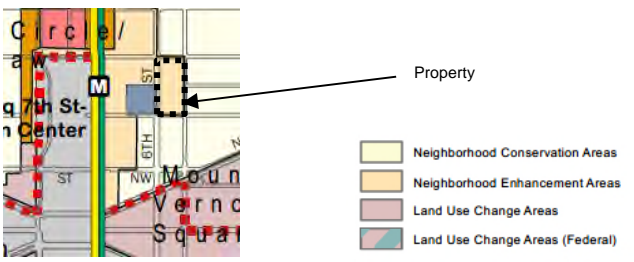
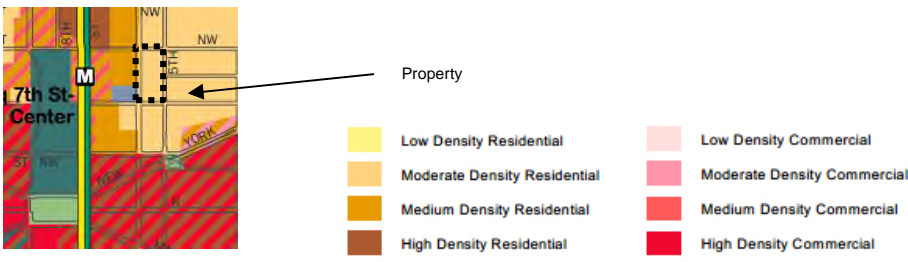


Consistency with the Comprehensive Plan and Convention Center Area Strategic Development Plan

Map Designation	Application to the Project
<p>The Property is designated on the Generalized Policy Map as a “Neighborhood Enhancement Area,” which is intended as “primarily residential in character. . . . with opportunities for compatible small-scale infill development, including new single family homes, townhomes, and other density housing types. . . .” and to “ensure that new development “fits-in” and responds to the existing character, natural features, and existing/planned infrastructure capacity. New housing should be encouraged to improve the neighborhood and must be consistent with the land use designation on the Future Land Use Map. The unique and special qualities of each area should be maintained and conserved.” 10-A DCMR §§ 223.6, 223.7.</p> 	<p>The Project* is not inconsistent with the Generalized Policy Map’s designation for the Property. The Project is exclusively residential in character and is among the “other density housing types” that “fits-in” and responds to the existing character and existing/planned infrastructure capacity of the area surrounding the Property. The Project is consistent with the land use designation on the Future Land Use Map (shown below) and helps maintain and conserve the unique and special qualities of the surrounding area, including walkable streets, patrons to support the nearby small corner stores and retail and other uses along 7th and 9th Streets, NW, a transit-oriented character, and low (50 foot) heights.</p> <p>*Unless otherwise defined in this Exhibit, all capitalized terms used herein have the meaning first set forth in the Statement to which this Exhibit is attached.</p>
<p>The Property is shown on the Future Land Use Map as “Moderate Density Residential” which “applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings” and expressly contemplating the RA-2 zone (formerly the R-5-B zone district). <i>Id.</i> §§ 225.4.</p> 	<p>The Project is not inconsistent with the Future Land Use Map’s designation for the Property. The existing zone designation for the Property is expressly contemplated within the Moderate Density Residential category, and the Project does not seek to change that existing zone designation. In addition, the Project is a “low-rise apartment building” within the meaning of the Future Land Use Map. Finally, the Future Land Use Map contemplates that “the granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited.” <i>Id.</i> § 226.1. Thus, to the extent the Project exceeds “Moderate Density Residential” limits, such excess height is permissible under the Comprehensive Plan when obtained through a PUD.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>The Project is consistent with the Comprehensive Plan as a whole. The Project is either affirmatively consistent or not inconsistent with the following Guiding Principles of the Comprehensive Plan’s Framework Element and the individual policy objectives of the District Wide and Area Elements for the reasons stated in the right column below. The Project is not inconsistent with those Principles and policy objectives not listed below, which are not applicable to the Project or the Property.</p>	
<p>Framework Element: Guiding Principles</p>	
<p>1. Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives such as poverty, crime, and homelessness. <i>Id.</i> § 217.1</p>	<p>The Project is the type of desirable change in the District that improves upon and protects the neighborhood (e.g., high-quality architectural design and adds housing opportunities) and helps alleviate negative aspects of City dwelling (e.g., removes surface parking and adds “eyes on the street”).</p>
<p>3. Diversity also means maintaining and enhancing the District’s mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples. <i>Id.</i> § 217.3</p>	<p>The Project adds to the diversity of housing types in the Shaw neighborhood and accommodates households of all sizes.</p>
<p>6. Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. <i>Id.</i> § 217.6</p>	<p>The Project redevelops a transit-oriented infill opportunity and is designed to respect the community context. More than adequate infrastructure capacity will serve the Project.</p>
<p>8. The residential character of neighborhoods must be protected, maintained and improved. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places in which to live. These qualities can lead to development and redevelopment pressures that threaten the very qualities that make the neighborhoods attractive. These pressures must be controlled through zoning and other means to ensure that neighborhood character is preserved and enhanced. <i>Id.</i> § 218.1</p>	<p>The Project protects and maintains the residential character of the surrounding neighborhood and improves an underutilized lot in a way that makes the entire neighborhood more desirable and attractive.</p>
<p>9. Many neighborhoods include commercial and institutional uses that contribute to their character. Neighborhood businesses, retail districts, schools, park and recreational facilities, houses of worship and other public facilities all make our communities more livable. These uses provide strong centers that reinforce neighborhood identity and provide destinations and services for residents. They too must be protected and stabilized. <i>Id.</i> § 218.2</p>	<p>The Project adds residents who will support neighborhood commercial uses and the Project helps reinvigorate the Property, which is surrounded by five houses of worship.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>10. The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. <i>Id.</i> § 218.3</p>	<p>The Project adds approximately 363 units of housing, adds income-restricted (i.e., affordable) housing where currently none exists, and creates a building welcoming to residents with a mix of incomes.</p>
<p>11. The District of Columbia contains many buildings and sites that contribute to its identity. Protecting historic resources through preservation laws and other programs is essential to retain the heritage that defines and distinguishes the city. Special efforts should be made to conserve row houses as the defining element of many District neighborhoods, and to restore neighborhood “main streets” through sensitive renovation and updating. <i>Id.</i> § 218.4</p>	<p>The Project is not within a historic district, but it is opposite a historic district on two sides. The Project includes many special efforts and design elements to conserve and respect the nearby historic row houses as defining elements of the neighborhood.</p>
<p>13. Enhanced public safety is one of the District’s highest priorities and is vital to the health of our neighborhoods. The District must continue to improve safety and security, and sustain a high level of emergency police, fire, and medical assistance. Moreover, the District must engage in appropriate planning and capital investments to reduce the likelihood and severity of future emergencies. <i>Id.</i> § 218.6</p>	<p>The Project enhances public safety by removing surface parking lots and putting residences on each of the four surrounding streets.</p>
<p>14. Confidence in government begins at the neighborhood level. It is built block-by-block, based on day-to-day relationships and experiences. Meaningful citizen participation and quality, responsive neighborhood services are essential to sustain successful neighborhoods. <i>Id.</i> § 218.7</p>	<p>The Project has already begun to undergo a robust citizen-led review process and citizen input will continue through the PUD process.</p>
<p>15. Public input in decisions about land use and development is an essential part of creating successful neighborhoods, from development of the Comprehensive Plan to every facet of its implementation. <i>Id.</i> § 218.8</p>	<p>The public will have input on the decision about the Project and its implementation of the Comprehensive Plan.</p>
<p>22. Providing more efficient, convenient, and affordable transportation for residents to access jobs in the District and in the surrounding region is critical to achieve the goal of increasing District residents’ access to employment. <i>Id.</i> § 219.7</p>	<p>The Project is transit-oriented and allows approximately 363 households to have transit access to jobs in the District and beyond.</p>
<p>25. Increased mobility can no longer be achieved simply by building more roads. The priority must be on investment in other forms of transportation, particularly transit. Mobility can be enhanced further by improving the connections between different transportation modes, improving traveler safety and security, and increasing system efficiency. <i>Id.</i> § 220.1</p>	<p>The Project prioritizes pedestrian, bicycle, and transit mobility modes over single-occupant vehicles.</p>
<p>31. The District’s communities are connected by a shared heritage of urban design, reflecting the legacy of the L’Enfant Plan, the McMillan Plan, the Height Act of 1910, and preservation of much of the historic urban fabric. After more than two centuries of building, the nation’s capital is still a remarkable place. Urban design and streetscape policies must retain the historic, majestic, and beautiful qualities that make Washington unique among American cities. <i>Id.</i> § 220.7</p>	<p>The Project’s urban design reinforces the L’Enfant Plan, respects the Height Act, and contributes to the critical mass of beautiful architecture and landscaping that makes the District a remarkable place.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
33. The earth, water, air, and biotic resources of the District must be protected. Furthermore, such resources should be restored and enhanced where they have been degraded by past human activities. In particular, reforestation of the District and maintenance of its tree cover should be emphasized to sustain the District’s reputation as one of America’s “greenest” cities. <i>Id.</i> § 221.2	The Project introduces modern sustainability and “green” measures to a site that currently contains surface parking and obsolete structures. The Project advances each of the specific sustainability objectives in these two Guiding Principles.
34. As the nation’s capital, the District should be a role model for environmental sustainability. Building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. <i>Id.</i> § 221.3	
35. Planning decisions should improve the health of District residents by reducing exposure to hazardous materials, improving the quality of surface and groundwater, and encouraging land use patterns and land uses that reduce air pollution and facilitate pedestrian and bicycle travel. <i>Id.</i> § 221.4	The Project’s transit-oriented location and pedestrian/bicycle-friendly design are land use decisions that help reduce air pollution.
36. The District’s parks and open spaces provide health, recreational, psychological, aesthetic, and ecological benefits that contribute to the quality of life. Maintenance and improvement of existing parks, and increased access to open space and recreation across the city are basic elements of the city’s vision. The District’s public open spaces should be protected against exploitation, and their recreational and environmental values should be conserved. <i>Id.</i> § 221.5	The Project adds usable green open spaces that will have health, recreational, psychological, aesthetic, and ecological benefits for the Project’s new residents in the Shaw neighborhood.
Land Use Element	
Policy LU-1.1.7: Central Employment Area Edges --Support the retention of the established residential neighborhoods adjacent to the Central Employment Area [“CEA”]. Appropriate building setbacks, lot coverage standards, and a stepping down in land use intensity and building height shall be required along the edges of the CEA to protect the integrity and historic scale of adjacent neighborhoods and to avoid creating sharp visual distinctions between existing and new structures. <i>Id.</i> § 304.13	The Project is located within a residential area immediately adjacent to the CEA. The Project’s low height, articulation, and materials protect the integrity of the adjacent blocks and avoid any sharp visual differences.
Policy LU-1.3.2: Development Around Metrorail Stations --Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. <i>Id.</i> § 306.11	The Property is currently poorly utilized land within one block of a Metrorail entrance. The Project is designed to minimize the necessity of automobiles and maximize transit ridership while respecting the character of the surrounding blocks and the capacity of the Metrorail stop.
Policy LU-1.3.3: Housing Around Metrorail Stations --Recognize the opportunity to build senior housing and more affordable “starter” housing for first-time homebuyers adjacent to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations. <i>Id.</i> § 306.12	Although the Project is not dedicated to seniors or for sale housing, it is not inconsistent with this objective of providing housing and affordable housing near transit in order to keep household expenses lower.

