

## Analysis of Consistency with the Comprehensive Plan and Small Area Plan With a focus on Racial Equity

This document analyzes the Application’s consistency with the Comprehensive Plan (“Plan”)<sup>1</sup> with a particular focus on the Application’s effect on advancing racial equity in the District. The racial equity focus responds to the Plan’s directive that the Commission “evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.”<sup>2</sup>

### I. Summary

In sum, the Application is not inconsistent with the Plan, when considering as a whole the Plan’s two maps, the Plan’s heightened focus on racial equity, and the individual policy objectives of the District Elements, Rock Creek East Area Element, and the Central 14<sup>th</sup> Street Vision Plan and Revitalization Strategy, a small area plan adopted to supplement to the Plan (“**Small Area Plan**”). Even if the Application is not fully consistent with any particular individual objectives of the Plan or Small Area Plan, this analysis demonstrates that the Application is not inconsistent with the Comprehensive Plan and other plans *as a whole*.

In identifying racial equity as a primary lens for the Commission’s review, the Plan notes that equity considerations include both the substantive (“rising costs and inequitable access to opportunity . . . for housing . . . businesses, employment, and other necessities”<sup>3</sup>) and the procedural (“a participatory approach for meeting the needs of underserved communities”<sup>4</sup>). More specifically, in this proceeding racial equity includes (i) substantively, an evaluation of affordable housing, direct displacement effects, access to opportunities, and a balanced sharing of the benefits and impacts of development, and (ii) procedurally, participation in the decision-making process.

- **Maps:** The height, density, and mix of uses proposed for the Project are consistent with the Future Land Use Map and Generalized Policy Map designations for the Property.
- **Racial Equity:** The Project reserves 66 percent of its residential units as affordable for households earning 30%, 50%, and 60% MFI. From an equity perspective, the Project increases housing opportunities and affordable housing opportunities in an amenity-rich neighborhood without causing any direct displacement of residents. Also, the Project provides opportunities for new jobs for a variety of skill sets, ranging from construction jobs to full time, hourly, and salaried employment. The Project preserves and enhances the Dance Loft, which provides space for multiple minority-owned dance organizations and a significant number of minority artists (including students) to practice and earn their living through performing and/or working directly for the Dance Loft. While the project does potentially displace up to six minority-owned businesses, the Project includes meaningful items to mitigate such displacement and provides a mechanism to assist these tenants to relocate nearby and even to potentially return to the property. The overall project will have an extraordinarily positive net impact on racial equity issues.
- **Overall:** The Project is not inconsistent with the Plan and other policies as a whole and implements the Plan’s Area Element and Small Area Plan with respect to the Project site.

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<sup>1</sup> See 11-X DCMR §§ 304.4, and 500.3.

<sup>2</sup> 10-A DCMR § 2501.8 (2021).

<sup>3</sup> *Id.* § 107.21.

<sup>4</sup> *Id.* § 213.7. See also *id.* §§ 213.6 and 213.9 (“Equity is both an outcome and a process.”).

**II. Analysis**

The table below evaluates the consistency of the Application with the Plan. Potential inconsistencies are noted in *bold italics* and considered in the table. The construction of new development almost necessarily involves trade-offs, and the Project is no exception. Although the Project presents some inconsistency with a handful of individual policy objectives, those inconsistencies are heavily outweighed by the Application’s overall consistency with the vast majority of applicable policy objectives in the Plan and Small Area Plan.

Most significantly, the Project is not inconsistent with the Land Use Element and related maps as recently amended, which together are to be evaluated as having the greatest weight of any portion of the Plan. The Project’s consistency with the Land Use Element’s density, use mix, housing and job creation objectives, combined with the similar consistency with the affordable housing and resilience civic priorities outweigh the identified inconsistencies with the Plan. None of the inconsistencies noted below, whether individually or considered collectively, justify finding that the Application is inconsistent with the Plan and Small Area Plan when considered “*as a whole*”.<sup>5</sup> In totality, the Application is broadly consistent with the Plan and Small Area Plan as demonstrated in the foregoing analysis of more than 250 policies from the Plan and the goals of the Small Area Plan. (A discussion of the Plan’s Guiding Principles is at Exhibit 2J of the record in this case.)

Comprehensive Plan Element		Analysis
Maps	<b>Future Land Use Map:</b> Mixed Use Moderate Density Residential/Moderate Density Commercial (allows FAR 2.5-4.0)	The Project, including the requested Zoning Map amendment is not inconsistent with the Future Land Use Map’s designation for the Property. The mixed-use Project with an FAR of approximately 3.79 is not inconsistent with this designation, and the Project accommodates and incorporates both commercial and residential uses consistent with the mixed-use designation for the Property.
	<b>Generalized Policy Map:</b> Main Street Mixed Use Corridor <sup>6</sup>	The Project is not inconsistent with the Generalized Policy Map’s Main Street Mixed Use Corridor designation for the Property given the proposed arts and retail/restaurant ground floor uses with residential above.
	<b>Overall:</b>	Overall, the Application is consistent with the Plan’s two maps: the Future Land Use Map mixed-use “Moderate Density” designation expressly supports the MU-5 amendment to the Zoning Map, and the Project’s density is within the 2.5 to 4.0 range (which the Plan notes is able to be increased through inclusionary zoning or PUDs). The Project maintains a pedestrian-oriented environment with storefronts at-grade and residential uses above per the “Main Street” definition.

<sup>5</sup> The Commission’s review must consider the Plan “read as a whole”, and if the Commission approves an application that is inconsistent with one or more individual policies reflected in the Plan, “the Commission must recognize these policies and explain why they are outweighed by other, competing considerations.” See *Wheatley v. District of Columbia Zoning Commission*, 229 A.3d 754, 759 (2020).

<sup>6</sup> 10-A DCMR § 225.14 (A “Main Street Mixed Use Corridor” is defined as a “traditional commercial business corridor[] with a concentration of older storefronts along the street” and “a pedestrian-oriented environment with traditional storefronts. **Many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment**”. Any new “development or redevelopment that occurs [along a Main Street Mixed Use Corridor] should support transit use and enhance the pedestrian environment.”) (emphasis added).

