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March 27, 2020

VIA EMAIL AND HAND DELIVERY

Mr. Stephen Cochran
District of Columbia
Office of Planning
1100 4th Street, SW – Suite E650
Washington, DC 20001

**Re: ZC Case No. 20-06 / 1333 M Street, SE
First-Stage PUD, Consolidated PUD, and Related Map Amendment
Supplemental Information for PUD Application**

Dear Mr. Cochran:

This filing is submitted in support of the above-referenced application. Specifically, we are providing revised sheets to the architectural drawings and plans, as well as a list of the requested areas of flexibility, and details on the PUD benefits and how the PUD advances various objectives and policies of the Comprehensive Plan.

I. REVISED ARCHITECTURAL DRAWINGS AND PLANS

Since the application was originally filed, the Applicant has re-organized the PUD site as two theoretical lots instead of three, with Buildings 1A and 1B being situated on the same theoretical lot. Also, while the unit count remains at 900, the allocation of the units between the buildings has shifted. Originally, Building 1A had 294 units, Building 1B had 529 units and Building 2 had 77 units. The Applicant now proposes that Building 1A have 307 units, Building 1B have 496 units and Building 2 have 97 units. The total gross floor area for the PUD has increased slightly from 791,063 square feet with a density of 6.20 FAR to 792,715 square feet with a density of 6.22 FAR.

The foregoing changes as well as technical corrections and updates to the architectural plans and drawings are reflected on the following revised sheets:

- First-Stage PUD Plans: A-5 through A-10; L-9, L-23 and L-24; and C-2 and C-3.
(Exhibit A)

- Consolidated PUD Plans: A-1 through A-14; L-9, L-17 and L-18; and C-2 and C-3. The distribution of the inclusionary zoning units is depicted on Sheet A-1. **(Exhibit B)**

II. AREAS OF FLEXIBILITY

The PUD process was created to allow greater flexibility in planning and design than may be possible under conventional zoning procedures. In this application, the Applicant has attempted to comply with all aspects of the Zoning Regulations for the MU-9 zone district. However, the Applicant seeks flexibility from certain specific requirements of the Zoning Regulations, as described below. As permitted by 11-X DCMR § 303.1, the Zoning Commission may grant such flexibility in its discretion.

A. Vehicle Parking (11-C DCMR § 701.5)

The Applicant requests flexibility from the minimum vehicle parking requirement for Building 2. As currently proposed, Building 2 will contain approximately 97 residential dwelling units and approximately 1,204 GFA of retail use. Based on the minimum vehicle parking requirements of 11-C DCMR § 701.5, the minimum parking requirement for Building 2 is 16 parking spaces. The Applicant is not proposing any vehicle parking for Building 2.

The requested flexibility is appropriate given the availability of some vehicle parking spaces in Building 1 that can be devoted to Building 2 residents, and the proximity of the PUD site to the D.C. Circulator and multiple Metrobus routes, both of which connect to nearby Metrorail stations. In addition, Building 2 is immediately adjacent to the Anacostia Riverwalk trail, which provides another viable transportation option. These factors will mitigate any potential impacts that may result from the lack of parking in Building 2.

B. Loading (11-C DCMR § 901.1)

The Applicant requests flexibility from the minimum loading requirements for Building 2. Based upon the minimum loading requirements of 11-C DCMR § 901.1, Building 2 has a minimum loading requirement of one (1) loading berth and one (1) service delivery space. As proposed, Building 2 will contain a loading area adjacent to M Street, SE; however, it is not large enough to fit the required loading berth and delivery space.

Given the relatively modest size of Building 2, the loading demand generated by the building can be accommodated by the smaller loading area proposed along M Street. The Applicant will work with DDOT to develop a loading management plan that allows for curbside loading without adversely impacting circulation along M Street. Thus, any impacts that may result from the requested loading flexibility will be mitigated. Furthermore, as permitted under Subtitle C § 903.6 of the Zoning Regulations, the loading facilities located in Building 1 can accommodate some or all of the loading demand for Building 2 through a shared loading arrangement. While a shared loading arrangement would eliminate the need for the requested

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loading flexibility, the Applicant believes a curbside loading strategy will be more effective for Building 2, and for the functioning of the overall PUD site.

