

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jeff Utz
Meghan Hottel-Cox

DATE: November 23, 2020

SUBJECT: Z.C. Case 20-18 – 1319 South Capitol Street SW (the “**Property**”) – Design Review Project Consistency with the Comprehensive Plan

In approving a Design Review project, the Commission must determine that a project is not inconsistent with the District of Columbia’s Comprehensive Plan (the “**Plan**”),¹ meaning that while the Commission need not find the project not inconsistent with each aspect of the Plan, it must find that the project, on balance, is not inconsistent with the Plan taken as a whole. The Plan is comprised of the Future Land Use Map (“**FLUM**”), the Generalized Policy Map (“**GPM**”), the Framework Element, Citywide Elements, and Area Elements (collectively, “**Elements**”). These map designations and Elements outline policies, including land use, housing, economic development, environmental resiliency, among others, which guide development in the District. As detailed in this analysis, 1319 South Capitol Owner, LLC (the “**Applicant**”) demonstrates that, on balance, the project proposed in the above-referenced case (“**Project**”) is not inconsistent with the Plan.

The Project will convert a surface parking lot into a multifamily building with up to approximately 310 residential units, including approximately 25 affordable units and potentially approximately 3,800 square feet of commercial use. The Project is located on the west side of South Capitol Street and is subject to mandatory Design Review due to the Property’s location in the CG-2 Zone and its frontage on South Capitol Street, SW.

This memorandum highlights the Project’s consistency with the FLUM, GPM, Framework Element, Citywide Elements, Area Element, and the Southwest Neighborhood Plan. Exhibit D, however, features an in-depth analysis of the Project’s consistency with relevant provisions of the Plan.

I. FLUM and GPM Designations

The Project is consistent with the height and density permitted by its zoning designation, the CG-2 Zone District. The Applicant is neither proposing a map amendment nor does it seek

¹ Comprehensive Plan Amendment Act of 2006, codified in part as D.C. Code § 1-306.01, D.C. Law 16-300, 54 D.C. Reg. 924, as amended, referred to herein as the “**Plan**.”

any discretionary increase in the height or density allowed on-site. Rather, the Project is consistent with height and density parameters established by the Zoning Commission for the CG-2 Zone District². The CG-2 zoning designation, as well as the Project, is consistent with both the FLUM and GPM designations for the Property.

The DC Council recently updated portions of the Framework Element of the Plan, pursuant to DC Act No. 23-217 (signed by the Mayor on February 11, 2020).³ The updated Framework Element provides the following guidelines in interpreting the FLUM and the GPM:

The Generalized Policy Map and the Future Land Use Map are intended to provide generalized guidance for development and conservation decisions, and are considered in concert with other Comprehensive Plan policies. Several important parameters, defined below, apply to their use and interpretation.

- a. The Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements for setbacks, height, use, parking and other attributes, the Future Land Use Map is intended to be “soft-edged” and does not follow parcel boundaries, and its categories do not specify allowable uses or dimensional standards. By definition, the Future Land Use Map is to be interpreted broadly and the land use categories identify desired objectives.
- c. While the densities within any given area on the Future Land Use Map reflect all contiguous properties on a block, there may be individual buildings that are larger or smaller than these ranges within each area. 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 the Planned Unit Developments or Inclusionary Zoning) may result in density that exceeds the typical ranges cited here.
- d. The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the Citywide Elements and the Area Elements.⁴

² It is worth noting that at the time the CG-2 Zone District, then known as the CG/C-2-C Zone District, was adopted, the Zoning Commission specifically found that it was not inconsistent with the Comprehensive Plan. The following is excerpted from Order No. 06-25, “The amendment would not be inconsistent with the Comprehensive Plan or the Comprehensive Plan Generalized Land Use Map and would particularly further the following major themes as outlined in Chapter 1 of the Comprehensive Plan: (a) Stabilizing and improving the District’s neighborhoods (e) Respecting and improving the physical character of the District (f) Preserving and ensuring community input (g) Preserving the historic character of the District (i) Promoting enhanced public safety The proposed amendments would also be consistent with the Anacostia Waterfront Initiative (“AWI”), and NCPC initiatives that advocate the provision of a consistent, “monument” character to South Capitol Street.”