Exhibit H: Analysis of Comprehensive Plan, Small Area Plan through a Racial Equity Lens

<b>Racial Equity Analysis</b>	<b>New Affordable Housing and Family-Sized Units</b>	<p>The Project provides 67 new affordable units reserved as affordable for households earning 30%, 50%, or 60% MFI, an amount of affordable housing units and levels of affordability that substantively advance racial equity in the District. This housing primarily benefits the District’s Black and low-income residents by providing affordable housing opportunities within an overall inclusive development in an amenity-rich area of the District. Sixteen (16) of the Project’s residential units are affordable three bedrooms (24 of the units overall are three-bedroom units), which will create affordable housing opportunities for District families to remain in the District.</p>
	<b>No Residential Displacement</b>	<p>No residences existing on the Property today, so the Project does not displace any existing residents, notable in a part of the District where many Black residents and members of other vulnerable communities face displacement concerns. The inclusive nature of the overall development supports, rather than destabilizes, existing low-income Black and other residents who live in Ward 4.</p>
	<b>Access to Economic and Job Opportunities</b>	<p>The Project allows the Dance Loft to remain in operations and three other small businesses to provide economic and job opportunities. Dance Loft has a strong commitment to and history of maintaining a diverse workforce and ensuring opportunities to a diverse mix of artists and audiences. For instance, Dance Loft currently has 68 artists or organizations that use space at Dance Loft, either for rehearsals or for teaching. Each has between 2 and 50 of their own participants for weekly classes or rehearsals. Of those 68:</p> <ul style="list-style-type: none"> <li>• 21 are White,</li> <li>• 36 are Black, Latinx, or AAPI, and</li> <li>• 11 are Other/Unknown.</li> </ul> <p>In total, over half of all users of Dance Loft are from a racial minority. Dance Loft itself enables minority-owned dance businesses, and as an arts institution reflects the diversity within DC and within different forms of dance. Within Dance Loft’s youth programs, Dance Loft serves over 600 local Ward 4 students each year with free bilingual dance education (Spanish/English) and free performances. The majority are Kindergarten through 2nd grade. Based on the racial composition of partner schools, discussions with classroom teachers and principals, and anecdotal reporting, over 75% of these students are racial minority, including dozens that speak English as a second language.</p> <p>In addition, the Project is an opportunity for a Black-owned real estate business, The Menkiti Group, to continue its success in the District. Also, one of the partners of Heleos is a Black real estate professional. Finally, the Project adds residents who will be future patrons of other minority-owned businesses on the 14<sup>th</sup> Street corridor.</p>

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	<p><b>Potential Displacement of Minority-Owned Businesses</b></p>	<p>The Project preserves and enhances the Dance Loft, which also provides space for other multiple minority-owned dance organizations and a significant number of minority artists (including students) to practice and earn their living through performing and/or working directly for the Dance Loft. While the Project does potentially displace up to six minority-owned businesses, the Applicant has committed to working with each current retail business as provided in more detail in <u>Exhibit D</u>. In sum, the Project provides a mechanism to assist these tenants to relocate nearby and the Project can invite some, but not all, of the current retail businesses to return, as part of the community discussion process discussed in <u>Exhibit D</u> to determine full community preferences regarding future retail spaces. Even if the existing minority-owned businesses do not return to the Project, the Applicant has committed to measures to mitigate impacts.</p>
	<p><b>Balancing the Benefits and Impacts of New Development in Sixteenth Street Heights and Ward 4</b></p>	<p>The Project may have some construction-period inconveniences for nearby residents and may result in modest post-completion impacts such as winter shadows and other changes that result from new development. The benefits of the Project will be enjoyed by, among others, residents of the Project’s new housing, many of whom are likely to be Black given the demographics of the District’s affordable housing waiting list.</p> <p>The District’s equitable development goals open the door to the imposition of minor inconveniences on the relatively wealthier, predominantly white residents of Northwest DC who have long enjoyed the benefits, amenities, and opportunities of NW neighborhoods in exchange for an opportunity for Black and other racial minority District residents to share in those benefits and opportunities.</p>
	<p><b>Equitable Process and Participation</b></p>	<p>The Project has gone through a robust public process with multiple, intensive rounds of meetings with the ANC. The Applicant has made itself available for discussing the Project with any interested neighbors or community groups to the maximum extent possible given the public health situation in the District.</p>
	<p><b>Overall:</b></p>	<p><b>Substantively, the Project advances racial equity goals of affordable housing and job creation, sharing of benefits, and avoiding displacement of residents. The Project’s impacts on minority-owned businesses overall are likely to be net positive but will result in the need for some current minority-owned retail businesses to relocate. The impacts to current tenants are capable of being mitigated. Procedurally, the Project team has initiated a sustained participatory process that has allowed for “meaningful involvement” in the development process.</b></p>

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<b>District Elements</b>	<b>Land Use Element</b> (ch. 3)	The Project balances the myriad and sometimes competing objectives of the Land Use Element of the Plan, which is the Element that should be given the greatest weight. <sup>7</sup> In general, the Project’s mix of uses, moderate density, and quality design advance the objectives of this Element. The Project is pedestrian-oriented and includes high-quality architecture and public spaces, affordable and family-sized housing to allow District residents to remain in the neighborhood and share in the benefits of Ward 4 and proximity to its amenities including Rock Creek Park. Community engagement was a priority in the Project’s development. No residents are displaced as a result of the Project.	
	More specifically and consistent with the Land Use Element, the Project:		
	Adds an appropriate amount of residential density to achieve the Plan’s affordable housing goals, housing diversification objectives, and Fair Housing obligations following a detailed Small Area Plan effort and extensive neighborhood engagement for a PUD (“explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types in low-density and moderate-density neighborhoods where it would result in the appropriate production of additional housing and particularly affordable housing . . . neighborhood planning and engagement is a condition predicate to any proposals” “All neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing”), and the Project includes an innovative ownership model to provide “affordable commercial space” (per LU-2.1.13) for Dance Loft to remain in its current home indefinitely (and actually own its space).	LU-2.1.8 LU-2.1.5 LU-2.1.13 LU-2.1.1	
	Retains a thriving cultural performing arts use as a critical asset for central 14 <sup>th</sup> Street NW and provides a modest amount of other commercial uses, all at appropriate scales and with appropriate mitigation measures to minimize any adverse or quality of life impacts on nearby residential areas (“Recognize the importance of low-profile, neighborhood-serving arts and culture as assets for community preservation and building. Encourage the preservation or expansion of arts and culture in discretionary review of development projects.” <i>Id.</i> § 312.14).	LU-2.3.12 LU-2.4.6 LU-2.4.9 LU-2.4.12 LU-3.3.3	
	Focuses District resources to (a) create opportunities for family-sized and affordable housing to “advance equitable development and racial equity”, (b) expand commercial opportunities in a way that avoids “unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts” on nearby residences, (c) advance sustainability and Fair Housing goals, (d) optimize tax and job creation benefits, and (e) revitalize “Node Two” of central 14 <sup>th</sup> Street NW.	LU-2.1.2 LU-2.1.3 LU-2.3.2	
	Helps establish the role of 14 <sup>th</sup> Street NW as a Main Street corridor by (a) devoting the ground floor to compatible commercial uses, (b) adding upper story residential uses that create weekend/evening populations to support the growth of retail and services in Ward 4, (c) offering employment opportunities, (d) designing public and private outdoor spaces that are inviting, accessible, attractive and supportive of social interaction, and (e) providing opportunities for cultural uses and the performing arts.	LU-2.4.1 LU-2.4.2	
	Integrates the development of the Project into the surrounding urban fabric by (a) establishing a compatible, inclusive, connected, ungated relationship with the existing neighborhood fabric, (b) improving upon sidewalks and public spaces surrounding the Property in a manner that maintains pedestrian zones, facilitates public interaction, and does not privatize or enclose public space but instead creates indoor-outdoor zones for performing arts, (c) including landscaping and other improvements to the	LU-1.5.1 LU-2.2.2 LU-2.2.4 LU-2.4.10	

<sup>7</sup> *Id.* §§ 300.3, 2504.6 (“the Land Use Element . . . should be given greater weight than the other elements”).

