

## MEMORANDUM

**TO:** District of Columbia Zoning Commission  
**FROM:** <sup>JLS</sup>Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation  
Stephen Cochran, Project Manager  
**DATE:** September 27, 2021  
**SUBJECT:** Supplemental Report for Zoning Commission Case No. 20-12, Consolidated Planned Unit Development and Related Map Amendment at 400 I Street, SW (Square 499, Lot 52)

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### **I. BACKGROUND**

In its previous reports, the Office of Planning (OP) recommended approval of the proposed PUD and provided an analysis of the proposal against the then-current (2012) Comprehensive Plan. This report responds to the Zoning Commission's request to supplement those reports with an analysis of the proposed PUD's consistency with the 2020 Comprehensive Plan, including an analysis through a racial equity lens. For specific information about the project's dimensional and use aspects and its zoning compliance, please see OP's Hearing Report (Exhibit 26) or the applicant's most recent filings (Exhibit 46 *et al.*).

### **II. REVISED RECOMMENDATION**

The Office of Planning (OP) continues to **recommend the Zoning Commission** (the Commission) **approve** the application for a consolidated Planned Unit Development (PUD) and a related map amendment from the R-3 zone to the MU-2 zone for the construction of a mixed-use project at 400 I Street, S.W. However, in light of the emphasis that the Implementation Element of the 2020 Comprehensive Plan places on racial equity, OP **recommends approval with the following condition:**

- If the West Tower is delivered as a rental property, it shall, at initial occupancy and thereafter, include the proportion and distribution of Inclusionary Zoning (IZ) units that would have been required in that tower had Subtitle C §1001.6 not temporarily exempted the project from delivering IZ units until the end of the financing-related IZ exemption period for the senior affordable housing in the East Tower.

### **III. PROJECT SUMMARY**

The site is on the southwest corner of 4<sup>th</sup> Street, S.W. and I Street, S.W. in near Southwest Washington, two blocks north of the Waterfront Metro station. The principal public benefits would include the construction of 123 units of affordable senior housing to add to the near Southwest's existing stock of affordable housing and the retention of the community-oriented Westminster Presbyterian Church on its current site.

On balance, the proposal would be not inconsistent with the 2020 Comprehensive Plan, including the updated Generalized Future Land Use Map. The proposal would be consistent with the Southwest Small Area Plan that was adopted by the Council in 2015 and that is reflected in the updated Lower Anacostia Waterfront/Near Southwest Area Element of the Comprehensive Plan. The design and uses would be generally consistent with the pattern of approved PUD developments between I and M Streets, SW near the Waterfront Metro Station.

However, despite OP's generally positive recommendation and the additional applicant comments in Exhibit 46, pages 2 and 3, OP continues to have strong concerns about the permanent absence of Inclusionary Zoning (IZ) units from the West Tower and the request for permanent flexibility from the distribution requirements of Subtitle C § 1005.5 of the Zoning Regulations – even after LIHTC-type requirements expire on the East Tower. The applicant has not provided a financial analysis demonstrating that the project's affordable component is dependent on the West Tower's market rate exclusivity. If the West Tower is to be for-sale condominiums OP understands the complexity of converting some of those condominiums to IZ condominiums in the future, but the applicant's recent filings do not state whether the West Tower is rental or condominium or why IZ distribution requirements could not be met in the future if both towers were rental properties.

As discussed in the next section of this report, the provision of affordable units in the West Tower would promote the District's racial equity objectives by providing for a mix of incomes in both towers and .