C. Rear Yard (11-G DCMR § 405.3)

Due to the small size and irregular shape of Theoretical Lot 2, the Applicant is requesting flexibility from the rear yard requirement for Building 2. Pursuant to 11-G DCMR § 405.3, Building 2 has a minimum rear yard requirement of 23'-8". The Applicant is only able to provide a rear yard of approximately 12'-7".

The requested rear yard flexibility will not have any substantial impact on adjacent properties, nor impair the purpose and intent of the Zoning Regulations. First, there are no properties that are immediately adjacent to Building 2. In addition, the lack of a fully compliant rear yard is fully mitigated by the presence of the Water Street right-of-way and waterfront to the immediate south. Therefore, there will be more than adequate light and air available to Building 2 and the surroundings. It is noteworthy that if the Building 2 theoretical lot was a through lot, defined as a “[a]n interior lot having frontage on two (2) or more streets where the streets differ in direction by forty-five degrees (45°) or less,” the rear yard for Building 2 could be measured from the centerline of Water Street and there would be no need for the requested rear yard flexibility.

D. Side Yard (11-G DCMR § 406.1)

The Applicant requests flexibility from the side yard requirements for Building 1A. Pursuant to 11-G DCMR § 406.1, no side yard is required for a building in the MU-9 zone; however, if one is provided it must be equal to 2 inches per foot of building height. For Building 1A, this results in a minimum side yard requirement of approximately 21'-8".

Pursuant to 11-G DCMR § 406.3, any portion of a building set back from a side lot line shall be considered a side yard and not a court. Thus what would appear to be two small courts along the west side of Building 1A, is actually a noncompliant side yard under the Zoning Regulations.

As shown in the Courts and Yards diagram submitted by the Applicant, due to the very irregular side lot lines at the west end of the PUD Site the Applicant must request flexibility from the minimum side yard requirement. The requested flexibility will not have any substantial impact on adjacent properties, nor impair the purpose and intent of the Zoning Regulations. First, there are no properties that are immediately adjacent to the area where side yard flexibility is requested. Rather, an substantial open space is provided within the Virginia Avenue right-of-way that will ensure that adequate light and air is available to Building 1A and the surroundings.

E. Court (11-G DCMR § 202.1)

The Applicant is requesting flexibility from the minimum court requirements for the open court located on the east side of Building 2. Pursuant to 11-G DCMR § 202.1, a court is not required in an MU zone; however, where one is provided for a residential use it must have a width equal to at least 4 inches per foot of court height. In this instance, the court for Building 2 must have a minimum width of 32'-8".

Contrary to the side yard flexibility requested for Building 1A, the correct flexibility in this instance is from the court requirements since there are no side lot lines on the east side of Building 2. Rather, the noncompliant court is formed at the juncture of a front and rear lot line. Due to the acute angle at which these two lot lines intersect, the Applicant is unable to provide an open court that meets the minimum width requirement. The requested flexibility will not have any substantial impact on adjacent properties, nor impair the purpose and intent of the Zoning Regulations. First, there are no properties that are immediately adjacent to the area where court flexibility is requested. In addition, the lack of a fully compliant open court on the east side of Building 2 is fully mitigated by the presence of the M and Water Street rights-of-way. Therefore, there will be more than adequate light and air available to Building 2 and the surroundings.

III. LIST OF PUD BENEFITS

A. Superior urban design and architecture. 305.5(a)

The design of the PUD is inspired by the architectural character of Historic Boathouse Row and the tradition of industrial buildings formally located along the waterfront in this part of the city. The goal is to create an authentic design solution that will honor the past while simultaneously expressing a modern industrial aesthetic.

The overall massing solution for the development was created to respond to the various contextual edges that border the property. This includes the orthogonal grid to the north facing Capitol Hill, the diagonal orientation of Virginia Avenue to the south, and the irregular waterfront edge to the east along Water Street. Two view corridors have been preserved through the site at the private road and the 14th Street right of way. This ensures that views of the Anacostia River and Anacostia Hills will be preserved from the north. Additional porosity has been achieved through the introduction of a "cut-out" at floors 3 thru 6 along the façade of Building 1B.