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	neighborhood’s overall visual quality and animation levels of the street, (d) improving the Project’s visual beauty including with public art (where graffiti in the context of the Project represents artistic expression rather than a blight to be removed per LU-2.2.2 and 2.2.4) and an improved appearance relative to the existing condition of the Property	
	Combines land use and transportation planning by (a) implementing best practice design for a new mixed-use residential building along a transit corridor (i.e., sufficient new residential density near transit to justify the public investment in transit), (b) providing garage parking spaces, in an amount that responds to site- and use-specific parking demand, (c) locating all parking from an alley entrance to maintain an attractive street environment, (d) including transportation demand and loading management elements that address any potential parking and traffic impacts, (e) prioritizing pedestrians and cyclists, and (f) not adding any new curb cuts.	LU-1.4.5 LU-1.4.8 LU-2.1.11 LU-2.4.8
	Serves as a buffer between the existing and planned higher-intensity uses to the east of the 14 <sup>th</sup> Street, NW and the residential areas to the west.	LU-2.3.3 LU-2.3.4
	Advances a site-specific resilient design and actively anticipates future flood risk by (a) being located outside of the flood plain in a neighborhood that is otherwise likely to be flood-prone, (b) incorporating green roof area and other stormwater mitigation elements, and (c) including on-site renewable energy generating capacity.	LU-1.1.2 LU-1.2.9
	Seizes on an opportunity for an innovative land use regulatory process (i.e., a consolidated PUD and Map Amendment with associated public space improvements) that simultaneously advances civic and ANC-led beautification objectives and incorporates enforceable conditions regarding design, building, and operating criteria.	LU-1.3.4 LU-2.2.5 LU-2.2.6
	Avoids items the Land Use Element cautions against including (a) unnecessary demolition of any quality homes, (b) negative impacts to any row house neighborhoods, loss of family-sized units (the Project expands the number of family-sized units and is compatible with existing design patterns), (c) conversion of existing alleys (instead improving and activating the alley system in Square 2704), (d) encroachment of “large-scale, incompatible commercial uses into [residential] areas” and instead makes 14 <sup>th</sup> Street NW “more attractive, pedestrian-friendly, and transit accessible, [with] opportunities for compatible commercial development which provides jobs for nearby residents”, (e) concentration of incompatible or out-of-scale non-residential uses, or (f) creating any deficiencies in public utility infrastructure.	LU-2.1.6 LU-2.1.7 LU-2.1.9 LU-2.1.10 LU-2.2.7 LU-2.3.1 LU-2.3.3 LU-3.2.13
	<b><i>Does involve the demolition rather than rehabilitation or adaptive reuse of an aging structure contrary to this objective (“In redeveloping areas characterized by vacant, abandoned, and underused older buildings, generally encourage rehabilitation and adaptive reuse of architecturally or historically significant existing buildings rather than demolition. Id. § 310.11”). However, in light of the Project’s affordable housing commitments, the Plan’s affordable housing goals necessarily outweigh this objective (let alone the project’s other commitments such as arts preservation). See, e.g., id. § 504.8 “The production and preservation of affordable housing for low- and moderate-income households is a major civic priority”).</i></b>	LU-2.1.4
<b>Opponent Letters and the Land Use Element</b>	<p>The Project is not inconsistent with objectives LU-1.4.6 and LU-2.4.5 regarding development along transit corridors and nodal development notwithstanding some opponents’ challenges to the contrary. See Exhibit 343. The Commission should disregard certain opponents’ misreading of the Plan because the opponents misunderstand the cited objective and omit important context.</p> <p>The opponents’ primary challenge is that the Project does not “respect the integrity and character of [the] surrounding residential areas” and, allegedly in violation of the Plan, does “unreasonably impact” such areas. The language cited by the opponent misreads the objective and ignores the balancing inherent between respect for context and building new affordable housing.</p>	

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Page 2 of Exhibit 343 cites LU-2.4.5, though quotes from LU-1.4.6, the latter of which provides in full:

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to *respect the character, scale, and integrity of adjacent neighborhoods*, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. 307.14

However, the opponents either cherry-pick or misunderstand the cited objective, which in the first instance (underlined above) expressly encourages development along priority transit corridors, which includes 14<sup>th</sup> Street NW. The opponents then point to only the middle, italicized language, ignoring the important qualifier at the end that “respect for character, scale, and integrity of adjacent neighborhoods” must be “balance[ed] against the District’s broader need for housing”. Nowhere in their letter do the opponents recognize the balancing concept, which is at the heart of the Commission’s exercise. Under a full reading of LU-1.4.6, the Project is not inconsistent with that objective given the District’s acute need for affordable housing and the Project’s provision of same. That is, the Project’s provision of affordable housing out-balances the modest, if any, character and scale impacts that opponents lament. The ANC report expressly agrees that the Project’s proposed scale **is fully consistent** with the neighborhood context.<sup>8</sup>

On page 4 of Exhibit 343 the opponents also seem to suggest that the Project is inconsistent with LU-1.4.6, which the opponents purport limits future development to sites adjacent to Metrorail stations. LU-1.4.6 imposes no such limit. Rather, the second sentence of the cited objective refers to Metrorail stations AND “corridors”, the latter being the “priority transit and multimodal corridors” referenced in the immediately preceding sentence of LU-1.4.6. Contrary to the opponent’s mistaken reading of the Plan, the Project is proximate to a designated priority transit corridor, 14<sup>th</sup> Street, NW. See 11-C DCMR § 702.1(c)(7).

Finally, the opponents cite but do not analyze objective LU-2.4.5. In the interest of completeness, the Project is not inconsistent with that objective either. First, the Project is pedestrian-oriented rather than auto-oriented (despite opponents’ forceful efforts to make it more so by increasing the amount of parking) consistent with the first sentence of LU-2.4.5 (“Discourage auto-oriented commercial strip development and instead encourage pedestrian-oriented nodes of commercial development at key locations along major corridors.”). Second, the Project’s height, mass, and scale do respect the integrity and character of surrounding residential areas, such as via the proposed setbacks at the rear of the Project. The contextual appropriateness of the Project was noted unequivocally by the ANC in its report. Finally, even if the Project does have modest impacts on surrounding residential areas, such impacts would not make the Project inconsistent with this objective. Rather, this objective cautions against only “unreasonable impacts.” The Project’s impacts, if any, are quite reasonable: to the extent the Project’s minor impacts directly facilitate the construction of 67 units of affordable housing, which is a “civic priority.”