³ 10-A DCMR §200.1 *et. seq.*

⁴ Plan § 228.

A. Future Land Use Map

As shown in Appendix 1, the Property is designated for Mixed-Use: Moderate Density Commercial/Medium Density Residential use on the FLUM. The Plan notes that Moderate Density Commercial is intended for “retail, office, and service businesses” and can be “larger business districts” and Medium Density Residential is designated for “mid-rise apartment buildings”.⁵ The CG-2 Zone District is consistent with this designation and the Zoning Regulations specifically state that the zone district “is intended to permit medium-density mixed-use development with a focus on residential use and provide for the establishment of South Capitol Street as a monumental civic boulevard.”⁶ The objectives of the CG-2 Zone District are two-fold: support additional housing while establishing a presence along South Capitol Street. The Project achieves both. The Project’s FAR and height are matter-of-right in the CG-2 zone, and reflect the bonus density allowed in compliance with IZ requirements. Both the height and density are focused along South Capitol Street in an effort to realize the second goal of the CG-2 Zone District, to establish South Capitol Street as a monumental civic boulevard.⁷

The CG-2 Zone is consistent with the FLUM designation for Medium Density Residential use in particular, prioritizing housing along South Capitol Street near Metrorail. The Project’s residential density supports the CG-2 Zone’s goals and the Plan’s policies favoring housing supply, affordable housing, transit-oriented development, focusing density along major boulevards, and a development’s fitting in within the context of a neighborhood, all as detailed below.

- Housing supply: The Project provides up to approximately 310 units on a Property with no existing usable housing.⁸ The Project will develop underutilized land, currently comprised mostly of surface parking, and greatly increase the housing supply in the neighborhood, helping to meet the demand.
- Affordable housing: The Project will provide approximately 25 affordable units, including family-sized affordable units to address the shortage of affordable housing, and specifically affordable family housing.
- Transit-oriented development: The Project is located less than 0.5 mile from the Navy Yard-Ballpark Metrorail Station and one block south of several bus lines along M Street.

The matter-of-right height and density of the Project is also consistent with its context. More specifically, the Camden South Capitol building located directly to the south of the Property has a height of 110 feet and FAR of 6.6 and the Ballpark to the east of South Capitol Street has a

⁵ Plan §§227.7; 227.11.

⁶ 11-K DCMR §502.1.

⁷ 11-K DCMR §502.3.

⁸ The rowhouses located on the Property are all vacant.

height of 110 feet. The height and density of the Project work in concert with its context to establish a “monumental civic boulevard” that frames the viewshed of the Capitol.⁹

B. Generalized Policy Map

As shown on Appendix 2, the GPM designates the Property as a Land Use Change Area. “The guiding philosophy in the Land Use Change Areas is to encourage and facilitate new development” exactly like the Project proposes.¹⁰ The Land Use Change Areas “represent much of the city’s supply of vacant and underutilized land.”¹¹ The Project is a quintessential Land Use Change Area development in that the Property is underutilized and largely occupied by surface parking lots and the Applicant is redeveloping the underutilized land with a matter-of-right residential building. The Project simultaneously increases the District’s housing supply and establishes the prominence of the South Capitol corridor, both key objectives of the CG-2 Zone District, as noted above.¹² The current uses on the Property are not consistent with the “monumental civic boulevard” of South Capitol Street, yet, the height and density of the Project fully support this objective. The evolution of the Property from surface parking lot to residential uses, potentially with ground level commercial uses, is clearly consistent with this policy.