The development program is distributed across three building structures organized within this unique triangular site. Buildings 1A and 1B are connected at the second level through a bridge element that provides access for all building residents to a series of dynamic interior and exterior amenity spaces. Building 2 is a stand alone structure located at the eastern edge of the site. Its building massing is reminiscent of the traditional sailboat form, with a tapered edge at the intersection of M and Water Streets. In order to take advantage of the steep topography running north/south across the site, a series of retail plazas, outdoor courtyards and private terrace spaces have been organized to create dynamic pedestrian experiences overlooking the Anacostia Waterfront at multiple levels.

B. Superior landscaping, or creation or preservation of open spaces. 305.5(b)

Throughout the duration of this phased development, a balance of soft vegetation and hardscaped public spaces will create a diverse landscape for all seasons. The great lawn and park at the intersection of M Street, and Virginia Avenue, serves as a gateway to the project from the west, and is an ideal place for public recreation and leisure activities. A hardscaped pedestrian plaza located at the east end of the park creates a different user experience that anchors the architecture to the PUD site.

A pedestrian promenade with distinctive paving connects this great lawn, park, and plaza to a pedestrian retail plaza at the terminus of Virginia Avenue. This plaza will have filtered shade from lacy textured trees, benches for seating, and lushly planted green panels to capitalize on riverfront views, cultivate social interaction, and activate the adjacent retail and café spaces. The plaza has been designed in a flexible manner to accommodate outdoor dining, small gatherings, art fairs, farmers' markets, and other activities.

A grand staircase and accessible route to Water Street, provides a texturally rich experience while creating a needed public connection down to the Anacostia River. Amphitheater seating within the ramp is a fun and engaging public amenity providing a potential gathering space for temporary events, daily views and access to the river.

Furthermore, a green visual connection will be incorporated between the buildings to align with the 14th Street right-of-way across the Southeast Boulevard freeway. A hardscaped plaza will mark the entrance to this important site connection. A gently sloping lawn panel will then turn into a sloping hillside planted with wild flower meadow. Although on private property, this green will communicate the continuation of the city's street network.

C. Site planning and efficient and economical land utilization. 305.5(c)

The Applicant proposes a visionary mixed use development that reactivates the Anacostia River and provides evocative public spaces giving a full life cycle to this underutilized site. The site is located adjacent to "Historic Boathouse Row," which is home to four historic yacht clubs that have been devoted exclusively to affordable community recreational power boating and stewardship of the Anacostia River for over 100 years.

D. Housing that exceeds the amount that would have been required through matter-of-right development under existing zoning. 305.5(f)

The proposed rezoning of the property to MU-9 allows it to be redeveloped with housing where the underlying PDR-4 zoning does not. The PDR zones are intended to accommodate production, warehousing distribution, light and heavy industrial, and research and development activities as well as compatible office and retail uses and development. Pursuant to Subtitle U, Sec. 801.1(k), residential uses are permitted only on a limited bases in the PDR Zone as a matter of right.

E. Affordable housing. 305.5(g)

The affordable housing generated by the PUD exceeds what would have been required through the matter of right development under the existing PDR-4 zoning. Additionally, the Applicant proposes that 10% of the gross floor area dedicated to residential use be set aside for affordable units where the Inclusionary Zoning regulations require that only 8% of the gross floor area be set aside for affordable units.

F. Environmental and sustainable benefits. 305.5(k)

1. The PUD includes the following environmental and sustainable features that exceed zoning and other regulatory standards:

- Riparian oriented plant material has been selected for areas in close proximity of the waterfront to help to mitigate stormwater runoff and tolerate flood events. Bioretention planters have also been included and strategically placed around the site in order to collect, filter, and detain runoff in close proximity to each planter. In addition, extensive and intensive green roof systems have been incorporated on terraces of the building. (305.5(k)(2))
- A private community garden is proposed on the roof of Building 1B. This edible garden space is available to residents and potentially available to the retail spaces at the ground levels of the building. It is accompanied by a storage shed for tools and equipment, includes a watering system, pedestrian accessible, and includes an architecturally compatible railing. The garden is south facing for maximum solar orientation. (305.5(k)(3))

2. Additionally, as requested by the ANC, the PUD incorporates some key elements of the Waterfront regulations in Subtitle C, Chapter 11:

- The PUD has a waterfront setback that is greater than 75 feet. (1102.1(a)) The southeast corner of Building 1B is the closest point to the Anacostia River and it is approximately 204 feet from the edge of the river.
- Parking spaces, passenger drop-off areas, access to parking and loading areas are not located within the waterfront setback area. (1102.1(c))
- There are no buildings or structures within the street right-of-way lines that extend to the water, and there are no buildings or structures that are constructed parallel to the water. (1102.2 and 1102.3)