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-1.3.4: Design To Encourage Transit Use--Require architectural and site planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots. <i>Id.</i> § 306.13</p>	<p>The Project is designed to encourage pedestrian and bicycle activity and make those forms of transportation convenient to access the nearby Metrorail. The Project does not have a “suburban building form” and removes existing surface parking spaces.</p>
<p>Policy LU-1.3.5: Edge Conditions Around Transit Stations--Ensure that development adjacent to Metrorail stations is planned and designed to respect the character, scale, and integrity of adjacent neighborhoods. For stations that are located within or close to low density areas, building heights should “step down” as needed to avoid dramatic contrasts in height and scale between the station area and nearby residential streets and yards. <i>Id.</i> § 306.14</p>	<p>The Project’s use, height, site plan, and overall design respects the adjacent blocks. The Project steps down in height from the taller Convention Center building at the Metrorail stop toward the lower height rowhouses east of the Convention Center.</p>
<p>Policy LU-1.3.6: Parking Near Metro Stations--Encourage the creative management of parking around transit stations, ensuring that automobile needs are balanced with transit, pedestrian, and bicycle travel needs. New parking should generally be set behind or underneath buildings and geared toward short-term users rather than all day commuters. <i>Id.</i> § 306.15</p>	<p>The Project employs the type of parking solution encouraged by this Policy: all of the Project’s parking is located below-grade and is reserved for residents, not commuters. The Project’s site plan prioritizes pedestrian and bicycle travel over automobile needs.</p>
<p>Policy LU-1.3.7: TOD Boundaries--Tailor the reach of transit-oriented development (TOD) policies and associated development regulations to reflect the specific conditions at each Metrorail station and along each transit corridor. The presence of historic districts and conservation areas should be a significant consideration as these policies are applied. <i>Id.</i> § 306.16</p>	<p>The Project reflects the reflects the “Transit Oriented Housing” goals and policies of the Convention Center Area Strategic Development Plan in furtherance of this item.</p>
<p>Policy LU-1.4.1: Infill Development--Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. <i>Id.</i> § 307.5</p>	<p>The Project is infill development on vacant land that currently contains gaps in the urban fabric. The Project’s height, architecture, and materials complement nearby blocks.</p>
<p>Policy LU-1.4.3: Zoning of Infill Sites--Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development. <i>Id.</i> § 307.7</p>	<p>The Project does not propose any change in zoning, which is already compatible with the prevailing development pattern nearby.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-2.1.1: Variety of Neighborhood Types--Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. <i>Id.</i> § 309.5</p>	<p>The Project is consistent with this objective because it strengthens the character of Shaw as a moderate-density residential neighborhood. The positive elements of Shaw include zero lot line front setbacks, predominantly masonry architecture, and a predominantly residential character in the vicinity of the Property. The Project preserves and enhances each of these elements by being compatible in every such respect.</p>
<p>Policy LU-2.1.2: Neighborhood Revitalization--Facilitate orderly neighborhood revitalization and stabilization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need. Use social, economic, and physical indicators such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate as key indicators of need. <i>Id.</i> § 309.7</p>	<p>The Project facilitates orderly neighborhood revitalization and stabilization through a government action: a PUD. The Project’s private party sponsorship contributes roughly 363 new housing units while allowing District resources to be devoted elsewhere.</p>
<p>Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods--Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others. <i>Id.</i> § 309.8</p>	<p>The Project balances the goals of increasing the housing supply and protecting neighborhood character and preserving historic resources. The Project contributes a meaningful number of new units (1 percent of the Mayor’s recent goal) but foregoes the additional height permitted under a PUD in order to protect character and respect nearby historic resources.</p>
<p>Policy LU-2.1.4: Rehabilitation Before Demolition--In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition. <i>Id.</i> § 309.9</p>	<p>The Project does not rehabilitate or reuse existing buildings. However, it is not inconsistent with this objective, which seeks rehabilitation or reuse only “generally.” Demolition of the existing buildings on the Property is appropriate here given the addition of a substantial number of new units and the substantially improved architecture and environmental performance of the Project relative to the existing buildings.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-2.1.5: Conservation of Single Family Neighborhoods--Protect and conserve the District’s stable, low density neighborhoods and ensure that their zoning reflects their established low density character. Carefully manage the development of vacant land and the alteration of existing structures in and adjacent to single family neighborhoods in order to protect low density character, preserve open space, and maintain neighborhood scale. <i>Id.</i> § 309.1</p>	<p>Some of the blocks surrounding the Project contain single family row houses. The Project maintains the appropriate neighborhood scale given that many of the existing rowhouses have already been converted to multiple dwellings.</p>
<p>Policy LU-2.1.6: Teardowns--Discourage the replacement of quality homes in good physical condition with new homes that are substantially larger, taller, and bulkier than the prevailing building stock. <i>Id.</i> § 309.11</p>	<p>Similar to the discussion in Policy LU-2.1.4, the existing buildings are not in good physical condition. Therefore, even though the Project presents a building that is larger, taller, and bulkier than the prevailing building stock on the Property, it is not inconsistent with this Policy because of the quality of the existing buildings on the Property.</p>
<p>Policy LU-2.1.7: Conservation of Row House Neighborhoods--Protect the character of row house neighborhoods by requiring the height and scale of structures to be consistent with the existing pattern, considering additional row house neighborhoods for “historic district” designation, and regulating the subdivision of row houses into multiple dwellings. Upward and outward extension of row houses which compromise their design and scale should be discouraged. <i>Id.</i> § 309.12</p>	<p>The Project protects the character of the surrounding row house blocks because its height and scale are consistent with the existing pattern of development. Any potential adverse effects of the Project on nearby historic rowhouses is mitigated by the configuration of the Property as a single contiguous block that does not contain any existing buildings.</p>
<p>Policy LU-2.1.8: Zoning of Low and Moderate Density Neighborhoods--Discourage the zoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through R-4) for multifamily apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood. <i>Id.</i> § 309.13</p>	<p>The Project does not result in the demolition of any housing in good condition. Moreover, the Project is not out of character with the existing neighborhood. Finally, the Project does not entail any rezoning, so it is not at all inconsistent with this policy objective.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-2.1.9: Addition of Floors and Roof Structures to Row Houses and Apartments--Generally discourage increases in residential density resulting from new floors and roof structures (with additional dwelling units) being added to the tops of existing row houses and apartment buildings, particularly where such additions would be out of character with the other structures on the block. Roof structures should only be permitted if they would not harm the architectural character of the building on which they would be added or other buildings nearby. <i>Id.</i> § 309.14</p>	<p>The Project does not add any new floors or structures to existing buildings. The Project does contain new roof structures, which do not harm the architectural character of any nearby buildings. All such structures are fully-compliant with the Zoning Regulations and are elegantly designed and clad.</p>
<p>Policy LU-2.1.10: Multi-Family Neighborhoods--Maintain the multi-family residential character of the District’s Medium and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible. <i>Id.</i> § 309.15</p>	<p>The Project maintains the character of an existing multi-family residential block and does not add any incompatible uses. Instead, the Project makes the surrounding sidewalks more attractive, and pedestrian-friendly.</p>
<p>Policy LU-2.1.11: Residential Parking Requirements--Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. <i>Id.</i> § 309.16</p>	<p>The Project provides an amount of parking that is between the minimum amount of parking allowed under the Zoning Regulations given the proximity to transit with the desire to not disrupt neighborhood street parking supply. In addition, all of the Project’s parking is located underground in order to minimize interference with traffic flow and to maintain an attractive pedestrian environment.</p>
<p>Policy LU-2.2.2: Appearance of Vacant Lots and Structures--Maintain and enforce District programs (such as “Clean It Or Lien It”) which ensure that vacant lots and buildings are kept free of debris, litter, and graffiti. Such sites should be treated in way that eliminates neighborhood blight, improves visual quality, and enhances public safety. <i>Id.</i> § 310.3</p>	<p>The Project’s removal and replacement of vacant buildings advances this objective of improving the District’s visual quality and enhancing public safety.</p>
<p>Policy LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings--Reduce the number of vacant and abandoned buildings in the city through renovation, rehabilitation, and where necessary, demolition. Implement programs that encourage the owners of such buildings to sell or renovate them, and apply liens, fines, and other penalties for non-compliant properties. <i>Id.</i> § 310.4</p>	<p>The Project’s removal and replacement of vacant buildings also advances this objective, which expressly contemplates demolition of such buildings. The Project will reduce the number of vacant residential buildings in the District.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-2.2.4: Neighborhood Beautification--Encourage projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. <i>Id.</i> § 310.5</p>	<p>The Project's superior architecture, urban design, and landscaping improve the visual quality of the Shaw neighborhood in accordance with this policy objective.</p>
<p>Policy LU-2.2.5: Enforcement of Approval Conditions--Fully enforce conditions of approval for new development. Ensure that such projects are designed, built, and operated consistently with such conditions, and apply appropriate penalties in the event of non compliance. <i>Id.</i> § 310.6</p>	<p>The PUD process contemplates conditions of approval, which will be imposed on the Project through the Commission's Order in this case.</p>
<p>Policy LU-2.2.6: Public Stewardship--Support efforts by local Advisory Neighborhood Commissions, citizen/civic associations, garden clubs, homeowner groups, and other organizations to initiate neighborhood improvement and beautification programs. Provide information, guidance, and technical assistance to these groups as appropriate and feasible. <i>Id.</i> § 310.7</p>	<p>The Project advances this objective insofar as the Applicant has been and will continue to work with the ANC and other neighborhood groups to identify public benefits that enhance and improve the neighborhood around the Property.</p>
<p>Policy LU-2.2.7: Alley Closings--Discourage the conversion of alleys to private yards or developable land when the alleys are part of the historic fabric of the neighborhood and would otherwise continue to perform their intended functions, such as access to rear garages and service areas for trash collection. <i>Id.</i> § 310.8</p>	<p>The Project is consistent with this objective because the Project does not entail closure or conversion of any existing alley.</p>
<p>Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas--Maintain zoning regulations and development review procedures that: (a) prevent the encroachment of inappropriate commercial uses in residential areas; and (b) limit the scale and extent of non-residential uses that are generally compatible with residential uses, but present the potential for conflicts when they are excessively concentrated or out of scale with the neighborhood. <i>Id.</i> § 311.3</p>	<p>The Project is not inconsistent with this objective because the Project does not include any non-residential uses.</p>
<p>Policy LU-2.3.3: Buffering Requirements--Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. <i>Id.</i> § 311.5</p>	<p>The Project is not inconsistent with this objective because the Project does not include any non-residential uses.</p>
<p>Policy LU-2.3.6: Places of Worship and other Religious Facilities--Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city's neighborhoods. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these facilities' transportation needs, operations, and expansion, so that existing and new religious facilities may be sustained as neighborhood anchors and a source of spiritual guidance for District residents. Recognize also that places of worship or religious assembly, and some other religious facilities or institutions, are accorded important federal constitutional and statutory protections under the First Amendment (U.S. Const. Amend. I) and the Religious Land Use and Institutionalized Persons Act of 2000, approved September 22, 2000 (114 Stat. 803; 42 U.S.C. 2000cc). <i>Id.</i> § 311.8</p>	<p>No fewer than five places of worship are on the streets immediately around the Property. The Project is designed to recognize the important role that those nearby institutions play in the neighborhood and has been designed to avoid any adverse impacts on those uses.</p>

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis

Policy Objective	Application to the Project
<p>Policy LU-2.4.2: Hierarchy of Commercial Centers--Maintain and reinforce a hierarchy of neighborhood, multi-neighborhood, regional, and main street commercial centers in the District. Established centers should be expanded in areas where the existing range of goods and services is insufficient to meet community needs. <i>Id.</i> § 312.6</p>	<p>Although the Project does not contain any commercial uses, it does advance this objective by providing new patrons for the nearby neighborhood commercial areas on 7th and 9th Streets, NW. Such patrons are essential to allowing those business districts to thrive.</p>
<p>Policy LU-2.4.5: Encouraging Nodal Development--Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them. <i>Id.</i> § 312.9</p>	<p>The Project advances this objective by strengthening the node around the Convention Center Metrorail station stop. As detailed above, the Project is designed to respect the integrity and character of the surrounding residential areas.</p>
<p>Policy LU-3.1.1: Conservation of Industrial Land--Recognize the importance of industrial land to the economy of the District of Columbia, specifically its ability to support public works functions, and accommodate production, distribution, and repair (PDR) activities. Ensure that zoning regulations and land use decisions protect active and viable PDR land uses, while allowing compatible office and retail uses and development under standards established within CM- and M- zoning. Economic development programs should work to retain and permit such uses in the future. <i>Id.</i> § 314.7</p>	<p>The intensification of residential density on the Property indirectly helps reduce pressures to convert to residential uses PDR areas elsewhere in the District so that those areas can continue as industrial uses.</p>
<p>Transportation Element</p>	
<p>Policy T-1.1.2: Land Use Impact Assessment--Assess the transportation impacts of development projects using multi-modal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment to land use impacts. <i>Id.</i> § 403.8</p>	<p>The Project will undergo a CTR, which will assess the transportation impacts of the Project using multi-modal standards. Environmental and climate change impacts of the Project will be reviewed as applicable during the EISF stage of the Project.</p>
<p>Policy T-1.1.3: Context-Sensitive Transportation--Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. <i>Id.</i> § 403.9</p>	<p>The Project’s transit-oriented location, urban design and provision of space for bicycles contributes positively to the Shaw neighborhood’s pedestrian- and bike-friendly transportation network.</p>
<p>Policy T-1.1.4: Transit-Oriented Development--Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. <i>Id.</i> § 403.1</p>	<p>The Project is an archetypical transit-oriented development that will enhance the nearby Metrorail and bus networks.</p>