II. Framework Element

The Project furthers the goals of the amended Framework Element. Specifically, the Framework Element notes that “there is substantial room for growth under current zoning” and encourages development in places where there are opportunities, noting that not developing these areas would “represent missed opportunities for the District to grow inclusively.”¹³ The Framework Element also points out that “the rising cost of housing is one of the most pressing and critical issues facing the District and the region” but notes that “tied in with housing cost issues are deeper concerns about displacement, the impacts of gentrification, and long-term competitiveness.”¹⁴

These concerns, and the Framework Element’s focus on the importance of equity, inclusion, and resilience, are of vital importance to the District and inform the Zoning Commission’s review of the Project. The Project furthers the goals of equity, inclusion, and resilience. The Plan defines equity as “where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender.”¹⁵ First, the introduction of an additional approximately 310 residential units contributes to a reduction in overall housing costs in the District. As explained in Exhibit E of this submission, increasing the

⁹ *See id.*

¹⁰ Plan §225.10.

¹¹ *Id.*

¹² While there are 8 vacant rowhouses on the site, the Property is predominantly comprised of surface parking lots.

¹³ Plan §205.6.

¹⁴ Plan §206.1.

¹⁵ Plan §213.6.

housing supply contributes to lowering overall rental rates in the area. Lowering rents, in turn, makes housing more accessible to greater populations of people, which increases the “access, choice, [and] opportunities” for all people, as directly called for by the Framework Element. The Project also provides 25 affordable units, working to concentrate these, at the request of the community, in family-sized units, again increasing the “access, choice, and opportunity” for families. Finally, the Project includes a commitment to resilience with sustainability features such as a commitment to LEED v.4 Gold and approximately 1,000 square feet of solar panels. This LEED certification will improve the sustainability of the Project by reducing energy use and carbon emissions, conserving water, and incorporating green materials.

Some of the letters and testimony in opposition to the Project raised concerns about the Project’s consistency with the Plan, particularly the emphasis on equity and affordable housing. These letters argue that the only way the Project can be consistent with the Comprehensive Plan is to provide 1/3 of the units at a deeply affordable level, 1/3 at a workforce affordable level, and 1/3 at market rate. This assumption, however, is flawed and contradicted directly by caselaw. The Court of Appeals has already concluded that even though the Plan and the District may focus on trying to provide 1/3 of new units coming online as affordable, “the Comprehensive Plan does not direct that one-third of *every* project should be affordable housing; projects that involve, for example, replacement subsidized housing units contribute to the one-third goal in a way that permits the Commission to approve other projects that include fewer affordable units but that offer other significant public benefits and promote other Comprehensive Plan goals.”¹⁶ Here, the Project achieves the required degree of affordable housing on site.

This Project is providing more than is required for a matter-of-right development: it is providing a greater allocation of family-sized affordable units at the community’s request, it is designing a building complementary of and deferential to the surrounding neighborhood and rowhouse context (including incorporating existing structures in historically sensitive preservation-like approach) it is constructing a highly efficient and environmentally friendly building, and it is promoting numerous Comprehensive Plan goals, as detailed herein and in Exhibit D.

III. Land Use Element

The Project is also not inconsistent with the Land Use Element of the Plan, which should be given greater weight than other elements of the Plan because it incorporates and balances the competing policies found in other District Elements.¹⁷ The Land Use Element calls for “new central city mixed-use neighborhoods combining high-density residential . . . use in the following areas: . . . 4. South Capitol Street corridor/Stadium area” where “housing, including affordable housing, is particularly encouraged and should be a vital component of the future land use mix.”¹⁸

¹⁶ *Wheatley v. D.C. Zoning Commission*, 229 A.3d 754, 764-765 (D.C. 2020).

¹⁷ Plan §300.3.

¹⁸ Plan §304.11.