In sum, the opponents misreading of the Plan in Exhibit 343 should be disregarded.

<sup>8</sup> “We agree that a 5-story building along a major commercial corridor (14<sup>th</sup> Street) that scales back to 4 stories at the rear closest to surrounding rowhomes, and which is separated by an alley and has ample setbacks of 61’7”-75’4” ft from those homes, is contextually appropriate in this neighborhood and that the applicant has mitigated any negative impacts sufficiently. Any further reduction in the size of the project would compromise the project’s numerous and substantial community benefits and amenities.”

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	<b>Transportation Element (ch. 4)</b>	The Project advances the pedestrian, cycling, safety, public space, and parking optimization objectives of the Transportation Element and is accompanied by a robust analysis and TDM measures.
Consistent with the Transportation Element of the Plan, the Project:		
	Conforms to best practices for transit-oriented design with (a) a strong presence on 14 <sup>th</sup> Street, NW, (b) new and improved pedestrian and cycling infrastructure that prioritizes the designated mobility priorities for 14 <sup>th</sup> Street, NW in the moveDC plan and pedestrian safety and (c) improved alley access from 14 <sup>th</sup> Street, NW.	T-1.1.4 T-1.2.4 T-2.3.1 T-2.4.1 T-2.4.2 T-2.5.1
	Balances off-street parking supply with demand and the multitude of transit and other mobility options, includes a curbside plan to limit long-term curbside parking and innovative and future-thinking parking measures (e.g., EV parking, a lift system to reduce the parking footprint) in the Project’s garage, and removes existing above-grade parking structures in favor of more productive uses (arts and housing).	T-1.1.8 T-3.2.1 T-3.2.2 T-3.2.3
	Improves the urban design and streetscape and overall visual quality of 14 <sup>th</sup> Street NW, with a building of substantial design quality and mass in light of the width of that corridor and avoids any auto-oriented uses or curb cuts.	T-1.2.1 T-1.2.3
	Constructs enhancements to public space to support an active and naturally-landscaped pedestrian environment that includes areas and gathering spaces for a mix of ages and abilities (with an emphasis on innovative accessibility measures for Dance Loft) without introducing walking or cycling obstructions.	T-1.4.1 T-1.4.2 T-2.4.4
	Expands at the Applicant’s cost (a) cycling infrastructure and adds residents and workers who will contribute to the use of CaBi stations and the overall cycling system and (b) electric vehicle (EV) charging capacity in a new mixed-use development consistent with the District’s goal of supporting the growth of EVs.	T-2.3.5 T-5.2.1 T-5.2.2 E-5.1.9
	Includes a robust multimodal transportation impact assessment with required mitigation measures.	T-1.1.2
	Delivers a robust TDM package that (a) improves overall system efficiency and minimizes new trips, (b) manages PUDO, loading and truck activities to minimize negative impacts elsewhere on 14 <sup>th</sup> Street, NW and the public alley network surrounding the Project, and (c) does its part to help broader Vision Zero and climate resilience goal through an emphasis on walkability and cycling infrastructure.	T-2.2.7 T-2.5.4 T-3.1.1 T-3.3.4 T-3.3.7 T-4.2.1 T-4.4.2
	Adds density, residents, and jobs that will ultimately help justify transit investments along 14 <sup>th</sup> Street and 16 <sup>th</sup> Street NW in support of the objectives of the Plan’s Transportation Element, especially when viewed through a racial equity lens (e.g., transit investments are noted to benefit the District’s racial minority populations disproportionately) and in light of the diverse uses within walking distance of the Property.	T-1.1.7 T-1.3.1 T-2.1.1 T-2.1.2 T-2.1.6 T-2.6.1
	Does not interfere with WMATA’s efforts at the Northern Bus Garage (“Bus Barn”) opposite 14 <sup>th</sup> Street, NW but does add another voice to continue to advocate for the electrification of WMATA’s fleet on environmental justice grounds.	T-1.1.6 T-5.2.3



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	<p><b>Housing Element</b> (ch. 5)</p>	<p>The Project helps satisfy the District’s goal of 1,580 new units in the Rock Creek East planning area. The District’s <i>Housing Equity Report</i> shows that as of October 2019, the Rock Creek East planning area was short 340 units of affordable housing, meaning that <b>the Project alone provides nearly 20% of the Rock Creek East planning area’s affordable housing deficiency. Significantly, one third of the Project’s affordable units are affordable at 30% MFI.</b> The Project adds affordable housing in an amenity-rich area that otherwise includes largely only single-family, ownership opportunities that are now all-but unattainable to many District residents. H-1.2.1, H-1.2.2, H-1.2.3, and H-1.2.9</p>
<p>Consistent with the Housing Element of the Plan, the Project:</p>		
	<p>Addresses two major housing production civic priorities: includes affordable housing (where none is currently allowed or required) and imposes perpetual affordability restrictions to preserve such housing and includes 24 three-bedroom (“family-sized”) units, including affordable 16 three-bedroom units at a site that “received increased residential density as a result of underlying changes to the Future Land Use Map” (<i>id.</i> § 503.11) and that is proximate to transit and other amenities (parks, retail, schools).</p>	<p>H-1.1.9 H-1.3.1</p>
	<p>Is a private-sector-led, high-density, mixed-use development with market rate and affordable housing that (a) consistent with the density designation for the Property relies on a zoning density bonus as an incentive for additional deeply affordable housing, (b) helps meet present and long-term housing needs for Ward 4, an area that is becoming a high-cost area of the District but that through the Project will remain inclusive, (c) redevelops underutilized commercially-zoned land on a Main Street corridor within walking distance of transit access, (d) mitigates and minimizes adverse impacts on the design character of existing residential areas, (e) minimizes any future displacement effects, and (f) balances housing opportunities in Ward 4 (i.e., by adding affordable rate housing in an otherwise increasingly unaffordable submarket and building in long-term affordability in anticipation of future rent growth).</p>	<p>H-1.1.1 H-1.1.2 H-1.1.3 H-1.1.4 H-1.1.8 H-1.2.7 H-1.2.11 H-2.1.6</p>
	<p>Achieves high quality architecture and interior quality/sustainability standards despite its high levels of affordability and provides market rate and affordable units that (a) are externally indistinguishable, (b) include access to recreational amenities such as balconies, (c) achieve high levels of environmental sustainability, and (d) avoid long-term potential health hazards (e.g., no lead paint or gas appliances).</p>	<p>H-1.1.5 H-2.2.4</p>
	<p>Achieves EGC+, a high level of sustainability and water efficiency, and is seeking the net-zero energy target encouraged (but not mandated) by the Plan.</p>	<p>H-1.6.5</p>
	<p>Is being developed consistent with (a) the Small Area Plan which takes a “whole neighborhood” view of the development of Central 14<sup>th</sup> Street NW (i.e., to ultimately include services, job training, food access, parks, gardens, transit, and the like) even if the Project does not include those items and (b) sustainable design and resiliency goals.</p>	<p>H-1.4.6 H-1.6.1</p>
	<p>Does not displace any existing residents or convert any existing housing and provides a mix of affordable units to help mitigate displacement elsewhere in Ward 4.</p>	<p>H-2.1.4 H-2.2.1</p>
	<p>Complies with all fair housing laws and begins to redress through investment in amenities and infrastructure the adverse effects of racially-restrictive deeds and similar discriminatory methods that occurred in neighborhoods around the Property.</p>	<p>H-1.4.3 H-3.2.1 H-3.2.2 H-3.2.3</p>