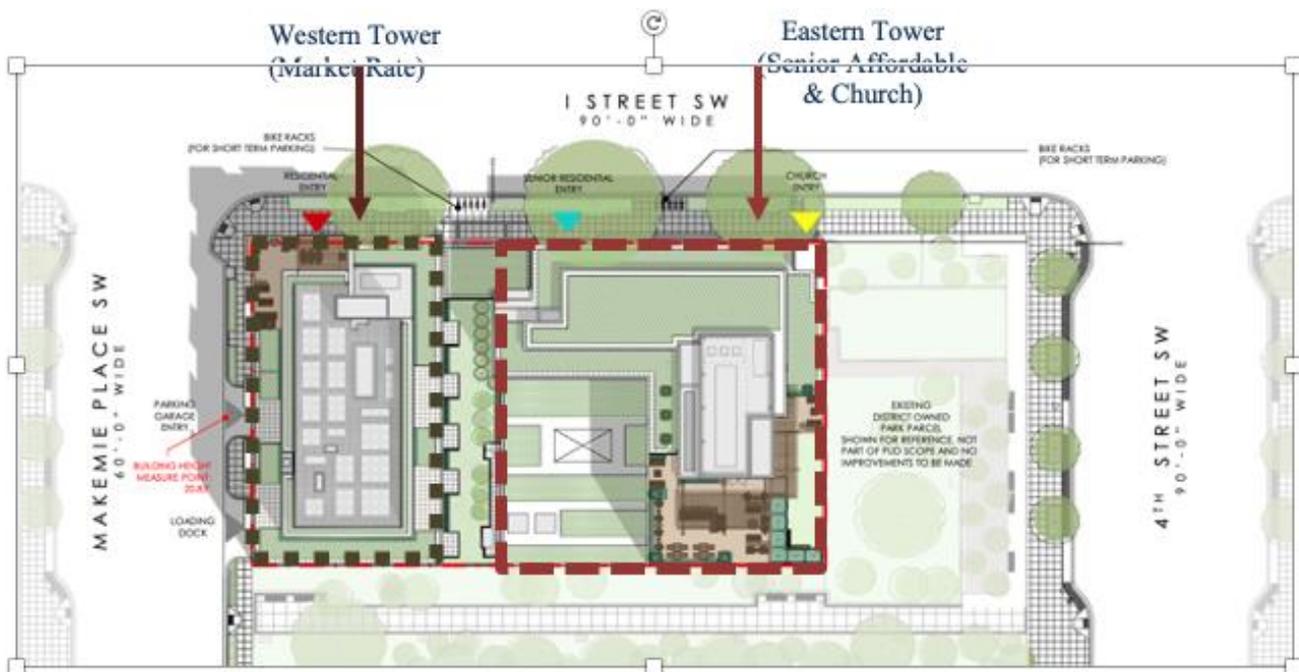


Figure 1. Site Plan Showing East and West Towers

#### IV. THE COMPREHENSIVE PLAN, RACIAL EQUITY, AND ZONING

Racial equity is a broad and encompassing goal of the entire District government. As explained in the Framework Element of the Comp Plan,

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

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

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

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

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

The direction to consider equity “as part of [the Zoning Commission’s] Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and whether a proposed zoning action is “not inconsistent” with that plan, rather than on a separate determination about a zoning action’s equitable impact. Whenever the Commission considers

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<sup>1</sup> Comprehensive Plan Housing Element 512.2

Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action before the Commission and what aspects of the outcome the Zoning Commission can control.

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

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

The PUD proposed by the subject application would deliver several benefits that would integrate racial equity:

- Due to the socio-economic composition of the District in general, and the Southwest neighborhood in particular, the 123 units of affordable housing for seniors would almost certainly provide access to residential units for residents of color;
- The PUD would retain the Westminster Presbyterian church on its present site and provide additional space for its community outreach, social and cultural programs. The Church provides the following programs and services that all residents of the District:
  - Providing and subsidizing a community-based catering and food service training operation;
  - Supporting youth-oriented DC Court-ordered community service programs;
  - Housing and subsidizing a weekly domestic violence clinic and weekly Narcotics Anonymous meetings;
  - Hosting and subsidizing a harm-reduction program for at-risk residents who experience substance abuse;
  - Regularly providing free services for funerals, weddings, and other gatherings in the neighborhood; and
  - Making annual contributions to support Amidon-Bowen school programs.
- The First Source Employment Agreement (Exhibit 46F) would require that 51% of all new job hires and 31% of apprenticeship hours be for District residents. This agreement sets forth opportunity to accessing new jobs and apprenticeship for the District's Black residents, currently the largest racial group in the District.