The Project provides housing, including affordable housing and family-sized units, on South Capitol Street, contributing a “vital component” of future land use in the area. The architecture is high-quality and designed to fit in with the context of the surrounding neighborhood, with the rear façade specifically mirroring building elements of the nearby historic Syphax School building. The brick detailing, including soldier and belt coursing and cornices were drawn specifically from the Syphax School in order to establish a purposeful connection between the building and its historic context. The building design also integrates components of the South Capitol rowhouses, including similar brick detailing. Perhaps most importantly, the building is designed as a primarily masonry structure on all exposed sides, providing a highly articulated form reflective of the character of the neighborhood itself.

The Project also furthers the Land Use Element’s goals of “encouraging nodal development” and “infill development” on “vacant lots that create ‘gaps’ in the urban fabric.” The Land Use Element also advises to “concentrate redevelopment efforts on those Metrorail station areas which offer the greater opportunities for infill development and growth.”¹⁹ The Navy Yard-Ballpark Metrorail station is located less than 0.5 mile from the Property. The Project’s proximity to the station will promote transit ridership for future residents and minimize the necessity of vehicular transportation. The Project will redevelop the underutilized land on the Property, which currently consists mostly of a surface parking lot. By replacing this current use with housing, the Project is consistent with these policies.

The Land Use Element also encourages that “new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects” and “support[s] the retention of the established residential neighborhoods adjacent to the Central Employment Area.”²⁰ The Property is located immediately to the west of the South Capitol border of the Central Employment Area. Though the bulk of the Property is dedicated to surface parking, there are eight vacant rowhouses on the Property. The Project retains six of the rowhouses and makes six of them available for residential use once again (unless up to two of them along South Capitol are used for commercial uses). In an effort to retain the perceived single-family nature of the rowhouses along N Street, the proposed building will incorporate setbacks, allowing each rowhouse to appear independent from the multi-family building while providing the rowhouses access to building amenities and increasing the size of these units.

Finally, the Project significantly furthers the Land Use Element’s policy on neighborhood beautification, “including landscaping and tree planting, façade improvement. . . [and] street and sidewalk repair.”²¹ The Project provides robust landscaping design, retaining existing trees in the public space and installing a new double row of trees along certain portions of South Capitol Street. The proposed building and renovated rowhomes will present a varied streetscape along the important South Capitol Street boulevard, framing the viewshed of the Capitol. The building will

¹⁹ Plan §§ 306.11; 307.5; 312.9.

²⁰ Plan §§ 304.13; 311.5.

²¹ Plan § 310.5.

also provide a unique urban plaza with landscaping and hardscaping in the interior of the site to envelope and buffer the rowhouses along South Capitol while also providing an area of resident and visitor respite.

IV. Other Comprehensive Plan Provisions

In addition to the FLUM, GPM, Framework Element and Land Use Element, the Project is not inconsistent with the other elements of the Plan that are too numerous to include here. Instead, these other policies of the Elements have been detailed in Exhibit D included with this Post-Hearing Submission. The Project is also not inconsistent with the Lower Anacostia/Near Southwest Area Element or the Southwest Neighborhood Small Area Plan.

A. Lower Anacostia/Near Southwest Area Element

The Project is not inconsistent with the Lower Anacostia/Near Southwest Area Element that applies to the Property. The Area Element focuses on “transform[ing] South Capitol Street into a great urban boulevard.”²² The Property has key visibility along South Capitol Street: it is across the street from the ballpark, yet, it is currently used as a surface parking lot. The Project will eliminate the parking lot, reintroduce active residential uses, and incorporate a highly designed building with quality materials. The Project further highlights South Capitol Street with “memorials . . . and other commemorative works along the South Capitol Street Corridor” through the inclusion of memorial plaques and public art spaces.²³ As detailed in the Applicant’s previous submissions, and at the request of the ANC, the Applicant will be outlining the former footprint of the two removed rowhouses with brick and provide commemorative plaques to detail their history. Additionally, the Project includes space for public art along South Capitol Street. Finally, the balconies proposed along South Capitol Street increase the “urban boulevard” nature of South Capitol and the live/work units and proposed commercial use will increase pedestrian traffic along this thoroughfare.