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Policy Objective	Application to the Project
<p>Policy T-1.2.3: Discouraging Auto-Oriented Uses--Discourage certain uses, like “drive-through” businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. <i>Id.</i> § 404.8</p>	<p>The Project minimizes the number of curb cuts (i.e., merely two for an entire block redevelopment) and has a pedestrian-oriented rather than an auto-oriented design.</p>
<p>Policy T-2.2.2: Connecting District Neighborhoods--Improve connections between District neighborhoods through upgraded transit, auto, pedestrian and bike connections, and by removing or minimizing existing physical barriers such as railroads and highways. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan that has been approved by the District government. <i>Id.</i> § 408.6</p>	<p>The Project helps improve connections between the District’s neighborhoods with pedestrian-friendly sidewalks and an emphasis on pedestrian-scaled urban design. Pedestrian considerations are comprehensively integrated into the Project’s design. In addition, the Property is adjacent to a bicycle lane on 5th Street, NW and is designed to minimize any impacts on that network by keeping the primary vehicle entrance off of that street. The Project also provides secure interior storage for bicycles and other bicycle accommodations, and the Applicant is exploring other improvements to the District’s bicycle network through its outreach to the ANC and neighbors.</p>
<p>Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning--Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks. <i>Id.</i> § 409.8</p>	
<p>Policy T-2.3.2: Bicycle Network--Provide and maintain a safe, direct, and comprehensive bicycle network connecting neighborhoods, employment locations, public facilities, transit stations, parks, and other key destinations. Eliminate system gaps to provide continuous bicycle facilities. Increase dedicated bike-use infrastructure, such as bike-sharing programs like Capital Bikeshare, and identify bike boulevards or bike-only rights of way. <i>Id.</i> § 409.9</p>	
<p>Policy T-2.3.3: Bicycle Safety--Increase bicycle safety through traffic calming measures, provision of public bicycle parking, enforcement of regulations requiring private bicycle parking, and improving bicycle access where barriers to bicycle travel now exist. <i>Id.</i> § 409.1</p>	
<p>Policy T-2.4.1: Pedestrian Network--Develop, maintain, and improve pedestrian facilities. Improve the city’s sidewalk system to form a network that links residents across the city. <i>Id.</i> § 410.5</p>	<p>The Project helps maintain and improve pedestrian facilities.</p>
<p>Policy T-2.4.2: Pedestrian Safety--Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals. <i>Id.</i> § 410.6</p>	<p>Pedestrian safety is a priority of the Project’s design. Vehicle entrances are designed with pedestrian safety in mind. The Applicant’s CTR will assess the need for other safety improvements in the vicinity of the Project.</p>
<p>Policy T-2.4.4: Sidewalk Obstructions--Locate sidewalk cafes and other intrusions into the sidewalk so that they do not present impediments to safe and efficient pedestrian passage. Maintain sidewalk surfaces and elevations so that disabled or elderly pedestrians can safely use them. <i>Id.</i> § 410.8</p>	<p>The Project does not introduce any impediments to safe and efficient pedestrian passage on nearby sidewalks.</p>
<p>Policy T-2.5.1: Creating Multi-Modal Corridors--Transform key District arterials into multi-modal corridors that incorporate and balance a variety of mode choices including bus or streetcar, bicycle, pedestrian and auto. <i>Id.</i> § 411.11</p>	<p>The Project’s design and use supports, and in no way detracts from, the multi-modal nature of adjacent streets.</p>

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Policy Objective	Application to the Project
<p>Policy T-2.5.2: Managing Roadway Capacity--Manage the capacity of principal arterials within existing limits rather than increasing roadway capacity to meet induced demand for travel by car. Increase auto capacity on roadways only if needed to improve the safety of all travelers, improve connectivity of the multimodal transportation network, or improve targeted connections to regional roadways. <i>Id.</i> § 411.12</p>	<p>The Project’s transit-oriented location and pedestrian- and bike-friendly design help reduce the need for vehicle trips in furtherance of this policy objective.</p>
<p>Policy T-3.1.1: Transportation Demand Management (TDM) Programs--Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. <i>Id.</i> § 414.8</p>	<p>The Project’s CTR will include TDM programs and strategies aimed at reducing car trips and may, after further study, include mitigation measures such as car sharing, innovative parking management measures, and systems such as a TransitScreen, all in furtherance of these TDM policy objectives.</p>
<p>Policy T-3.1.2: Regional TDM Efforts--Continue to pursue TDM strategies at the regional level and work with regional and federal partners to promote a coordinated, integrated transportation system. <i>Id.</i> § 414.9</p>	
<p>Policy T-3.1.3: Car-Sharing--Encourage the expansion of car-sharing services as an alternative to private vehicle ownership. <i>Id.</i> § 414.1</p>	
<p>Policy T-3.2.2: Employing Innovations in Parking--Consider and implement new technologies to increase the efficiency, management, and ease of use of parking. These include consolidated meters, changeable parking meter fees by time of day or day of the week, shared-use parking, vertical/stacked parking, electronic ticketing of parking offenders and other innovations. <i>Id.</i> § 415.4</p>	
<p>Policy T-3.4.1: Traveler Information Systems--Promote user-friendly, accurate, and timely traveler information systems for highways and transit such as variable message signs, Global Positioning System (GPS) traffic information, and real-time bus arrival information, to improve traffic flow and customer satisfaction. <i>Id.</i> § 417.3</p>	
<p>Policy T-3.3.1: Balancing Good Delivery Needs--Balance the need for goods delivery with concerns about roadway congestion, hazardous materials exposure, quality of life, and security. <i>Id.</i> § 416.8</p>	<p>The Project’s loading design accommodates turning maneuvers on private property and will help avoid resident moving activities from curbside locations.</p>
<p>Policy T-3.3.4: Truck Management--Manage truck circulation in the city to avoid negative impacts on residential streets and reduce the volume of truck traffic on major commuter routes during peak travel hours. <i>Id.</i> § 416.11</p>	
<p>Housing Element</p>	
<p>Policy H-1.1.1: Private Sector Support--Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. <i>Id.</i> § 503.2</p>	<p>The Project is a private-sector led effort to provide new housing to meet the needs of present and future District residents at a location consistent with the Land Use Element and other policies summarized here.</p>
<p>Policy H-1.1.2: Production Incentives--Provide suitable regulatory, tax, and financing incentives to meet housing production goals. These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing. <i>Id.</i> § 503.3</p>	<p>The Project relies on zoning incentives through the PUD process. Consistent with this objective, the PUD allows for more building area than can be achieved by-right.</p>

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<p>Policy H-1.1.3: Balanced Growth--Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. <i>Id.</i> § 503.4</p>	<p>The Project is new housing on vacant or underutilized land in a transit-oriented location that otherwise has relatively few sites for new housing development.</p>
<p>Policy H-1.1.5: Housing Quality--Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood. <i>Id.</i> § 503.6</p>	<p>The Project provides affordable housing that is indistinguishable from market-rate housing, provides recreational amenities, and respects the design of the surrounding neighborhood and nearby properties.</p>
<p>Policy H-1.1.6: Housing in the Central City--Absorb a substantial component of the demand for new high-density housing in Central Washington and along the Anacostia River. Absorbing the demand for higher density units within these areas is an effective way to meet housing demands, create mixed-use areas, and conserve single family residential neighborhoods throughout the city. Mixed income, higher density downtown housing also provides the opportunity to create vibrant street life, and to support the restaurants, retail, entertainment, and other amenities that are desired and needed in the heart of the city. <i>Id.</i> § 503.7</p>	<p>The Projects adds to the supply of new housing in a downtown-adjacent location and contributes to the vibrancy of the Shaw neighborhood with new patrons for nearby businesses and users for recreational amenities and services.</p>
<p>Policy H-1.2.1: Affordable Housing Production as a Civic Priority--Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. <i>Id.</i> § 504.6</p>	<p>The Project contributes to the production of affordable housing in a mixed-income setting. The Project adds affordable housing in a neighborhood with high housing prices but does not overly concentrate affordable units.</p>
<p>Policy H-1.2.3: Mixed Income Housing--Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. <i>Id.</i> § 504.8</p>	
<p>Policy H-1.2.2: Production Targets--Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the area wide median income (AMI). <i>Id.</i> § 504.7</p>	<p>By providing more affordable housing than would be required in a matter-of-right building the Project helps the District pursue its lofty affordable housing production goals.</p>
<p>Policy H-1.2.4: Housing Affordability on Publicly Owned Sites--Require that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households. <i>Id.</i> § 504.11</p>	<p>The Project is not a publicly owned site so this objective is inapplicable to the Project.</p>
<p>Policy H-1.2.5: Workforce Housing--In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, fire fighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city. <i>Id.</i> § 504.12</p>	<p>In addition to those units specifically income-restricted, the Project’s size and diversity of unit types and features will attract residents at a variety of price points.</p>

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<p>Policy H-1.2.7: Density Bonuses for Affordable Housing--Provide zoning incentives to developers proposing to build low- and moderate-income housing. Affordable housing shall be considered a public benefit for the purposes of granting density bonuses when new development is proposed. Density bonuses should be granted in historic districts only when the effect of such increased density does not significantly undermine the character of the neighborhood. <i>Id.</i> § 504.14</p>	<p>The Project provides a substantial amount of affordable housing, in turn relying on density bonuses in exchange. Because of the Project’s thoughtful design, the Project’s density bonuses do not undermine the character of the nearby blocks in a historic district.</p>
<p>Policy H-1.3.1: Housing for Families--Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. <i>Id.</i> § 505.6</p>	<p>The Project provides three-bedroom apartment units.</p>
<p>Policy H-1.3.2: Tenure Diversity--Encourage the production of both renter-occupied and owner-occupied housing. <i>Id.</i> § 505.7</p>	<p>Consistent with this objective’s broad goal of providing a mix of housing types, the Project provides rental units in a neighborhood where owner-occupied units are common.</p>
<p>Policy H-1.4.1: Restoration of Vacant Housing--Make the restoration of vacant housing units a major government priority. Where restoration receives public funding, ensure that a substantial share of the renovated units is made available to persons of low and moderate income. <i>Id.</i> § 506.7</p>	<p>As noted above, restoration of the existing units on the Property is not feasible given other policy objectives and the condition of the existing structures. This policy objective is only a priority and not mandatory, so the Project is not inconsistent with this policy.</p>
<p>Policy H-1.4.6: Whole Neighborhood Approach--Ensure that the construction of housing is accompanied by concurrent programs to improve neighborhood services, schools, job training, child care, parks, health care facilities, police and fire facilities, transportation, and emergency response capacity. <i>Id.</i> § 506.12</p>	<p>The Shaw neighborhood is undergoing regular and ongoing improvements to its services, schools, and facilities. The Project cannot advance all of the items identified in this objective but it is not inconsistent with the holistic improvements underway in the neighborhood under the auspices of other District department controls.</p>
<p>Policy H-1.5.1: Land and Building Regulations--Ensure that the District’s land regulations, including its housing and building codes, its zoning regulations, its construction standards, and its permitting fees, enable the production of housing for all income groups. Avoid regulations which make it prohibitively expensive or difficult to construct housing. <i>Id.</i> § 507.2</p>	<p>The District’s land regulations make development of new housing very costly. However, the Project includes affordable housing that is income restricted in perpetuity.</p>
<p>Policy H-2.1.1: Protecting Affordable Rental Housing--Recognize the importance of preserving rental housing affordability to the well-being of the District of Columbia and the diversity of its neighborhoods. Undertake programs to protect the supply of subsidized rental units and low-cost market rate units. <i>Id.</i> § 509.5</p>	<p>The Project includes units that will be preserved as affordable in perpetuity, consistent with the objective of this policy.</p>

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Policy Objective	Application to the Project
<p>Policy H-2.1.2: Expiring Federal Subsidies--Preserve expiring subsidies for affordable housing units, particularly those in Section 8-based projects, and projects funded with Low Income Housing Tax and Tax Exempt Bonds, wherever possible. <i>Id.</i> § 509.6</p>	<p>The Property is not currently the subject of any subsidies for affordable units (including Section 8 contracts) and does not currently contain any income-restricted or affordable units.</p>
<p>Policy H-2.1.3: Avoiding Displacement--Maintain programs to minimize displacement resulting from the conversion or renovation of affordable rental housing to more costly forms of housing. These programs should include financial, technical, and counseling assistance to lower income households and the strengthening of the rights of existing tenants to purchase rental units if they are being converted to ownership units. Rental housing comprises almost 60 percent of the housing stock and is the main housing option for those just entering the workforce and those without the initial resources to purchase a home. <i>Id.</i> § 509.7</p>	<p>The Property does not contain any affordable housing units today, and there will be no displacement or loss of affordable units as a result of the Project. Instead, the Project involves the creation of a substantial number of new affordable units to be income-restricted in perpetuity.</p>
<p>Policy H-2.1.4: Conversion of At-Risk Rentals to Affordable Units--Support efforts to purchase affordable rental buildings that are at risk of being sold and converted to luxury apartments or condominiums, in order to retain the units as affordable. Consider a variety of programs to manage these units, such as land banks and sale to non-profit housing organizations. <i>Id.</i> § 509.8</p>	
<p>Policy H-2.1.5: Long-Term Affordability Restrictions--Ensure that affordable housing units that are created or preserved with public financing are protected by long-term affordability restrictions and are monitored to prevent their transfer to non-qualifying households. Except where precluded by federal programs, affordable units should remain affordable for the life of the building, with equity and asset build up opportunities provided for ownership units. <i>Id.</i> § 509.9</p>	<p>Consistent with this policy objective, the Project's affordable units will be required in perpetuity.</p>
<p>Policy H-2.2.1: Housing Conversion--Discourage the conversion of viable, quality housing units to nonresidential uses such as offices and hotels. Ensure that zoning regulations provide sufficient protection to avoid the loss of housing in this manner. <i>Id.</i> § 510.3</p>	<p>The Project ensures that the Property is not converted to non-residential uses, consistent with this policy objective.</p>
<p>Policy H-2.2.4: Energy Retrofits--Encourage energy efficiency retrofits that reduce water use, and home heating and cooling costs, thereby reducing monthly housing expenditures. <i>Id.</i> § 510.6</p>	<p>Although not strictly an energy efficiency retrofit, the Project substantially improves upon sustainability and environmental performance relative to the existing buildings on the Property.</p>
<p>Policy H-4.2.4: Barrier-Free Housing for the Disabled--Work toward a target of designing eight (8) percent of the new housing units added to the city's stock over the next 20 years specifically to meet the accessibility needs of persons with physical disabilities. These units should be spread evenly across affordability brackets. <i>Id.</i> § 516.1</p>	<p>The Project is anticipated to include approximately 54 units (15 percent of the total) that will be accessible to households with individuals experiencing physical disabilities.</p>