- Housing

The site currently has no housing. The requested PUD-related MU-2 map amendment would also enable the provision of more residential units on the site than would the existing R-3 zoning, the senior housing in the East Tower would clearly be affordable, and at the macro level, the production of more housing decreases the upward pressure on overall housing prices.

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

OP's reservations about the West Tower's market-rate exclusivity notwithstanding, the proposed project would, on balance, also be not inconsistent with the maps and written elements of the 2020 Comprehensive Plan.

### A. MAPS

#### Generalized Future Land Use Map (FLUM)

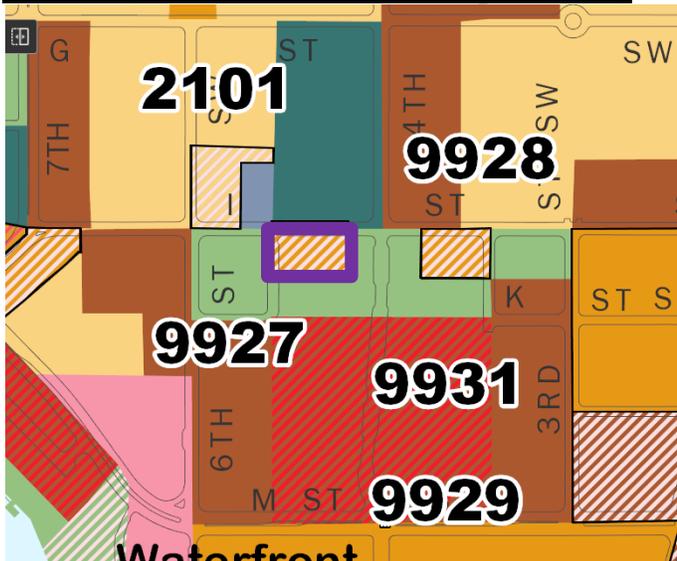


Figure 2. 2020 FLUM with Site Outlined in Purple

The 2020 Future Land Use Map (FLUM) indicates that the site is appropriate for a mix of Medium Density Residential and Low-Density Commercial uses. The Medium Density Residential category is defined in 10-A DCMR § 227.7 of the Framework Element as applying to neighborhoods *generally, but not exclusively, suited for mid-rise apartment buildings and may also apply to taller residential buildings surrounded by large areas of permanent open space* such as the Duck Pond to the west and the linear park to the south and the remaining portion of Town Square park to the east.

The project's 7.06 FAR would exceed the density ranges the Framework element uses to illustrate the site's FLUM categories, but such greater density is permitted *when complying with Inclusionary Zoning or when approved through a Planned Unit Development*. Non-residential uses would not exceed 0.6 FAR, which would be not inconsistent with the Low Density Commercial category.

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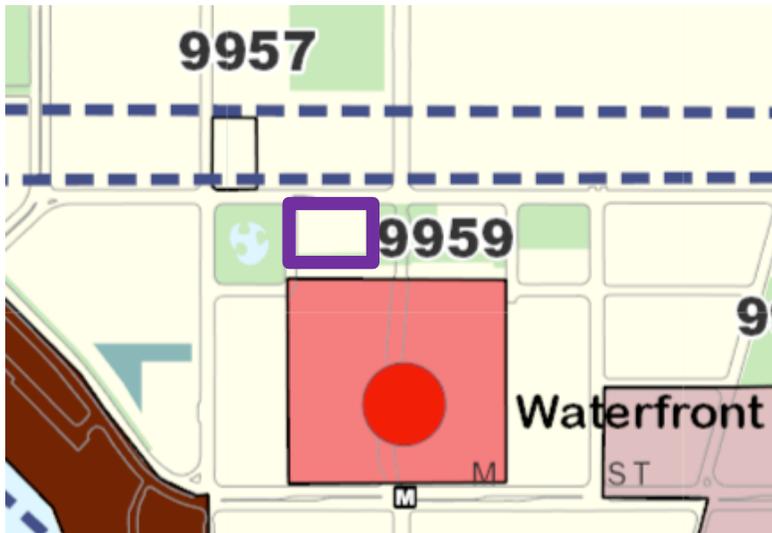
With respect to the requested MU-2 PUD-related map amendment, the Framework Element notes that

*Similarly, the land-use category definitions describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. The granting of density bonuses (for example through Planned Unit Developments or Inclusionary Zoning) may result in density that exceed the typical ranges cited here. (10-A DCMR § 228.1c.). The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the*

*Comprehensive Plan, including the Citywide Elements and the Area Elements (10-A DCMR § 228.1c.).*

As discussed below the PUD and the requested zoning would be consistent with these elements.