G. Streetscape plans, subject to approval by DDOT Public Space Committee, including implementation and maintenance of the streetscape for the duration of the project for areas where there are no design standards. 305.5(l)

The PUD plans include enhancing and reconstructing the roadways adjacent to the project site. M Street is to be realigned and brought into conformance with DDOT standards. This includes

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curbs and gutters, green infrastructure standards, on street parking, appropriately sized landscape amenity panels, and a pedestrian sidewalk.

Virginia Avenue, in its current configuration, serves as overflow parking for the Maritime Plaza to the West of the project site. With the redevelopment of the property, the gravel lot will be transformed into a roadway that complies with DDOT standards, including green infrastructure, curbs and gutters, on street parking, landscape amenity panels, and a pedestrian sidewalk.

A private drive will create a vehicular connection between the enhanced M Street and Virginia Avenue. This roadway will include loading and service access for Buildings 1A and 1B.

H. Transportation infrastructure beyond that needed to mitigate any potential adverse impacts of the application, including but not limited to, dedication and/or construction of a public street or alley; maintenance of a street median; or provision of a public easement for a pedestrian walkway that would not otherwise be required. 305.5(o)

The Applicant proposes to reconstruct M Street along the site frontage to current DDOT standards. Currently, M Street has an ill-defined cartway with no curb and gutter. As proposed, M Street would be reconstructed with a 30-foot width, including two 11-foot travel lanes and an 8-foot on-street parking lane. Curb and gutter would be constructed on both sides of the street. A new traffic circle to the east of the PUD site, at the intersection of M and Water Streets also is proposed, subject to DDOT approval. This circle will enable eastbound traffic on M Street, which dead-ends east of the PUD site, to turn around without having to exit the site via the narrower Water Street.

The Anacostia Bike Trail on the south side of M Street, which currently is in disrepair and substandard in width (approximately 6 feet). It will be reconstructed to the current standard of 10 feet and relocated to the north side of M Street, which will provide a better connection to the west, where the trail is already on the north side of the street. East of the PUD site, the trail will cross M Street on the east side of the proposed traffic circle (where vehicular volumes will be minimal) to connect to the existing trail to the east.

Virginia Avenue will be re-established in a defined and improved manner and will provide a connection between M Street and a new mid-block private drive running through the PUD site. Virginia Avenue will be constructed to current standards with a 38-foot width, including two 11-foot travel lanes and 8-foot parking lanes on either side of the street.

I. Mass transit improvements. 305.5(p)

The Applicant will implement a Transportation Demand Management (TDM) Plan for the site, which will identify strategies and/or infrastructure improvements to encourage the use of non-auto modes of transportation. Details of the TDM Plan will be determined upon completion of the Comprehensive Transportation Review and in consultation with DDOT.

J. Uses of special value to the neighborhood or the District of Columbia as a whole. 305.5(q)

1. The PUD includes a connection to the retail promenade on the southern and eastern edges of the project. This generous walkway will be a place for residents and visitors to shop, linger, gather, dine, relax and socialize. Ample room will be provided for outdoor dining and future programming to activate the space. The promenade embraces another great lawn that is terraced by small groups of stairs in an amphitheater fashion. This lawn will have expansive views of the river and could serve as a place for performances, festivals, and open recreation.

2. The site design builds upon existing infrastructure of adjacent parcels and reinforces the overarching circulation routes and expands upon them in a seamless manner to connect the proposed development with the adjacent yacht clubs. All of the adjacent roadways are currently underutilized and the development aims to reconstruct and improve the vehicular circulation routes, and by extension, the pedestrian experience and existing bicycle connectivity. Currently, the Anacostia Bike Trail is loosely defined and difficult to follow. The project proposes utilizing the newly available space north of M Street to include a defined and DDOT standard bike trail to connect the proposed development, adjacent trail spurs, and any future developments that may occur in the vicinity.