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Environmental Protection Element	
<p>Policy E-1.1.1: Street Tree Planting and Maintenance--Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods. <i>Id.</i> § 603.4</p>	<p>The Project features well-designed landscaping and includes planting new ornamental trees and maintaining existing street trees, all in accordance with this policy objective.</p>
<p>Policy E-1.1.2: Tree Requirements in New Development--Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. <i>Id.</i> § 603.5</p>	<p>The Project uses planning and zoning to ensure that street trees around the Property are retained and that new trees are planted and maintained as a condition of approval.</p>
<p>Policy E-1.1.3: Landscaping--Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. <i>Id.</i> § 603.6</p>	<p>The Project employs landscaping and a green roof to beautify the City, reduce stormwater runoff, and create a sense of place.</p>
<p>Policy E-1.3.1: Preventing Erosion--Ensure that public and private construction activities do not result in soil erosion or the creation of unstable soil conditions. Support the use of retaining walls and other "best management practices" that reduce erosion hazards. Erosion requirements should be implemented through building permit and plan reviews, and enforced through the permitting and regulatory processes. <i>Id.</i> § 605.2</p>	<p>The Project employs an erosion control plan to avoid erosion or unstable soil conditions and to implement best management practices to reduce erosion hazards.</p>
<p>Policy E-1.3.2: Grading and Vegetation Removal--Encourage the retention of natural vegetation and topography on new development sites. Grading of hillside sites should be minimized and graded slopes should be quickly revegetated for stabilization. <i>Id.</i> § 605.3</p>	<p>The Property does not include any hillslopes and the Project retains natural vegetation and topography to the extent possible.</p>
<p>Policy E-1.3.3: Reducing Sedimentation--Prevent sedimentation of rivers and streams by implementing comprehensive stormwater management measures, including regular maintenance of storm drains and catch basins and the use of sedimentation ponds where appropriate. <i>Id.</i> § 605.4</p>	<p>The Project complies with the District's robust stormwater management measures to prevent sedimentation per this policy.</p>
<p>Policy E-1.3.4: Restoring Eroded Areas--Abate soil erosion problems in developed areas, particularly where erosion has resulted from poor site design, aging streets and alleys, or deferred maintenance. <i>Id.</i> § 605.5</p>	<p>The Project redevelops the Property's existing surface parking lots to modern GAR and stormwater standards.</p>
<p>Policy E-2.1.1: Promoting Water Conservation--Promote the efficient use of existing water supplies through a variety of water conservation measures, including the use of plumbing fixtures designed for water efficiency, drought-tolerant landscaping, and irrigation systems designed to conserve water. <i>Id.</i> § 609.3</p>	<p>The Project's sustainable building strategy promotes the efficient use of water supplies and employs conservation measures.</p>
<p>Policy E-2.2.1: Energy Efficiency--Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees. <i>Id.</i> § 610.3</p>	<p>The Project's sustainable building strategy and LEED commitment likewise promotes the</p>

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Policy Objective	Application to the Project
<p>Policy E-2.2.3: Reducing Home Heating and Cooling Costs--Encourage the use of energy-efficient systems and methods for home insulation, heating, and cooling, both to conserve natural resources and also to reduce energy costs for those members of the community who are least able to afford them. <i>Id.</i> § 610.5</p>	<p>efficient use of energy to ultimately reduce energy costs for the residents of the Project.</p>
<p>Policy E-2.2.5: Energy Efficient Building and Site Planning--Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals. <i>Id.</i> § 610.7</p>	<p>The Project employs energy efficiency building elements as a result of the District's zoning and building standards.</p>
<p>Policy E-2.2.7: Consumer Education on Energy--Promote citizen awareness concerning energy issues through educational and demonstration initiatives and other programs. <i>Id.</i> § 610.1</p>	<p>The public display and disclosure requirements of the Project's LEED rating helps raise awareness of energy and sustainability issues.</p>
<p>Policy E-3.1.1: Maximizing Permeable Surfaces--Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. <i>Id.</i> § 613.2</p>	<p>The Project employs permeable surfaces throughout its rooftops and replaces an existing parking lot with "green" surfaces to reduce stormwater runoff. The Project does not include any large paved surfaces. It also employs a number of "green" engineering best practices (notably its green roof system) and technology to reduce environmental damage and waste generation.</p>
<p>Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff--Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. <i>Id.</i> § 613.3</p>	
<p>Policy E-3.1.3: Green Engineering--Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. <i>Id.</i> § 613.4</p>	
<p>Policy E-3.2.1: Support for Green Building--Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. <i>Id.</i> § 614.2</p>	<p>As noted above, the Projects uses green building methods as evidenced by its commitment to attain LEED Silver v4, and its LEED commitment includes a public awareness component.</p>
<p>Policy E-3.2.2: Green Building Education and Awareness--Support programs that educate District employees, the building and real estate communities, and the public regarding the benefits and techniques of green building. <i>Id.</i> § 614.3</p>	
<p>Policy E-3.4.1: Mitigating Development Impacts--Take measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited. <i>Id.</i> § 616.3</p>	<p>The Project results in environmental improvements through its LEED level of design, its replacement of surface parking and impermeable rooftops with green surfaces, and stormwater management measures. The Project does not include any degrading construction practices.</p>

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<p>Policy E-3.4.2: Transparency of Environmental Decision-Making--Ensure that discussions and decisions regarding environmental impacts and mitigation measures occur through a transparent process in which the public is kept informed and given a meaningful opportunity to participate. <i>Id.</i> § 616.4</p>	<p>The Project’s Zoning Commission process includes an environmental review of the Project’s potential adverse impacts, and the Project will comply with the requirements for a comprehensive, technical environmental impact review as part of the building permit process.</p>
<p>Policy E-3.4.3: Environmental Assessments--Ensure full and meaningful compliance with the District of Columbia Environmental Policy Act of 1989, effective October 18, 1989 (D.C. Law 8-36; D.C. Official Code § 8-109.01 et seq.), including the use of procedures to assess the environmental impacts of major development projects comparable to the regulations developed by the Council on Environmental Quality for the National Environmental Policy Act of 1969, approved January 1, 1970 (83 Stat. 852; 42 U.S.C. 4321 et seq.). The environmental review should include all pertinent information about the effects of the project on the human environment, including information about existing conditions, projected impacts, and mitigation measures. Carbon dioxide and other greenhouse gas (GHG) emissions impacts should be included in the environmental impact assessments. The process should ensure that the information is available when a development is proposed and is available to the public and decision-makers before any decision is made. <i>Id.</i> § 616.5</p>	<p>The Project’s environmental reviews include opportunities for public participation at multiple points and will include reviews of many or all of the impacts referenced in these policy objectives. In general, given the limited scope of potential environmental impacts in light of the Project’s scale, the Project and the PUD review process for this Application are consistent with these policies.</p>
<p>Policy E-3.4.4: Monitoring of Operational and Construction Impacts--Strengthen District government programs that monitor and resolve air pollution, water pollution, noise, soil contamination, dust, vibration, and other environmental impacts resulting from commercial uses, industrial uses, trucking, construction activities, and other activities around the city that could potentially degrade environmental quality. <i>Id.</i> § 616.6</p>	<p>The Project will be constructed pursuant to a robust environmental and construction management plan to avoid and mitigate activities that could potentially degrade environmental quality.</p>
<p>Policy E-4.1.1: Attaining Air Quality Standards--Continue to undertake programs and initiatives that move the region closer to attaining and maintaining federal air quality standards. Expand these programs as feasible to incorporate new technology and to reflect best practices around the country. <i>Id.</i> § 618.6</p>	<p>The Project helps regional air quality goals insofar as it is designed to accommodate its residents’ use of transit and bicycle usage in lieu of automobiles trips.</p>
<p>Policy E-4.1.3: Evaluating Development Impacts On Air Quality--Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. <i>Id.</i> § 618.8</p>	<p>As noted above, the Project will comply with the District’s environmental review requirements. The Project also employs many of the mitigation elements referenced in this policy.</p>

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Policy Objective	Application to the Project
<p>Policy E-4.1.5: Improving Air Quality Through Transportation Efficiency--Promote strategies that reduce motor vehicle emissions in the District and surrounding region. As outlined in the Land Use and Transportation Elements of this Comprehensive Plan, this includes the development of a fully integrated regional system of buses, streetcars, rail transit, bicycles, taxis, and pedestrian facilities to make it easier and more convenient to travel without an automobile. It also includes the promotion of trip reduction measures such as videoconference facilities, telecommuting, flextime, and carpooling. Strategies to reduce congestion and idling time, such as improved signal timing and reversible commute lanes also should contribute to air quality improvement. <i>Id.</i> § 618.1</p>	<p>The Project will include TDM measures to reduce automobile trips in furtherance of air quality and transportation efficiency goals. The Project’s Downtown-adjacent and transit-oriented location make it a poster-child for the type of environmentally-responsible “smart growth” that these policies espouse.</p>
<p>Policy E-4.2.1: Improving Water Quality--Improve the quality of water in the District's rivers and streams to meet public health and water quality standards, and maintain the physical, chemical, and biological integrity of these watercourses for multiple uses, including recreation and aquatic life. <i>Id.</i> § 619.6</p>	<p>The Project’s stormwater management and water efficiency elements advance the objectives of these policies. The Project’s green roof and landscaping systems reduce urban runoff and pollution and protect the District’s groundwater from adverse effects. The Property will be redeveloped in compliance with all environmental contamination laws to minimize any public exposure to hazards.</p>
<p>Policy E-4.2.3: Control of Urban Runoff--Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. <i>Id.</i> § 619.8</p>	
<p>Policy E-4.2.5: Groundwater Protection--Protect Washington's groundwater from the adverse effects of urban uses. Contaminated groundwater should be investigated to determine whether long term monitoring or treatment is necessary or feasible. Future land uses and activities should be managed to minimize public exposure to groundwater hazards and reduce the likelihood of future contamination. <i>Id.</i> § 619.1</p>	
<p>Policy E-4.3.1: Interior Noise Standards--Ensure that interior noise levels in new buildings and major renovation projects comply with federal noise standards and guidelines. Support the retrofitting of existing structures to meet noise standards where they are currently exceeded. <i>Id.</i> § 620.4</p>	<p>The Project will comply with all applicable noise regulations.</p>
<p>Policy E-4.3.3: Household Noise Control--Strengthen enforcement of local ordinances and regulations that limit sources of household noise in the city, including noise originating from car alarms, construction activities, mechanical equipment and machinery, and similar sources. <i>Id.</i> § 620.6</p>	<p>The Project locates all vehicles below-grade and in an enclosed garage to minimize car alarms. Construction activities and mechanical systems on the Property will comply with applicable regulations.</p>
<p>Policy E-4.3.5: Noise and Land Use Compatibility--Avoid locating new land uses that generate excessive noise adjacent to sensitive uses such as housing, hospitals, and schools. Conversely, avoid locating new noise-sensitive uses within areas where noise levels exceed federal and District guidelines for those uses. <i>Id.</i> § 620.8</p>	<p>The Project’s use is compatible with surrounding uses and will not generate excessive noises near any existing sensitive uses.</p>
<p>Policy E-4.4.2: Hazardous Building Materials and Conditions--Protect public health and safety by testing for and, where appropriate, removing lead, radon gas, asbestos, and other hazardous substances from the built environment. When these hazards are abated, require full compliance with all applicable licensing and inspection standards. <i>Id.</i> § 621.6</p>	<p>As noted above, the Project will proceed in accordance with all applicable environmental and public safety laws, regulations, and licensing requirements.</p>