### **Generalized Policy Map**



The Generalized Policy Map (Fig. 2) designates the site as part of a Neighborhood Conservation Area (NCA). It is immediately north of the Waterfront Metro area that has been designated as an Enhanced/New Multi-Neighborhood Center.

*The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas, The diversity of land uses and building types in these areas should be maintained*

**Figure 3. 2020 Generalized Policy Map with Site Outlined in Purple**

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

Within the area bounded by 4<sup>th</sup>, 7<sup>th</sup>, G and M Streets, SW, development south of I Street includes residential and office buildings ranging from 90 to 110 feet high and approved as PUDs. With one exception, development north of I Street has rowhouses or low-and mid-rise apartment buildings. The proposed project would be a 90-foot-high building south of I Street. That height would be transitional between the 110-foot height of the apartment building immediately to the south and both the 48-foot-tall apartment building approved for the corner of 6<sup>th</sup> and I Streets, SW and the townhouses north of that building. The proposed PUD would, thereby, be not inconsistent with the development pattern in the Neighborhood Conservation Area.

## **B. WRITTEN ELEMENTS**

The proposed project would, on balance, also be not inconsistent with written elements of the current Comprehensive Plan. The Land Use, Transportation, Housing, Urban Design and Lower Anacostia Waterfront/Near Southwest Area elements include policies and recommended actions with which the

proposal is congruent. It would: be transit-oriented; retain the church as an important community anchor; provide new housing where now there is a surface parking lot behind the church; employ architectural and urban design generally using high-quality materials, varied massing and fenestration and attention to ground floor details and public benefits affecting pedestrians; enhance environmental and sustainability objectives through the various green elements that would be built into a project intended for LEED-Silver equivalency; and generally be consistent with policies supporting the Southwest Waterfront and its major streets.

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

### 1. **Framework Element**

- The critical need for new affordable housing units is identified as ***high-priority public benefits in the evaluation of residential PUDs (10-A DCMR Section 224.9)*** and would be provided by the PUD through the addition of 123 affordable senior units where on currently exist.

### 2. **Land Use Element**

- *Station Areas as Neighborhood Centers (Policy LU 1.4.1) and Development Around Metrorail Stations (Policy LU-1.3.2)* encourage mixed-use, higher density development near Metro stations such as the Waterfront station.
- *Housing Around Metrorail Stations (Policy LU-1.3.3)* favors the building of housing adjacent to Metro stations and that serves of mix of incomes and household types, including housing for seniors.
- *Metro Station and Inclusionary Zoning (Action LU-1.4.C)* encourages development near Metro to exceed the number of affordable units required by IZ, and bonus density and height to encourage this. The project does provide more non-IZ affordable housing for seniors than would be required by IZ but limits the future number of IZ units to those required by the Zoning Regulations and would locate them only in one of the two proposed towers of the single building.
- *Places of Worship and Other Religious Facilities (Policy LU 2.3.6)* recognizes places of worship like the Westminster Church as important, ongoing elements of the District's heritage and community health.
- *Arts and Culture Uses in Neighborhoods (Policy LU-2.3.12)* encourages the preservation or expansions of arts and culture in discretionary review of development projects, consistent with the ongoing jazz evenings and other events hosted by the Westminster Church.

### 3. **Housing Element**

- *Private Sector Support (Policy H-1.1.1) and Tenure Diversity (Policy H-1.3.1)* encourage private sector production of market rate and affordable housing, both of which this project would have.