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	Includes housing specifically-designed for persons with disabilities (and does not preclude housing anyone in other vulnerable groups such as seniors and returning citizens) for 15 percent of the units with broad accessibility measures for all units (e.g., elevators, in-unit washer/dryer, etc.) not possible or available in older buildings	H-4.1.3 H-4.3.3 H-4.3.4
	<b><i>Does not anticipate any owner-occupied housing (or any future homeowner assistance program), however, it is unusual for a single building to have rental and owner-occupied units together; instead, the Project contributes to a mix of rental and owner-occupied units in Sixteenth Street Heights, which is largely owner-occupied housing.</i></b>	H-1.3.2 H-1.4.2 H-3.1.1
<b>Environmental Element</b> (ch. 6)	The Project proactively advances climate resiliency, stormwater, landscaping, water efficiency, renewable energy, and energy efficiency objectives of the Plan.	
Consistent with the Environmental Element of the Plan, the Project:		
	Advances climate resilience objectives consistent with the District’s civic priorities by, among other things, (a) being located outside of any flood plain, (b) capturing a very high amount of stormwater runoff through green roof areas and other “absorbent” features, (c) providing on-site energy generating capabilities, and (d) relying on resilient and native vegetation selections.	E-1.1.1 E-2.1.3
	Incorporates a landscaping and tree planting to (a) reduce adverse heat island impacts, (b) capture and manage stormwater as part of climate resilience and general infrastructure resilience priorities, (c) provide habitat for pollinating species, (d) improve the overall quality of the environment, and (e) improve the aesthetic balance of the Project.	E-1.1.2 E-2.1.5 E-2.1.6 E-4.1.1 to E-4.1.3 E-7.1.3 PROS-3.3.3 IN-2.2.1 IN-2.2.2
	Complies with green building methods, helps raise awareness of those methods, minimizes the risk of future groundwater contamination, and mitigates and anticipates environmental impacts through stormwater capture, water and energy efficiency measures, and other sustainable elements.	E-4.2.1 E-4.2.2 E-4.4.1 E-6.1.5
	Employs water conservation methods to achieve sustainable building goals.	E-3.1.1
	Incorporates renewable energy and energy efficiency measures that reduce greenhouse gases and improve overall air quality although the Project does not achieve the lofty net zero goals encouraged in this Element (see above in the Housing Element for further discussion regarding the Plan’s net zero objectives); also anticipates implementing a novel sewer heat energy capture system as an alternative energy source consistent with these objectives and the “demonstration” objectives of this Element.	E-3.2.1 to E-3.2.3 E-3.2.5 to E-3.2.8 E-3.2.13 to E-3.2.15 E-5.1.1 E-5.1.7 E-7.2.4
	Includes an evaluation of climate and resiliency measures and consideration of other environmental measures; however, the Project does not undergo a full environmental review at the zoning entitlement stage even though <b><i>the Plan encourages impact assessments that consider environmental and other impacts before any decision is made. Such reviews are not mandatory requirements in the Plan and are not typically included as part of PUD cases.</i></b>	E-4.4.2 E-4.4.3 E-5.1.3 IM-1.1.1 T-1.1.2
	Provides TDM measures, multi-modal enhancements, and other measures to reduce vehicle-related emissions (see also the Transportation Element analysis above).	E.5.1.5
	Avoids adding noise-generating uses near existing residential areas and is designed comply with the District’s noise limits.	E-6.2.1 E-6.2.5

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	Generates construction demolition debris because the site contains buildings that will be razed; <b><i>however, the deconstruction (rather than demolition) objective is not stated in mandatory terms in the Plan, and any demolition activity will comply with applicable health and safety standards.</i></b>	E-3.3.2 E-6.3.2
	Anticipates construction-period measures to limit erosion and avoid any adverse construction-period effects even with respect to the topographic changes across the Property.	E-2.3.1 to E-2.3.3 E-2.4.1 E-6.1.3
	Includes plans to control vectors, airborne dust, and vehicle emissions and otherwise mitigate impacts during construction.	E-6.5.1 IM-1.1.1
	Avoids creating an environmental justice situation vis-à-vis the WMATA Northern Bus Garage, which has recently pledged to be an all-electric facility. <sup>9</sup>	E-6.7.1 E-6.7.2
<b>Economic Development</b> (ch. 7)	The Project includes the Dance Loft as an economic anchor plus additional retail/service/eating and drinking uses to help to continue to revitalize 14 <sup>th</sup> Street NW and add entry-level and salaried jobs. ED-3.1.5 and ED-3.1.6	
Consistent with the Economic Development Element of the Plan, the Project:		
	Adds to the District’s performing arts and retail use job sectors to capture more regional and District resident discretionary spending and to help anchor the future development of neighborhood shopping options along a Main Street commercial center outside from the District’s historic commercial core and Mall that is developing its own unique identity with the assistance of the Uptown Main Street program.	ED-1.1.3 ED-2.2.1 ED-2.2.3 ED-2.2.5 ED-2.2.7 ED-2.3.2 ED-2.3.3 ED-3.1.1 to -3.1.3 ED-3.1.8
	Retains and avoids displacement of the Dance Loft on the Property. <b><i>The Project could potentially result in some displacement of small business retail tenants, including minority-owned businesses. In turn, the Applicant has prepared a suite of measures to mitigate small minority-owned business displacement through targeted assistance and a right to return.</i></b>	ED-3.2.6 ED-3.2.7
	Continues the success of a woman-owned non-profit organization and a variety of CBE organizations and provides future space for incubation of new small businesses or potentially the return of the existing tenants.	ED-1.1.4 ED-1.1.5 ED-2.2.4 ED-3.2.1 ED-3.2.2
	Adds opportunities for (a) entry-level jobs and jobs that result in upward mobility for District residents, (b) small start-up and incubator businesses through the future small-footprint retail spaces, (c) professional artists and entrepreneurs who will access the Dance Loft space for performance and instruction purposes.	ED-2.2.8 ED-4.2.6 ED-4.2.9
	Includes a commitment to CBE and First Source employment programs for local and/or small business spending and hiring.	ED-3.2.8 ED-4.2.12
	<b><i>Does not provide any opportunities for direct community equity investment. However, as with many policy objectives of the Plan, this item is only ambiguously applicable to private developers (as opposed to District policymaking more generally). On balance, the Project’s other positive attributes—affordable housing,</i></b>	ED-3.1.7