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Policy Objective	Application to the Project
<p>Policy E-4.5.1: Drinking Water Safety--Ensure the safety of the city's drinking water supply and distribution system. Maintain sustained efforts to reduce health hazards associated with lead and other contaminants. <i>Id.</i> § 622.3</p>	<p>The Project replaces existing, out-of-date buildings with modern water distribution systems for the benefit of future residents.</p>
<p>Policy E-4.6.1: Vector Control--Continue and strengthen efforts to control rats, mice, mosquitoes, and other disease vectors and pests. A variety of related strategies should be used to support these programs, including public outreach and education, garbage control and containment, adequate trash and refuse collection services, ongoing maintenance of public space, enforcement of littering and dumping regulations, clean-up of construction and demolition debris, structural controls and integrated pest management, and a reduction in the number of vacant and abandoned buildings. <i>Id.</i> § 623.3</p>	<p>The Project locates all trash and refuse collection in an interior, enclosed location and replaces vacant buildings with a new occupied building. The Project's construction will include vector controls.</p>
<p>Policy E-4.6.3: Discouraging Illegal Dumping--Develop and maintain effective public education and enforcement tools to curb littering and illegal dumping, and to promote the safe disposal of solid waste (including hazardous waste, medical waste, construction debris, used oil, and scrap tires) and bulky items. <i>Id.</i> § 623.5</p>	<p>The demolition of the existing buildings on the Property will proceed in accordance with all applicable solid waste disposal laws and permit requirements.</p>
<p>Policy E-4.7.3: Light Pollution--Maintain regulations for outdoor lighting to reduce light pollution and conserve energy. Particular attention should be given to preventing glare and nighttime light trespass in the vicinity of the Naval Observatory, so that its operational needs are respected. <i>Id.</i> § 624.6</p>	<p>The Project's lighting has been designed to minimize disturbance on neighbors and to reduce nighttime light pollution. No adverse effects on the Observatory are expected from the Project given its location in Shaw.</p>
<p>Policy E-4.7.4: Flood Plains--Restrict development within FEMA-designated flood plain areas. Consistent with the Federal Elements of the Comprehensive Plan, prohibit activities within these areas that could pose public health or safety hazards in the event of a flood. Regulation of land uses in flood plains, waterfronts, and other low-lying areas should consider the long-term effects of global warming and sea-level rise on flood hazards. <i>Id.</i> § 624.7</p>	<p>The Project is not located in a flood plain and will not pose a threat in the event of a flood even in the face of climate change.</p>
<p>Policy E-5.1.1: Low Impact Development and Green Building Methods for the District--Strongly encourage the use of low impact development (LID) methods and green building design methods and materials in new construction and major rehabilitation projects undertaken by the District of Columbia government. <i>Id.</i> § 627.3</p>	<p>The Project employs LID and green building design methods and materials in furtherance of the intent of this objective even though it is a private sector-led development.</p>
<p>Policy E-5.1.4: Sustainable Landscaping--Encourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides. <i>Id.</i> § 627.6</p>	<p>The Project involves the use of sustainable landscaping techniques, including for stormwater management as well as the deployment of appropriate plant species.</p>

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Policy Objective	Application to the Project
<p>Policy E-5.2.2: Continuing Education on the Environment--Encourage greater participation by residents, business owners, institutions, and public agencies in maintaining environmental standards. This should be achieved through public education, media, outreach and awareness campaigns, compliance assistance, and environmental enforcement programs. Typical programs could include recycling projects, creek cleanups, and tree planting initiatives. <i>Id.</i> § 628.3</p>	<p>The Project’s sustainable building elements represent a business owner’s participation in environmental stewardship.</p>
<p>Policy E-5.2.4: Demonstration Projects--Encourage best practice guides, demonstration projects, tours, and other tools to create a culture where the "green choice" (i.e., the choice that results in greater energy efficiency and better environmental health) is the preferred choice for energy, transportation, construction, and design decisions. <i>Id.</i> § 628.5</p>	<p>The Project’s LEED level of design represents the Applicant furthering the culture of sustainable development in the District building industry.</p>
<p>Policy E-5.4.1: Environmental Planning--Create a District administrative structure that allows for the most effective possible means of natural resource planning and management. <i>Id.</i> § 630.3</p>	<p>The Project’s participation in the PUD process allows for environmental planning and impact review as part of a new real estate development.</p>
<p>Economic Development Element</p>	
<p>Policy ED-2.2.1: Expanding the Retail Sector--Pursue a retail strategy that will allow the District to fully capitalize on the spending power of residents, workers and visitors, and that will meet the retail needs of underserved areas. <i>Id.</i> § 708.4</p>	<p>Although the Project does not include retail uses, its addition of new residents will contribute to the success of nearby retail development, much of which in the vicinity of the Project is non-chain and emerging from vacant buildings (e.g., along 9th Street, NW).</p>
<p>Policy ED-2.2.3: Neighborhood Shopping--Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences. <i>Id.</i> § 708.7</p>	
<p>Policy ED-2.2.6: Grocery Stores and Supermarkets--Promote the development of new grocery stores and supermarkets, particularly in neighborhoods where residents currently travel long distances for food and other shopping services. Because such uses inherently require greater depth and lot area than is present in many commercial districts, adjustments to current zoning standards to accommodate these uses should be considered. <i>Id.</i> § 708.1</p>	<p>The Project is between two full-size grocery stores, reducing the distance the Project’s residents will need to travel and allowing shopping trips to occur via foot or on bike.</p>
<p>Policy ED-2.2.7: Planning For Retail--Coordinate neighborhood planning efforts with the District's economic development planning and implementation programs to improve retail offerings in local commercial centers. Consolidate retail according to existing and forecasted demand and consider converting retail to other uses where an increased consumer base is required. <i>Id.</i> § 708.11</p>	<p>“Rooftops drive retail” is a familiar truism in the real estate industry, and the Project’s increase of residential density helps improve nearby economic development and retail offerings.</p>
<p>Policy ED-3.1.1: Neighborhood Commercial Vitality--Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents. <i>Id.</i> § 713.5</p>	

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Policy Objective	Application to the Project
<p>Policy ED-4.3.2: Links to Regional Job Centers--Continue to seek inter-jurisdictional transportation solutions to improve access between the District neighborhoods and existing and emerging job centers in Maryland and Virginia. These solutions should include a balance between transit improvements and highway improvements. They should also include transportation systems management initiatives such as shuttles, ridesharing, and vanpooling. <i>Id.</i> § 718.5</p>	<p>The Project’s transit-oriented location allows its residents to commute easily via transit to jobs Downtown or elsewhere in the District or to “reverse commute” to job centers in Maryland and Virginia without requiring highway travel.</p>
<p>Parks, Recreation, and Open Space Element</p>	
<p>Policy PROS-1.2.3: Responding To Community Change--Update and improve existing parks in response to changing demographics, cultural norms, and community needs and preferences. Parks should reflect the identity and needs of the communities they serve. <i>Id.</i> § 805.7</p>	<p>The Project’s rooftop and courtyard open spaces function as privately-maintained parks for the needs of the Project’s residents and can be programmed to respond to those needs and preferences. (The Parks Element of the Comprehensive Plan expressly includes privately-owned open spaces within its purview. <i>See id.</i> §§ 816.2, 818.1.)</p>
<p>Policy PROS-1.3.1: Balancing Competing Needs--Manage the District’s parklands to protect and enhance their open space character while also accommodating a range of recreational activities. Park activities and facilities should be designed in a way that makes the best possible use of each space while minimizing conflicts between different recreational uses. <i>Id.</i> § 806.3</p>	<p>The Project provides open space benefits as well as passive and active recreational opportunities for residents.</p>
<p>Policy PROS-3.3.3: Small Park and Mini-Park Cluster Improvements--Prioritize improvements of small park and mini-park clusters in areas with limited access to parks and open space and a growing population. Apply common themes, such as sustainability, place-making, or connectivity to plan, enhance, and maintain the small parks as a system. <i>Id.</i> § 814.6a</p>	<p>The Project’s courtyards function as mini-parks and are designed around different themes to enhance their value to residents.</p>
<p>Policy PROS-4.3.1: Open Space in the Downtown Landscape--Sustain a high quality network of downtown pocket parks, courtyards, arcades, plazas, and rooftop gardens that provide space for recreation, scenic beauty, and outdoor activities for workers, visitors, and residents. Podium parks use the air rights of below grade roadways to provide parks and plazas. <i>Id.</i> § 819.3</p>	<p>The Project’s high-quality open spaces advance this policy objective with space for outdoor recreation and other outdoor activities in an urban locale.</p>
<p>Policy PROS-4.3.3: Common Open Space in New Development--Provide incentives for new and rehabilitated buildings to include "green roofs", rain gardens, landscaped open areas, and other common open space areas that provide visual relief and aesthetic balance. <i>Id.</i> § 819.5</p>	<p>The Project takes advantage of incentives, the PUD density bonus and lot occupancy flexibility, for outdoor balconies and common outdoor amenity areas.</p>

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Policy Objective	Application to the Project
<p>Policy PROS-4.3.4: Protection of Open Space in Multi-Family Development--Recognize the implicit value of the lawns, courtyards, gardens, and other open areas that surround many of the District's older high- and medium density residential buildings. Discourage the practice of building on these areas if the historic proportions and character of the original buildings would be compromised. <i>Id.</i> § 819.6</p>	<p>Consistent with this objective, the Project incorporates and celebrates its open spaces as integral parts of the building's overall design.</p>
<p>Policy PROS-4.3.5: Residential Yards--Recognize the value of residential yards as a component of the city's open space system and discourage increased coverage of such areas by buildings and impervious surfaces. <i>Id.</i> § 819.7</p>	<p>The Project includes court yards at ground level and pervious surfaces at the roof level, consistent with this policy objective.</p>
<p>Urban Design Element</p>	
<p>Policy UD-1.1.1: National Image--Strengthen and enhance the physical image, character and outstanding physical qualities of the District, its neighborhoods, and its open spaces, in a manner that reflects its role as the national capital. <i>Id.</i> § 903.6</p>	<p>The Project improves upon the overall physical image and character of the existing development of the Property in furtherance of this objective.</p>
<p>Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans--Respect and reinforce the L'Enfant and McMillan Plans to maintain the District's unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L'Enfant Plan reservations (green spaces), limits on street and alley closings, and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds. <i>Id.</i> § 903.7</p>	<p>The Project's form, massing, height, and articulation all respect and reinforce the L'Enfant Plan, and the Project does not interfere with any viewsheds.</p>
<p>Policy UD-1.1.4: Height Act of 1910--Protect the civic and historical character of the city, particularly the "horizontal" urban quality of Central Washington, by limiting building heights in accordance with the Height Act of 1910. <i>Id.</i> § 903.1</p>	<p>The Project is primarily a horizontal structure in accordance with the design effects of the Height Act and in accordance with the character of the District generally.</p>
<p>Policy UD-1.2.1: Respecting Natural Features in Development--Respect and perpetuate the natural features of Washington's landscape. In low-density, wooded or hilly areas, new construction should preserve natural features rather than altering them to accommodate development. Density in such areas should be limited and setbacks should be provided as needed to protect natural features such as streams and wetlands. Where appropriate, clustering of development should be considered as a way to protect natural resources. <i>Id.</i> § 904.3</p>	<p>The Project respects the natural features of the Shaw neighborhood, which is generally flat and low in the vicinity of the Property and lacking in any significant natural resources or features.</p>
<p>Policy UD-1.2.2: Protecting the Topographic "Bowl"--Consistent with the Federal Elements of the Comprehensive Plan, maintain the prominence of the topographic bowl formed by lowland and rim features of the L'Enfant city. This should include preserving the green setting of the Anacostia hills and maintaining the visual prominence of the Florida Avenue escarpment. <i>Id.</i> § 904.4</p>	<p>The Project's height does not interfere with the prominence of the Florida Avenue escarpment or any ridgelines in the District.</p>
<p>Policy UD-1.2.3: Ridgeline Protection--Protect prominent ridgelines so as to maintain and enhance the District's physical image and horizontal skyline. <i>Id.</i> § 904.5</p>	

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<p>Policy UD-1.2.4: View Protection--Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods. <i>Id.</i> § 904.6</p>	<p>The Project preserves all existing views and enhances the view along the one-block Ridge Street, NW by providing a well-designed terminus in the Project’s eastern courtyard.</p>
<p>Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors--Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place. <i>Id.</i> § 906.9</p>	
<p>Policy UD-1.4.4: Multi-Modal Avenue/Boulevard Design--Discourage the use of the city's major avenues and boulevards as "auto-only" roadways. Instead, encourage their use as multi-modal corridors, supporting transit lanes, bicycle lanes, and wide sidewalks, as well as conventional vehicle lanes. <i>Id.</i> § 906.1</p>	<p>The Project reinforces the surrounding streets as multi-modal corridors with active sidewalks and successful bicycle lanes.</p>
<p>Policy UD-2.1.1: Design Character--Create a more coherent design character for Central Washington by improving the physical linkages between the monumental core, the business sub-districts on the perimeter of the National Mall, and the expanding mixed use areas to the east and southeast of Downtown. Urban design strategies should focus on making the entire area more walkable, discouraging monolithic architecture, improving signage and streetscape features, and adding new land uses which make the area more lively, interesting, and dynamic. <i>Id.</i> § 909.7</p>	<p>The Project improves walkability and avoids monolithic architecture. The Project’s balconies and engagement with the street help create a dynamic interaction between private and public space.</p>
<p>Policy UD-2.1.3: Downtown Edges--Establish and maintain scale and density transitions between Downtown and adjacent lower density neighborhoods. Use variations in height, massing, and architectural quality to ensure that the fine-grained pattern of adjacent neighborhoods is protected. <i>Id.</i> § 909.1</p>	<p>The Project employs variations in height, architecture, and articulation to harmonize with the fine-grained pattern of the Shaw neighborhood. The Project maintains the density transition between Downtown and Shaw.</p>
<p>Policy UD-2.1.4: Architectural Excellence--Promote excellence in the design of Downtown buildings and landscapes. Particular attention should be focused on ground floor (street) levels, with greater architectural details used to improve visual image. <i>Id.</i> § 909.12</p>	<p>The Project exemplifies excellent architecture, especially at the ground level.</p>
<p>Policy UD-2.1.6: Pedestrian Bridges and Tunnels--Discourage the construction of second-level Downtown pedestrian bridges that drain activity from the street level. Subterranean tunnels between buildings also should be discouraged, unless they improve access to Metro and are necessary for pedestrian safety. <i>Id.</i> § 909.14</p>	<p>The Project encourages pedestrian activity and interaction.</p>
<p>Policy UD-2.2. 1: Neighborhood Character and Identity--Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. <i>Id.</i> § 910.6</p>	<p>The Project is designed to respond on each of its four elevations to the surrounding context.</p>