- *Mixed-Use Development (Policy H-1.1.4)* encourages new housing, including affordable housing on commercially zoned land near neighborhood centers and Metrorail stations, which this project would provide
- *Housing Quality (Policy H-1.1.5)* and *Production of Housing in High-Cost Areas (Policy H-1.1.9)* encourages the production of both market rate and affordable housing in high-cost areas such as the immediate Southwest neighborhood
- *Density Bonuses for Affordable Housing (Policy H-1.2.7)* The applicant has requested such bonuses through the PUD process.
- *Housing Choice for Seniors (Policy H-4.3.2)* and *Neighborhood-Based Housing for Older Adults (Policy H-4.3.3)* These policies encourage the production of multi-unit buildings oriented to providing accessible dwelling units for seniors. While the PUD is more oriented to individual seniors than to couples and does not mix market rate and affordable units for seniors, it does increase the stock of senior affordable housing.
- *Build Nonprofit Sector Capacity (Policy H-1.2.6)* this policy calls for the active involvement and coordination with “. . .the nonprofit sector, including faith-based institutions, to meet affordable housing needs, including housing construction and housing service delivery.”

There are some housing policies that the PUD would not strongly further. These include policies such as *H-1-3-1, Housing for Larger Households* and *Action H-1.2.E Leveraging Inclusionary Zoning*. The former policy encourages providing a mix of unit types, including 3- and 4-bedroom units, which the PUD would not provide. The latter Action encourages examining and proposing greater IZ requirement when zoning actions permit greater density, when uses change or when there are financial subsidies. This applicant has requested a map amendment that would enable greater density and would likely include public financial assistance through the use of Low Income Housing Tax Credits (LIHTC). While the Action is meant to encourage District government action, its intention is to increase the production of IZ units in such cases. Despite the requested increase in density the PUD would provide only the minimum required number of IZ units, and only after LIHTC-type controls expire in 40 years. Even then, those units would be studio and one-bedroom units and all of them would be located in only one of the building's two towers.

The applicant has taken exception to OP's citing of the 2012 Comprehensive Plan's *Action H-1.2.A – Inclusionary Zoning* as relevant to the project's consistency with the Comprehensive Plan (Exhibit 46, page 17). This Action was part of the Comprehensive Plan when OP wrote its previous reports on this application. It reads:

*Adopt an Inclusionary Zoning requirement which would require the inclusion of affordable units for low income households in new residential developments of 10 units or greater, with accompanying provisions for density bonuses and long-term affordability. Apply this requirement as fairly and uniformly as possible, providing flexibility as necessary for sites where density bonuses cannot feasibly be provided.*

The applicant submits that this action referred to the fair and uniform applicability of IZ across the entire District, not within individual projects. OP acknowledges that the Action is no longer included in the 2020 Comprehensive Plan update. However, its intention to apply the IZ requirements “as fairly and uniformly as possible” has been embodied in 11 DCMR Subtitle C §1005.5's regulation requiring that IZ units not be overly concentrated by tenure or dwelling type on

any floor of a project or, by extension, within particular tiers or wings of a building – especially for sites where density bonuses can be provided. That is why the applicant could not propose excluding IZ units from the West Tower without relief from C §1005.5, and why the former Action H-1.2.1 remains relevant.

#### **4. Transportation Element**

The project would be located within two blocks of the Waterfront Metro and major bus lines on 4<sup>th</sup>, Eye and M Streets, S.W. The location would make it feasible for many residents of the senior building and the market rate tower, and churchgoers or patrons of the Westminster Church to access the site by transit rather than private vehicles. The applicant has proposed an extensive Transportation Management Plan (TMP) in coordination with the District Department of Transportation (DDOT). To further discourage automobile ownership the project would meet, but not exceed, vehicular parking requirements, would unbundle the cost of parking from unit rental or purchase agreements.<sup>2</sup> The project would encourage the use of bicycles through the provision of more than the required number of bicycle parking spaces and the coordination of public space plans with DDOT's future enhancements of bicycle lanes on Eye Street. Pedestrian / vehicular conflicts would be minimized by locating the loading facilities and the parking garage entrance on Makemie Place, a street much less heavily used by pedestrians or vehicles than Eye or 4<sup>th</sup> Streets. Together these provisions would support several policies in the Transportation Element, including:

- *Transit-Oriented Development (Policy T-1.1.4)*
- *Equitable Transportation Access (Policy T-1.1.7)*
- *Minimize Off-Street Parking (Policy T-1.1.8)*
- *Discouraging Auto-Oriented Uses (Policy T-1.2.3)*
- *Bicycle Facilities (Action T-2.1.B)*
- *Pedestrian Network (Policy T-2.4.1)*
- *Unbundle Parking Cost (Action T-3.2.D).*

#### **5. Environmental Protection Element**

While the project may not be in the forefront of sustainable development, its projected features and performance would not be inconsistent with the Environmental Element. The East Tower is designed to meet Enterprise Green Communities standards while the West Tower is designed to meet LEED Silver v4 certified. The project would incorporate green roofs and employ trees, bioretention and other sustainable landscaping practices to reduce stormwater runoff and beautify the public realm. OP and the Department of Energy and the Environment (DOEE) have met with the applicant several times to encourage the development of the West Tower to a LEED Gold v4 standard, but the applicant has not chosen to do this. Nevertheless, the project would further the following policies in the Environmental Protection Element:

- *Urban Heat Island Mitigation (Policy E-1.1.2)* would be assisted using green roofs and cool roofs throughout much of the project

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<sup>2</sup> It is not clear if the TMP would preclude building tenants from securing residential parking permits.

- *Tree Requirements in New Development (Policy E- 2.1.2) and Sustainable Landscaping Practices (Policy E-2.1.3)* The applicant would be coordinating with DDOT's public space committee, the Department of Parks and Recreation and the Southwest BID on the planting of new street trees and the protection of existing trees lining the linear park to the south of the site.
- *Energy Efficient Building and Site Planning (Policy E-3.2.7)* While the overall building design and performance of the building would not notably exceed required sustainability standards for new development, the concentration of the site transit-adjacent location and the site planning's proposed density and mix of uses would, in and of themselves, promote this policy.

## **6. Arts and Culture Element**

- *Cultural and Artistic Diversity (Policy AC-1.1.5) and Encourage Cultural Space in Planned Unit Developments (Policy AC-1.1.10)* Construction of the PUD and the provision of additional church-related space on the ground floor would enable the Westminster Church to expand its long-standing and successful programming of diverse artistic and cultural offerings.
- *Support Arts and Cultural Clusters (Policy AC-1.2.6)* The preservation and expansion of the arts and cultural uses at the site would be consistent with the reinforcement of I Street, S.W. as a cultural corridor between Maine Avenue and South Capitol Street.

## **7. Urban Design Element**

OP's previous reports analyzed the project's design and suggested reconsideration of various aspects, including the treatment of the architectural embellishment at the corner of 4<sup>th</sup> and I Streets, the color of the lighter panels on the East Tower, and the absence of balconies on the West Tower. The applicant has discussed these concerns in its most recent report (Exhibit 46) but has not made significant changes to the design that was submitted on March 23, 2021 (Exhibits 23A1 – 23A10). Nevertheless, OP had described the design as being not inconsistent with the 2012 Urban Design Element and that continues to be the case with respect to the 2020 Urban Design Element. This includes:

- *Reinforcing L'Enfant's 1791 Plan for the City of Washington and Olmsted Highway Plans (Policy UD-1.1.2)* The project would retain what remains of the Plan's original street layout.
- *Height Act of 1910 (Policy UD-1.1.5)* The height is consistent, but relief has been requested for a small section of roof structure setback.
- *Streetscapes That Prioritize the Human Experience (Policy UD-2.1.1), and Engaging Ground Floors (Policy US-2.4.1)* The PUD would promote the policy with a strong pedestrian entrance to the church and its associated cultural and community facilities, as well as the placement of active uses on the ground floor, to be visible from the street.
- *Transitions in Building Intensity (Policy UD 2.2.4)* The building would act as a transition between the 110-foot-high buildings to the south and east and the smaller scale buildings north of I Street.
- *Inclusive and Diverse Neighborhood Spaces (Policy UD-2.4.1) and Social and Community Meeting Spaces (UD 3.2.2)*, The design enables the retention and expansion of the church and its

community-related spaces, which include the sponsorship or hosting of a broad range of community-based groups, social organizations, and cultural offerings.