<sup>9</sup> See WMATA News, *Metro announces first all-electric bus garage to be built at Northern bus facility* (Sept. 20, 2021), available at <https://www.wmata.com/about/news/First-all-electric-bus-garage-to-be-built-at-Northern-bus-facility.cfm#:~:text=Metro%20announced%20today%20that%20it,years%20once%20all%20approvals%20are>

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<i>family-sized housing, Dance Loft retention, and job creation opportunities, chief among them—make the Project overwhelmingly consistent with the Plan and Small Area Plan.</i>		
<b>Urban Design and Historic Preservation Elements</b> (ch. 9 and 10)	The Project’s design advances the Plan’s design objectives on scales ranging from massing, orientation, and siting to the streetscape, placemaking, and pedestrian-level façade detailing.	
Consistent with the Urban Design Element of the Plan, the Project:		
Is consistent with the massing, design, building-orientation, corridor-based viewshed preservation, and Height Act-limited/horizontal urbanism principles in Washington DC and improves upon the delivery of such principles in the image of the District generally relative to the existing conditions.		UD-1.1.1 to UD-1.1.3 UD-1.1.5 UD-2.2.1 HP-2.1.1 HP-2.1.3 to HP-2.1.5
Promotes and improves upon the usability of the alley network surrounding the Property, including by widening the alley onto private property.		UD-1.1.8
Helps strengthen the 14 <sup>th</sup> Street NW corridor, a major thoroughfare in Washington, DC, in a location that does not disturb the “topographic bowl” of the city.		UD-1.4.1 UD-1.2.2 HP-1.6.2
Employs superior and innovative architectural design that advances the Small Area Plan’s design goals (see below), improves nearby public spaces, avoids monotony, and will endure for decades.		UD-4.1.2 UD-4.1.7 UD-4.1.8 UD-4.2.1
Advances the streetscape objectives of the Plan including: (a) comfortable, safe, and interesting walking paths with direct, accessible pedestrian corridors and numerous pedestrian entrances to a mix of at-grade uses, (b) street trees and pedestrian lighting, (c) cycling infrastructure, (d) integrated non-vehicular transportation options, (e) seamless connections to publicly accessible space on adjacent (privately-owned) portions of the Property, (f) pedestrian-focused placemaking and traffic-calming improvements including crosswalks, (g) no curb cuts, and (h) “public spaces that can be flexibly programmed to enhance public life”.		UD-2.1.1 UD-2.1.2 UD-2.1.3 UD-2.1.4 UD-2.1.5 UD-2.1.6 UD-2.1.7 UD-2.2.3
Creates a unique indoor-outdoor dance studio along 14 <sup>th</sup> Street, NW, consistent with the Plan’s goals regarding “spaces that incorporate play and welcome multiple generations”, “social play” and “mini-play destinations” all of which bring people together (outdoors) in an inclusive way and accessible manner in public space; in addition, the Project provides high-quality, street-activating publicly spaces for sidewalk vendors, cafés, and foodsellers, special events, and other activities, with features, lighting, and an overall design that promotes public safety, inclusion, and accessibility; importantly, the Project does not remove or adversely affect any meaningful existing open spaces.		UD-2.3.1 to UD-2.3.5 UD-2.4.1 to UD-2.4.4 UD-3.1.1 UD-3.1.3 to UD-3.1.5 UD-3.2.2 UD-3.2.4 UD-3.2.5 UD-3.3.1 to UD-3.3.5 UD-2.2.7 PROS-2.2.7
Preserves the existing defined streetwall, employs projections (canopies, oriels, and balconies) that preserve views along 14 <sup>th</sup> Street NW, provides high-quality storefronts, includes multiple entrances with a mix of uses to enliven the entire frontage, and improves the adjacent streetscape with social and pedestrian-oriented features that also add visual interest.		UD-4.2.2 UD-4.2.3 UD-4.2.6 UD-4.3.2 UD-4.3.5

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	<p>Provides a classic tripartite design with a strong top level that respects the urban design intent of the Height Act and penthouse setback requirements as well as the character of the neighborhood while also leveraging the views available at the Property and creating opportunities for outdoor gathering, and resident interactions, and neighborhood play.</p>	<p>UD-3.2.1 UD-4.2.5 UD-4.3.1 UD-4.3.4 UD-2.3.5 UD-1.2.4</p>
	<p><i>Creates sharp transitions in mass, scale, does not maintain existing roof lines, and changes the character relative to the single-story buildings and existing rooflines in the immediate vicinity of the Property (without any of the more customary stepping or transitioning that might be expected), however, such transitions are consistent with the density designations of the Plan and the revitalization objectives of the Small Area Plan, which anticipates the Project leading future development of the corridor (and indeed future development proposals are underway for other sites along 14<sup>th</sup> Street NW in the vicinity of the Project); moreover, “new architectural contributions that complement and enrich the District’s design heritage” are encouraged.</i></p>	<p>UD-2.2.4 UD-2.2.5 UD-2.2.2 UD-4.2.4 UD-4.3.3 HP-1.6.3</p>
<p><b>Arts and Culture, Education, and Parks, Recreation and Open Space Elements</b> (ch. 8, 12, and 14)</p>	<p>The Project’s innovative arts component, the retention of the Dance Loft, advances numerous related elements of the Arts and Culture, Community Facilities, Education, and Parks, Recreation, and Open Space Elements. Of particular note, objective AC-1.1.10 encourages “Developing long term, low-cost cultural space should be considered an important and desired benefit in discretionary development reviews. Where appropriate, it should be provided in addition to, not instead of, any affordable housing deemed appropriate for the project.” <i>Id.</i> § 1403.14. This particular objective plus its companion in the Land Use Element (i.e., the LU-2.3.12 objective cited above) speak with precision to the Project and outweigh any potential inconsistency between other objectives which are not so clearly applicable to this Application.</p>	
<p>Consistent with these four Elements of the Plan, the Dance Loft use in the Project:</p>		
	<p>Preserves and enhances an “arts and cultural organization[’s] facilities to enhance the quality, diversity, and distribution of cultural infrastructure” that (a) “accommodate[s] a wide variety of arts disciplines, cultures, individuals, and organizations,” (b) is located near transit on a revitalizing Main Street corridor located “beyond the Mall,” and (c) draws visitors and patrons (and their spending) to the District.</p>	<p>AC-1.1.1 AC-1.1.5 AC-1.1.6 AC-1.2.4 AC-3.2.1 ED-3.2.1</p>
	<p>Provides a variety of innovative performances spaces to reach a diversity of District residents and expand the cultural infrastructure in the District.</p>	<p>AC-1.1.7 AC-1.2.2 AC-1.2.3</p>
	<p>Avoids the displacement of a cultural organization through a partnership with a private development team to “to use art and cultural facilities, combined with programming, to support vibrant neighborhoods and inclusive real estate development” (<i>id.</i> § 1415.9).</p>	<p>AC-1.2.7 AC-4.2.2 AC-4.3.7</p>
	<p>Is positioned alongside affordable housing to provide synergies for affordable housing for artists and performers (within the strictures of the District’s affordable housing lottery regulations).</p>	<p>AC-3.1.1 to -3.1.4</p>
	<p>Follows a robust and ongoing community engagement and planning process.</p>	<p>AC-4.3.4</p>
	<p>Will continue its strong tradition of arts- and cultural-based partnerships with local educational institutions and for area youth in a manner that brings arts and cultural programming and recreation to such populations in an equitable fashion.</p>	<p>AC-4.4.1 AC-4.4.2 AC-4.4.4 EDU-1.1.6</p>