The Area Element also focuses on the conservation of established neighborhoods like the residential neighborhood to the west and north of the Property. The Project provides appropriate infill development with the same general height and density as the other properties along South Capitol Street. However, the Project incorporates setbacks, articulation, and materials to minimize the perception of massing adjacent to the neighboring rowhouses as well as the adjacent Syphax Village. Additionally, the Project incorporates materials and patterning consistent with the surrounding properties. Specifically, the design of the base level of the building along South Capitol Street includes brickwork reflecting the cornice detailing of the existing South Capitol rowhouses, while the rear façade’s first level includes brick detailing reminiscent of the Syphax Village architecture. Further the choice of materiality and color itself is intended to draw characteristics throughout the neighborhood onto the site and blend them in a complementary

²² Plan §1912.7.

²³ Plan §1912.9.

urban form. Therefore, consistent with the Area Element, the Project ties together the urban boulevard along South Capitol Street with the established neighborhood to the west and north of the Property.

B. Southwest Neighborhood Plan

The Plan explains that “the zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.”²⁴ The Property is subject to the approved Southwest Neighborhood Small Area Plan (the “SAP”), which should also inform the Commission’s analysis of the Project.²⁵ The Property is located in the secondary area of the SAP, where neighborhood conservation, connectivity, and sustainability are the principal focus. The Project is consistent with those goals. The Project preserves six of the existing eight rowhouses at the Property and incorporates design elements, as discussed above, from the surrounding neighborhood. The Project also does not create any displacement of existing residents but will bring new residents to the Property by reintroducing active residential use at the Property. The significant public space improvements related to the Project will also increase connectivity in the neighborhood. Finally, the Project includes significant sustainability commitments through the commitment to LEED v.4 Gold certification and providing an area of solar panels comprising at least 1,000 square feet.

The Project also promotes the Guiding Principles of the SAP,²⁶ specifically:

Neighborhood Character: The Project preserves the neighborhood’s varied scale by retaining numerous existing rowhouses and setting the taller portion of the Project back from the rowhouses along N Street and sculpting the building away from the rowhouses along South Capitol Street. The Project also includes an articulated massing and carefully selected materials and coloration, appropriate for new development that complements the character of the existing neighborhood.

Pedestrian Safety: The Project will greatly enhance the public space around the Property while allowing for unique areas of urban landscaping and greenery, improving pedestrian circulation and general neighborhood conditions.

Housing: The Project significantly serves the housing goals for the SAP by providing up to approximately 310 new residential units, including approximately 25 affordable units.

²⁴ Plan § 226(d).

²⁵ See *Southwest Neighborhood Plan*, dated June 5, 2015, approved by the DC Council Resolution R21-0128, referred to herein as “SAP”.

²⁶ SAP at 67-68.

Transportation: The Project also furthers transportation goals by removing a surface parking lot and creating a transit-oriented development, along with implementing a robust transportation demand management plan.

Historic Preservation: The Applicant coordinated the design of the Project with the Historic Preservation Office (“HPO”) and the Southwest Neighborhood Assembly (“SWNA”) to design the new construction to respect the older rowhouses that are incorporated into the Project. This coordination with HPO and SWNA resulted in the significant setbacks from the existing rowhouses and a degree of retention and restoration typically reserved for projects subject to the District’s historic preservation laws.

New Development: The Project replaces surface parking lots with a new, high-quality residential building of a similar height and density to other projects along the South Capitol boulevard, while respecting and incorporating details of the residential neighborhood to the north and west of the Project.

Sustainability: The Project includes significant sustainability measures, including a commitment to certification at the LEED v.4 Gold level and providing an area of solar panels of at least 1,000 square feet.

