NW or 6 th Street, NW need to be relocated?	The Applicant continues to study whether the 5 th Street, NW water line will need to be relocated. On 6 th Street, NW, the Project is located no further forward of the Property line than the existing buildings, which accommodate access to and maintenance of the existing water line on that street. As a result, the Applicant does not expect that the 6 th Street, NW water line will need to be relocated.
2. How will the building be serviced by water (i.e., will there be a single water meter)?	The Applicant will coordinate with DC Water during the permitting stage to determine the appropriate service model for the Project and the necessary excavation mitigation measures. As part of the discussion at the interagency meeting, DC Water did not indicate that these questions needed to be resolved prior to the PUD approval.
3. How will tiebacks/support of excavation work given the existing water lines surrounding the property?	
4. Does the project contain any commercial uses that would affect the system availability fee calculation?	The Project does not include any commercial uses. It will be subject to the residential fee calculation.
5. There is plenty of sewer capacity in the area around the project and plenty of available water given the size of surrounding lines.	The Applicant appreciates confirmation that there is adequate water and sewer capacity to accommodate the Project without producing any stress on the existing infrastructure.

DEPARTMENT OF ENERGY & ENVIRONMENT COMMENTS

AGENCY COMMENT	APPLICANT RESPONSE
1. DOEE is available for consultation regarding the incorporation of solar in the green roof design and calculations relating to those requirements.	The applicant will work with DOEE ahead of and during the permitting process regarding the solar panel and green roof installations.
2. Does the garage include electric vehicle charging stations?	The Applicant will provide three (3) electric vehicle charging stations in the Project's garage as a sustainability measure. In addition, the Applicant is aware the Commission encourages wiring the long-term bicycle storage to accommodate e-bikes. Accordingly, the Applicant will provide power outlets in the long-term bicycle storage.

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT COMMENTS

AGENCY COMMENT	APPLICANT RESPONSE
1. How much affordable housing would a matter-of-right alternative to the project be required to provide if it were to satisfy the minimum set aside based on the 75% of the Inclusionary Zoning bonus density?	<u>34,618 square feet.</u> The Project ultimately reserves <u>41,153 square feet</u> of residential gross square footage for affordable housing, which is <u>approximately 6,535 square feet more than would be required for a matter-of-right development of the Property.</u> Whether a matter-of-right development of the Property would need to satisfy the 75% IZ bonus density requirement or the minimum GFA set-aside, the Project's affordable housing proffer is significantly greater than any matter-of-right

	alternative. Moreover, the Project includes 18 three-bedroom units.
2. Please provide the proposed location of the affordable units in the upcoming filing.	Refer to Exhibit 23A2 – Sheet G10 (IZ unit Mix)
3. Is it possible to provide an affordable housing set aside in excess of 12% of residential GFA or to reserve more of the affordable units at 50% MFI?	The Applicant believes that a 12 percent set aside is appropriate for this Project in light of the lack of a map amendment and limited zoning flexibility requested. The Project includes affordable units reserved at 50% MFI consistent with the penthouse affordable housing requirements.

DEPARTMENT OF TRANSPORTATION COMMENTS

AGENCY COMMENT	APPLICANT RESPONSE
1. DDOT is still reviewing the CTR and may have additional comments in its report it will file with the Commission. DDOT is reviewing the TDM and pavement types at the intersection of 6 th Street, NW and M Street, NW among other items.	The Applicant will provide responses to DDOT’s comments as necessary following the filing of the DDOT report.
2. Has the applicant submitted for a conceptual curb cut approval from the Public Space Committee for the two vehicle entrances to the project?	The applicant filed for concept approval in December 2019.

URBAN FORESTRY DIVISION

AGENCY COMMENT	APPLICANT RESPONSE
UFD recommends the [Applicant] schedule a walk through to determine a path forward to preservation. Street trees to be preserved . . . require a Tree Preservation Plan (TPP) developed by a Certified Arborist	As UFD noted, in its report filed as Exhibit 22, the Applicant and UFD have walked the Property. The Applicant will meet on site with UFD and a Certified Arborist to develop a Tree Preservation Plan acceptable to UFD and the Applicant, to mitigate any removed trees and to identify a planting program for new trees.

The Urban Forestry Division of DDOT filed its report to the Commission at Exhibit 22 of the record. At the writing of this report, DDOT’s comments were not included to the record.

Based on overall comments provided by city agencies it should not result in unacceptable project impacts on the surrounding area or on the operation of city services and facilities but where there may be conflicts, the impacts would be mitigated, or acceptable given the quality of public benefits in the project.

IX. COMMUNITY COMMENTS

The applicant met extensively with the ANC6E and collaborated with community organizations to create a community benefits package, consistent with Subtitle X § 305. The ANC 6E voted to support the project at its regularly held meeting on December 19, 2019.

At the writing of this report, exhibit 24 is included in the record as a party in opposition to this application.

JLS/kt

COMPREHENSIVE PLAN WRITTEN ELEMENTS

Citywide Elements of the Comprehensive Plan

The proposed development is not inconsistent with the following policies of the 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-2.1.2: Neighborhood Revitalization

Facilitate orderly neighborhood revitalization and stabilization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need. Use social, economic, and physical indicators such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate as key indicators of need (10A DCMR § 309.7).

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 (10A DCMR § 309.8).

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 (10A DCMR § 310.5).