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		EDU-1.4.2 EDU-2.1.1 PROS-2.2.5
	Does not involve any school-related proffers specifically (there was no request from the community for such proffers) and additional proffers are not warranted in light of the Project’s robust package of public benefits; however, the Applicant, through Dance Loft, does maintain a robust presence in many District public schools.	EDU-1.2.3 EDU-1.3.3
<b>Community Services and Infrastructure Elements</b> (ch. 11 and 13)	The Project is served by adequate community services and infrastructure, which will be updated to the extent necessary as part of the construction of the Project.	
Consistent with the Infrastructure and Community Services and Facilities Elements of the Plan, the Project:		
	Is served by adequate infrastructure, and the Applicant’s team has worked with PEPCO, DC Water, and other service providers on the location, scale, and scheduling/timing of facilities to meet future development and neighborhood demand, fees for which are paid at the time of obtaining a building permit; <i>however, some electrical utilities in the vicinity of the Property are not underground contrary to the goals of IN-5.1.2.</i>	IN-1.1.1 IN-5.1.1 IN-5.1.2 IN-6.1.1 IN-6.2.2 IM-1.1.3
	Includes solid waste collection from a fully-indoor trash collection facility which reduces adverse effects (noise, odors, truck movements) on neighbors.	IN-3.1.1 IN-3.1.2
	Contributes property taxes to ensure that it pays its fair share for public facilities (note that this objective provides that impact fees are only to be “considered” for new development and are not required or even necessarily recommended or prioritized).	CSF-1.1.2 CSF-1.2.6
	Adds residential density and demand that will attract and justify continued and further investment in community-serving health and emergency services.	CSF-2.3.1 CSF-4.2.4
	Includes amenities, programming, and services for any future senior residents of the neighborhood (sidewalks, parking, balconies, etc.).	CSF-2.4.4
<b>Implementation Element</b> (ch. 25)	The Project is consistent with the implementation objectives of the Plan, including those specifically applicable to the Zoning Commission’s review of the Applications.	
Consistent with the Implementation Element of the Plan, the Project:		
	Considers, and provides, this analysis to allow the Commission to evaluate, the Project against the Plan’s overlapping (and sometimes competing or contradictory) policy objectives as part of a consolidated PUD and related Zoning Map amendment case.	IM-1.1.5 IM-1.3.3 IM-1.3.4
	Involves an amendment to the Zoning Map that remedies the existing inconsistency between the current MU-3A zoning and the Moderate Density designation.	IM-1.3.2
	Was developed as part of a robust public process that included meaningful ANC, neighbor, and other stakeholder participation in the design and revisions of the Project, its program of uses, package of public benefits, and mitigation measures.	IM-1.5.1 IM-1.5.2 IM-1.5.3 IM-1.5.5
	Is consistent with the existing Small Area Plan (see below).	IM-1.2.1
	Uses additional height and density and flexibility from the Zoning Regulations’ parking to achieve other objectives of the Plan including affordable housing and other goals that advance racial equity outcomes.	IM-1.1.4
	Includes a transportation study (with recommended conditions to mitigate potential impacts), the racial equity analysis contained herein, and commitments regarding District employment and other requirements.	IM-1.1.6
	Includes a significant housing component with “housing for low-income households ... and larger family-sized units to serve growing and multigenerational families” per this objective.	IM-1.1.7

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	Includes a package of public benefits that accrue either to the District as a whole or to ANC 4C specifically and that will be monitored and enforced by District agencies.	IM-1.1.8 IM-1.1.9
	<b>District Elements Overall</b>	<b>The Project is not inconsistent with the Land Use Element, which is the most heavily weighted Element of the Plan, even when considering the anti-displacement objectives of the Plan, as recently amended. Modest inconsistencies with other individual policy objectives of other District Elements are significantly outweighed by the Project’s overall consistency with the District Elements.</b>
<b>Area Element</b>	<b>Rock Creek East Area Element (ch. 22)</b>	The Project advances the housing, commercial, livability, transportation, and sustainability objectives of the Rock Creek East Area Element.
	Consistent with the Area Element, the Project:	
	Balances respect for the density and height of nearby residences with the need for new housing opportunities, recognizing that those two aspects of this single objective operate somewhat in tension with each other but tip in favor of additional housing given the Plan’s comments about affordable housing being a civic priority and the greatest weight in the Plan being given to the Land Use Element.	RCE-1.1.2 RCE-1.1.1
	Adds the new density and development at a designated “Node” along 14 <sup>th</sup> Street NW.	RCE-1.1.3 RCE-2.7.1
	Add new housing that increases housing choices and affordability with a priority on housing for families and no loss of existing housing (that could, e.g., be rehabilitated).	RCE-1.1.6 RCE-1.1.5
	Maintains a mix of retail and service uses, small businesses, and an arts organization with strong multicultural programming.	RCE-1.1.4 RCE-1.1.13 RCE-1.2.5 RCE-1.2.6 RCE-2.7.4
	Provides an appropriate amount of parking (in a highly efficient stacked system), other alternative mobility improvements, and additional residents, workers, and visitors who will increase demand for transit along 14 <sup>th</sup> Street NW and mitigates transportation impacts otherwise.	RCE-2.7.3 RCE-1.1.9 To -1.1.12 RCE-1.1.14
	Integrates sustainable design elements and renewable energy and improves the public realm and pedestrian environment surrounding the Property including along 14 <sup>th</sup> Street, NW, in the alleys to the rear, and at nearby intersections.	RCE-1.1.15 RCE-2.7.2
<b>Small Area Plan</b>	<b>Central 14<sup>th</sup> Street Vision Plan and Revitalization Strategy</b>	The Project helps achieve the active, walkable, and connected vision for central 14 <sup>th</sup> Street, NW by retaining an anchor arts destination and adding new residents who will support local businesses and bolster the case for transit enhancements to the corridor. The Project revitalizes an underused commercial site with new retail and arts offerings and a significant contribution of affordable housing at a scale and density in line with the Plan’s vision for the Property.
	Consistent with the Small Area Plan, the Project:	
	Continues to provide a mix of retail uses and other uses (i.e., the Dance Loft on 14) that attract visitors to the area and continues the existing active, walkable and safe condition of 14th Street, NW in the vicinity of the Property, adds to the transit and micro-mobility user base for the neighborhood without impairing east-to-west connectivity and without reducing the “green-ness” of the public space in front of the Property (or elsewhere given the lack of existing greenness on the Property today).	Priorities (pg. 5-7)