In addition to furthering the Guiding Principles of the SAP, the Project furthers several specific policies of the SAP. The Project furthers the Model Community Vision and Actions that call for Southwest to be “an exemplary model of equity and inclusion.”²⁷ The Model Community Actions specifically note that District dispositions and Planned Unit Developments are the project types where affordable housing above the IZ requirements should be required.²⁸ The Project is not a Planned Unit Development or a public disposition, and therefore this call for enhanced affordability does not apply. The Project complies with the IZ requirements which further the SAP’s goals for additional affordable housing. Additionally, the Applicant is working to concentrate the IZ units in family-sized units.

The Project also furthers the goals of the Modernist Gem Actions to work with the community, provide infill development, and improve public space.²⁹ The Applicant has been engaged in community outreach for multiple years regarding the Project. The Applicant has been actively engaged with the SWNA and the Advisory Neighborhood Commission (“ANC”), as well as many immediate neighbors for several years. The Applicant also coordinated, and executed a “Good Neighbor Agreement” with Syphax Village. The results of this coordination, as detailed in the Applicant’s other filings, include the retention of the townhouses along N Street and South Capitol Street, the highly articulated rear façade design elements, the significant setbacks from the rowhouses along N and South Capitol Streets, as well as construction management terms. The

²⁷ SAP at 70.

²⁸ See SAP Model Community Action 4-6 at 75.

²⁹ See SAP Modernist Gem Action 1, 3, 5-7 at 80.

Project is an ideal infill development on an underutilized site that is consistent with the community's architectural character. The Project retains and respects the South Capitol streetscape and helps frame this great boulevard.

Additionally, the Project furthers the following Modernist Gem Design Guidelines listed in the SAP:

Principle 1: Encourage a mix of building heights. *Provide a massing and mix of defined building heights which complement and uphold the current mixture of high-rise and low-rise buildings. Particularly on large sites, this mix should include the provision of rowhouses and high-rise buildings, and avoidance of mid-rise building forms.*

The Project provides a complementary height and massing along South Capitol Street with the 110-foot-tall building height of the building immediately adjacent to the similarly-sized Camden building to the south, while sculpting the building away from the rowhouses along South Capitol Street and varying the façade with the townhouse-style units and the preserved rowhouses. As stated above, this building form incorporates significant building setbacks from the existing rowhouses along N Street and South Capitol Street.

Principle 2: Achieve design excellence for high quality and timeless development. *Achieve high quality development and the creation of attractive buildings and landscapes through design excellence by using distinguished architecture, durable high quality materials and detailing, and advanced sustainable design.*

The Project is highly designed on all exposed sides and includes high-quality materials, including masonry and significant brick detailing outlined above. The Project's landscaping is also highly designed at the roof, elevated courtyard, and ground levels.

Principle 3: Promote variation in building frontages along streets with continuous massing. *Promote cohesive building forms and design, while incorporating articulation in the building and landscape design. This will ensure a pedestrian-scale of development and lessen the perceived length of high-rise buildings or rowhouse groupings. Blank, unarticulated walls should be avoided, particularly along streets and pedestrian ways.*

The Project includes three highly-designed sides, all well-articulated with brick detailing and balconies. The Project's South Capitol and N Street frontages include variation in building form with setbacks from the rowhouses to provide a deferential mass while supplying the density called desired along the South Capitol boulevard.

Principle 4: Enhance green space through landscaped perimeters and internal green or amenity spaces. *Support Southwest’s vibrant green character through the provision of publicly visible landscaped perimeters; internal green or amenity spaces; and landscaped setbacks appropriate to the streetscape, particularly for high-rise structures.*

The Project’s perimeter will include landscaping and improvements including additional tree plantings. Additionally, the building includes green amenity space on the roof, elevated courtyard, and between the building and the South Capitol rowhouses, providing green space for residents and visitor outdoors.

Principle 5: Incorporate sustainable building and site design. *Employ a range of innovative sustainable design strategies and building standards to promote a high performing environment that encourages healthy living, energy efficiency, and stormwater management.*

The Project is committed to achieving LEED v.4 Gold certification and will include a minimum area of solar panels of 1,000 square feet on the roof.