K. Public benefits other than those listed above to be considered by the Zoning Commission. 305.6

The redevelopment of the Property requires the cleanup of a contaminated site in proximity to other parcels where the District is undertaking environmental cleanup. The Property is a highly industrialized parcel that was the site of a petroleum tank farm, and it neighbors a former manufactured gas plant. Environmental investigations indicate that there is soil contamination throughout the Property, the possibility of a buried underground storage tank, contaminated fill materials, and contaminated ground water. Existing buildings at the site likely have asbestos and lead paint contamination that will require special handling under applicable laws and regulations.

IV. THE PUD ADVANCES POLICIES AND OBJECTIVES OF THE COMPREHENSIVE PLAN

The PUD substantially advances certain policies and objectives of various elements of the Comprehensive Plan as discussed below.

A. Land Use Element

- ***LU-1.1.5: Urban Mixed Use Neighborhoods.*** *Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas: (5) Near Southeast/Navy Yard*

The PUD substantially advances this Land Use policy, as residential and ground-floor retail uses will combine and help establish a new, mixed-use community in Near Southeast/Navy Yard – a designated policy focus area under the *Lower Anacostia Waterfront/Near Southwest Area Element*. The PUD site will be developed with high-quality architecture inspired by Boathouse Row and will provide ample public spaces to facilitate a continuous life cycle. The type of development proposed by the Applicant is specifically contemplated by this policy.

- ***LU-2.2.4: Neighborhood Beautification.*** *Encourage PUDs 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.*

The PUD will serve to improve the visual quality of this area of the District. Throughout the duration of this phased development, a balance of soft vegetation and hardscaped public spaces will create a diverse landscape for all four seasons. The PUD Site currently contains unsightly surface parking and abandoned infrastructure from prior uses, conditions that are unsuitable for any mixed-use neighborhood let alone on this prime waterfront property. The PUD will dramatically improve the visual quality of the PUD Site through open space elements such as the great lawn at the intersection of M Street and Virginia Avenue and pedestrian retail plaza at the terminus of Virginia Avenue. Other visual improvements include the reconstruction of the M Street and a portion of the Virginia Avenue with new sidewalks and street trees where none currently exist, as well as a new landscaped pedestrian connection down to the waterfront.

B. Transportation Element

- ***Policy T-1.1.3: Context-Sensitive Transportation.*** *Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses.*

The Applicant proposes a PUD-sensitive access and circulation plan that will be in accordance with DDOT standards and support the proposed residential and retail uses. For example, subject to DDOT approval, the Applicant is introducing a new traffic circle to the east of the PUD site, at the intersection of M Street and Water Street. Other notable features that ensure efficient and safe circulation on and around the PUD site include the underground parking garage (beneath Building 1A and 1B), the strategic placement of loading and delivery services and passenger drop-off/pick-up zones. Furthermore, the Applicant proposes important right-of-way improvements (e.g., the re-establishment of Virginia Avenue) that will support the PUD and improve connectivity in this area of the city. Overall, the transportation infrastructure will help to establish a compact, accessible neighborhood in a manner that substantially advances this policy.

C. Housing Element

- **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 high-density housing.*

The PUD substantially advances this policy, as it will generate approximately 880 residential units on a vacant, underutilized site in a priority area of the city. In connection with the subject PUD application, the Applicant also proposes to rezone the land (from PDR-4 to MU-9), which will assist the District in meeting its long-term housing goals. Development under the PUD height and density permitted in the requested MU-9 zone will allow for more housing opportunities than would be possible under the site's current zoning, which only allows extremely limited residential use. The PUD will result in a significant contribution to the District's housing supply.

D. Environmental Protection Element

- **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, providing air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods.*

The planting of street trees is an essential feature of this PUD. The PUD Site is currently approximately 85.2% impervious with little to no tree cover. As proposed, after full build out of the PUD the amount of impervious surface will be approximately 57.1%, a significant reduction. The Applicant's PUD rejuvenates and beautifies the PUD site with appropriately located street trees and landscaping. Street trees will border the PUD site along Virginia Avenue and M Street. Additionally, the pedestrian retail plaza at the terminus of Virginia Avenue will provide filtered shade from lacy textured trees, adding a dimension of comfort and aesthetic value that is touted by this policy.