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	<p>Contributes to the overall eclectic mix of uses along 14<sup>th</sup> Street, NW by adding residential uses and new residents to a property where there currently are none and retaining an anchor arts/entertainment use; helps contribute to the creation of a desirable and unique destination and a welcoming and memorable experience; and adds new residents who will help contribute to the safety and activity of the Property's adjacent public spaces. The Dance Loft use and the Project's exemplary design both help define the sense of place and encourages visitors to return again and again.</p>	<p>Vision Statement (pg. 5-7)</p>
	<p>Improves the aesthetics of the street wall along 14th Street, NW, especially at the current entrance to the Value Furniture premises, includes numerous sustainable design strategies and amenities (Recommendation 2), represents private investments that contribute positively to the overall pedestrian experience along 14th Street, NW given that the Project's architecture and detailing are pedestrian-oriented (Recommendation 3), improves the appearance of an underutilized commercial property through a community-involved design and development process (Recommendation 5). Note that the Applicant does not anticipate seeking ANC grant funds, but has received written support from the ANC for the Project (Recommendation 6). (Recommendations 1 and 5 are not applicable.)</p>	<p>Public Realm Goals (pg 13-17)</p>
	<p>Employs an innovative and highly-efficient stacked parking system and adds new residents who will rely on transit and cycling, adds of new residents helps justify additional WMATA improvements in transit service along 14th Street, NW (Recommendation 1). Recommendation 2 is complete, independent of the Project, and the Applicant does not anticipate any car-sharing options for the Project's garage (Recommendation 3). (Recommendations 4 and 5 are not applicable.)</p>	<p>Transit Goals (pg 13-17)</p>
	<p>Adds a new building and new residents who will increase the conditions for existing and new small businesses along 14th Street NW, and to the extent area business groups apply for grant funding, the Applicant will explore participating in/supporting such efforts as part of Uptown Main Street. (Recommendations 1-3 are not applicable.)</p>	<p>Business Goals (pg 20-23)</p>
	<p>Dance Loft use engages in marketing and advertising outside of the neighborhood to increase patronage to the site. Since Dance Loft's opening in 2015, per conversations with Uptown Main Street, local eateries and convenience stores rely on lunchtime and dinnertime patronage from those attending classes, rehearsals, and/or performances at Dance Loft on 14 and to the extent area business groups engage in coordinated branding or marketing or related activities, the Applicant will explore participating in/supporting such efforts (Recommendation 1). The Dance Loft use itself is an anchor use that attracts visitors from outside the neighborhood and those visitors patronize other nearby shops and businesses (Recommendation 2).</p>	<p>Marketing Goals (pg 20-23)</p>
	<p>Represents land use change and infill development that is contextual. The Project's additional residents support the goal of attracting a grocery anchor and supporting existing businesses:</p>	<p>Node Two Goal</p>
	<ul style="list-style-type: none"> <li>• Involves a retail strategy that builds off the principles of the Vision Plan. The Dance Loft use is unique to the corridor and an attractor to visitors from outside the neighborhood while also a benefit to those within the neighborhood. The services offered by Dance Loft are not replicated elsewhere in the District and are truly unique to this location along the 14th Street, NW corridor.</li> <li>• Achieves this "Think Different" goal by providing a "healthy living studio" use.</li> <li>• Includes a commitment by the Applicant to continue to work with neighbors and community members to identify other retail tenants, likely including one or more eating and drinking establishment businesses, that advance the other retail objectives of the Vision Plan.</li> </ul>	<p>Think Different Retail (pg. 31-39)</p>



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	<ul style="list-style-type: none"> <li>• Is a development site, consistent with the Vision Plan that leverages the Property’s visibility, deep footprint and alley access points to provide a unique mixed-use anchor development at the core of “Node Two”.</li> <li>• Includes ground floor retail and anchor uses with four floors of residential above. Although the residential is one story greater than that envisioned here, all of the residential density above the amount identified in the Plan is affordable, advancing other priority goals of the District.</li> <li>• Was the subject of the Council’s recent modifications to the Future Land Use Map to allow moderate density residential and commercial (including the MU-5A zone expressly).</li> <li>• Seeks an increase in zoning appropriate for the Future Land Use Map moderate density designation.</li> <li>• Is not subject to the final bullet of Development Concept 2a, which applies to the property on the east side of 14th Street, NW does not apply to the Property, which is on the west side of 14th Street, NW.</li> </ul>	Dev. Concept 2a
	<ul style="list-style-type: none"> <li>• Is at the "Value Furniture" site, includes residential infill above ground floor non-residential uses.</li> <li>• Steps away from the existing residential uses and locates the height and density along 14th Street, NW to the extent feasible.</li> <li>• Includes store-front improvements that are highly articulated at the ground level, in the vein of the existing retail character.</li> <li>• Provides continuous street frontage and continues the pedestrian-friendly nature of the area. The Project’s 5-foot increase of the alley does not disrupt the pedestrian-friendly nature, as a 15-foot alley is still on the low end for alley widths</li> <li>• Includes parking is in a wrapped garage and is not accessible directly from 14th Street, NW.</li> <li>• Incorporates appropriate streetscape improvements.</li> </ul>	Node Two Design Guidance
	Recommendation 1 has been approved by the Council and signed by the Mayor. The change in zoning is part of this Application. Recommendations 2 and 3 are not applicable to the Project	Goals for Node Two
	<b>Area Element and Small Area Plan Overall</b>	<b>The Project implements the Zoning Map amendment, development, density, affordable housing, commercial, sustainability, transit, public realm and other objectives of the Area Element and Small Area Plan, and is overwhelmingly consistent with that planning guidance, when taken as a whole.</b>