Principle 6: Ensure parking is not a detractor. *Locate vehicle parking underground, or in above-grade structures that are visually buffered from the street and adjacent properties. Services such as parking and loading access should avoid the interruption of street-facing building fronts or communal open space.³⁰*

The Project removes surface parking, locating all parking below-grade. Additionally, the Project’s parking and loading will be accessed from an alley as opposed to directly from a street. Finally, no curb cuts are proposed by the Project and, in fact, the Project is closing a curb cut.

The Project also furthers the Green Oasis and Vibrant Connections items of the SAP, which call for transforming South Capitol Street into a great urban boulevard including landscaping, public space improvements, and increasing the tree canopy.³¹ The Project provides residential development along the urban boulevard of South Capitol Street while still preserving and incorporating existing rowhouses on the Property and designing the façade to fit within the neighborhood context. The Project also proposes improvements to the surrounding public space, including significant street trees.

Therefore, the Project is consistent with the Guiding Principles, Design Guidelines, and policies of the SAP.

³⁰ SAP at 81-83.

³¹ SAP at 91, 116.

V. Conclusion


For the reasons noted above, the Project is not inconsistent with the FLUM and GPM designations for the Property. The Project is also not inconsistent with the Plan's Framework Element, other Citywide Elements and the Area Element. Finally, the Project is not inconsistent with the SAP. The Project's significant provision of housing where none is currently provided, including family-sized affordable units, potential neighborhood-serving commercial uses, and the sustainability and public space improvements all serve the policies of the Plan. On balance, the Project is not inconsistent with the Plan and the Zoning Commission should approve this Design Review application.

Appendix 1

FLUM for the Property

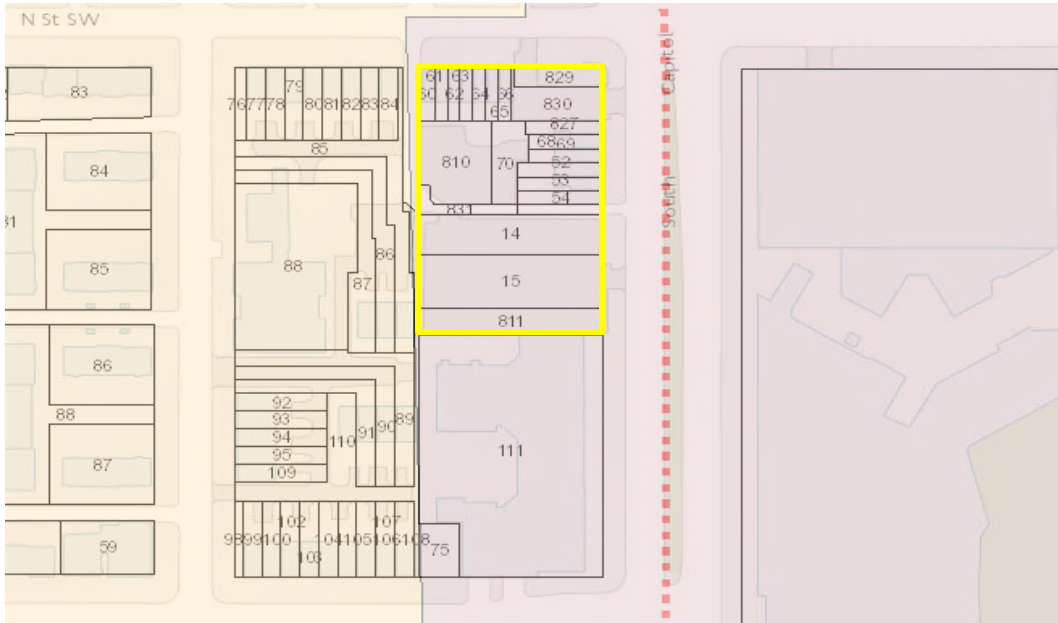


Property (approx. location)

 CMOD, RMED

Appendix 2

GPM for the Property



Property (approx. location)

Land Use Change Areas