The existing property is underutilized, and the proposed project would provide an increase in housing density in a desirable downtown neighborhood. The aged garden apartment complex would be replaced with a newer contemporary building, including more units with a related increase of affordable units within the neighborhood. The design and massing of the building would be respectful of the existing row houses along 5th Street and further east of 5th Street. Material use would be a mixture of brick and new materials consistent with newer material palettes in residential construction. Improved landscaping and open green spaces would replace the existing asphalt surface parking along the 5th Street frontage. Dedicated off-street loading, and below-grade off-street required parking would now be enclosed and located

below-grade, which would be an improvement to the neighborhood's more residential 5th Street frontage.

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-1.2.3: Discouraging Auto-Oriented Uses

Discourage certain uses, like "drive-through" businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas (10 DCMR § 404.8).

The proposed project would close a vehicle access curb cut on the M Street and relocate curb access for loading to 5th Street. The existing curb cut north on N Street would be relocated to provide access to an enclosed parking garage and loading access for the north wing. Further, the project would include both short-term and long-term bicycle parking. The applicant provided a Transportation Study (Exhibit 21) and it states that bicycle access to the 121 long-term secure bicycle spaces, to its dedicated storage room on the first level of the below-grade parking garage will primarily utilize the driveway on N Street NW. There would be 18 short-term bicycle parking spaces provided at various locations surrounding the site. The subject location is transit-accessible and in conjunction with secured long-term and short-term bike provisions, the project would encourage use of the available multi-modal transportation options.

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-1.1.3: 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 (10A DCMR § 503.3).

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 (10A DCMR § 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 and rehabilitation throughout the city (10A DCMR § 504.6).

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 (10A DCMR § 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 (10A DCMR § 509.5).

Policy H-2.1.3: Avoiding Displacement

Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units (10A DCMR § 509.7).

The proposed project would increase the amount of housing units currently provided at the subject property from 63 to 363 units and provide market-rate units, as well as affordable units. Family-sized apartments would be provided within 18 three-bedroom units and the applicant states that no unit size comprises more than one third of the units. Residential amenities would be accessible across all income levels. This project does not involve tenant displacement, as former tenants were relocated to nearby residences prior and the units have been vacant for at least two years.

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 (10A DCMR § 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 (10A DCMR § 603.6).

Policy E-2.2.1: Energy Efficiency

Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees (10A DCMR § 610.3).

Policy E-2.2.3: Reducing Home Heating and Cooling Costs

Encourage the use of energy-efficient systems and methods for home insulation, heating, and cooling, both to conserve natural resources and also to reduce energy costs for those members of the community who are least able to afford them (10A DCMR § 610.5).

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 (10A DCMR § 613.3).

The proposed project would be designed to achieve LEED Silver v4.0 certification (2019). The green roof shown on the fourth story roof and the penthouse roofs include 42,580 sf of roof with growth medium greater than 8 inches. In addition, landscaped areas at grade with soil depth greater than 24 inches amount to 617 square feet mainly along the entrance courtyards at 6th and 5th Street.

At grade, the courtyards represent 7,146 sf of bioretention facilities to reduce stormwater runoff from the site, where none previously existed. Both the green roof and the bioretention features would account for significant future reduction of the heat island effect of the former one-acre asphalt surface parking lot.

The landscaping would be significant over the existing situation as there would be four landscaped courtyards, including two interior yards designed for passive recreation and two provided as lush courtyards to the entrances. New trees with a mature canopy spread greater than 40 feet would be planted onsite and existing trees around the site's periphery in public space would be protected during construction and replaced if approved by DDOT's Urban Forestry (Exhibit 2G1 Sheet G09; Exhibit 2G9 Sheet L08-L09).

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 site is located two blocks from the Kennedy Recreation Center and playground at O Street and within walking/biking distance of the Shaw Library. The project's massing would be interrupted through the provision of open courts at entrances on 5th Street and 6th Street (See view from Ridge Street Sheets A14, A18, A19 and A24). The 5th Street entrance would be enhanced with seating as a residential amenity but would not be closed off to the immediate neighborhood.

Chapter 9 Urban Design

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

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 (10A DCMR § 910.6).

Policy UD-2.2.8: Large Site Development

Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades (10A DCMR § 910.16).

The redeveloped site would be designed with consideration given to the neighborhood context, including the materiality, façade form, and private entrances in acknowledgement to the existing row homes and other institutional buildings that define the immediate neighborhood, as discussed in OP's final report ([See pages 14-15](#), Items (a), (b) (c)).

Area Elements of the Comprehensive Plan

The proposed development is located within the Near Northwest Area Element of the Comprehensive Plan, and specifically within the Shaw/Convention Center Policy Focus Area. The proposal would particularly further the **Near Northwest Element** statements and policy objectives:

Policy NNW-1.1.2: Directing Growth Generally direct growth within the Near Northwest Planning Area to the eastern side of the Planning Area (Logan Circle and Shaw), given the strong market demand and limited land available on the west side, and the need for reinvestment and renovation on the east side. 2108.3

Policy NNW-2.1.3: Shaw/Howard University and Mount Vernon Square Metro Stations Encourage mixed-income residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots. 2111.7

Policy NNW-2.1.7: Public Realm Improve streets and open spaces throughout the Shaw/Convention Center Area. Open space in the area should promote a sense of community, provide a high level of public safety, and address multiple needs. Connections between the area's parks and open spaces should be strengthened and opportunities for new recreational activities should be accommodated where feasible. 2111.11

Action NNW-2.1.1: Street Hierarchy and Public Realm Undertake the following actions to improve the public realm in the Shaw/ Convention Center area: a. Develop, maintain, and enforce standards for residential and commercial streets that address sidewalks, tree boxes, and public rights-of-way;

The proposed development is attractively designed to contribute to the community's positive physical identity and would provide significant onsite green open space. The project anticipates an improved public realm around the site's periphery as it fronts on four streets ([See pages 15-16](#) Items (e) and (f)).