- **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.*

The PUD design creates a centerpiece open space within the 100-year floodplain and minimizes the amount of impervious surface area in this space. Riparian oriented plant material has been selected specifically for this area and will help to mitigate stormwater runoff and tolerate flood events. Outside of the floodplain, the landscape design focuses on

bioretention facilities throughout the streetscape and interior open spaces to capture and retain stormwater. A wildflower meadow provides habitat diversity and water filtration along this sensitive river edge. Elevated terraces and roofs integrate intensive and extensive green roof areas to not only aid with stormwater runoff reduction, but to create a dynamic landscape design for those that utilize the spaces.

- **Policy PROS-3.2.1: Protecting Waterfront Open Space.** *Recognize the importance of the city's waterfront for recreation, public access, ecological protection, and scenic beauty.*

The layout of the PUD is intended to protect and celebrate the Anacostia waterfront. Overall, the proposed mixed use development will reactivate the Anacostia River and provide several active and passive public spaces that transform this underutilized site into a vibrant waterfront community. For instance, the grand staircase and accessible route to Water Street, provides a texturally rich experience while creating a needed public connection down to the Anacostia River. Amphitheater seating within the ramp will provide an engaging public amenity that serves as a potential gathering space for temporary events, and daily views and access to the river.

E. Urban Design Element

- **Policy UD-1.3.1: DC as a Waterfront City.** *Strengthen Washington's civic identity as a waterfront city by promoting investment along the Anacostia River, creating new water-related parks, improving public access to and along the shoreline, and improving the physical and visual connections between the waterfront and adjacent neighborhoods.*

The PUD represents a significant investment along the Anacostia River. The proposed development will improve physical and visual access to and along the shoreline through publicly accessible open spaces and plazas that celebrate the history of the waterfront and aesthetic views afforded by the PUD site.

- **Policy UD-1.3.2: Waterfront Public Space and Access.** *Develop public gathering spaces along the waterfronts, including promenades, viewpoints, boating and swimming facilities, and parks. Such space should be designed to promote continuous public access along the rivers, and to take full advantage of site topography and waterfront views. Design treatments should vary from "hardscape" plazas in urban settings to softer, more passive open spaces that are more natural in character.*

A notable feature of this PUD is the inclusion of a pedestrian promenade that extends along Virginia Avenue from M Street to the Water Street, and the ground-level retail and a retail plaza along the promenade. In addition, a grand staircase and walkway will descend to a lower retail promenade and greensward facing the Anacostia Riverfront. These public space features provide opportunities for gathering along the waterfront and with pleasurable views, substantially advancing this policy.

- **Policy UD -1.3.3: Excellence in Waterfront Design.** *Require a high standard of design for all waterfront PUDs, with an emphasis on shoreline access, integration of historic features and structures, an orientation toward the water, and the creation of new water-oriented public amenities.*

The PUD is inspired by the architectural character of historic Boathouse Row and the tradition of industrial buildings formally located along the waterfront in this part of the city. The PUD will ultimately exhibit an authentic design solution that will honor the past while simultaneously expressing a modern industrial aesthetic. This integration of past and present, coupled with the public space amenities oriented toward the Anacostia riverfront, create an excellent waterfront design.

- **Policy UD-1.3.6: "Activating" Waterfront Spaces.** *Encourage design approaches, densities, and mixes of land uses that enliven waterfront sites. Architectural and public space design should be conducive to pedestrian activity, provide a sense of safety, create visual interest, and draw people to the water.*

The PUD will activate a vacant and underutilized site with an excellent design approach that promotes pedestrian activity along the Anacostia riverfront.

- **Policy UD-1.3.7: Neighborhood Connectivity.** *Improve the physical connections between neighborhoods and nearby waterfronts. Where feasible, extend the existing city grid into large waterfront sites to better connect nearby developed areas to the shoreline.*

The proposed transportation infrastructure, such as reconstructing / re-establishing the M Street and Virginia Avenue, SE rights-of-way, and the pedestrian circulation plan significantly improves the physical connections on and around the PUD site. This area of the city will have new vehicular and pedestrians connections, especially to the Anacostia waterfront, that currently do not exist. A particularly notable element of the PUD includes the added connections to the Anacostia Riverwalk Trail system, which will be reinforced and enhanced so that pedestrian, vehicular, and bicycle conflicts are minimized. The trail will be relocated to the north of M Street to provide an unobstructed connection from the existing trail to the east of the site to the existing trail to the west of the site, thereby eliminating the need to cross the new and improved portions of M Street.