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<p>Policy UD-2.2.2: Areas of Strong Architectural Character--Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development within such areas does not need to replicate prevailing architectural styles exactly but should be complementary in form, height, and bulk. <i>Id.</i> § 910.7</p>	<p>The Project preserves the integrity of the nearby Mt. Vernon Historic District and is complementary in form, height, and bulk.</p>
<p>Policy UD-2.2.4: Transitions in Building Intensity--Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. <i>Id.</i> § 910.11</p>	<p>The Project helps create a gradual transition from the much larger, bulkier Convention Center to the west to the smaller scale rowhouses to the east and south. Setbacks on the upper stories of the Project reinforce this transition.</p>
<p>Policy UD-2.2.5: Creating Attractive Facades--Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street. <i>Id.</i> § 910.12</p>	<p>The Project includes well-designed façades which improve the human quality of the street.</p>
<p>Policy UD-2.2.6: Maintaining Facade Lines--Generally maintain the established facade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic facade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing facades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm. <i>Id.</i> § 910.14</p>	<p>Although the Project occupies an entire block (and has no façade lines to maintain) it respects the façade lines of nearby blocks and reinforces the rhythms of bays and rooflines on surrounding blocks.</p>
<p>Policy UD-2.2.7: Infill Development--Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. <i>Id.</i> § 910.15</p>	<p>The Project's height and scale are compatible with surrounding blocks.</p>
<p>Policy UD-2.2.8: Large Site Development--Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades. <i>Id.</i> § 910.16</p>	<p>The Property is larger than many nearby lots, but the Project is broken into many smaller elements and varied forms to harmonize the grain of nearby rowhouses.</p>
<p>Policy UD-2.2.9: Protection of Neighborhood Open Space--Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. <i>Id.</i> § 910.18</p>	<p>The Project's height and setbacks minimize shadow impacts. There are no nearby open spaces or public areas affected by the Project.</p>
<p>Policy UD-2.2.10: Surface Parking--Encourage the use of shade trees and landscaping or screening of surface parking areas. Parking should be designed so that it is not the dominant element of the street, and should be located behind development rather than in front of it. <i>Id.</i> § 910.19</p>	<p>The Project removes existing surface parking and does not add any new surface parking. All parking in the Project is below-grade to avoid any visual impact from an urban design perspective.</p>
<p>Policy UD-2.2.11: Parking Structures--Encourage creative solutions for designing structured parking to minimize its visual prominence. Where feasible, the street side of parking structures should be lined with active and visually attractive uses to lessen their impact on the streetscape. <i>Id.</i> § 910.21</p>	

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<p>Policy UD-2.2.13: Urban Design Priorities--Focus the District's urban design assistance efforts on neighborhoods where the original design character has been damaged by disinvestment, blight, and poor architecture. <i>Id.</i> § 910.24</p>	<p>The Project substantially improves upon the dated urban design of the 1960s-era buildings currently located on the Property.</p>
<p>Policy UD-3.1.1: Improving Streetscape Design--Improve the appearance and identity of the District's streets through the design of street lights, paved surfaces, landscaped areas, bus shelters, street "furniture", and adjacent building facades. <i>Id.</i> § 913.8</p>	<p>The Project incorporates improvements to the surrounding streetscape and landscaped areas.</p>
<p>Policy UD-3.1.2: Management of Sidewalk Space--Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic. <i>Id.</i> § 913.9</p>	<p>The Project preserves and improves the surrounding sidewalks in a way that enhances pedestrian safety and efficiency.</p>
<p>Policy UD-3.1.3: Streetscape Design and Street Function--Use variations in lighting and landscaping to highlight and clarify the function of different streets. The design features of streets should make the city's circulation system easier to navigate and understand for residents and visitors. <i>Id.</i> § 913.1</p>	<p>The Project employs varying pavers to signify the different conditions surrounding the Project (e.g., brick pavers along M Street, NW highlight that sidewalk's proximity to the historic district).</p>
<p>Policy UD-3.1.4: Street Lighting--Provide street lighting that improves public safety while also contributing to neighborhood character and image. <i>Id.</i> § 913.11</p>	<p>The Project includes neighborhood-appropriate and safety-enhancing street lighting.</p>
<p>Policy UD-3.1.5: Streetscape and Mobility--Ensure that the design of public space facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Transit shelters, benches, bicycle parking, safe-pedestrian connections, and clear way-finding signage should be provided to facilitate multi-modal travel. <i>Id.</i> § 913.12</p>	<p>The Project's public space improvements facilitate connections between different modes and prioritize pedestrians and cyclists.</p>
<p>Policy UD-3.1.6: Enhanced Streetwalls--Promote a higher standard of storefront design and architectural detail along the District's commercial streets. Along walkable shopping streets, create street walls with relatively continuous facades built to the front lot line in order to provide a sense of enclosure and improve pedestrian comfort. <i>Id.</i> § 913.13</p>	<p>Although the Project is not along a commercial street, it nonetheless employs enhanced streetwalls to improve the pedestrian experience, consistent with nearby streets in the Shaw neighborhood. The Project minimizes curbcuts, avoids blank walls and gaps in the streetwall, and prioritizes pedestrian traffic on three of its four sides.</p>
<p>Policy UD-3.1.7: Improving the Street Environment--Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall. <i>Id.</i> § 913.14</p>	

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<p>Policy UD-3.1.9: Street Closures--Strongly discourage the closure of streets for private ownership or use. Any request for street closure should be reviewed in terms of the resulting impacts on vehicular and pedestrian circulation, access to private property, emergency access and fire protection, view obstruction, loss of open space, building scale, and other factors. <i>Id.</i> § 913.16</p>	<p>The Project does not entail any street closure.</p>
<p>Policy UD-3.1.11: Private Sector Streetscape Improvements--As appropriate and necessary, require streetscape improvements by the private sector in conjunction with development or renovation of adjacent properties. <i>Id.</i> § 913.18</p>	<p>The Project includes private sector-led streetscape improvements in conjunction with adjacent development.</p>
<p>Policy UD-3.1.12: Programming of Outdoor Space--Encourage the programming of outdoor space with events and activities (such as performances, arts, and farmers markets) that stimulate streetlife and active use. <i>Id.</i> § 913.19</p>	<p>The Project’s open (street-facing) courts include modest programming to stimulate and interact with street life and activity.</p>
<p>Policy UD-3.1.13: Signage--Encourage high standards of signage throughout the District, particularly for signs that designate landmarks, historic districts, and other areas of civic importance. <i>Id.</i> § 913.2</p>	<p>The Project includes high quality signage respectful of the nearby historic district.</p>
<p>Policy UD-3.2.5: Reducing Crime Through Design--Ensure that the design of the built environment minimizes the potential for criminal activity. Examples of preventive measures include adequate lighting, maintaining clear lines of sight and visual access, and avoiding dead-end streets. <i>Id.</i> § 914.1</p>	<p>The Project is designed to minimize potential for criminal activity through a strong “eyes on the street” design, multiple points of access to the street, lighting, and creation of a sense of defensibility and “ownership” of adjacent sidewalk areas.</p>
<p>Policy UD-3.3.1: Capital Improvements and Urban Design--Use new capital improvement projects as opportunities to establish a positive image in neighborhoods which currently have poor design identity and negative visual character. <i>Id.</i> § 915.3</p>	<p>The Project improves the image of the Shaw neighborhood, notwithstanding that it does not currently have a poor design identity or negative visual character.</p>
<p>Policy UD-4.1.2: Design Review--Support expanded design review programs in the District, with a priority on areas not currently protected by historic district designation. <i>Id.</i> § 916.7</p>	<p>As part of the PUD, the Project is undergoing a design review, which would not otherwise be required for a site adjacent to a historic district.</p>
<p>Policy UD-4.1.5: Small Area Plans--Integrate urban design considerations into small area plans. Consider the use of illustrative design guidelines and place-specific urban design standards as part of these plans. <i>Id.</i> § 916.1</p>	<p>The Project integrates the urban design objectives of the Area Plan. <i>See</i> below at 37-38.</p>
<p>Historic Preservation Element</p>	
<p>Policy HP-1.1.1: The City's Historic Image--Recognize the historic image of the national capital as part of the city's birthright. After two centuries of growth, the original vision of the city remains strong and remarkable in an increasingly homogenous global world. Over the years this fundamental character has been protected by local and national laws and policies. It must remain inviolate. <i>Id.</i> § 1003.5</p>	<p>The Project helps preserve the historic image of the District through a contextually appropriate, yet unique, design on a site adjacent to a historic district.</p>

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Policy Objective	Application to the Project
<p>Policy HP-2.3.1: The Plan of the City of Washington--Preserve the defining features of the L'Enfant and McMillan plans for Washington. Work jointly with federal agencies to maintain the public squares, circles, and major reservations as landscaped open spaces that provide a means to experience the legacy of the city plan. Preserve the historic pattern of streets and associated minor reservations, and protect these historic rights-of-way from incompatible incursions and intrusions. <i>Id.</i> § 1010.3</p>	<p>As noted above, the Project preserves and respects the character of the surrounding L'Enfant Plan streets and sidewalks including the existing street trees surrounding the Property.</p>
<p>Policy HP-2.3.3: Spatial Character of L'Enfant Plan Streets--Protect the generous open space and reciprocal views of the L'Enfant Plan streets, avenues, and reservations. Protect the integrity and form of the L'Enfant system of streets and reservations from inappropriate new buildings and physical incursions. Support public and private efforts to provide and maintain street trees to help frame axial views and reinforce the city's historic landscape character. <i>Id.</i> § 1010.5</p>	
<p>Policy HP-2.3.4: Public Space Design in the L'Enfant Plan--Reinforce the historic importance and continuity of the streets as public thoroughfares through sensitive design of sidewalks and roadways. Avoid inappropriate traffic channelization, obtrusive signage and security features, and other physical intrusions that obscure the character of the historic street network. <i>Id.</i> § 1010.6</p>	
<p>Policy HP-2.3.2: Historic Image of the City--Protect and enhance the views and vistas, both natural and designed, which are an integral part of Washington's historic image. Preserve the historic skyline formed by the region's natural features and topography and its historically significant buildings and monuments from intrusions such as communication antennas and water towers. Preserve the horizontal character of the national capital through enforcement of the 1910 Height of Buildings Act. <i>Id.</i> § 1010.4</p>	<p>Also as noted above, the Project respects and advances the historic horizontality of the District and does nothing to interfere with historic viewsheds or vistas.</p>
<p>Policy HP-2.3.5: Enhancing Washington's Urban Design Legacy--Adhere to the design principles of the L'Enfant and McMillan Plans in any improvements or alterations to the city street plan. Where the character of the historic plan has been damaged by intrusions and disruptions, promote restoration of the plan through coordinated redevelopment and improvement of the transportation network and public space. <i>Id.</i> § 1010.7</p>	
<p>Policy HP-2.4.1: Rehabilitation of Historic Structures--Promote appropriate preservation of historic buildings through an effective design review process. Apply design guidelines without stifling creativity, and strive for an appropriate balance between restoration and adaptation as suitable for the particular historic environment. <i>Id.</i> § 1011.6</p>	<p>The Project is not inconsistent with this objective insofar as the existing buildings on the Property are not historic.</p>
<p>Policy HP-2.4.3: Compatible Development--Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, preserve the established form of development as evidenced by lot coverage limitations, yard requirements open space, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, repair, maintenance, and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail. <i>Id.</i> § 1011.8</p>	<p>Although the Property is not within a historic district, it is adjacent to one and therefore takes significant design steps to preserve the form of development in that district and to ensure that the new architecture is compatible and sensitive to the character and materials of the historic district.</p>