- *Creating Engaging Facades (Policy UD 4.2.4)* The tower-like architectural embellishment at 4<sup>th</sup> and I Streets, with its embedded cross, would likely become one of the more notable features of the Southwest streetscape.

The areas where the design is not as strongly consistent with the Urban Design Element include:

- *Buildings That Enable Social Interaction (Policy UD-3.2.1)* Although the building will promote social interaction within the building, it does not include spaces such as units that open to the street, front stoops, and balconies that foster interaction between building residents and users and passersby.
- *Areas of Strong Architectural Character (UD 2.2.2)* The near Southwest neighborhood has an exceptionally strong collection of buildings and landscaping that reflect the tenets of mid-20<sup>th</sup> century architecture and urban design. Exemplary elements include sites with tall and low buildings and open spaces, the extensive use of masonry, ground level columns that enable permeability between public and private spaces at the ground level, screening elements that provide transitions between private and public spaces, and balconies. Other than the employment of balconies in the East Tower, the design is not notable for its inclusion of or references to these Southwest neighborhood design characteristics. While the design may not contribute notably to that tradition, it is not inconsistent with the architectural design that has characterized many more recent 21<sup>st</sup> century buildings in Southwest.

## **8. Lower Anacostia Waterfront/Near Southwest Area Element**

The site falls within the LAW Southwest Neighborhood focus area of this element. The PUD would not be inconsistent with:

*1914.5 Policy AW-2.5.2: Southwest Neighborhood Plan. Implement the policies and recommendations of the Southwest Neighborhood Plan. Use the Southwest Neighborhood Plan as a framework for guiding public investment and evaluating new development per plan recommendations and design guidelines.*

As OP had noted in previous reports, changing the FLUM designation and considering development on the site only in conjunction with a PUD was an important recommendation of the neighborhood plan. The 2020 amendments to the Area Element strengthen the relationship between the PUD and the Area Element:

*1914.11 Policy AW-2.5.8: Southwest Arts and Culture. Grow and support Southwest as a premier arts and cultural destination, leveraging existing institutions, such as Arena Stage and the Anthem concert venue to attract new creative uses in both temporary and permanent locations and to reinforce I Street SW as a cultural corridor.*

The Westminster Presbyterian Church has long-supported community arts and cultural programming, including a highly regarded jazz series. The Church has pledged the continuation of these programs in the PUD application. With the Blind Rhino and upcoming art museum near South Capitol and I Streets, the new library at 3rd and I Streets and the possible Shakespeare Theater facilities at 5th and I Streets, the PUD would contribute to reinforcing I Street as a cultural corridor.

*1914.7 Policy AW-2.5.4: An Equitable and Inclusive Southwest Neighborhood. Ensure that Southwest remains an exemplary model of equity and inclusion for all races, ages, abilities, and income levels and enhances all residents' well-being. Support and encourage affordable and equitable access to housing with a range of housing types to support families, older adults, single persons, persons with disabilities, and artists. Encourage more inclusive options for transit and more accessible public realm design.*

and

*1914.14 Policy AW-2.5.11: Affordable and Family-Sized Housing in Southwest. Promote a mix of affordable and market rate residential units that better serve community needs in Southwest. Prioritize the creation of a greater number of affordable units than the Inclusionary Zoning requirement or more family-sized units as part of a community benefits agreement for any PUDs and by targets on District-controlled sites that exceed overarching affordable housing requirements.*

The project would further the above two Area Element policies by increasing the number of affordable housing units for seniors by 123 units. The affordable senior units would provide 86,925 more square feet of affordable housing than would be required by IZ. However, including near-term affordable units and future IZ units within only one of the two towers and for only one age-group would diminish the project's furtherance of these two policies, and some of the objectives of the IZ regulations. The promotion of these policies and conformance with the IZ regulations would be significantly stronger if IZ units – particularly two- or three-bedroom IZ units --were also included in the West (market rate) Tower now and in the future.