F. Lower Anacostia Waterfront/Near Southwest Element

- **Policy AW-2.3.1: Restoring the Urban Pattern of Near Southeast.** *Encourage high-density mixed use development and open space on newly configured parcels, with new buildings designed and oriented to make the most of their waterfront or near-waterfront settings.*

The PUD is designed and oriented to maximize the PUD site's position near the Anacostia waterfront. The layout respects the riverfront and open space elements are designed to provide unique riverfront views, some at elevated vantage points.

The mixed-use PUD will establish an urban community that takes advantage of the site's topography and proximity to the Anacostia River.

- *Policy AW-2.3.2: Near Southeast Shoreline Access. Improve shoreline access and movement to and through the Near Southeast by eliminating real and perceived barriers, improving public space and street corridors, reducing the amount of land occupied by surface parking and industrial uses, and encouraging new land uses that maximize public activity near the waterfront.*

The PUD will revamp an underutilized and vacant site with residential and ground-floor retail that generates significant activity near the waterfront. New pedestrian connections will improve shoreline access and maximize the PUD site's waterfront location, substantially advancing this policy.

- *Policy AW-2.3.3: Near Southeast Housing Opportunities. Near Southeast Housing Opportunities. Significantly increase residential land uses in the Near Southeast, particularly in the Southeast Federal Center, Capper Carrollsburg, Canal Blocks, and South Capitol Gateway areas. Consistent with the existing zoning for these areas, mixed use development that includes housing as well as commercial uses should be strongly encouraged. The mix of housing should accommodate residents of all incomes and household types.*

The PUD is a visionary mixed-use development that will generate approximately 900 dwelling units and devote approximately 45,455 square feet of GFA dedicated to ground-floor retail use. Additionally, a mix of market-rate and affordable dwelling unit types will be provided to accommodate residents of all incomes and household types. The PUD will make a significant contribution to the District's housing goals.

- *Policy AW-2.3.4: M Street Southeast. Transform M Street into an attractive pedestrian-oriented thoroughfare, lined with retail shops and services, with upper story office, hotels and residential uses. The street itself should be designed as a multi-modal boulevard, accommodating pedestrians, bicycles and transit vehicles as well as cars. It should strengthen connections between the Near Southeast, Southwest, and Capitol Hill.*

The PUD site is located at the eastern terminus of the vibrant M Street, SE commercial corridor. However, the subject property currently is somewhat isolated from the rest of the corridor due to barriers created by existing transportation infrastructure that could potentially be overcome through redevelopment of the site with a mix of ground-floor retail and residential uses, as well as new open spaces and improved connections to the waterfront. The PUD presents the opportunity to substantially transform and revitalize this section of M Street, SE.

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- *Policy AW-2.3.6: Near Southeast Urban Amenities. Leverage new development in the Near Southeast to create amenities such as parks, trails, child care facilities, civic uses, and retail space that serve the area's residents and workforce.*

Many of the proposed improvements, such as the reinforced connections to the Anacostia Riverwalk Trail system and integrated retail plazas, are new amenities that will serve both the PUD's residents and the District's workforce. By leveraging a new mixed-use urban community to provide such amenities in this underutilized location, the PUD substantially advances the themes underlying this objective.

Thank you for your considerate attention to this matter. We trust this information is helpful in your review of the application. Please do not hesitate to contact me with any follow up questions or concerns.

Sincerely,

HOLLAND & KNIGHT LLP



Leila M. Jackson Batties
Christopher S. Cohen

Enclosures

cc: Zoning Commission for the District of Columbia
Ms. Jennifer Steingasser, D.C. Office of Planning
Mr. Joel Lawson, D.C. Office of Planning
Ms. Anna Chamberlin, DDOT
Advisory Neighborhood Commission 6B c/o Commissioner Brian Ready, Chair
Commissioner Corey Holman, ANC 6B-06

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March 27, 2020

CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2020, a copy of the foregoing application for a first-stage PUD, consolidated PUD, and a related Zoning Map amendment was served on the following persons via email with hard copies sent on the following business day.

Zoning Commission for the
District of Columbia
441 Fourth Street, NW
Washington, DC

VIA IZIS AND HAND DELIVERY

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Advisory Neighborhood Commission 6B
c/o Commissioner Brian Ready
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VIA EMAIL

Commissioner Corey Holman
Advisory Neighborhood Commission 6B-06
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VIA EMAIL



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