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Policy Objective	Application to the Project
Community Service and Facilities Element	
<p>Policy CSF-1.1.1: Adequate Facilities--Construct, rehabilitate, and maintain the facilities necessary for the efficient delivery of public services to current and future District residents. <i>Id.</i> § 1103.6</p>	<p>The Property is within a neighborhood that has more than adequate public facilities for the services needed by current and future District residents. Nothing about the size or specific demands of the Project suggest that District facilities or services will be overtaxed or unable to respond to existing and future demands.</p>
<p>Policy CSF-4.2.1: Adequate Fire Stations--Provide an adequate number of properly equipped fire stations to ensure the health and safety of residents of the District of Columbia. The adequacy of existing facilities should be evaluated in part on the ability to maintain a response time of four minutes at least 90 percent of the time for emergency fire calls and eight minutes at least 90 percent of the time for emergency medical calls. Where response times exceed acceptable limits, equipment and facilities should be relocated or provided to close these gaps. <i>Id.</i> § 1114.8</p>	
<p>Policy CSF-4.2.3: Responsiveness to Demographic Change--Ensure that fire and emergency medical services and facility assessments are responsive to the changing social and economic composition of the population, including workers and visitors as well as residents. <i>Id.</i> § 1114.1</p>	
<p>Policy CSF-1.2.6: Impact Fees--Ensure that new development pays its "fair share" of the capital costs needed to build or expand public facilities to serve that development. Consider the use of impact fees for schools, libraries, and public safety facilities to implement this policy. Adoption of any fees shall take potential fiscal, economic, and real estate impacts into account and shall be preceded by the extensive involvement of the development community and the community at large. <i>Id.</i> § 1104.8</p>	<p>The Project will pay for its fair share of capital costs through fees and charges levied as part of the building permit process.</p>
<p>Policy CSF-2.1.1: Primary and Emergency Care--Ensure that high quality, affordable primary health centers are available and accessible to all District residents. Emergency medical facilities should be geographically distributed so that all residents have safe, convenient access to such services. New or rehabilitated health care facilities should be developed in medically underserved and/or high poverty neighborhoods, and in areas with high populations of senior citizens, the physically disabled, the homeless, and others with unmet health care needs. <i>Id.</i> § 1106.12</p>	<p>The Property is within a neighborhood that has more than adequate health facilities for the services needed by current and future District residents.</p>
<p>Policy CSF-3.1.1: State-of-the-Art Public Library System--Ensure that the District has a state-of-the-art Central Library and branch libraries that meet the information and life-long learning needs of District residents. <i>Id.</i> § 1110.9</p>	<p>The Property is within walking distance of two recently-renovated public libraries, and the Project will add residents who will likely patronize and support those libraries and help strengthen those institutions as important civic pillars.</p>
<p>Policy CSF-3.2.1: Location of Branch Libraries--Locate branch libraries in a systematic way to maximize access for the greatest number of District residents, including future residents who will reside in planned new neighborhoods. This approach may result in the development of new libraries in growing population centers within the city and the replacement of the substandard "kiosk" type libraries with larger, more appropriately designed facilities. <i>Id.</i> § 1111.2</p>	

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Policy Objective	Application to the Project
Educational Facilities Element	
<p>Policy EDU-1.4.5: Pedestrian and Transit Access to Schools--Increase coordination between DDOT and DCPS to improve the safety of students walking to and from school through design and transportation improvements. In addition, new school buildings should be designed to foster safe and attractive pedestrian access. At the high school level, encourage the routing of bus lines to provide easy access to campuses, thereby minimizing the need for students to drive to school. <i>Id.</i> § 1206.7</p>	<p>The Project improves upon pedestrian safety along nearby sidewalks which is consistent with this goal of providing safe walking routes to neighborhood schools.</p>
Infrastructure Element	
<p>Policy IN-1.1.1: Adequate Water Supply--Ensure a safe, adequate water supply to serve current and future District of Columbia needs by working with other regional jurisdictions, the Army Corps of Engineers and WASA. <i>Id.</i> § 1303.4</p>	<p>The Project will provide a system connection fee as part of its permitting process, which fee is paid to DC Water and supports DC Water’s water and sewer infrastructure improvement mission. In conjunction with DC Water, the Applicant will explore the condition of nearby water and sewer infrastructure and make improvements as necessary to support the Project.</p>
<p>Policy IN-1.2.1: Modernizing and Rehabilitating Water Infrastructure--Work proactively with WASA to repair and replace aging infrastructure, and to upgrade the water distribution system to meet current and future demand. The District will support water system improvement programs that rehabilitate or replace undersized, defective, or deteriorating mains. The District will also support concurrent programs that ensure that lines are flushed in order to eliminate the potential for stagnant water to accumulate at the ends of water mains. ANCs and community organizations should be consulted in the siting of any new facilities to ensure that the potential for adverse impacts are appropriately addressed. <i>Id.</i> § 1304.3</p>	
<p>Policy IN-1.2.2: Ensuring Adequate Water Pressure--Work proactively with WASA to provide land for new storage tanks and other necessary operations so that adequate water supply and pressure can be provided to all areas of the District. The siting and design of water storage tanks and similar facilities should be consistent with the policies of the Urban Design and Environmental Protection Elements, and should minimize visual impacts and "skylining" effects on ridges or hills. <i>Id.</i> § 1304.4</p>	
<p>Policy IN-2.1.1: Improving Wastewater Collection--Provide for the safe and efficient collection of wastewater generated by the households and businesses of the District. Ensure that new development does not exacerbate wastewater system deficiencies, and instead supports improved system efficiency and reliability. <i>Id.</i> § 1306.7</p>	
<p>Policy IN-2.1.2: Investing In Our Wastewater Treatment Facilities--Provide sustained capital investment in the District's wastewater treatment system to reduce overflows of untreated sewage and improve the quality of effluent discharged to surface waters. Ensure that the Blue Plains treatment plant is maintained and upgraded as needed to meet capacity needs and to incorporate technological advances in wastewater treatment. <i>Id.</i> § 1306.8</p>	

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Policy Objective	Application to the Project
<p>Policy IN-2.2.1: Improving Stormwater Management--Ensure that stormwater is efficiently conveyed, backups are minimized or eliminated, and the quality of receiving waters is sustained. Stormwater management should be an interagency process with clear lines of responsibility with regard to oversight, guidelines, and resources. <i>Id.</i> § 1307.3</p>	<p>The Project employs advanced stormwater management methods consistent with the objectives of this policy.</p>
<p>Policy IN-3.1.1: Solid Waste Collection--Ensure safe, reliable, adequate solid waste collection from residences, business establishments, institutions and other facilities. <i>Id.</i> § 1310.5</p>	<p>The Project will employ a private waste-collection service per this policy.</p>
<p>Policy IN-3.1.3: Reducing Community Impacts--Reduce the adverse effects of solid waste facilities, including noise, odors, and truck traffic, on District neighborhoods. <i>Id.</i> § 1310.6</p>	<p>The Project’s waste storage is enclosed within the Project to reduce any adverse noise or odors.</p>
<p>Policy IN-5.1.1: Adequate Electricity--Ensure adequate electric supply to serve current and future District of Columbia needs. This will require collaboration with PEPCO and other service providers. <i>Id.</i> § 1314.6</p>	<p>The Applicant will work with PEPCO to ensure that the Project is served with adequate infrastructure to avoid impacts on neighbors.</p>
<p>Policy IN-5.1.2: Undergrounding Electric Distribution Lines--Plan for the undergrounding of electric distribution lines throughout the District to provide increased reliability of service and enhanced aesthetics and safety, and seek equitable means to cover the high costs associated with undergrounding. Use the opportunity for undergrounding to bury other above-ground communication lines, such as telephone lines, wherever feasible. <i>Id.</i> § 1314.7</p>	<p>All of the power lines surrounding the Project are buried below ground and the Project will not disturb or reverse that condition.</p>
<p>Policy IN-5.2.1: Natural Gas Safety--Promote consumer education on the benefits of regular monitoring of all above ground and buried natural gas piping on the customer’s side of the meter to prevent corrosion, leaking, and other safety hazards. <i>Id.</i> § 1315.2</p>	<p>The Project’s construction will comply with all gas line safety requirements.</p>
<p>Policy IN-6.1.3: Developer Contributions--Require that private developers fund the necessary relocation or upgrading of existing utilities to address limitations with existing infrastructure on or adjacent to proposed development sites. For necessary upgrades to water and wastewater infrastructure, developers should contribute to the cost of extending utilities to the project site or upgrading existing utilities to the specifications necessary for their proposed project. <i>Id.</i> § 1317.5</p>	<p>As noted above the Project will contribute significantly to infrastructure upgrade funds and will bear the costs of water and wastewater upgrades as necessary with respect to the Project.</p>
<p>Arts and Culture Element</p>	
<p>Policy AC-2.1.1: Emphasizing Important Places with Art--Use public art to strengthen the District’s identity as a local cultural and arts center. Public art should accent locations such as Metro stations, sidewalks, streets, parks and building lobbies. It should be used in coordination with landscaping, lighting, paving and signage to create gateways for neighborhoods and communities. <i>Id.</i> § 1406.3</p>	<p>The Project’s high-quality open court design and water features advance these public art placemaking objectives. In particular, the Project creates an attractive western terminus for Ridge Street, NW, with a water element that will help strengthen neighborhood identity.</p>
<p>Policy AC-2.2.1: Using Art to Create Identity--Use art as a way to help neighborhoods express unique and diverse identities, promoting each community’s individual character and sense of place. <i>Id.</i> § 1407.2</p>	

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Policy Objective	Application to the Project
Near Northwest Area Element	
<p>Policy NNW-1.1.1: Residential Neighborhoods--Maintain and enhance the historic, architecturally distinctive mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, Foggy Bottom, Dupont Circle, Sheridan-Kalorama, Logan Circle, Mount Vernon Square, and Shaw. Ensure that infill development within these areas is architecturally compatible with its surroundings and positively contributes to the identity and quality of each neighborhood. <i>Id.</i> § 2108.2</p>	<p>The Project enhances the historic and distinctive character of Shaw, is compatible with surrounding buildings, and contributes positively to the quality of the neighborhood.</p>
<p>Policy NNW-1.1.2: Directing Growth--Generally direct growth within the Near Northwest Planning Area to the eastern side of the Planning Area (Logan Circle and Shaw), given the strong market demand and limited land available on the west side, and the need for reinvestment and renovation on the east side. <i>Id.</i> § 2108.3</p>	<p>The Project is growth in the eastern portion of the Near Northwest Planning Area on a block with a need for reinvestment and renovation.</p>
<p>Policy NNW-1.1.4: Neighborhood Commercial Revitalization--Improve the neighborhood shopping areas along 7th, 9th, and 11th Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses that provide needed goods and services to area residents should be attracted. <i>Id.</i> § 2108.5</p>	<p>The Project helps improve the neighborhood shopping areas along 7th and 9th Streets, NW by providing new residents to patronize shops in those areas.</p>
<p>Policy NNW-1.1.7: Loss of Housing--Strongly discourage the demolition of viable housing or the conversion of occupied housing units to non-residential uses such as medical offices, hotels, and institutions. Maintain zoning regulations that limit the encroachment of non-residential uses into Near Northwest neighborhoods, particularly around the new Convention Center, along the west side of Connecticut Avenue, and in Foggy Bottom. <i>Id.</i> § 2108.8</p>	<p>Although the Project demolishes existing housing, the existing units are out of date and not viable. Moreover, the Project replaces vacant units with more housing rather than another use, as encouraged by this policy.</p>
<p>Policy NNW-1.1.9: Affordable Housing--Protect the existing stock of affordable housing in the Near Northwest Planning Area, particularly in the Shaw and Logan Circle neighborhoods. Sustain measures to avoid displacement, such as tax relief and rent control, and to encourage the production of new affordable housing throughout the community. <i>Id.</i> § 2108.1</p>	<p>The Project adds permanently protected affordable housing where none exists today.</p>
<p>Policy NNW-1.1.10: Parking Management--Continue to develop and implement programs to improve parking management in the commercial districts along Wisconsin Avenue, M Street, Connecticut Avenue, P Street, 17th Street, 14th Street, 9th Street, and 7th Street. Innovative methods for providing additional parking such as expanding the residential permit parking program, and leasing parking spaces at public facilities to parking operators for evening and weekend use, should be explored. <i>Id.</i> § 2108.11</p>	<p>The Project locates all parking below-grade in accordance with the intent of this policy objective.</p>
<p>Policy NNW-1.1.11: Pedestrian and Bicycle Safety--Improve safety for pedestrians and bicycles, and the security of parked bicycles, throughout the Near Northwest, especially in the Dupont Circle area. <i>Id.</i> § 2108.12</p>	<p>The Project is designed to prioritize pedestrian and cyclist safety by concentrating vehicular activity on one street. The Project also maintains and enhances the surrounding street tree network.</p>
<p>Policy NNW-1.1.12: Pedestrian Connections--Improve pedestrian connections through Near Northwest . . . Create a continuous tree canopy along the area's streets to create more comfortable conditions for pedestrians and bicyclists. <i>Id.</i> § 2108.13</p>	

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Policy Objective	Application to the Project
<p>Policy NNW-1.1.13: Managing Transportation Demand--Strongly support buses, private shuttles, and other transit solutions that address travel needs within the Near Northwest area, including connections between Metrorail and the universities and the Georgetown commercial district, and connections between the Connecticut Avenue and Embassy Row hotels and the National Mall and downtown areas. <i>Id.</i> § 2108.14</p>	<p>The Project includes TDM measures to address travel needs and reduce automobile trips.</p>
<p>Policy NNW-1.2.6: Increasing Park Use and Acreage--Identify opportunities for new pocket parks, plazas, and public spaces within the Near Northwest Planning Area, as well as opportunities to expand and take full advantage of existing parks. <i>Id.</i> § 2109.6</p>	<p>The Project includes new privately-owned open spaces that are not inconsistent with this objective.</p>
<p>Policy NNW-1.2.9: Design Review--Use the historic preservation design review process to promote superior architecture and urban design in Near Northwest's designated historic districts, including Georgetown, Sheridan-Kalorama, Strivers Section, Dupont Circle, Foggy Bottom, Massachusetts Avenue, Mount Vernon Square, Greater 14th Street, Logan Circle, Blagden Alley, and Shaw. <i>Id.</i> § 2109.9</p>	<p>The Project is undergoing a PUD-related design review that will result in superior architecture and urban design on a property adjacent to a historic district.</p>
<p>Policy NNW-1.2.10: Sustainable Development--Encourage the use of green building practices within Near Northwest, with a particular emphasis on green roofs. Rooftop gardens should be encouraged in new construction and major rehabilitation projects as a way to create additional green space, reduce stormwater runoff, and provide an amenity for residents. <i>Id.</i> § 2109.1</p>	<p>The Project employs sustainable development practices in accordance with this objective.</p>
<p>Policy NNW-2.1.1: Affordable Housing--Protect existing affordable housing within the Shaw/Convention Center area, and produce new affordable housing and market rate housing on underutilized sites. Use a range of tools to retain and develop affordable housing in the study area, including tenant organization and public education, inclusionary zoning, renewing project-based Section 8 contracts, tax abatements, public-private partnerships, and including affordable housing when development on publicly owned land includes a residential component. <i>Id.</i> § 2111.5</p>	<p>The Project provides new affordable housing where none exists today.</p>
<p>Policy NNW-2.1.2: Reinforce Existing Development Patterns--Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center Area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metrorail stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is consistent with the neighborhood's character. <i>Id.</i> § 2111.6</p>	<p>The Project locates a multi-unit building near the Mount Vernon/Convention Center Metrorail station in a manner that is consistent with the character of the surrounding neighborhood.</p>
<p>Policy NNW-2.1.3: Shaw/Howard University and Mount Vernon Square Metro Stations--Encourage mixed-income residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots. <i>Id.</i> § 2111.7</p>	<p>The Project is mixed-income residential development, partially on an existing surface parking lot, one block from the Mount Vernon/Convention Center Metrorail station.</p>
<p>Policy NNW-2.1.7: Public Realm--Improve streets and open spaces throughout the Shaw/Convention Center Area. Open space in the area should promote a sense of community, provide a high level of public safety, and address multiple needs. Connections between the area's parks and open spaces should be strengthened and opportunities for new recreational activities should be accommodated where feasible. <i>Id.</i> § 2111.11</p>	<p>The Project improves streets and open spaces. The Project's open spaces improve safety and address multiple needs (e.g., environmental, recreational, aesthetic, etc.).</p>

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Policy Objective	Application to the Project
<p>Policy NNW-2.1.8: Street Hierarchy--Design the streetscapes in the Shaw/Convention Center Area to clearly differentiate between residential streets and commercial streets, and to highlight the distinct role of avenues, retail streets, greenways, and primary and secondary residential streets. <i>Id.</i> § 2111.12</p>	<p>The Project’s streetscaping helps reinforce the existing hierarchy of the surrounding residential street system.</p>
<p>Implementation Element</p>	
<p>Policy IM-1.1.1: Mitigation of Development Impacts--To the greatest extent feasible, use the development review process to ensure that impacts on neighborhood stability, traffic, parking and environmental quality are assessed and adequately mitigated. <i>Id.</i> § 2502.5</p>	<p>The PUD process is the best mechanism to review the Project’s impacts on the concerns addressed in this policy. The PUD process requires assessment and adequate mitigation of impacts, and the Project complies with these objectives.</p>
<p>Policy IM-1.1.3: Relating Development to Infrastructure Capacity--Ensure that development does not exceed the capacity of infrastructure. Land use decisions should balance the need to accommodate growth and development with available transportation capacity, including transit and other travel modes as well as streets and highways, and the availability of water, sewer, drainage, solid waste, and other public services. <i>Id.</i> § 2502.7</p>	<p>The Project does not exceed the infrastructure capacity serving the Property, the surrounding neighborhood, or the District as a whole. The Project, through its density limits, balances the socioeconomic need for more housing with the limits of development and transportation capacity.</p>
<p>Policy IM-1.1.4: Incentives for Achieving Goals and Policies--Allow the use of zoning incentives such as increased height and density in appropriate locations as a tool for achieving Comprehensive Plan goals and policies. <i>Id.</i> § 2502.8</p>	<p>The Project relies on zoning incentives to advance the many goals and policies of the Comprehensive Plan identified in this Exhibit.</p>
<p>Policy IM-1.1.5: Development Approvals and the Comprehensive Plan--To the extent they are relevant, consider the goals and policies of the District Elements in the approval of planned unit developments, variances, campus plans, special exceptions, large tract reviews, and other projects requiring review. <i>Id.</i> § 2502.9</p>	<p>This Exhibit identifies for the Commission’s consideration during its review of this PUD Application all relevant goals and policies of the District Elements.</p>
<p>Policy IM-1.1.6: Studies Preceding Zoning Case Approvals--Ensure that zoning case approvals such as Planned Unit Developments (PUDs) utilize: (1) transportation and infrastructure studies and recommended conditions of approval to mitigate potential impacts; (2) agreements for financing any necessary improvements, including public and private responsibilities; (3) agreements to comply with "first source employment" requirements and other regulations that ensure public benefits to District residents. <i>Id.</i> § 2502.1</p>	<p>The Project will be subject to a CTR and transportation-related conditions of approval; as applicable, infrastructure financing requirements; and public benefits conditions that benefit District residents.</p>
<p>Policy IM-1.1.7: Housing as a PUD Amenity--Consider the provision of on-site housing for low and moderate income households, seniors, and persons with special needs as an important amenity in Planned Unit Developments. <i>Id.</i> § 2502.11</p>	<p>The Project provides on-site housing as a PUD amenity.</p>

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Policy Objective	Application to the Project
<p>Policy IM-1.1.8: Location of PUD Amenities--Require that a substantial part of the amenities proposed in Planned Unit Developments (PUDs) shall accrue to the community in which the PUD would have an impact. <i>Id.</i> § 2502.12</p>	<p>As outlined in the statement to which this Exhibit is attached, the Public Benefits accrue primarily to the ANC in which the Property is located.</p>
<p>Policy IM-1.2.1: Small Area Plans--Prepare Small Area Plans and other planning studies for parts of the city where detailed direction or standards are needed to guide land use, transportation, urban design, and other future physical planning decisions. The focus should be on areas that offer opportunities for new residential, commercial, and mixed use development, or areas with problems or characteristics requiring place-specific planning actions. Use the Comprehensive Plan Area Elements, the Generalized Policies Map, and land use monitoring activities to identify areas in the city where such plans are needed. Citizens shall have the right to petition or suggest small area plans to be proposed by the Mayor. <i>Id.</i> § 2503.2</p>	<p>The Project is consistent with the Area Plan in effect for the Property. The applicable Small Area Plan satisfies the objectives of these policies.</p>
<p>Policy IM-1.2.2: Protocol for Small Area Plans--Ensure that Small Area Plans take a form appropriate to the needs of the community and reflect citywide needs, District and neighborhood economic development policies and priorities, market conditions, implementation requirements, competing demands, available staffing resources and time, and available funding. Such plans should address such topics as neighborhood revitalization and conservation needs and strategies, aesthetic and public space improvements, circulation improvements and transportation management, capital improvement requirements and financing strategies, the need for zoning changes or special zoning requirements, and other implementation techniques necessary to achieve plan objectives. Small area plans should be adopted by the Council and used to supplement the Comprehensive Plan. <i>Id.</i> § 2503.3</p>	
<p>Policy IM-1.3.2: Zone Map Consistency--Consistent with the Home Rule Charter, ensure that the Zone Map is not inconsistent with the Comprehensive Plan Future Land Use Map. Make appropriate revisions to the Zone Map to improve its alignment with the Future Land Use Map and to eliminate clear inconsistencies. <i>Id.</i> § 2504.4</p>	<p>The Property's zone designation is not inconsistent with the Future Land Use Map designation for the Property.</p>
<p>Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions--Require the Board of Zoning Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. <i>Id.</i> § 2504.5</p>	<p>The Applicant provides this analysis of the Project's consistency with the Comprehensive Plan and accompanying maps to inform the Commission's decision making in this PUD Application.</p>
<p>Policy IM-1.3.4: Interpretation of the District Elements--Recognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements. As noted at Section 300.2, since the Land Use Element integrates the policies of all other District elements, it should be given greater weight than the other elements. <i>Id.</i> § 2504.6</p>	<p>The Applicant encourages the Commission to review the Project against the Comprehensive Plan as a whole in accordance with applicable decisions of the Court of Appeals.</p>

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<p>Policy IM-1.5.1: Involvement of Advisory Neighborhood Commission--Include the Advisory Neighborhood Commissions and area residents in the review of development to assist the District in responding to resident concerns. Consistent with the statutory requirements of the DC Code, feedback from the ANCs should be given "great weight" as land use recommendations and decisions are made. <i>Id.</i> § 2507.3</p>	<p>The Applicant has already engaged with the ANC and looks forward to the ANC's input on the Project.</p>
<p>Policy IM-1.5.2: Promoting Community Involvement--Encourage the community to take a more proactive role in planning and development review, and to be involved in Comprehensive Plan development, amendment, and implementation. A variety of means should be used to secure community input, including advisory and technical committees, community workshops, review of draft texts, public forums and hearings, and other means of discussion and communication. <i>Id.</i> § 2507.4</p>	<p>The Applicant has taken a proactive outreach approach with the community, hosting a community meeting to present the Project before filing this Application and to solicit feedback and input.</p>
<p>Policy IM-1.5.3: Faith Institutions--Recognize the importance of faith institutions to neighborhood life in the District, including their role as neighborhood centers, social service providers, and community anchors. Work collaboratively with local faith institutions in neighborhood planning and development initiatives, both to address community needs and to reach residents who might not otherwise participate in local planning initiatives. <i>Id.</i> § 2507.5</p>	<p>The Applicant will work with the faith-based institutions near the Property as appropriate during the PUD process.</p>
<p>Policy IM-1.5.4: Transparency in Decision-Making--Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents and maintaining open lines of communication with the public as plans are developed. <i>Id.</i> § 2507.6</p>	<p>The Project is proceeding a as PUD, which involves a transparent decision-making process with all deliberations and decisions make on the record with opportunity for public comment and input.</p>
<p>Convention Center Area Strategic Development Plan – Development Guide Framework</p>	
<p>Maintain or increase existing number of affordable housing units.</p>	<p>The Project creates affordable housing units where none currently exist.</p>
<p>Locate multi-unit buildings in areas already zoned for greater density</p>	<p>The Project does not seek to change the exiting zoning designation for the Property.</p>
<p>Concentrate multi-unit buildings in areas with good access to mass transit</p>	<p>The Project is a multi-unit building within one block of a Metrorail station.</p>
<p>Identify publicly-owned sites that have the potential to include affordable housing</p>	<p>This goal is not applicable to the Project.</p>
<p>Maximize development opportunities on sites suitable for multiple-unit buildings</p>	<p>The Project maximizes density for a multi-unit building.</p>
<p>Reinforce existing patterns of residential development.</p>	<p>The Project reinforces the prevailing development pattern on surrounding streets.</p>
<p>Reinforce a clear street hierarchy that differentiates between residential streets and commercial streets</p>	<p>This goal is not applicable to the Project.</p>

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Policy Objective	Application to the Project
Reinforce and strengthen parks and open space and the connections between them.	The Project creates enhanced connections between the new building and its adjacent open spaces.
Accommodate additional recreational activities in existing parks and recreation centers	This goal is not applicable to the Project.
Convention Center Area Strategic Development Plan – Transit Oriented Housing Sub-Area Recommendations	
Encourage mixed-income residential development with underground parking on surface parking lots adjacent to Metro stations.	The Project is a mixed-income residential development with underground parking on a site currently with surface parking near a Metrorail station.
Encourage renewal of Project-based Section 8 contracts; alternatively, redevelop with equivalent/increased number of affordable residential units.	This goal is not applicable to the Project as the Property is not subject to a project-based Section 8 contract.
Encourage additional new construction of mixed-income housing at and near Metro stations that are compatible with adjacent residential areas	The Project includes new construction of mixed-income housing near a Metrorail station in a manner compatible with the adjacent residential areas.
Provide prominent building entrances and lobbies	The Project includes an appropriately prominent building entrance and lobby.
Provide design that animates street through projections or openings	The Project animates the street through articulation, projections, and multiple pedestrian entrances.
Tripartite arrangement of building elevation encouraged	The Project is not inconsistent with this goal.
Material shall be of high quality, providing a sense of detail, scale and visual interest	The Project includes high-quality façade materials.
Provide a sense of privacy for ground level residential units	The Project provides some separation between the street and ground floor units with areaways but balances the need for “eyes on the street” design.
Through-wall HVAC units are not allowed on public elevations	The Project locates all HVAC units on the roof.
Garage and service entrances should be from alleys, not on front elevations	This item is not applicable to the Property, which has no alleys.
Encourage infill developments built to property line on street frontage with open space oriented to the interior of the block	The Project is generally built to the Property line except to create appropriate gaps that break up the mass of the building.

Comprehensive Plan and Convention Center Area Strategic Development Plan Analysis